

Conor Madison

From: DNCR: NHB Review <nhbreview@dncr.nh.gov>
Sent: Monday, June 20, 2022 3:57 PM
To: Ford, Michelle T
Cc: Nelson, Kurt I; Conor Madison
Subject: [EXTERNAL] RE: Eversource 380-326 Consultation Req. NHB22-0743, NHB22-0862, NHB22-0740, NHB21-3366

Hi Michelle,

I finally had a chance to look at this email. Yes, the proposed survey areas, species, habitats and survey times are approved by NHB, thank you for providing this for our input prior to the surveys. Thank you for clarifying the access route demarcations.

Jessica Bouchard (she/her/hers)
Ecologist
New Hampshire Natural Heritage Bureau (NHB)
Division of Forests & Lands
NH Dept. of Natural & Cultural Resources
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[NHB DataCheck Tool](#)

From: Ford, Michelle T <michelle.ford@eversource.com>
Sent: Thursday, June 2, 2022 8:48 AM
To: DNCR: NHB Review <nhbreview@dncr.nh.gov>
Cc: Nelson, Kurt I <kurt.nelson@eversource.com>; Conor Madison <Conor.Madison@gza.com>
Subject: RE: Eversource 380-326 Consultation Req. NHB22-0743, NHB22-0862, NHB22-0740, NHB21-3366

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Jess,

In response to your questions on the 380-326:

1. *The plan set shows 'existing' access, 'primary' access, and 'off-ROW' access. Existing and off-ROW access are obvious, but can you please clarify what 'primary' access is meant to depict?*

We've updated the plan set and legend to be more specific about access types. The updated plan set is attached.

- "Existing Access" is an access road that needs no improvements for construction
- "Proposed Access" is where a gravel access road must be created
- "Access to be Improved" is an access road that needs some improvement, i.e. top dressing with gravel to accommodate construction

- “Off ROW Access” is either an “Existing”, “Proposed” or “Access to be Improved” planned route located off of Eversource’s existing easement. At this point in the permitting process it has yet to be determined if the off ROW access will be used as Eversource is still negotiating with property owners for permission.

- EXISTING ACCESS
- PROPOSED ACCESS
- ACCESS TO BE IMPROVED
- OFF-ROW ACCESS

2. *If new access is proposed, please describe how the work will be performed and the width of the proposed access.*

New access entails stripping and stockpiling the loamy soil layer and laying down and compacting crushed stone to create a 16 ft wide access road in upland areas. Cut and fills of subsoils may also be required to create level access and work pad areas. Stockpiled loamy material is used to topdress the perimeter of work pad areas and is graded into the surrounding landscape.

3. *For the work to replace two structures at the Hudson/Pelham town line, will any disturbance occur for access road modification or upgrades?*

There is a well-established access road here so this would be considered “Existing Access” and no expansion of the road is required.

Also – below is the plant survey protocol that we are proposing:

Proposed Plant Survey Protocol:

Surveys for state-listed plants will be conducted by a qualified botanist during the appropriate time of year, i.e. flowering period or other time of year when the diagnostic plant characteristics are clearly visible, within 20’ of all work areas (as shown on the project plans (attached)) in the areas specified by species below:

Segment 1: Structures 326/78 to 326/81 (northern Hudson) NHB22-0743

- Red Threeawn (*Aristida longespica* var. *geniculata*)
 - Survey Period: Late-August to Mid-October
 - Habitat preference: Dry, open, semi-disturbed sandy areas in ROW, and compacted soils adjacent to roadway.
- Nuttall’s Reed Grass (*Calamagrostis coarctata*)
 - Survey Period: Mid-August to Early-October
 - Habitat Preference: Areas of swamps, peatlands, sandy or peaty hydric openings.
- Anemone Meadow-Rue (*Thalictrum thalictroides*)
 - Survey Period: Mid-April to June
 - Habitat Preference: Partially shaded Areas of rocky ridges and woodlands, dry forests, and thin woods
- Common Star-Grass (*Hypoxis hirsuta*)
 - Survey Period: Late-May to Early-August
 - Habitat Preference: Surveys to be focused in areas of sandplains, disturbed openings, dry forests, and thin woods.

Segment 2: Structures 380/58 to 326/49 (Londonderry) NHB22-0862

- Red Threeawn (*Aristida longespica* var. *geniculata*)
 - Survey Period: Late-August to Mid-October

- Habitat Preference: Areas of dry, open, semi-disturbed sandy areas in ROW, and compacted soils adjacent to roadway.
- Nuttall's Reed Grass (*Calamagrostis coarctata*)
 - Survey Period: Mid-August to Early-October
 - Habitat Preference: Areas of swamps, peatlands, sandy or peaty hydric openings and rights-of-way.

Segment 3: Structures 380/29 to 380/6 (Londonderry) NHB22-0862

- Red Threeawn (*Aristida longespica* var. *geniculata*)
 - Survey Period: Late-August to Mid-October
 - Habitat Preference: Areas of dry, open, semi-disturbed sandy areas in ROW, and compacted soils adjacent to roadway.
- Nuttall's Reed Grass (*Calamagrostis coarctata*)
 - Survey Period: Mid-August to Early-October
 - Habitat Preference: Areas of swamps, peatlands, sandy or peaty hydric openings and rights-of-way.
- Licorice Goldenrod (*Solidago odora* ssp. *odora*)
 - Survey Period: Mid-August to Early-October
 - ⊖ Habitat Preference: Areas of previously disturbed areas and early successional habitat, such as open woodlands (growing in open areas away from overstory), fields, meadows, roadsides,. Infrequently mowed or un-mowed open, sunny areas.

Segment 4: Structures 326/69 to 326/72 NHB22-0862

- Red Threeawn (*Aristida longespica* var. *geniculata*)
 - Survey Period: Late-August to Mid-October
 - Habitat Preference: Areas of dry, open, semi-disturbed sandy areas in ROW, and compacted soils adjacent to roadway.
- Nuttall's Reed Grass (*Calamagrostis coarctata*)
 - Survey Period: Mid-August to Early-October
 - Habitat Preference: Areas of swamps, peatlands, sandy or peaty hydric openings and rights-of-way.
- Orange-Fruited Horse-Gentian (*Triosteum aurantiacum*)
 - Survey Period: Mid-May to Mid-June
 - Habitat Preference: Areas of rich forests and thickets. It grows best in clearings and light shade in early successional forests.

Segment 5: Structures 326/121-326/127 (Pelham/Hudson) NHB22-0740, NHB22-0743

- Four-Leave Milkweed (*Asclepias quadrifolia*)
 - Survey Period: June to July
 - Habitat Preference: Areas of dry Appalachian oak forest/rich Appalachian oak rocky woods but associated with natural communities and other rare plants within ROW.
- Hairy Bedstraw (*Galium pilosum* var. *pilosum*)
 - Survey Period: Early-August to Late-September
 - Habitat Preference: Surveys to be focused in areas of woodlands, ridges, fields, clearings.
- Hoary Mountain-Mint (*Pycnanthemum incanum* var. *incanum*)
 - Timeframe: Early-August to Late-September
 - Surveys to be focused in areas of rich Appalachian oak rocky woods but associated with natural communities and other rare plants within ROW.
- Late Purple American-Aster (*Symphyotrichum patens* var. *patens*)
 - Timeframe: Mid-August to Mid-October
 - Surveys to be focused in areas of rich Appalachian oak rocky woods but associated with natural communities and other rare plants within ROW.
- Narrow-Leaved White-Topped-Aster (*Sericocarpus linifolius*)
 - Survey period: Mid-July to Late-August
 - Habitat Preference: Areas of woodlands, dry fields and clearings.

- Round-Leaved Trailing Tick-trefoil (*Desmodium roundifolium*)
 - Survey Period: Early-August to Mid-September
 - Habitat Preference: Areas of sandplains, disturbed openings, dry forests, and thin woods. Rare plants occur in both powerline ROW and in Rich Appalachian oak rocky woods.
- Slender Bush-Clover (*Lespedeza virginica*)
 - Survey Period: Mid-August to Mid-September
 - Habitat Preference: Areas of sandplains, disturbed openings, dry forests, and thin woods. Rare plants occur in both powerline ROW and in Rich Appalachian oak rocky woods.
- Sicklepod Rockcress (*Beochera sparsiflora*)
 - Survey Period: Late-June to Mid-September
 - Habitat Preference: Areas of dry Appalachian oak forest and rich Appalachian oak rocky woods. Also found within other ROW corridors but note that it is intolerant of completely open conditions.
- Smooth Forked Whitlow-Wort (*Paronychia canadensis*)
 - Survey Period: Mid-July to Mid-September
 - Habitat Preference: Areas of rich Appalachian oak rocky woods but associated with natural communities and other rare plants within ROW.

GZA will provide survey updates as work progresses, and at the end of the rare plant survey field work (End of August to beginning of September) GZA will prepare a brief narrative report summarizing our findings, relevant mapping showing identified state-listed plants, and rare plant data forms, which shall be provided to NHB via Eversource.

Please let me know if you have any questions or concerns,
Michelle

Michelle T. Ford, CWB[®], PWS, CESSWI
Senior Program Administrator – Wildlife and Protected Species



107 Selden Street, Berlin, CT 06037
(o) 860-665-3183

From: DNCR: NHB Review <nhbreview@dncr.nh.gov>
Sent: Monday, May 16, 2022 12:19 PM
To: Ford, Michelle T <michelle.ford@eversource.com>
Cc: Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: Eversource 380-326 Consultation Req. NHB22-0743, NHB22-0862, NHB22-0740, NHB21-3366

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Hello,

I have a couple question regarding the proposed project plan set:

1. The plan set shows 'existing' access, 'primary' access, and 'off-ROW' access. Existing and off-ROW access are obvious, but can you please clarify what 'primary' access is meant to depict?
2. If new access is proposed, please describe how the work will be performed and the width of the proposed access.
3. For the work to replace two structures at the Hudson/Pelham town line, will any disturbance occur for access road modification or upgrades?

For this project, NHB recommends that rare plant surveys are conducted (where habitat is appropriate) in areas of proposed permanent and temporary land disturbance. Rare plants within 0.5 mile of work areas are shown on the Datacheck Letter. If a rare plant species is within 0.5 mile of a work area, please include it in a survey. Please refer to the attached spreadsheet and the descriptions below for the recommended survey locations. If recommended survey locations for specific species are unclear, please let me know.

Londonderry:

-A total of six species are documented nearby the work areas in Londonderry.

-Please survey for the red threeawn, Nuttall's reed grass, common star grass, and licorice goldenrod throughout the proposed work areas within Londonderry.

-At the southernmost work segment (near Hudson) please also include orange-fruited horse gentian and anemone meadow rue in the survey.

Hudson:

-Please survey for the four species that are documented nearby the northernmost work segment in Hudson (nearby Londonderry), as shown on the Datacheck Letter (red threeawn, Nuttall's reed grass, common star grass, and anemone meadow rue).

-Surveys are not requested at the southern project segment in Hudson, as there are no documented rare species in the vicinity of this work area.

Hudson/Pelham town line:

-Ten species are documented at the Hudson/Pelham town line. Please survey for nine of these species in areas of appropriate habitat that are proposed to be disturbed by the project. These nine species are upland species that have the potential to be present in the ROW at this location. Wetlands will not need to be surveyed. Please refer to the attached spreadsheet (column 'Survey Locations') for the nine species to include in this location.

Please ensure that a qualified botanist is present during plant surveys to direct survey work and to verify species identification.

The attached spreadsheet lists the species that NHB recommends a survey for, as well as those that do not need to be surveyed due to a likely lack of appropriate habitat within the ROW. The spreadsheet includes habitat and flowering time information.

Please conduct surveys during the appropriate time of year for the species in question. Please include rare species reporting forms (one per species), GPS coordinates of occurrences (preferably shapefiles), and diagnostic photos to verify ID.

If rare plants are within areas proposed to be disturbed (excavation, dredging, fill, grading, vegetation removal), please notify NHB well in advance of proposed work to determine best methods to minimize or mitigate impacts to occurrences. Please include rare plant locations on the plan sheets so that occurrences can be visually represented.

Please let me know if you have any comments or concerns.

Thank you,

Jessica Bouchard (she/her/hers)
Environmental Reviewer / Ecological Information Specialist
New Hampshire Natural Heritage Bureau (NHB)
Division of Forests & Lands
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From: Ford, Michelle T <michelle.ford@eversource.com>
Sent: Tuesday, April 19, 2022 9:54 AM
To: FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Winters, Melissa <Melissa.J.Doperalski@wildlife.nh.gov>; Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>; Newton, Kevin <Kevin.M.Newton@wildlife.nh.gov>; DNCR: NHB Review <nhbreview@dnrc.nh.gov>
Cc: Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: Eversource 380-326 Consultation Req. NHB22-0743, NHB22-0862, NHB22-0740, NHB21-3366

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Please see the attached consultation request for Eversource's 380-326 Line Structure replacement project in Hudson, Litchfield, Londonderry and Pelham. Please confirm receipt at your earliest convenience and let me know if you have any questions.

Thanks as always,
Michelle

Michelle T. Ford, CWB[®], PWS, CESSWI
Senior Program Administrator – Wildlife and Protected Species

EVERSOURCE

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**Please note that I will be on vacation from Thursday, April 14 at noon through Wednesday, April 20. Please let me know if you will need project assistance during this time so we can plan accordingly.*

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