

Conor Madison

Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862
NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry
Hudson AoT 220401-070

From: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>

Sent: Monday, July 18, 2022 12:59 PM

To: Nelson, Kurt I <kurt.nelson@eversource.com>; Ford, Michelle T <michelle.ford@eversource.com>

Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Mauck, Ridgely <Addison.R.Mauck@des.nh.gov>

Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326
Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EVERSOURCE IT NOTICE – EXTERNAL EMAIL SENDER ** Don't be quick to click! ******

Do not click on links or attachments if sender is unknown or if the email is unexpected from someone you know, and never provide a user ID or password. Report suspicious emails by selecting 'Report Phish' or forwarding to SPAMFEEDBACK@EVERSOURCE.COM for analysis by our cyber security team.

Michelle and Kurt,

NHFG issued recommendations for the 380 326 Structure Replacement in Pelham, Litchfield, Londonderry, and Hudson (NHB22-0740, NHB21-3366, NHB22-0862, NHB22-0743) on June 16, 2022 (attached). NHFG has reviewed Eversource's concerns with the time of year restrictions for work areas west of Mammoth Road and north of Elwood Road and the proposal for alternative work strategies to mitigate impacts to rare wildlife in the vicinity.

NHFG wants emphasize that this is an **extremely** sensitive area with rare animals known to make extensive use of the ROW and surrounding habitat, as well as an area of past compliance issues with Eversource. Future work in this region must be coordinated with NHFG earlier in the planning process in order to allow for the implementation of NHFG recommendations.

It was stated that exclusionary fence was installed around structure 56 and in the fiber area in May 2022 in anticipation of this project scope. If work in this area was anticipated in May 2022 for summer 2022, exclusionary fencing should have been placed around all structures and work areas or NHFG coordination should have been sought out sooner.

NHFG again wants to make it clear that polygons shown on NHB datacheck letters should not be interpreted as rare species habitat. Records shown on NHB datacheck letter maps represent an observation of an individual at a moment in time, and do not represent range, habitat, or other limiting factors for the individual or population. If a species is listed on the NHB datacheck letter, it should be assumed to be present in the project area.

All observations of rare species should continue to be reported to NHFG.

Project BMPs include the establishment of a qualified biological monitor. Please provide qualifications of the biological monitor to NHFG.

Recommended BMPs apply to entire project area unless otherwise specified by NHFG.

These comments apply to all work areas west of Mammoth Road and north of Elwood Road. All other recommendations issued 6/16/22 still apply. The recommendations below, the recommendations given 6/16/22, and NHFG comments made on the Protection Measures document (attached) shall be incorporated into the Protection Measures document included in the project submission. BMPs shall be included on plan sheets to the extent feasible.

- At least one qualified biological monitor shall be on-site at all times in all work areas west of Mammoth Road and north of Elwood Road. A qualified biological monitor shall be someone with training and experience in turtle and reptile identification and handling techniques and shall operate under the guidance of a qualified herpetologist. A qualified herpetologist shall be a wildlife biologist well versed on and with extensive experience in turtle identification, life history, habitat preference, handling, and documentation, i.e. activity, sexing, aging, etc.
 - The qualified herpetologist shall be responsible for:
 - Searching for, identifying, documenting, reporting and relocating any state-listed herpetofauna within the work areas immediately prior to the placement of gravel and/or matting.
 - Instructing and guiding biological monitor on matters pertaining to herpetofauna.
 - Ensuring proper documentation and handling techniques are abided to by the construction personnel and the biological monitor.
 - At the end of the project, the qualified herpetologist shall provide Eversource Licensing and Permitting staff a report, which includes a summary of observations, reporting logs documenting any documented state-listed species, and mapping and .shp files showing the location of any observed state-listed species. The report shall be reviewed and provided to NH F&G for their records.
 - The biological monitor shall:
 - Inspect all work areas daily for S&E controls, the presence of state-listed species, to ensure compliance with environmental regulations and permit conditions.
 - Maintain regular contact with the project's qualified herpetologist on all matters pertaining to herpetofauna protection and surveys.

- Serve as the primary contact between the contractor and EL&P staff.
 - Report observations of state-listed species immediately to EL&P staff who shall in turn report those observations to NHF&G.
 - Document field activities and observations daily.
- All work activities shall be restricted to the defined roads, construction areas, and staging areas, with no equipment or materials staged or stored outside of the defined areas as shown on plan sheets.
- All defined roads, construction areas, and staging areas shall be kept cleared of plant succession and pioneer vegetation to prevent turtles from seeking refuge and potentially being crushed if hidden.
- Blanding's turtle (state endangered), spotted turtle (state threatened), and Northern black racer (state threatened) occur within the vicinity of the project site. Site operators shall be informed of the potential presence of these species and shall be provided a flyer that helps to identify these species along with NHFG contact information. See Plan Sheet xxxxxx. *Include attached flyers to plan sheet set.*
- Vernal pools and potential vernal pools shall be flagged prior to work and all impacts to vernal pools and potential vernal pools shall be avoided.
- Turtles and snakes may be attracted to disturbed ground during nesting season. Turtle nesting season occurs approximately May 15th – June 30th. Nesting areas may include work pads and access roads that are not hard pack gravel and other sandy/gravel work areas. All turtle species nests and Northern black racer nests are protected by NH laws. Turtles nesting or exhibiting nesting behavior shall not be moved or in any way disturbed. If a turtle or snake nest is observed or suspected, operators shall contact Melissa Winters (603-479-1129) or Josh Megyesy (978-578-0802) at NHFG immediately for further consultation.
- Prior to daily construction activities, timber matting shall be swept for snakes and turtles.
- Observations of Northern black racers in the months of April-May and September-October may indicate the potential for a den site on or near the project site. Observations of this species during this timeframe shall be reported immediately to the New Hampshire Fish and Game Department Nongame and Endangered Wildlife Environmental Review Program. Please contact Melissa Winters (603-479-1129) or Brendan Clifford (603-944-0885). Observations of this species outside of this timeframe can follow general reporting guidance. Please include photograph with text if feasible.
- Any rare species that are observed in work areas and are in immediate danger shall be moved away from impact area in the direction the animal was moving. Any handling of rare species shall be reported to NHFG immediately.
- Minimize work pad areas, including matting, to the greatest extent possible, especially in wetlands and other sensitive areas. Restore work pads using topsoil stockpiled during initial grading to an approximately 30-foot by 60-foot or smaller area at the base of the structure to allow for future maintenance. Stabilize exposed soils with seed and mulch as necessary.
- All manufactured erosion and sediment control products, with the exception of turf reinforcement mats, utilized for, but not limited to, slope protection, runoff diversion, slope interruption, perimeter control, inlet protection, check dams, and sediment traps shall not contain plastic, or multifilament or monofilament polypropylene netting or mesh with an opening size of greater than 1/8 inches;
- All observations of threatened or endangered species on the project site shall be reported immediately to the NHFG nongame and endangered wildlife environmental review program by phone at 603-271-2461 and by email at NHFGreview@wildlife.nh.gov, with the email subject line containing the NHB DataCheck tool results letter assigned number, the project name, and the term Wildlife Species Observation;
- Photographs of the observed species and nearby elements of habitat or areas of land disturbance shall be provided to NHFG in digital format at the above email address for verification, as feasible;
- In the event a threatened or endangered species is observed on the project site during the term of the permit, the species shall not be disturbed, handled, or harmed in any way prior to consultation with NHFG and implementation of corrective actions recommended by NHFG.
 - Site operators shall be allowed to relocate wildlife encountered if discovered within the active work zone and if in direct harm from project activities. Wildlife shall be relocated in close proximity to the capture location but outside of the work zone and in the direction the individual was heading. NHFG shall be contacted immediately if this action occurs.

- The NHFG, including its employees and authorized agents, shall have access to the property during the term of the permit.

Additional Recommendations

- Wood turtles (state species of special concern) and smooth green snake (state species of special concern) occurs within the vicinity of the project site. Site operators should be informed of the potential presences of these species and shall be provided a flyer that helps to identify these species along with NHFG contact information. See Plan Sheet **xxxxxx**. *Include attached flyers to plan sheet set.*

Please let me know if you have any questions.

Thank you,
Kat

From: Nelson, Kurt I <kurt.nelson@eversource.com>
Sent: Monday, July 18, 2022 12:40 PM
To: Ford, Michelle T <michelle.ford@eversource.com>; Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Confirmed. Our schedule does align with the time of year restriction in Hudson.

Thank you.

KURT I. NELSON
SR. LAND USE LICENSING & PERMITTING SPECIALIST



13 LEGENDS DRIVE
HOOKSETT, NH 03106
(603) 714-3031 (CELL) (603) 634-3256 (OFFICE)
KURT.NELSON@EVERSOURCE.COM

From: Ford, Michelle T <michelle.ford@eversource.com>
Sent: Monday, July 18, 2022 12:04 PM
To: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

Kat,
Thank you very much for the thorough and prompt response.

Kurt – can you please confirm with Kat ASAP if the project is able to comply with the time of year restrictions recommended for the Hudson segments of work?

Michelle

From: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Sent: Monday, July 18, 2022 11:59 AM
To: Ford, Michelle T <michelle.ford@eversource.com>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EVERSOURCE IT NOTICE – EXTERNAL EMAIL SENDER ** Don't be quick to click! ******

Do not click on links or attachments if sender is unknown or if the email is unexpected from someone you know, and never provide a user ID or password. Report suspicious emails by selecting 'Report Phish' or forwarding to SPAMFEEDBACK@EVERSOURCE.COM for analysis by our cyber security team.

Michelle,

Yes, as discussed, inflexibility with project timing and not coordinating with NHFG earlier in the planning process makes it difficult and more time consuming to issue effective recommendations, especially in sensitive habitats such as the ones involved in this review. That process must improve moving forward in order for NHFG and Eversource to coordinate efficiently.

I am currently working on modifying NHFG's recommendations for the segment of work west of Mammoth Road and north of Elwood Road in Londonderry, the section for which you expressed concerns with meeting the time of year restrictions. I am making additional recommendations and making comments on the BMPs included in the project submission that should be incorporated in order to help minimize impacts to rare species in this area. My plan is to have these finished this afternoon.

It is my understanding that Eversource is able to comply with the time of year restrictions recommended for the Hudson segments of work. If this is not the case, please let me know immediately.

If there are concerns other than the ones I discussed above, please let me know immediately.

Thank you,
Kat

From: Ford, Michelle T <michelle.ford@eversource.com>
Sent: Monday, July 18, 2022 11:43 AM
To: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Kat,

Sorry to bug you (again) but Kurt informed me that in order to meet their current outage, the project needs to start civil work (grading and preparation for construction) next week. This also means we need the allotted 1 week notice to NHDES. Point being, do you have an idea of which path you are looking at for this project:

1. Authorize construction without the TOY restriction using the BMPs/protection measures provided by Eversource; or
2. Sticking with the recommended TOY restrictions;
3. Modifying the consultation response; or
4. F&G needs more time to evaluate (which means Eversource will likely miss their outage window).

I know we spoke last week about F&G feeling pressured to comply with Eversource's scheduled outages and that is a topic which we discussed internally with our management and will strive to improve moving forward. However, this project in particular is up against their deadline and are looking to know what they can expect from F&G.

Sorry again to bug you on this, but the project team just needs to know how to move forward. Any information is appreciated.

Thanks,
Michelle

From: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Sent: Monday, July 18, 2022 9:09 AM
To: Ford, Michelle T <michelle.ford@eversource.com>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EVERSOURCE IT NOTICE – EXTERNAL EMAIL SENDER *** Don't be quick to click! *******

Do not click on links or attachments if sender is unknown or if the email is unexpected from someone you know, and never provide a user ID or password. Report suspicious emails by selecting 'Report Phish' or forwarding to SPAMFEEDBACK@EVERSOURCE.COM for analysis by our cyber security team.

Thank you.

From: Ford, Michelle T <michelle.ford@eversource.com>
Sent: Monday, July 18, 2022 9:00 AM
To: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Kat,
Here you go. The project BMPs are outlined in the consultation request as Item 12 and additionally as Attachment F on page 163 at the end.

Thanks,
Michelle

From: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Sent: Monday, July 18, 2022 8:55 AM
To: Ford, Michelle T <michelle.ford@eversource.com>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: RE: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EVERSOURCE IT NOTICE – EXTERNAL EMAIL SENDER ** Don't be quick to click! ******

Do not click on links or attachments if sender is unknown or if the email is unexpected from someone you know, and never provide a user ID or password. Report suspicious emails by selecting 'Report Phish' or forwarding to SPAMFEEDBACK@EVERSOURCE.COM for analysis by our cyber security team.

Michelle,

I do not see the BMP document that is referenced in the email attached. Can you please send me the document with the protections measures from the R-187/S-188/X-116/Z-119 project?

Kat

From: Ford, Michelle T <michelle.ford@eversource.com>
Sent: Monday, June 20, 2022 3:06 PM
To: Wadiak, Kathleen <Kathleen.P.Wadiak@wildlife.nh.gov>
Cc: Winters, Melissa <Melissa.J.Winters@wildlife.nh.gov>; FGC: NHFG review <NHFGreview@wildlife.nh.gov>; Nelson, Kurt I <kurt.nelson@eversource.com>
Subject: Question/concern with NHFG Review NHB22-0740 NHB21-3366 NHB22-0862 NHB22-0743 Line 380 326 Structure Replacement Pelham Litchfield Londonderry Hudson AoT 220401-070

EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.

Kat,

Our project team dove into your response for the 380/326 Line structure replacement project and unfortunately, due to the outage scheduling and reliability requirements, cannot comply with NHF&G's recommended time of year (TOY) restriction for the areas West of Mammoth Road and North of Elwood Road in Londonderry (NHB22-0862) and South of Keinna Road in Hudson (NHB22-0743). I am writing to request a modification to the consultation response from F&G to allow work to proceed without a TOY restriction using the same protection measures as the adjacent R-187/S-188/X-116/Z-119 project (BMP document attached). Given the proximity, the majority of structures in the area West of Mammoth Road and North of Elwood Road in Londonderry will be replaced concurrently by the trained contractor that is working on the R-187/S-188/X-116/Z-119 project and the wildlife monitors and protocols currently employed on the R-187/S-188/X-116/Z-119 will also be employed to monitor the 380/326 structure replacements in this area. The turtle protection measures and full-time environmental monitoring on the project has resulted in numerous sightings (and reporting) of state-listed turtles to NHF&G which is further validation of their efficacy at protecting turtles. Construction activities will occur between July 2022 and April 2023 outside of the critical nesting period (May/June).

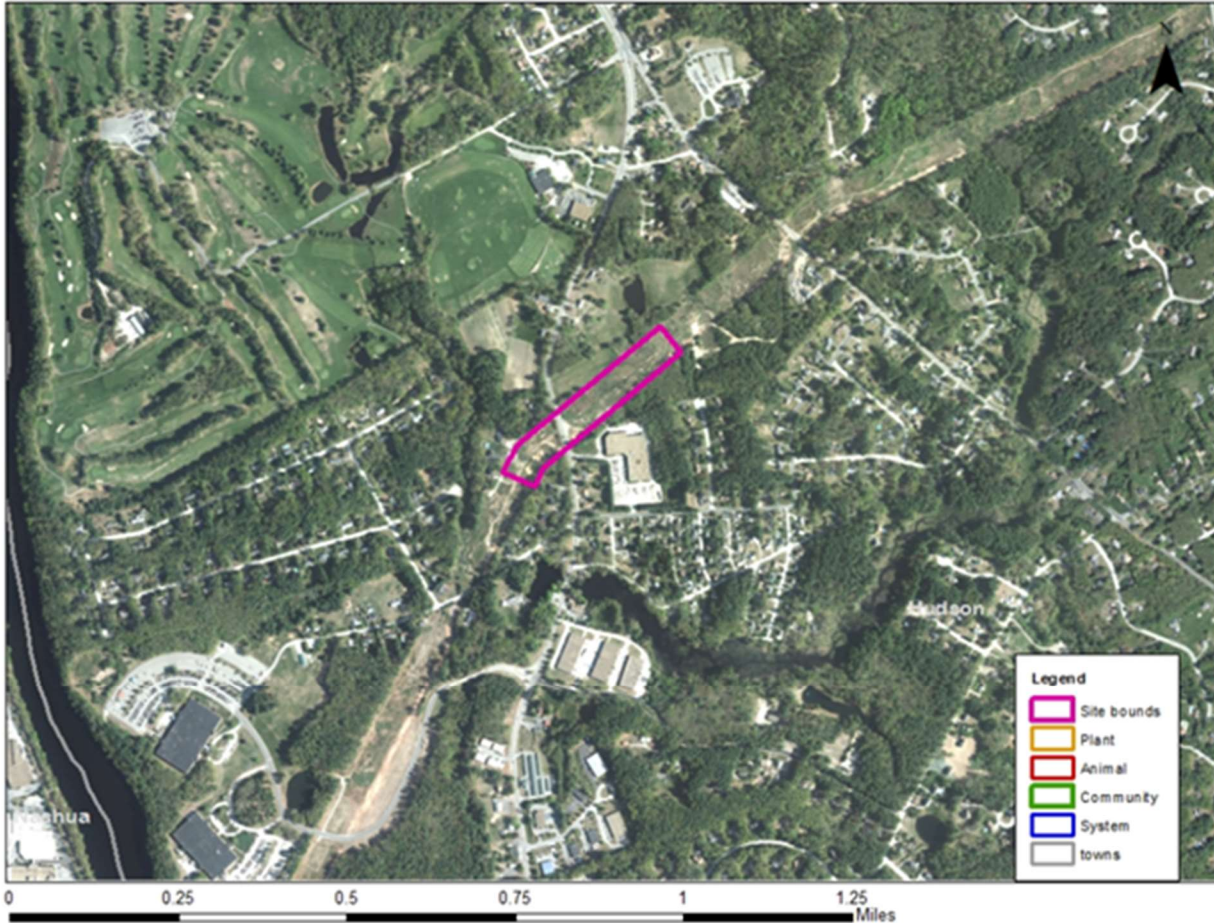
In the work in the area off of Rt 3A (screenshot shown below) in Hudson (NHB22-0743), we would like some clarification on the need to implement turtle protection measures here as there are no polygons shown on the NHB report map

page for this location. The implementation of the protection measures comes at a substantial cost to Eversource (and subsequently New Hampshire rate payers) and we want to ensure that they are employed where warranted.

I appreciate your time and consideration and if it's easier to discuss by phone, I would be happy to set up a call with the environmental project specialist and project manager to discuss your concerns and identify ways we could proceed without the TOY restriction and ensure turtles are protected.

Thanks as always,
Michelle

NHB22-0743



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

EVERSOURCE

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

Please note that I will be on vacation from Thursday, June 30 through Friday, July 8

This electronic message contains information from Eversource Energy or its affiliates that may be confidential, proprietary or otherwise protected from disclosure. The information is intended to be used solely by the recipient(s) named. Any views or opinions expressed in this message are not necessarily those of Eversource Energy or its affiliates. Any disclosure, copying or distribution of this message or the taking of any action based on its contents, other than by the intended recipient for its intended purpose, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete it from your system. Email transmission cannot be guaranteed to be error-free or secure or free from viruses, and Eversource Energy disclaims all liability for any resulting damage, errors, or omissions.

This electronic message contains information from Eversource Energy or its affiliates that may be confidential, proprietary or otherwise protected from disclosure. The information is intended to be used solely by the recipient(s) named. Any views or opinions expressed in this message are not necessarily those of Eversource Energy or its affiliates. Any disclosure, copying or distribution of this message or the taking of any action based on its contents, other than by the intended recipient for its intended purpose, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete it from your system. Email transmission cannot be guaranteed to be error-free or secure or free from viruses, and Eversource Energy disclaims all liability for any resulting damage, errors, or omissions.

This electronic message contains information from Eversource Energy or its affiliates that may be confidential, proprietary or otherwise protected from disclosure. The information is intended to be used solely by the recipient(s) named. Any views or opinions expressed in this message are not necessarily those of Eversource Energy or its affiliates. Any disclosure, copying or distribution of this message or the taking of any action based on its contents, other than by the intended recipient for its intended purpose, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete it from your system. Email transmission cannot be guaranteed to be error-free or secure or free from viruses, and Eversource Energy disclaims all liability for any resulting damage, errors, or omissions.

This electronic message contains information from Eversource Energy or its affiliates that may be confidential, proprietary or otherwise protected from disclosure. The information is intended to be used solely by the recipient(s) named. Any views or opinions expressed in this message are not necessarily those of Eversource Energy or its affiliates. Any disclosure, copying or distribution of this message or the taking of any action based on its contents, other than by the intended recipient for its intended purpose, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete it from your system. Email transmission cannot be guaranteed to be error-free or secure or free from viruses, and Eversource Energy disclaims all liability for any resulting damage, errors, or omissions.

This electronic message contains information from Eversource Energy or its affiliates that may be confidential, proprietary or otherwise protected from disclosure. The information is intended to be used solely by the recipient(s) named. Any views or opinions expressed in this message are not necessarily those of Eversource Energy or its affiliates. Any disclosure, copying or distribution of this message or the taking of any action based on its contents, other than by the intended recipient for its intended purpose, is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete it from your system. Email transmission cannot be guaranteed to be error-free or secure or free from viruses, and Eversource Energy disclaims all liability for any resulting damage, errors, or omissions.