X178-2 Transmission Line Phase 1 Rebuild and OPGW Project Eversource Energy Woodstock, Easton, and Sugar Hill New Hampshire

NHDES Alteration of Terrain Permit Application #240401-068 March 26, 2024 GZA File No. 04.0191410.39

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The subject of this application is the beginning and ending segments of the X-178-2 Transmission Line referred to as X178-2 Phase 1 which includes proposed structure replacements outside of the White Mountain National Forest (WMNF). The proposed project includes the replacement of 106 existing utility structures along the X178-2 Transmission Line that exceed AoT impact thresholds. The proposed project extends approximately 11.2 miles through portions of Woodstock, Easton, and Sugar Hill. To more efficiently conduct routine maintenance of the existing X178-2 Transmission Line, work pad grading and access road improvements are proposed as part of this project in upland area, and temporary grading for access along steep slope wetlands. The proposed project will require disturbance subject to AoT permitting through the NHDES as a result of impact areas cumulatively exceeding 100,000 square feet of contiguous disturbance in the project are or 50,000 square feet of contiguous disturbance within the protected shoreland as defined in RSA 483-B.

Included with this submittal is a copy of the application fee check, a completed AoT Permit Application Form, a detailed project overview narrative, required plans and figures, and additional supporting materials. In addition, a waiver request for the preparation of a stormwater drainage report, drainage area plans, and hydrologic soil group plans and from amendment requirements for shifting access roads greater than 20 feet is enclosed as required by Env-Wq 1509.04. The proposed project is scheduled to commence in the summer of 2024 and continue through 2026. Eversource appreciates the efforts of the Alteration of Terrain Bureau in helping to maintain the anticipated construction schedule, which is dependent on scheduled outages dictated by regional outage planning.

Page 1- Impacts have been minimized and avoided to the greatest extent practicable through Site evaluations of access routes and work pad placements. Where possible, existing gravel roads are utilized for access.

The project requires approximately 1,912,751 square feet (sq.ft.) of total disturbance, including 478,541 sq.ft. of temporary wetland matting and 1,434,210 sq.ft. of ground disturbance. The proposed project (to replace a total of 106 existing utility poles) is subject to the AoT disturbance threshold per Env-Wq 1500 and RSA 485-A:17.

Town	Area ID	Approx AoT impact (sq.ft.)	Line	
Existi	ing Structure	es		
Woodstock	Area A	255,131	X178	171-183
Easton	Area	B 492,881	X1	78 292-
294, 297-2	99			
			315-339	
Sugar Hill	Area C	686,198	X178	340-401

Area B includes the portion of the X178 Transmission Line ROW on the south side of Easton Valley Road from Structure 292 continuing in a north/northwesterly direction to Structure 339 for a distance of approximately 4.1 miles. The ROW in this portion varies in width from approximately 225-ft to 150-ft.

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2.3 IDENTIFICAITON OF NATURAL AND CULTURAL RESOURCES

"GZA GeoEnvironmental, Inc. (GZA) has been retained by Eversource to provide professional services on this project that relate to natural and cultural resources identification and assessment, as well as permit applications for natural resources and AoT impacts required to complete the project. GZA has conducted field evaluations and has corresponded with the appropriate agencies to identify natural and cultural resources present in the vicinity of the proposed project."

2.3.3 Identification of Rare, Threatened, and Endangered Species

In the Town of Easton, the New Hampshire Natural Heritage Bureau (NHB) and New Hampshire Fish and Game (NHFG) identified records of wood turtle (Glyptemys insculpta) in the vicinity of the X178-2 Transmission Line ROW (See Appendix C for the NHB Reports). Typical of similar Eversource projects, rare species best management practices have been incorporated into the design. Construction personnel will be made aware of the potential presence of sensitive turtle and snake species. Species information will be incorporated into project plans.

Page 3- "GZA will notify the NHFG and NHB of any rare species observations for inclusion in the statewide database. In addition, NHB identified the presence of high-elevation spruce-fir forest system natural community. However, this natural community is not located within the proposed project area."

Additionally, there are specific requirements for monitoring, time of year work limitations, and other items from NHFG summarized below:

- Wood turtles (state species of special concern) occur within the vicinity of the project area. All operators and personnel working on or entering the site shall be made aware of the potential presence of these species and shall be provided flyers that help to identify these species, along with NHFG contact information. See Plan Sheet 4-5.
- Rare species information (e.g. identification, observation and reporting of observations, when to contact NHFG immediately and NHFG contact information) shall be posted on site at all times and communicated during morning tailgate meeting prior to work commencement.
- 3. 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. <u>All turtle species nests are protected by NH laws</u>. Be aware of the potential to encounter nesting wildlife in these areas.
- 4. If a 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. The nest or suspected nest shall be marked (surrounding roped off or cone buffer) and avoided; this shall be communicated to all personnel onsite. Site activities shall not occur in the area surrounding the nest or suspected nest until further guidance is provided by NHFG.
- 5. Vernal pools and potential vernal pools (PVP) shall be flagged prior to work, and impacts shall be avoided with the following exception as described in the table embedded in the attached screenshot entitled "Vernal Pool Summary EVS X178":
 - 1. Wetland WS-75 and L/ET-16 contain vernal pools within the proposed work pad area for structures 180 and 269. The work pads may overlap these vernal pools to construct a safe work area. Temporary timber matting shall be utilized and restoration shall occur following impacts. Impacts to the vernal pools shall only occur December 1 to March 1. Work shall occur under frozen or dry conditions if possible. NHFG shall be notified prior to disturbance.
- 6. No disturb vegetative buffers of 50' shall be maintained around vernal pools wherever possible. NHFG acknowledges the following vernal pool buffer impacts as described in the table embedded in the attached screenshot titled "Vernal Pool Summary EVS X178."

- Wetlands WS-64, WS-75, WS-117, L-73, L66, L-42, L-40, L/ET-16, LW-1, ET-31, ET-37 contain vernal pools. Temporary timber matting will be utilized within 50-ft of these vernal pools.
- 7. All matting which will be placed in waterbodies deemed suitable for hibernating rare turtles will be placed prior to the start of the inactive season (October 16-March 31) so as to prevent accidental placement atop hibernating turtles. <u>Areas identified as suitable hibernation habitat shall be identified on plan sheets and provided to NHFG at least two weeks prior to beginning work.</u>
- 8. Immediately prior to the placement of matting in wetlands during the active season (April 1-October 15), the areas shall be cleared by a trained individual. A trained individual shall be defined as any contractor who has gone through project-species protection education conducted by the qualified biologist on rare wildlife species at the site. Contact NHFG if turtles in matting areas are observed or suspected.

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- 9. For all work pads, staging areas, matting, and access roads, searches and sweeps shall be conducted by trained individuals immediately before the start of work and movement of equipment in order to minimize the chance of animals entering an area between the sweep and work. A trained individual shall be defined as any contractor who has gone through project-species protection education conducted by the qualified biologist on rare wildlife species at the site.
- 10. 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 or equivalent document.
 - Minor field changes to access roads and work pads including: shifting access from one side of the right of way to the other, shifting of work pads and staging areas forward or backwards, but not increasing the overall square footage of the work pads or staging areas, may be considered based on location. NHFG shall be notified of any proposed changes.
- 11. Work, pull pads, and access shall be minimized to the greatest extent possible.
- 12. Work pads shall be reduced post-construction to 30' x 60' and restored with native vegetative seed mix.
- 13. 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.

- 14. 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 <u>NHFGreview@wildlife.nh.gov</u>, with the email subject line containing the NHB DataCheck tool results letter assigned number, the project name, and the term Wildlife Species Observation.
- 15. 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.
- 16. 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 or Trained Individuals 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.
- 17. The NHFG, including its employees and authorized agents, shall have access to the property during the term of the permit.

If NHFG staff are unable to be reached, contact the Wildlife Administrator at 603-271-2461.

2.3.4 Identification of Cultural and Historical Resources

SEARCH, Inc. (Search) and Victoria Bunker, Inc. (VBI) completed Phase 1A Archeological Assessments in 2014 and 2013, respectively, which combined cover the entirety of the X178 Transmission Line ROW. The Phase 1A Assessments identified 27 Sensitivity Areas along the X178-2 Transmission Line ROW that required Phase IB Archeological Survey. A Phase 1B Archeological Survey was completed by Independent Archeological Consultants, LLC (IAC) for the 27 Sensitivity Areas in August 2022. The majority of Sensitivity Areas were cleared through Phase IB survey, and where Archeological Sites were identified and could not be avoided during construction, Eversource agreed to utilize upland matting within Site Boundaries to avoid ground disturbance to Archeological Sites.

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In addition, IAC completed a review of the New Hampshire Division of Historic Resources (NHDHR) Enhanced Mapping & Management Information Tool (EMMIT) Database to review potential visual impact assessments for previously recorded historic properties within a half mile of the structure replacement locations. IAC conducted the NHDHR EMMIT file review on June 8, 2023.

A Request for Project Review (RPR) was submitted to NHDHR on November 8, 2023. NHDHR is requesting an above-ground architectural survey be completed for the proposed project. The above-ground architectural survey will be completed by Preservation Company in the spring of 2024 and results of this survey will be incorporated into an updated RPR which will be submitted upon completion of this survey.

3.0 EXISTING CONDITIONS

The proposed project is located within the existing and maintained X178-2 Transmission Line ROW. The proposed project work areas subject to this Alteration of Terrain permit cross through portions of three towns. Existing dirt and/or grass access routes currently used for access to existing utility structures within the ROW are proposed to be improved using gravel and stone as a part of a routine structure maintenance project. Proposed access road improvements include 12-to 16-foot wide gravel and stone roads with a 20-foot total width limit of disturbance. Based on NRCS soil mapping, existing upland soils are primarily fine sandy loams. Slopes are variable and generally range from 0 to 60%, with an average of approximately 20%.

The project area includes upland and wetland areas located in primarily rural and forested areas. Upland vegetation includes American grandifolia), black raspberry beech (Fagus (Rubus occidentialis). bracken (Pteridium aquilinum), fern goldenrod (Solidago), hay scented fern (Dennstaedtia punctilobula), quaking aspen (Populus tremuloides), sweet fern (Comptonia peregrina), and white pine (Pinus strobus). Wetlands in the ROW primarily consist of palustrine emergent (PEM) or palustrine scrub-shrub (PSS) systems that are seasonally saturated. Vegetation in the wetlands were dominated by balsam fir (Abies balsamea), cinnamon fern (Osmundastrum cinnamomeum), fringed sedge (Carex crinita), grav birch (Betula populifolia), interrupted fern (Osmuna clayoniana), meadowsweet (Spiraea alba), red maple (Acer rubrum), reed canary grass (Phalaris arundinacea), sensitive fern (Onoclea sensibilis), speckled alder (Alnus incana), steeplebush (Spiraea tomentosa), and woold grass (Scirpus cyperinus).

Existing conditions along the X178-2 Transmission Line is discussed below by areas subject to jurisdiction under the AoT Law and Rules and consistent with discussions with the AoT Bureau for Eversource Line projects.

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3.2 AOT AREA B- EASTON

Area B includes the portion of the X178 Transmission Line ROW on the south side of Easton Valley Road from Structure 292 continuing in a north/northwesterly direction to Structure 339 for a distance of approximately 4.1 miles. The ROW in this portion varies in width from approximately 225-ft to 150-ft. This area includes upland and wetland areas with elevations ranging from approximately 1,228 fasl at the proposed access between Structures 300 and 301, to approximately 1,820 fasl at Structure 325. This portion of the ROW is located in a primarily forested and undeveloped areas and residential areas in the Town of Easton.

Land disturbance subject to Alteration of Terrain Law and Rules due to Env-Wq 1502.58 (b) (2) (see Section 5.1.2 below) within this area includes:

- Work pads associated with X178 Structures:
 - o 292-294
 - o 297-299, and
 - o 315-339
- Access from the south side of Easton Valley Road at Structure 292 to the Easton and Sugar Hill town line.

3.2.1 Surface and Groundwater Protection-Area B

Within this portion of the project area there are two unnamed streams associated with wetlands ET-52 and ET-83.1 (see Figure 3- Surface Water and Groundwater Overlay Plans). This portion of the project area includes temporary wetland matting in 13 wetland systems for access and work pad placement. A NHDES SDF permit has been submitted for temporary wetland impacts for the proposed project in the Town of Easton. Temporary wetland matting totals are summarized in the table below. AoT disturbance area is summarized in Section 5.1.2.

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Temporary Impact Impact (sq. ft.)

Wetland Matting 56, 278 sq. ft.

According to Figure 3, Area B is located within AoT screening layers. These layers include "Outstanding Resource Waters" and "Groundwater Classification Area GA2."

3.2.2 <u>FEMA 100-year Floodplain, Shoreland Protection, Designated</u> <u>Rivers-Area B</u>

According to the FEMA Flood Insurance layer on Figure 3, this area is not located within a 100-year floodplain.

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4.0 STRUCTURE REPLACEMENT AND MAINTENANCE

As previously mentioned, the proposed project includes the replacement of 106 existing utility structures within AoT areas. The structures must be replaced due to environmental damage over time. The process of replacing structures typically consists of drilling approximately 4-foot diameter holes to install a caisson approximately 7 to 15-ft below the ground surface. New structures will be installed in caissons and backfilled with clean, suitable materials. Any disturbed upland and wetland areas will be restored or stabilized upon completion of work. Anchors will also be installed to stabilize new structures. Anchors will be installed by excavating trenches, installing the concrete block anchors, and backfilling trenches. Backfill for anchors in wetlands will consist of hydric soils to maintain hydric conditions in the soil.

Old structures will be typically removed in upland areas and cut to the ground surface in wetlands. In addition to the removal of old structures, old cross-arms, wires, and accessory equipment will be removed off-Site and disposed. Old structure butts may be dug up and removed depending on field conditions and whether or not the remaining pole butt would impact the structural integrity of new structures.

4.1.1. <u>Access</u>

The proposed Rebuild and OPGW Project utilizes existing access routes within the existing X178-2 ROW to the greatest extent practicable. Access into the existing ROW will be obtained from various state and local roadways and private properties where permission has been obtained. Proposed access routes, as shown on Figures 3 and 4, were identified to minimize ground disturbance to the greatest extent practicable while providing safe and efficient access to existing utility structures. Access through existing wetlands within the project area will be completed using temporary timber matting, with the exception of temporary grading access along a steep slope wetland identified as Wetland SH-46.1 in the Town of Sugar Hill. Temporary grading is required for safe access along steep slope wetlands and will be restored to the greatest extent upon completion of work.

4.1.1.1. Road Construction

Proposed access road improvements include 12- to 16'-foot-wide gravel and stone roads with a 2—foot total width limit of disturbance. The roads will provide access to existing utility structures for routine maintenance activities. Improved access will provide reliable, permanent, and quick, efficient access to utility structures for future maintenance activities and when emergency repairs are required (see Appendix E-Photographic Log). Where temporary grading is required in wetlands, geotextile fabric will be placed after grading is completed, followed by addition of stone. Upon completion of work, the stone and geotextile fabric will be removed and temporarily graded wetlands will be restored to pre-existing contours to the greatest extent possible.

4.1.1.2 Wetland and Upland Temporary Matting

Access through existing wetlands in the project area will be completed using temporary timber matting to minimize and prevent rutting in the wetlands (see Figure 4-Alteration of Terrain Permitting Plans). In addition, upland matting may be used rather than improving access with gravel and stone if access is necessary through maintained property owner lawns or farm fields.

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4.1.2 Work Pad Construction

The proposed project includes the construction of up to 100-foot by 100-foot gravel work pads to stage construction equipment and vehicles necessary to replace utility structures. Work pads will be constructed using clean modified riprap (6-to 8-inch diameter) or equivalent stone. In addition, the work pad will be top-dressed with 1.5 to 3-inch diameter clean stone. Lastly, disturbed areas in proximity to

the final work pad configuration will be stabilized with an upland seed mix. Upon completion of work, work pads will be reduced to a 30-foot by 60-foot gravel maintenance work pad. The restored portions of the larger gravel work pad will be seeded and mulched for restoration.

Proposed work pads in wetland areas will be constructed using temporary timber matting and removed upon completion of work.

4.2 CONSTRUCTION SEQUENCE

This proposed project is scheduled to begin in 2024 with work activities completed through 2026. The work is proposed to be undertaken during the late fall and winter following the receipt of all regulatory approvals. The following is a description of the anticipated construction sequence for this type of routine maintenance work. Once contractor(s) are scheduled, a more finalized sequence and schedule will be determined.

- 1. Install sediment and erosion controls in proposed locations, as shown in Figure 4
- 2. Upgrade access routes and build work pads. Timber matting to be used in uplands and wetlands as designated by Figure 4.
- 3. Conduct drilling activities, including drilling of approximately 4-ft diameter holes for caisson placement, approximately 7-15 ft below the ground surface.
- 4. Conduct structure replacement activities, including installation of new structures, and removal of old structures.
- 5. Complete optical ground wire replacement work.
- 6. Reduce 100-foot by 100-foot gravel work pads to 30-foot x 60-foot gravel work pads to remain after construction and apply seed and mulch to restored portions of gravel work pad.
- 7. Remove temporary timber matting and stabilize exposed soils within the ROW and restore temporarily disturbed wetland areas with appropriate wetland seed mix, as necessary.
- 8. Remove erosion and sedimentation controls following stabilization.

4.3 BEST MANAGEMENT PRACTICES

Work will be conducted in accordance with Eversource's standard Best Management Practices (BMPs) as designated by the NHDES Best Management Practices Manual for Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire, dated March 2019. By implementing these BMPs, impacts to both wetland and upland areas will be minimized and prevented to the greatest extent practicable. Where necessary, perimeter protective measures consisting of a silt fence, straw wattle, mulch, and straw bales will be installed around the structures to minimize potential impacts to nearby resource areas. Water bars will be installed in areas of road improvements with steep slopes as identified by the Contractor. If necessary and based on localized Site conditions, a silt fence may be used. Disturbed soil will be seeded and mulched with hay or straw for stabilization as needed following completion of work. No equipment or material will be stored within wetland areas.

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Erosion controls will be implemented during construction as detailed in Note sheets 1 through 3 of Figures 3 and 4 to minimize potential impacts during construction (see Figure 3- Surface Water and Groundwater Overlay Plans and Figure 4- Alteration of Terrain Permitting Plans).

Timber matting will be used in wetlands and in some upland areas to minimize impacts and provide level work pads. Upon completion of work where timber matting is implemented in upland areas, those upland areas will be restored and stabilized to pre-existing conditions, and areas of exposed soils will be seeded and/or mulched. Additionally, should any removal of BMPs be necessary, it will occur during restoration activities.

5.0 REGULATORY COMPLIANCE

5.1 ALTERATION OF TERRAIN

The NHDES requires an AoT permit whenever a project proposes to disturb more than 100,000 sq. ft. of terrain (50,000 sq.ft. if within a protected shoreland). This NHDES requirement, which is found in Administrative Rule Env-Wq-1500, is intended to protect New Hampshire surface waters by controlling soil erosion and managing stormwater runoff from developed areas. The project contains three AoT-regulated areas (referred to respectively as Areas A,B, and C) along the X178-2 Transmission Line ROW based on continuous areas of disturbance. Details on impacts in each regulated area are provided below in Section 5.1.2 Quantification of Impacts Subject to AoT.

5.1.1. <u>Waiver Request: Stormwater Drainage Report: Drainage Area Plan:</u> <u>Hydrologic Soil Group Plans (Env-WQ 1504.09)</u>

Per Env-Wq 1504.09, a waiver is being requested from the requirements to prepare a Stormwater Drainage Report, Drainage Area Plans, and Hydrologic Soil Group Plans because of the new impervious surface is limited to the footprint of new transmission line structures. It is not anticipated that the proposed structures will have a significant impact on -Site drainage patterns. Accordingly, stormwater treatment practices are not proposed. A formal waiver request is provided in Appendix F.

5.1.2- <u>Waiver Request: Measurement of Contiguous Area Disturbed; Inclusion</u> of Plans (Env-WQ 1503.12)

Per Env-Wg 1503.12, a waiver is being requested for including past terrain disturbance in the measurement of contiguous disturbed area included in this X178 Line AoT application. Existing terrain alteration associated with past transmission line maintenance within the X178 ROW is minimal. Any existing tails 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 disturbance beyond the scope of X178 Rebuild and OPGW Project described in this application is not known at this time. 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. Project disturbances included in this application and subsequent permit approvals will be considered if future structure maintenance is proposed within the ROW. Eversource respectfully request a waiver from including past disturbance in this application. A formal waiver request is proved in Appendix F.

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5.1.3 <u>Waiver Request: Deviation from the Approved Plans and Specifications</u> (Env-WQ 1503.21)

Per Env-Wq 1503.21, a waiver is being requested 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 the 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. Eversource respectfully requests a waiver from limiting shifts of the project road centerlines and parking areas to 20 feet. A formal waiver request is provided in Appendix F.

5.1.4 Quantification of Impacts Subject to AoT

The project requires approximately 1,912,751 square feet (sq.ft.) of total impact, including 478,584 sq.ft. of temporary wetland matting and 1,434,210 sq. ft. of ground disturbance along the X178 Transmission Line ROW that requires an AoT permit in accordance with Env-Wq 1502.58. Specific areas and construction activities that significantly alter the terrain are detailed below. Additional details are shown in Figure 4.

AoT Area B-	Easton
Map sheets	4 to 10
Disturbance Type	<u>Impact (sq.ft)</u>
New access	183,583
Gravel Work Pad	309,298
Total AoT Disturbed Area	<u>492,881</u>

Criteria Env-Wq 1502.58 (b) (2) "An area that, over a 10-year period, cumulatively exceeds 100,000 square feet of contiguous area." Work pad dimensions: Up to 100-ft x 100-ft; Access Road width: 16-ft

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5.2 OTHER REGULATORY PROGRAMS

Other regulatory permits and notifications required for the proposed project are summarized below:

<u>Agency</u>	Permit/Notification	<u>Status</u>
<i>Local</i> Town of Easton	Conditional Use Permits, Site Plan Review, Building Permit	Pending
<i>State</i> NHDES	NHDES Wetlands Permit	Pending
<i>Federal</i> EPA (Construction General Permit)	Stormwater Pollution Prevention Plan (SWPPP)	Pending
USACE General Permit	Pre-Construction Notice	Pending

The proposed project includes the replacement of 106 existing utility structures along the X178-2 Transmission Line that exceed AoT thresholds.

This includes a total of approximately 1, 434,210 sq. ft. of the impact associated with access improvements and work pad grading across three separate work areas.

The proposed project is necessary for routine maintenance of the X178 Transmission Lines and to ensure the long-term safety and reliability of the electrical infrastructure.