



August 11, 2016

Mr. Rene Pelletier, PG
Assistant Director, Water Division
NH Department of Environmental Services
PO Box 95
29 Hazen Drive
Concord, NH 03302-2964

Re: Joint Application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire d/b/a Eversource Energy: Further Response to NHDES Progress Report

Dear Mr. Pelletier:

On behalf of Northern Pass Transmission, LLC, we respectfully submit the enclosed additional response to the Department of Environmental Services May 16, 2016 Progress Report to the NH Site Evaluation Committee. This submittal includes a response to Item 7 in DES's request for more information from the wetlands program relating to access roads. It also includes mitigation Baseline Documentation Reports in the format requested by NHDES in Item 36 that contain additional information requested in Item 39 for eight of the conservation areas that are part of the Project's mitigation package. We expect to submit a Baseline Documentation Report for the final mitigation site, the Karner Blue Butterfly Site in Concord, in the near future, once agreements are reached with all parties. Last, we are submitting various revised plans in response to the AoT Program's requests 1(k), 5(a-b) and 7 (a-b).

In addition to the one paper copy, an electronic copy of this cover letter, the response and referenced attachments are on the flash drive enclosed with this letter.

Thanks again to you and your colleagues. If you have questions or comments, please do not hesitate to contact me directly at 637-1150 or at lcarbonneau@normandeau.com.

Sincerely,

A handwritten signature in blue ink that reads "Lee E. Carbonneau".

Lee E. Carbonneau
As agent for Northern Pass Transmission, LLC.
Senior Principal Scientist
Normandeau Associates, Inc.

Enclosures

Cc: Thomas Burack, Commissioner, NHDES (w/o enclosures)
Collis Adams, NHDES (w/o enclosures)
Craig Rennie, NHDES
David Keddell, USACE
Mark Kern, USEPA
Pamela G. Monroe, SEC Administrator
Robert P. Clarke, Eversource (w/o enclosures)
Kevin F. McCune, Eversource (w/o enclosures) Date

RESPONSE TO NH DEPARTMENT OF ENVIRONMENTAL SERVICES
ADDITIONAL DATA REQUESTS

A. ALTERATION OF TERRAIN BUREAU

1. For each of the Stormwater Management Study areas (Franklin Converter Station, Substations, Transmission Stations) provide the following:
 - k) For the BMP worksheets, provide documentation as to how the impervious area draining to each specific practice was determined.

Response: *An impervious area summary table was prepared for each station to support the BMP calculations. Enclosed are the summary tables and supporting BMP worksheets.*

5. For Transition Station #1:

- a) Provide justification for the differing initial flow paths between pre- and post-development subcatchments Area-A for the estimation of the subcatchment time of concentration.

Response: *The pre- and post- development time of concentrations for Area A were corrected. Enclosed are the revised pre- and post- development watershed maps.*

- b) For the proposed detention pond, the input for the analysis' Elevation-Area Volume Curve does not appear in agreement with the Stage/Storage Table provided. Please clarify.

Response: *Enclosed are the corrected Elevation-Area Volume Curve and Stage Storage Tables.*

7. For Transition Station #4:

- a) It is not clear why the estimated time of concentration differs between pre-development Area 4 and post-development Area-4.

Response: *Enclosed are the corrected pre- and post-development watershed maps.*

- b) It is not evident that post-development Area-A will discharge to the detention basin, as assumed in the analysis, nor follow the flow path assumed in estimation of the time of concentration of the subcatchment.

Response: *The post-development watershed map was corrected to show that the post-development Area-1A flow path will follow new Swale 1A3 to the detention basin. Swale 1A3 will be stabilized with Tensar North American Green VMax® P550® Turf*

Reinforcement Mats. Enclosed are the pre- and post-development watershed maps, as indicated in the response to 7-a.

B. WETLANDS BUREAU

7. There appears to be a change in use on some forestry access roads, as well as some ATV and snow machine trails, that will require additional permitting. See Rule Env-Wt 303.04(g)(1), which states “access shall not be used for subdivision, development, or other land conversion to non-forestry uses...”. Please include in the wetland application any additional wetland impact areas where this change in use occurs. In addition, existing stream crossings may need to be upgraded to meet the stream crossing standards of Chapter Env-Wt 900.

Response: *Northern Pass has conducted a stream crossing/culvert survey on roads that were likely permitted under a forestry Permit by Notification to identify culverts that will need to be upgraded to comply with the NHDES stream rules prior to use as off right-of-way construction access roads (ORARs). The Phase I memo, table and figures describing the survey and results is attached.*

36. The information in the baseline reports submitted with the application materials may need to be supplemented with additional information depending on the parcel and final easement holder. The DES can provide an example final baseline documentation report (BDR) to be the template used for the final documents. The BDR is signed upon recordation of the conservation easement and a final signed copy submitted to DES.

Response: *Northern Pass has revised the format of the mitigation Baseline Documentation Reports as requested by NHDES, and added soils maps and more detailed information about wildlife habitat, rare plants, and natural communities as attachments to the Baseline Documentation Report, following the template provided by NHDES. These Baseline Documentation Reports will be finalized with signatures and submitted again once the conservation easements are recorded.*

39. For the final preservation parcels, final recordable surveys for the parcels will need to be provided for recordation. A Phase 1 site assessment may need to be completed and the parcels may need to be reviewed in the field by DES once the following information is provided:

Preservation Site	Information that needs to be addressed
A	Need to show parking area, existing logging road, and relocate ORV trails out of the floodplain or explain how the trail will be extinguished. These parcel features may need to be noted in the final BDR. Identify who is maintaining fields and whether/how this will be addressed in a management plan.
B	Review the location and condition of the existing roadways, skidder trails and logging roads for inclusion in the BDR and management plan and propose any measures to limit impacts to aquatic resources.

	Consider excluding the transition station from the easement on parcels 158 and 200. Determine location of dug wells and note them on parcel plans. The continued use of the wells may need to be mentioned in the reserved rights section in the easement deed.
C	Determine whether it is possible to remove or exclude existing buildings from the easement parcel. Locate Corridor 20 and determine extent of unregulated use that may need to be addressed with gates, boulders, etc.
E	Consider excluding transition station from easement and note underground cable corridor in reserved rights relative to future maintenance. Future use of gravel roadways need to be noted in BDR and management plan. Note location of logging/skidder roads in property plan for BDR. and the orchard/tree plantation in photo 3.
K	Marking/Blazing parcel boundaries is a priority if this parcel continues to be a component of the mitigation package. Minimal future harvesting should be noted as well as no future wind tower construction allowed on the parcel.
N	Consider including snowmobile trail use in reserved rights and include provision that no additional trails shall be constructed.
Z1 – Pine Barrens	Provide complete documentation for proposed Pine Barrens parcel to offset impacts to Karner blue butterfly. If site manipulation for habitat restoration is needed, provide details and time frame when this will occur and note the coordination efforts with NHFG and NHB.
Z2 New Hampton	Discuss future access and uses with Pemigewasset River Local Advisory Committee. Consider excluding the round-a-bout area.
Z3 Pembroke	Provide information relative to location of existing conservation lands in vicinity of the parcel and within the town.

Response: Northern Pass has completed Phase I Site assessments on all mitigation parcels, and can provide the results if requested. There were no hazardous materials identified that would compromise natural resource values. We would welcome site visits by NHDES. In addition, relevant aerial photo site maps were updated to include trails, logging roads (where appropriate), and recommendations of the Pemigewasset River Local advisory Committee (New Hampton Site only). The draft conservation easement deeds address many of the NHDES site specific comments, and others will be addressed in the draft management plans, which will be submitted by the end of 2016.