



Stantec Consulting Services Inc.
30 Park Drive, Topsham ME 04086-1737

September 16, 2022
File: AoT-2205

Attention: Mr. Ridgely Mauck
Program Supervisor – Permitting
NHDES Land Resources Management
Alteration of Terrain Bureau
29 Hazen Drive
P.O. Box 95
Concord, NH 03302

Reference: Alteration of Terrain Permit Amendment Application, P145 Transmission Line Rebuild Project and C189, M108, H137 Structure Replacement Project, Concord, Pembroke, Bow, New Hampshire

Dear Mr. Mauck,

On behalf of the Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource), Stantec Consulting Services Inc. is submitting this Alteration of Terrain (AoT) permit amendment application for the proposed P145 Transmission Line Rebuild Project in accordance with Terrain Alteration Law (RSA 485-A:17), New Hampshire Department of Environmental Services (NHDES) Administrative Rules (Env-Wq 1500 Alteration of Terrain) and discussions between the NHDES AoT Bureau and Eversource. The amendment is for 19 additional structure replacements on the C189, M108, and H137 transmission lines that are adjacent to the P145 line and located within the same, existing right-of-way (ROW). The AoT permit for the P145 Rebuild Project was approved by NHDES on August 12, 2022 (AoT-2205). Additional upland disturbances were also added at select locations based on the results of a rare plant survey performed in July 2022. Upland matting was preliminarily planned at several historic red threeawn (*Aristida longespica* var. *geniculata*) locations to protect the listed plant species, but no plants were identified during the survey and therefore upland matting is no longer required.

The C189, M108, and H137 structure replacements will require an additional 132,665 square feet of upland disturbance subject to AoT permitting through the NHDES. The application fee of \$13,766.50 is based on the amount of total ground disturbance, minus wetland matting, and the latest NHDES fee schedule for permit amendments (\$0.10 per square foot + \$500).

Included with this permit amendment application is the application fee check, a completed AoT Amendment Request Form, updated plans and figures, and additional required materials. The C189, M108, and H137 structure replacements were included in the Natural Heritage Bureau Datacheck review area and NHDES wetland permitting. The adjacent structure replacements were also included in consultation with New Hampshire Fish and Game Department (NHFG). The Wildlife Protection Plan developed for the P145 Rebuild Project (dated July 20, 2022), which describes best management practices for avoiding and minimizing impacts to rare species, also incorporates these new structure replacements. The previous waiver requests under the P145 Rebuild Project AoT application would also apply to these adjacent structure replacements, including waivers for the preparation of a stormwater drainage report, drainage area plans and hydrologic soil group plans (Env-Wq 1509.04), notification of project deviations (Env-Wq

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1503.21), and measurement of contiguous area disturbed (Env-Wq 1503.12). Following email discussions with the AoT Bureau on August 16, 2022, an additional waiver is included in this amendment application to allow for greater than 40,000 square feet of additional disturbance to be permitted with an amendment, rather than an entirely new application (Env-Wq 1503.22 (c)(3)).

Construction of the P145 Rebuild Project is underway and the C189, M108, and H137 structure replacements are anticipated to be performed by the same contractor when working in the adjacent areas, between September 2022 and March 2024.

A copy of this application has also been sent to each of the three municipalities and to the Upper Merrimack River Local Advisory Committee. Proof of delivery will be forwarded to NHDES separately. Please contact me if you need additional information or have any questions or concerns regarding the enclosed application materials.

Regards,

Stantec Consulting Services Inc.



Tom Tetreau
Project Manager / Environmental Scientist
Phone: 207 504 7231
Tom.Tetreau@stantec.com

Attachment: Alteration of Terrain Permit Amendment Application
Application Fee Check

c. Ashley Friend, Eversource



ALTERATION OF TERRAIN AMENDMENT REQUEST FORM



Water Division/ Alteration of Terrain Bureau/ Land Resources Management
Check the Status of your Application: <https://www4.des.state.nh.us/DESOnestop>

RSA/ Rule: RSA 485-A:17, Env-Wq 1500

Administrative Use Only	Administrative Use Only	Administrative Use Only	File Number:
			Check No.
			Amount:
			Initials:

1. TYPE OF AMENDMENT REQUESTED [See Env-Wq 1503.27(a)]			
<input type="checkbox"/> Permit Transfer [use Section 7]	<input type="checkbox"/> Time Extension [use Section 8]	<input checked="" type="checkbox"/> Project/Plan Change [use Section 9]	
2. PROJECT INFORMATION [See Env-Wq 1503.27(b)]			
Project Name: P145 Transmission Line Rebuild Project			
Street/Road Address: between Farmwood Road in Concord and River Road in Bow			
Town/City: Concord, Pembroke, Bow		County: Merrimack	
Tax Map: multiple	Block: multiple	Lot Number: multiple	Unit: multiple
3. CURRENT PERMIT INFORMATION [See Env-Wq 1503.27(c)-(d)]			
Permit No.: AoT-2205		Current Expiration Date ¹ : 8/12/2027	
Name of NHDES Signatory: Ridgely Mauck			
Current Permit Holder Name: Eversource Energy		Contact Name: Ashley Friend	
Email: ashley.friend@eversource.com		Daytime Telephone: 603-634-2992	
Mailing Address: 13 Legends Drive			
Town/City: Hooksett		State: NH	Zip Code: 03106
4. CURRENT PERMIT HOLDER'S AGENT [See Env-Wq 1503.27(d)] If none, check here: <input type="checkbox"/>			
Business Name: Stantec		Contact Name: Tom Tetreau	
Email: tom.tetreau@stantec.com		Daytime Telephone: 207-504-7231	
Mailing Address: 30 Park Drive			
Town/City: Topsham		State: ME	Zip Code: 04086
5. CURRENT PROPERTY OWNER INFORMATION (IF DIFFERENT FROM PERMIT HOLDER) [See Env-Wq 1503.27(e)]			
Name:		Contact Name:	
Email:		Daytime Telephone:	
Mailing Address:			
Town/City:		State:	Zip Code:

¹ Expired permits cannot be extended.

ridge.mauck@des.nh.gov or (603) 271-2147

NHDES Alteration of Terrain Bureau, PO Box 95, Concord, NH 03303-0095

www.des.nh.gov

6. CURRENT PROPERTY OWNER'S AGENT INFORMATION [See Env-Wq 1503.27(e)] If none, check here: <input checked="" type="checkbox"/>			
Business Name:		Contact Name:	
Email:		Daytime Telephone:	
Address:			
Town/City:		State:	Zip Code:
7. COMPLETE THIS SECTION IF THERE IS A CHANGE IN PERMIT HOLDER OR PROPERTY OWNER [See Env-Wq 1503.23 and Env-Wq 1503.27(f)]			
A. Transferee Information			
Name:		Contact Name:	
Email:		Daytime Telephone:	
Mailing Address:			
Town/City:		State:	Zip Code:
B. Transferee Signature and Certification			
By signing below, I certify that:			
<ul style="list-style-type: none"> • I have received a copy of the permit and all approved plans and specifications; • I agree to comply with RSA 485-A:17, Env-Wq 1500, the permit, and all conditions contained in the permit, including the requirement for on-going inspection and maintenance of the stormwater management system(s); • The information contained in or otherwise submitted with this request is true, complete, and not misleading to the best of my knowledge and belief; • I understand that the submission of false, incomplete, or misleading information constitutes grounds for the department to deny the request, revoke any permit amendment that is granted based on the information, and/or refer the matter to the board of professional engineers established by RSA 310-A:3 if I am a professional engineer; and • I understand that I am subject to the penalties specified in New Hampshire law for falsification in official matters, currently RSA 641. 			
Transferee:		Print Name Legibly:	Date:
C. Transferor Signature and Certification			
By signing below, I certify that:			
<ul style="list-style-type: none"> • I have provided a copy of the permit and all approved plans and specifications to the transferee; • I am relinquishing all rights to the permit as originally issued; • The information contained in or otherwise submitted with this request is true, complete, and not misleading to the best of my knowledge and belief; • I understand that the submission of false, incomplete, or misleading information constitutes grounds for the department to deny the request, revoke any permit amendment that is granted based on the information, and/or refer the matter to the board of professional engineers established by RSA 310-A:3 if I am a professional engineer; and 			
I have provided a copy of the permit and all approved plans and specifications to the new owner and .			
Transferor:		Print Name Legibly:	Date:

ridge.mauck@des.nh.gov or (603) 271-2147

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Alteration of Terrain Waiver Request

RSA/Rule: RSA 485-A:17, Env – WQ 1500

Water Division / Alteration of Terrain Bureau / Land resources Management

29 Hazen Drive, PO Box 95

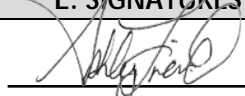
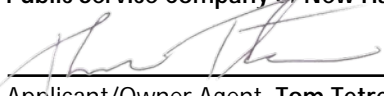
Concord, New Hampshire 03302-0095

A. PROJECT INFORMATION	
C189, M108, H137 Structure Replacement Project Project Name	
Existing transmission line right-of-way containing the P145, C189, M108, and H137 lines. Street Address	
Concord, Pembroke, Bow City/Town	Multiple Zip Code
Multiple – see attached plans Tax Map/Lot Number	

B. APPLICANT/OWNER INFORMATION		
Ashley First Name	Friend Last Name	
Public Service Company of New Hampshire d/b/a Eversource Energy (Eversource) Organization		
13 Legends Drive Street Address		
Hooksett City/Town	New Hampshire State	03106 Zip Code
ashley.friend@eversource.com Email		603-634-2992 Telephone Number

C. APPLICANT/OWNER AGENT INFORMATION		
Tom First Name	Tetreau Last Name	
Stantec Consulting Services Inc. Organization		
30 Park Drive Street Address		
Topsham City/Town	Maine State	04086 Zip Code
tom.tetreau@stantec.com Email		207-504-7231 Telephone Number

D. WAIVER REQUESTS	
Env-Wq 1503.22 (c)(3) Rule Section Waiver Request	The proposed disturbance is not more than 40,000 square feet outside the area of disturbance originally approved Name of Rule
Reason for Waiver Request Eversource is requesting a waiver for including additional upland disturbances in excess of 40,000 square feet associated with 19 structures replacements on the C189, M108, and H137 transmission lines that are adjacent to, and located within the same cleared ROW as the P145 transmission line. Upland disturbances for the P145 Transmission Line Rebuild Project were permitted under AoT-2205 and Eversource wishes to conduct these additional replacements at the same time as the P145 project. Additional upland disturbances are also proposed within the P145 Rebuild Project footprint as a result of rare plant surveys not identifying any rare plant species in previously suspected occurrence areas, and therefore upland matting is no longer necessary to protect the area. Although these additional work areas require greater than 40,000 square feet of additional disturbance, the work does not represent a substantial change in use compared to the permitted P145 project and all work will still occur in the same existing transmission line corridor.	
Waiver Timeline Permanent	
Proposed Alternative Allow for additional 132,665 square feet of upland disturbance under a permit amendment associated with 19 structure replacements on the C189, M108, and H137 transmission lines and additional upland disturbances on the P145 transmission line where rare plants are no longer present based on recent field surveys and protective measures are therefore not needed.	
Compliance with Env-Wq 1503.22 The project proposes to improve access routes and work pads around utility structures for the purpose of maintaining existing utility infrastructure. This project is necessary to maintain the safety and reliability of the electrical infrastructure. Proposed disturbances anticipated for 2022–2023 within the P145 ROW, including the C189, M108, and H137 replacement structures, are included in this amendment application and shown on updated AoT permitting plans and surface water and groundwater overlay plans. No permanent methods of protecting water quality were originally proposed or are currently proposed and the project will follow the Utility BMP Manual. Wetland and Shoreland permitting include the additional C189, M108, and H137 structures and therefore no changes are proposed to the wetland permitting or wetland impacts. No new impervious area is proposed. No changes to stormwater management systems are proposed. Shifts in roadway alignments or center points of structures are not proposed at this time, but Eversource requests that the previous waivers under AoT-2205 for project shifts (1503.21 (d)(6&7)), stormwater drainage report, drainage area plans and hydrologic soil group plans (Env-Wq 1509.04), and measurement of contiguous area disturbed (Env-Wq 1503.12) continue to remain in place under the amended project. Eversource respectfully requests a waiver from the 40,000 square feet additional disturbance threshold in this application.	

E. SIGNATURES	
 _____ Applicant/Owner, Ashley Friend Public Service Company of New Hampshire d/b/a Eversource Energy	9/15/2022 _____ Date
 _____ Applicant/Owner Agent, Tom Tetreau, Stantec Consulting Services Inc.	9/15/2022 _____ Date