Documentation of Eversource “Asset Condition” projects failure to use Best Management Practices as defined in ‘Best Management Practices Manual, Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire.’

https://www.nh.gov/nhdfl/documents/new_final_utility_bmp_manual_3_8_19.pdf

(Above: 391/373, 1/2/2024) All photos are of Eversource “Asset Condition projects.

“2.6 Operating Adjacent to Wetlands and Waterbodies

Work adjacent to wetlands and waterbodies, but not necessarily in wetlands and waterbodies, can present potential environmental impacts. Care must be taken when working in these areas in order to protect these existing resource buffers. To minimize erosion potential, preserve low-growing vegetation adjacent to wetlands or waterbodies to the fullest extent possible.

Stumps and rocks must not be removed unless required for safety reasons…”

(Above and below: 391/373 1/2/2024)

“Install temporary erosion controls immediately prior to initial disturbance of the soil. Temporary erosion controls must be properly maintained throughout construction, on a daily basis and reinstalled as necessary until replaced by permanent erosion controls or restoration is complete.” *(Above and below: 391/373 1/2/2024)*

“18 2.11.2 Upland Restoration
If exposed soils present sedimentation issues to adjacent wetlands and waterbodies, provide permanent soil protection. On steep slopes, install erosion control blankets as needed. “
(Below: 391/373 1/2/2024), 2/18/2024)

Best Management Practice 3: Temporary Construction Exit

(Above: 391/373 1/2/2024)

(Below: 391/373 1/2/24)

(Below: U-181 U-194)

“Description
A temporary stabilized construction exit consists of a pad of stone aggregate placed on a geotextile filter fabric, located at any point where traffic will be leaving a construction site to an existing access road way or other paved surface. Its purpose is to reduce or eliminate the tracking of sediment onto public roads by construction vehicles. This helps protect receiving waters from sediment carried by stormwater runoff from public roads.

Only construction traffic leaving the site is required to use the temporary stabilized exit.

Consider providing a separate, unprotected entrance for traffic entering the site. This will increase the longevity of the stabilized exit by reducing heavy loads and the total traffic over the device.

Locate construction entrances and exits to limit sediment leaving the site and to provide for maximum utility by all construction vehicles. Avoid exits that have steep grades or that are located at curves in public roads.

Installation
Temporary stabilized construction exits should meet the following requirements:

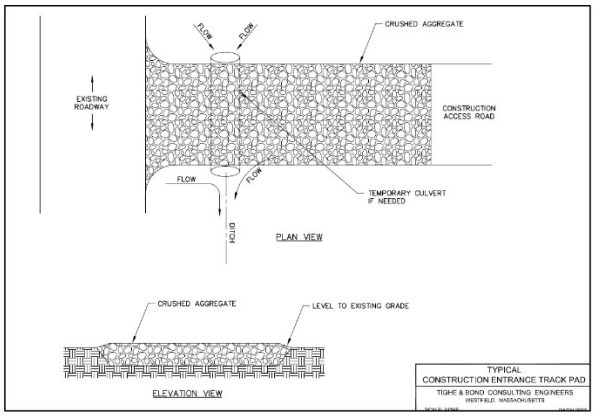
The minimum size stone used should be three-inch crushed stone.

The minimum length of the pad should be 75 feet, except that the minimum length may be reduced to 50 feet if a three- to six-inch high berm is installed at the exit of the project site.

The minimum depth of the pad should be at least six inches thick.

The pad should slope away from the existing roadway.

Natural drainage that crosses the location of the stone pad should be intercepted and piped beneath the pad, as necessary, with suitable outlet protection”



(Below: U-181 E-194, 2/23/2024)

(Above: 2/3/2024 373/391)

Mt. Rd. southerly

Left: Brown Rd. Westerly
Right: Rt. 107 northerly

Left: Brown Rd. westerly

Best Management Practice 4: Coir Logs

“Considerations
Consider using coir logs where slopes are susceptible to sheet and rill erosion, to freeze and thaw activity, or where slopes are difficult to vegetate because of soil movement.

Coir logs can be staked with live stakes, if site conditions warrant. The moisture retained by the coir log will encourage cutting establishment.

Installation
For slope stabilization, it is critical that coir logs are installed perpendicular to soil movement and parallel to the slop contour.

Coir logs, especially if used in slope stabilization, are not effective unless entrenched. Construct trenches half the diameter of the log in which to place the roll. Install rolls from the bottom of the slope and work up.

Lay the coir log along the trench, snugly fitting it against the soil. Ensure no gaps exist between the soil and the fiber roll.

Install stakes at least every three feet apart along the length of the roll. Additional stakes may be driven on the downslope side of the trenches on highly erosive or very steep slopes Consider using coir logs where slopes are susceptible to sheet and rill erosion, to freeze and thaw activity, or where slopes are difficult to vegetate because of soil movement."

(Above: 1/2/24 391/373, Below: E-194/U-181, 2/25/2024)

(Above and below: 1/2/24 391/373)

Best Management Practice 5: Silt Fence

No photos of silt fence available.
Below: 373 and 319 easement, silt, no silt barrier

Below: A-111 easement. Silt, no fence.

“Do not install straw or hay bale barriers across streams, channels, swales, ditches or other drainage ways, or areas with concentrated flows. Such barriers are not capable of effectively filtering the high rates and volumes of water associated with channelized flow. However, they may be used for check dams in applications where installation access or other conditions prevent the use of preferred materials such as stone. In such cases, embed the straw or hay bales within the concentrated flow path; otherwise, they are subject to undercutting and end cutting. This frequently not only results in the bypass of sediment laden-water, but also in the complete failure of the barrier. Such failures typically release sediment accumulation on the upgradient side of the barrier and severe erosion of the channel both upstream and downstream of the device. Under no circumstances should sediment barriers be constructed in live streams or in swales where there is a possibility of a washout.”

(Above: *1/2/24, 2/18/2024; 391/373)* Straw bales installed in swale, not “embedded within the concentrated flow path”. No erosion matting.

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Natural & Cultural Resources

(Right: 391/373: 2/12/2024) No coir no silt barriers, mats uncleaned and extended in width by improper placement of lower matting/support.

Constructing a swamp mat bridge span reduces direct impacts to the wetland surface and maintains aquatic organism passage through the construction area. The number of necessary swamp mats may be reduced using this method.

Below: U-181/E-194 12/2/2023) Wetlands impacts extended by lower layer.

"Description Swamp mats may be used as a temporary bridge over a stream to allow vehicles access to the work site. Small sections of mat are placed within and along the stream, parallel to the flow of water. These act as supports. Mats may then be placed perpendicular to the stream, resting on top of the initial swamp mat supports. It may be necessary to place a large steel plate along the top of the swamp mats for extra stability and to minimize the amount of sediment that could fall between the spaces of each timber.

(Right: U-181/E-194 12/2/2024)
Silty gravel dump above wetland.

Below: 1/2/24, easement with lines 373 and 391, wetland with no matting, coir coils, hay bales, protection of any kind. The equipment used to construct this area was working for a month prior to the photos of the matting being placed.

“Considerations
Minimize impact to wetland areas during installation, use and removal.

Swamp mats should be removed as soon as possible following completion of maintenance activities to reduce compaction of the underlying soil.”

Comment: 2/16/2024: The great swamp access road is still is still under mats from the Greenland Rd crossing of the 345 and the (2)115's. It appears Eversource removed the pads at the structures but the entire road is intact through the swamp. The mats have been there for months with hundreds of trips across them.

Many pole butts are being left in the wetlands. The poles are cut with the stub left sticking up. It is easier than pulling it and backfilling it.

“If construction mats are used ensure they are free of invasives (particular consideration if using timber mats) before arriving on site and clean as with other equipment when moving. Properly treat or dispose of invasive species, or any materials that may harbor invasive species…

Avoid spreading seeds and other propagules from infested to non-infested areas during activities.

Considerations:

a. Treat infestations before other activities begin in order to limit the spread of propagules.

b. Carry out activities under conditions that minimize the risk of spread, e.g., frozen ground, snow cover, seed/propagule absence, etc. (See Figure 1)

c. Clean equipment after activities in infested areas.

d. Run equipment air intake fans in reverse before moving from infested to non- infested areas.

e. Check non-infested areas for new invasions where activities have taken place 1-2 years after the activity.”

https://dnr.wisconsin.gov/sites/default/files/topic/Invasives/bmp_WetlandInvasive.pdf

Below left U-181/E-194, 2/18/2024, partial mat removal in an area colonized by invasive phragmites. No proof that any of the above measures were carried out.

Best Management Practice 15: Erosion Control Blankets

(Below: 1/2/24, easement with lines 373 and 391)

(1/2/24, 373/391) No erosion control blankets, glacial erratic dump pile.

Below: 307/391, 2/12/2024

2/28/2023: "The purpose of the site inspection was in response to concerns about construction practices" (DES)

'The siting of new poles is per engineer specifications and located approximately 10 feet off center from the existing poles. They use a pressure drill rig to pore new holes. Then insert a corrugated metal pipe (CMP) to be used as a sona tube for back filling once the pole is inserted. Depth can be up to 15 feet in the ground. Clean fill in the CMP meets NHDOT 304.04 sieve size and is compacted in lifts. The exterior of the CMP's in uplands is backfilled with either 8 inches of flowable fill or 10 inches of NHDOT 304.4. In wetlands they do not add any additional material around the outside. Site was covered in snow, no active work taking place. All pole work had been completed, new poles were installed, and old poles had been removed. Preparing to close out the work site in coming months."

Item No.	**304.4**
Item	**Crushed Stone (Fine)**
Sieve Size	**Percent Passing By Weight**
6"	---
5"	---
4"	---
3 1/2"	---
3"	---
2 1/2"	---
2"	100
1 1/2"	85 – 100
1"	---
3/4"	45 – 75
1/2"	
#4	10 – 45
# 200 (In Sand Portion)*	---
# 200 (In Total Sample)	0 – 5

* Fraction passing the # 4 sieve

2/12/2024 E-194

Has DES sampled the fill used on any of the Asset Condition projects to see if it meets standards or if it is high in silt?

Does the black pole coating contain PFAs or other toxins?

kris pastoriza march 2024