
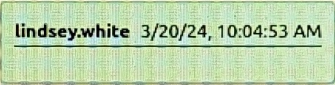


The New Hampshire AG has allowed Eversource to sign its X-178 Alteration of Terrain and Dredge and Fill Wetlands permit applications *as the landowner* though DES rules require that landowners receive and sign (or not) these applications.

Who signed the [Alteration of Terrain](#) permit application for the X-178 (2) below; Kurt Nelson/Eversource or Lindsey White/GZA?

D. WAIVER REQUESTS	
Env-Wq 1503.12 (d)(1&2) Rule Section Waiver Request	Measurement of Contiguous Area Disturbed; Inclusion in Plans Name of Rule
<b>Reason for Waiver Request</b> Eversource is requesting a waiver for including past terrain disturbance in the measurement of contiguous disturbed area included in this X178-2 Line AOT application. Future disturbance, beyond the scope of X178-2 Line Rebuild and OPGW project described in this application is not known at this time.	
<b>Waiver Timeline</b> Permanent	
<b>Proposed Alternative</b> Any existing trails or access roads that may have been created within the last 10 years will be utilized and/or improved as part of this project and have been included in the current calculations within this application. Future structure maintenance may occur within the X178-2 ROW. Eversource, through consultation with NHDES, will evaluate whether future terrain disturbances within the X178-2 ROW will be permitted with an amendment to this application or subject to a new, separate application.	
<b>Compliance with Env-Wq 1503.12 (d)(1&amp;2)</b> 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 2024 within the X178-2 ROW are included in this application and shown on Figures 3 and 4. Project disturbances included in this application and subsequent permit approvals will be considered if future structure maintenance is proposed within the X178-2 ROW. Eversource respectfully requests a waiver from including past disturbance in this application. Future disturbances within the X178-2 ROW will be evaluated and discussed with NHDES and permit amendments or new permit applications will be submitted, if necessary.	
E. SIGNATURES	
 Applicant/Owner, Kurt Nelson, Eversource Energy	 Date



#### D. WAIVER REQUESTS

Env-Wq 1504.09

Rule Section Waiver Request

Stormwater Drainage Report; Drainage Area Plans;  
Hydrologic Soil Group Plans  
Name of Rule

##### Reason for Waiver Request

Eversource is requesting a waiver for preparing a Stormwater Drainage Report, Drainage Area Plans and Hydrologic Soil Group Plans for proposed access improvements and work pad grading associated with maintenance of the existing X178-2 Transmission Line structures. The proposed access and work pad improvements for continued transmission line maintenance work will not result in new impervious surfaces. As a result, stormwater treatment practices are not proposed.

##### Waiver Timeline

Permanent

##### Proposed Alternative

The proposed access and work pad improvements will not result in new impervious surface. Therefore, there is no proposed alternative to substitute the requirements of Env-Wq 1504.09.

##### Compliance with Env- WQ 1509.04

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 in order to maintain the safety and reliability of the electrical infrastructure. Access and work pad improvements will be completed using stone and gravel, and therefore stormwater drainage should not be affected by the proposed project. In addition, it is not anticipated that stormwater drainage area plans would show significant differences between existing and proposed conditions. An NRCS Web Soil Survey report was generated to show general soil information within the project area. Since there is no new impervious surface area proposed and stormwater drainage is not anticipated to be affected by the proposed project, it is not anticipated that soils will be significantly impacted by the project.

Best Management Practices will be utilized to protect wetlands from erosion, sedimentation, or other environmental degradation. In addition, gravel work pads will be coated with seed and mulch to allow vegetation growth on the surface, further minimizing and preventing erosion and sedimentation. As a result, Eversource respectfully requests that a Stormwater Drainage Report, Drainage Area Plans, and Hydrologic Soil Group Plans be waived for the purposes of the proposed utility line maintenance project.

#### E. SIGNATURES



Applicant/Owner, Kurt Nelson,  
Eversource Energy

lindsey.white 3/20/24, 10:05:38 AM

Date



#### D. WAIVER REQUESTS

Env-Wq 1503.21 (d)(6&7)  
Rule Section Waiver Request

Notification; Certification  
Name of Rule

##### Reason for Waiver Request

Eversource is requesting a waiver for deviations from the approved plans without applying for an amended permit or a new permit if shifts in the proposed project layout occur. Changes in project layout are frequently identified during construction by Eversource and their contractors and may be necessary to safely perform the work. Access shifts would be limited to the extent necessary for safety, would not impact new resources, and access would remain within the existing and maintained ROW. The need for additional permit applications can impact construction schedules and incur costly delays.

##### Waiver Timeline

Permanent

##### Proposed Alternative

Allow for the access road centerlines to be relocated during construction, if necessary, up to a distance equal to the approximate width of the ROW (approximately 170-350 feet on the X178-2 Line). Shifts would not create greater than 5% increase in disturbed area along the individual access segment, which is assumed to be the length of the access road between two work pads/structures.

Allow for the center point of the parking area, assumed to be the structure replacement work pads for transmission line projects, to be relocated during construction, if necessary, up to a distance equal to half the approximate width of the ROW (approximately 170-350 feet on the X178-2 Line). Shifts would not create greater than 5% increase in disturbed area at each work pad.

This would allow contractors to avoid steep terrain or other hazardous areas, or areas that may require significant grading or earthwork that may not have been identified during initial constructability reviews. Landowners may also request layout changes be made after project permitting is complete. In most cases this shift is done to reduce the amount of disturbed area.

##### Compliance with Env-Wq 1503.21 (d)(6&7)

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 shown on Figures 3 and 4 are the result of avoidance and minimization measures and constructability reviews. Layout changes and shifts will be limited to the proposed alternative above. A reduction in disturbed area is often the result. As previously mentioned, access shifts would be limited to the extent necessary to safely perform work. Access routes will remain within the existing and maintained ROW and would not disturb new resources. Best Management Practices will be utilized to protect wetlands from erosion, sedimentation, or other environmental degradation as originally proposed. Eversource respectfully requests a waiver from limiting shifts of the project road centerlines and parking areas to 20 feet.

#### E. SIGNATURES



Applicant/Owner, Kurt Nelson,  
Eversource Energy

**lindsey.white** 3/20/24, 10:06:04 AM

Date



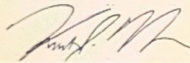
**12. REQUIRED SIGNATURES**

By signing below, I certify that:

- The information contained in or otherwise submitted with this application 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 application, revoke any permit 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 641:3.

☒ **APPLICANT**☐ **APPLICANT'S AGENT:**

Signature: \_\_\_\_\_



lindsey.white 3/20/24, 10:04:03 AM

Name (print or type): Kurt Nelson

Title: Manager, Licensing &amp; Pe

☐ **PROPERTY OWNER**☐ **PROPERTY OWNER'S AGENT:**

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Name (print or type): \_\_\_\_\_

Title: \_\_\_\_\_

In its '[Permitted](#) and non-Permitted Uses on Transmission Rights of Way Eversource acknowledges: "While Eversource has rights to operate and maintain the electric system through these easements, the underlying property is still owned by private parties."

Does DES issue AoT permits when there is no Property Owner signature on the AoT application?

Can DES explain what the blue box means?