



March 14, 2023

Ref: 52932.00

Lamprey River Advisory Committee
c/o Suzanne Peterson
88 Hedding Road
Epping, NH 03042

Re: Eversource 307 Electric Transmission Line Maintenance Project
Deerfield, Nottingham, Barrington, NH
NHDES File Number 230213-034

Dear Committee Members:

Thank you for your review of the Alteration of Terrain (AoT) permit application signed and dated 1-26-2023 pursuant to NH RSA 483. On behalf of Public Service Company of NH dba Eversource Energy (Eversource), VHB has prepared this response to the letter submitted to Ridge Mauck, NHDES AoT Bureau, dated February 22, 2023.

VHB will provide copies of the Wetland Statutory Permit Notification and Shoreland Permit by Notification for the proposed project to the Lamprey River Advisory Committee (LRAC) along with any viable vernal pool information and final recommendations from the NH Fish and Game Department (NHFG) when they are available. (LRAC Comment 1 and 3)

Due to the volume of maintenance work required on the transmission grid, the proposed work has been scheduled within the available outages as determined by the Eversource control center. Civil work to establish work pads and access occurs in advance of the pole replacement work and the pole replacement must work occur before the installation of the optical grounding wire (OPGW). The OPGW install is primarily via helicopter that will access each of the poles. Since helicopter work cannot be completed in adverse weather conditions, the work is phased so that the OPGW installation will occur before the winter of 2023. To the extent that the schedule allows, Eversource will accommodate recommendations for time of year restrictions requested by NHFG. (LRAC Comment 4)

The periodic maintenance described in the application was in reference to the vegetation management program that is responsible for maintaining vertical and horizontal clearance to the transmission lines on a 3 to 5-year cycle for each ROW. The vegetation maintenance has a beneficial impact and maintains critical habitat for reptiles, avian species, and rare plants. PSNH installs timber matting at water resource crossing locations and for access to poles within wetlands to minimize impacts and prevent environmental degradation. The use of timber matting distributes the weight of construction equipment minimizing earth and vegetation disturbance for their proposed work. Eversource constructs gravel access roads and stormwater Best Management Practices (BMPs) to prevent erosion and sedimentation. (LRAC Comment 5)

Eversource employs independent environmental monitors to inspect the project area during construction for permit compliance at the company's expense. The inspections are conducted on a weekly basis in compliance with the National Pollution Discharge Elimination System Construction General Permit (CGP) that requires inspections every



7 days or every 14 days and within 24 hours of a 0.25" precipitation event. The monitoring reports are submitted to the contractor and Eversource, as well as NHDES if requested in state permit approvals. A Stormwater Pollution Prevention Plan, environmental permit condition compliance matrix, local, state and federal approvals, agency recommendations, and the Utility BMP manual are provided to the contractor prior to construction. Inspections begin the week that contractor(s) mobilize to the site. Weekly monitoring reports include corrective action recommendations for any out of compliance items or proactive steps that can be taken to prevent potential non-compliance. Corrective actions are inspected and documented from week to week to ensure that proper erosion and sediment controls are installed and maintained. As construction is completed and restoration begins, the environmental monitor documents the removal of timber mats and observes the revegetation of wetlands to identify any corrective actions that may be required to reach 75% revegetation per state requirements. Upland areas are monitored for 85% revegetation per CGP requirements. Appropriate native seed mixes and weed-free straw are applied in situations where required to reach revegetation requirements. An invasive species control plan is implemented during construction and invasives are monitored within restoration areas. (LRAC Comment 5.1)

In most cases, PSNH does not own the underlying land parcel and only holds an easement that allows them to access and maintain the right of way (ROW) for overhead electric transmission. PSNH works with the landowners to install gates or other barriers to prevent access to the ROW by motorized vehicles, at the landowners' request. However, it is the landowners responsibility to post their property against trespassing or allow access. If PSNH owns a parcel of land along the easement that abuts a public road, PSNH installs a gate if access down the ROW is a concern. (LRAC Comment 5.2)

Sincerely,

VHB

A handwritten signature in black ink that reads "Sherrie Trefry". The signature is written in a cursive, flowing style.

Sherrie Trefry, CSS
Energy Market Leader

cc: Kurt Nelson, Eversource
Ridge Mauck, NHDES