

DATE September 22, 2022

TO: Kathleen Wadiak, NHF&G
NH Fish & Game Department
NHFGreview@wildlife.nh.gov

FROM: Ashley Friend, Specialist - Licensing & Permitting
Eversource Energy

CC: Melissa Winters, NHF&G
Michelle Ford, Eversource
William McCloy, Normandeau Associates

SUBJECT: NH F&G and NHB Consultation Request
NHB ID: NHB22-2488 & NHB22-2489
Eversource P106 Transmission Line Structure Replacement Project

The following information is being provided on behalf of Public Service Company of New Hampshire dba Eversource Energy Services Company (herein Eversource) in accordance with "Part Fis 1004.03(c) Information Required for Consultation."

On September 22, 2022, Kat Wadiak provided some initial feedback, requesting revisions to the BMPs for wildlife species, including revised language and including these BMPs in a separate document. See below.

Vertebrate Species:

- a) Blanding's turtle (*Emydoidea blandingii*) – State Endangered & [Spotted Turtle \(*Clemmys guttata*\) – State Threatened](#)
 - o Prior to the start of construction, a qualified biologist shall educate site operators who will be informed of the potential presence of this species and shall be provided with the NH Fish and Game listed species flyer for Blanding's turtle. The NHFG flyers contain information to identify this species and provide NHFG contact information.
 - o [Blanding's and spotted turtles may be encountered in both upland and wetland habitats within the project work area. Limited wetland habitat is present within the ROW, but BMPs should apply to all areas. Known-habitat \(only one wetland present within the ROW; completely avoided\) is limited within the ROW/Project Area.](#) Minimize work in known habitat during the active season (April 1 – October 15) to the greatest extent practicable. Work is proposed only at the end of and mostly outside the active season.
 - o If work must occur during the active season ([April 1 - October 15](#)), contractors working within the ROW will be trained by a qualified biologist on the identification and response protocols for Blanding's

- and spotted turtles. A Certified Wildlife Biologist will provide the training (resume to be provided).
- o During Inactive Period (Approximately October 16 - March 31), all contractors working within known habitat will be trained by a qualified biologist on the identification and response protocols for Blanding's and spotted turtles.
 - o Searches and sweeps shall be conducted immediately before the start of construction and movement of equipment in order to minimize the chance of animals entering an area between the sweep and work. ~~Prior to the start of construction within known habitat, trained contractors will search the work area.~~
 - o 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.
 - o 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.
 - o If a Blanding's or spotted turtle is discovered, the animal shall be photographed and either relocated (in the direction of travel) or allowed to migrate on its own outside the work area. ~~The~~ observing individual will then immediately contact the project Environmental Licensing & Permitting specialist from Eversource who will contact NH F&G for further information, as follows:
 - i. Josh Megyesy 978-578-0802; or
 - ii. Melissa Winters 603-479-1129.
 - iii. c) If NHF&G staff are unable to be reached, contact the Wildlife Administrator at 603--271-2461.
 - o Immediately ~~Pp~~rior to daily construction activities, timber matting shall be reviewed for snakes and turtles. An environmental addendum shall be added to the contractor's daily tailboards to include guidance on protocols for snakes and provide identification for turtles and snakes.
 - o At the conclusion of the project, a summary report of any rare species observations shall be provided to the NHFG Nongame Program.
- b) Northern black racer (*Coluber constrictor constrictor*) - State Threatened
- o Site operators shall be informed of the potential presence of this species and shall be provided with the NH Fish and Game listed species flyer for northern black racer. The NHFG flyers contain information to identify this species and provide NHFG contact information.
 - o Minimize work in known habitat during the active season (April 1 - October 31) to the greatest extent practicable.
 - o Disturbance for winter work areas should be minimized to the extent possible in order to limit impacts to hibernating snakes. Hibernacula can be impacted by work occurring in the inactive season. A single hibernaculum can host many snakes, so damage to one can result in

- significant impacts to the population. Northern black racers are known to hibernate directly adjacent to utility structures, so impacts must be considered even in the inactive season.
- o If work must occur during the active season, contractors working within the ROW will be trained by a qualified biologist on the identification and response protocols for northern black racers. A Certified Wildlife Biologist will provide the training (resume to be provided).
 - o Searches and sweeps shall be conducted immediately before the start of construction and movement of equipment in order to minimize the chance of animals entering an area between the sweep and work.
 - o 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.
 - o 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.
 - o If a northern black racer is discovered, the animal shall be photographed and the observing individual will then immediately contact the project Environmental Licensing & Permitting specialist from Eversource who will contact NH F&G for further information, as follows:
 - ~~i. Prior to the start of construction within known habitat, trained contractors will search the work area. If a northern black racer is discovered, the snake shall be photographed and either relocated (typically in the direction of travel) or allowed to migrate on its own outside the work area. The observing contractor will then immediately contact the project Environmental Licensing & Permitting specialist from Eversource who will contact NH F&G as follows:~~
 - ii. Brendan Clifford 603-944-0885; or
 - iii. Melissa Winters 603-479-1129.
 - iv. c) If NHF&G staff are unable to be reached, contact the Wildlife Administrator at 603- 271-2461.
 - o Immediately Ppprior to daily construction activities, timber matting shall be reviewed for snakes and turtles. An environmental addendum shall be added to the contractor's daily tailboards to include guidance on protocols for snakes and provide identification for turtles and snakes.
 - o Erosion control matting (including wattles), if utilized, shall consist of jute matting. In accordance with the NH Department of Natural & Cultural Resources, March 2019 Best Management Practices [BMP] Utility Maintenance in and Adjacent to Wetlands and Waterbodies Manual and Eversource's BMP Manual for Sediment and Erosion Control, all photodegradable and welded plastic mesh shall be prohibited on this project and only E&S controls made of

biodegradable, natural materials shall be utilized in order to prevent mortality to wildlife.

- o 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 via the contacts and procedures (including photographs if possible) above. Observations of this species outside of this timeframe can follow general reporting guidance.
- o At the conclusion of the project, a summary report of any rare species observations shall be provided to the NHFG Nongame Program.