Orr&Reno

Douglas L. Patch
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Admitted in NH and MA

August 28, 2018

Via Email
Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
c/o New Hampshire Public Utilities Commission
21 South Fruit St., Suite 10
Concord, NH 03301-2429

Re: SEC Docket No. 15-04, Application of Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site And Facility for the Construction of a New 115 kV Transmission Line from Madbury Substation to Portsmouth Substation – Partially Assented to Motion Requesting a Suspension of the Proceedings and that the Parties be included in DES/Applicant Discussions – Supplement to Motion

Dear Ms. Monroe:

Enclosed, on behalf of the Town of Durham and the University of New Hampshire in the above-captioned docket, are documents which the parties received from Eversource late yesterday afternoon. Receipt of this information at the last minute before the commencement of hearings in this docket provides further support for Durham/UNH's Motion Requesting a Suspension of the Proceedings and that the Parties be included in DES/Applicant Discussions. We are proving these documents today to the service list because we believe they should be in the possession of the parties and the Committee prior to the start of hearings tomorrow. We think the documents are extremely relevant to the consideration of our Motion.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance.

Sincerely,

Douglas L. Patch

DLP/eac
Enclosure
cc (via email): Service List in SEC Docket 15-04
2192496_1

Patch, Douglas L.

From: Burgess, Stacey <Stacey.Burgess@MCLANE.com>
Sent: Monday, August 27, 2018 3:57 PM
To: Needleman, Barry; Dumville, Adam; christopher.allwarden@eversource.com; elizabeth.maldonado@eversource.com; Bisbee, Dana; Maynard, Laura (Laura.Maynard@doj.nh.gov); christopher.aslin@doj.nh.gov; Fish, Viggo; jbaker@fatdogshellfish.com; hfrink@keene.edu; jratigan@dtclawyers.com; boepple@nhlandlaw.com; denisann@comcast.net; Geiger, Susan S.; Patch, Douglas L.; 'Richard A. Kanoff (rkanoff@burnslev.com)'; 'shossain@burnslev.com'; vivtarazimiller@gmail.com; jmiller@lydall.com; 'ischwartz@blaschwartz.com'; mab@nhbrownlaw.com; jim_obrien@tnc.org; tirwin@clf.org; dhartford@clf.org; sjudge@wadleighlaw.com; jlanzetta@wadleighlaw.com; dhacurator@comcast.net; janet.mackie@comcast.net
Subject: SEC Docket 2015-04: Seacoast Reliability Project - Discovery [MCLANE-DB.FID1391705]

To All Parties on the Discovery Service List:

Please find a link to access supplemental discovery being provided by the Applicant to the parties in the above-referenced docket.

https://mclanelawfirm.sharefile.com/d-s8dbdcc08bd74dc09

Thank you,
Stacey

MCLANE MIDDLETON
PROFESSIONAL ASSOCIATION

Stacey Burgess
Legal Administrative Assistant
11 South Main Street, Suite 500
Concord, NH 03301
Direct: (603) 230-4430
Fax: (603) 230-4448

website | **email**

Manchester, NH Woburn, MA Concord, NH Portsmouth, NH Boston, MA

From:	Sarah Allen
To:	Adams, Collis (Collis.Adams@des.nh.gov); Comstock, Gregg (Gregg.Comstock@des.nh.gov); david.price@des.nh.gov; Chris Nash (Chris.Nash@des.nh.gov)
Cc:	dena.champy@eversource.com; kurt.nelson@eversource.com; joseph.sperry@eversource.com; apembroke@normandeau.com
Subject:	Agenda for Wed"s meeting
Date:	Monday, June 18, 2018 5:03:00 PM
Attachments:	Agenda 062018.docx

Hello All,

Here are the topics we are looking to cover Wed.

See you then.

Sarah

SARAH ALLEN, *Sr. Principal Wetland Scientist*
Normandeau Associates, Inc.
25 Nashua Road, Bedford, NH 03110
603-637-1158 (direct), 603-714-3085 (cell)
sallen@normandeau.com www.normandeau.com

From: Sarah Allen
To: Adams, Collis (Collis.Adams@des.nh.gov)
Cc: kurt.nelson@eversource.com; dena.champy@eversource.com
Subject: Corps contact and SEC procedural schedule
Date: Thursday, May 10, 2018 12:55:00 PM
Attachments: 2015-04_2018-04-06_procedural_schedule.pdf

Collis,
Thanks for the call today. Norm Farris was my Corps technical contact for sediment sampling/contaminant testing at the Corps.
978-318-8336, Charles.N.Farris@usace.army.mil

He is in the engineering dept. He also recommended Kevin Kotelly and Josh Helms, both in southern MA, as project engineers.

And I've attached the current SEC procedural schedule for this project.

Sarah

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August 17, 2018

Mr. Collis Adams
Wetlands Bureau Administrator
29 Hazen Drive Concord
PO Box 95
Concord, NH 03302-0095

Re: Seacoast Reliability Project - SEC Docket 2015-04
Updated Request for Corrections, Clarifications and Discussion NHDES Permit Conditions issued 2/28/2018

Dear Collis;

Public Service of New Hampshire d/b/a Eversource Energy ("Eversource") appreciates the opportunity we had to meet with you to review and discuss the permit conditions issued by the Department of Environmental Services ("Department" or "DES") for the Seacoast Reliability Project ("SRP").

Based on our discussions with the Department during those meetings we are providing this letter as an update to our April 27, 2018 letter request for permit modifications and corrections. Our request for permit modifications is summarized below. Citation corrections of the permit conditions letter are summarized in Appendix A.

We formally request the following modifications:

Recommendation – Jet plow trial run

Eversource understands that the purpose of the trial jet plow run is for information gathering and determining the potential for appropriate process modification and /or mitigation for the final cable installation using jet plow construction in Little Bay.

We have committed to conducting a trial run within 21 days prior to the cable installation. *See* Supplemental Pre-Filed Testimony of Kenneth Bowes and David Plante at page 3 (July 27, 2018). We respectfully request that DES concur with this commitment. Conducting a jet plow trial run adds significant cost and potential schedule delays to the project. Conducting the trial 90 days prior to the cable installation would require working in the spring months which conflicts with time of year restrictions for aquatic species. Conducting the trial 90 days prior to the installation would also require an additional mobilization by the cable installation contractor which incurs significant costs of approximately $1.5 million for the project and ultimately the rate payers.

Conducting the trial within 21 days is typical of jet plow projects. *See* Supplemental Pre-Filed Testimony of Payson Whitney at pages 10 to 12 (July 2, 2018) (jet plow trial runs are "typically performed about a week or two before the start of the submarine cable installation and last for one or two days" to "assure that the trial will use the same equipment and personnel that will be used for the cable installation, provides a trial during the same seasonal conditions as the installation, and allows vessel crews to familiarize themselves with similar tidal, current, and navigational conditions as will be experienced during the installation"). This will allow for a single mobilization and provide DES with sufficient time for DES to review and respond to the monitoring results.

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General Conditions 1. All work shall be in accordance with plans dated September 14, 2017, submitted as part of the application to the New Hampshire Site Evaluation Committee on April 14, 2016 and supplemental information dated September 15, 2017 and received by the NH Department of Environmental Services (NHDES) on April 14, 2016 and September 15, 2017.

We request that the plan set dated July 25, 2018 that was submitted with the latest supplement (dated July 27, 2018) be referenced.

AOT-4. All activities shall comply with the plans and information provided with the Alteration of Terrain application submitted as part of the application to the New Hampshire Site Evaluation Committee, dated April 12, 2016, and the conditions provided below. Any proposed modifications which may affect surface water quality or quantity, shall receive NH DES approval prior to implementation.

We request the condition be modified to reference the most recent plan set submitted July 27, 2018.

WET-1 All work shall be in accordance with plans dated September 14, 2017, submitted as part of the application to the New Hampshire Site Evaluation Committee on April 14, 2016 and supplemental information dated September 15, 2017 and received by the NH Department of Environmental Services (NHDES) on April 14, 2016 and September 15, 2017.

We request this condition be modified to read.

"All work shall be in accordance with the environmental plan set dated July 25, 2018, submitted as part of ….supplemental information submitted July 27, 2018…

WET-2. At least thirty (30) days prior to the start of construction, the Applicant shall conduct a training program for construction staff, contractors, sub-contractors, environmental inspectors, the independent environmental monitor, and NH DES staff. The training program shall include, but not limited to, spill prevention and cleanup responses, a review and description of the allowable environmental conditions and methods to be implemented during construction, and contingency plans that will be implemented in the event that environmental conditions are exceeded.

We request that this condition be modified to read:

"Not more than thirty (30) days prior to the start of construction…"

WET-11. Transmission structures to be removed shall be cut at ground level and removed rather than pulled from the ground or foundation, to minimize impacts to surrounding habitat.

In the event that there may be a construction need to remove a pole butt, we request this condition be modified as follows:

"Unless authorized by NHDES, transmission structures to be removed shall be cut at ground level and removed rather than pulled from the ground or foundation, to minimize impacts to surrounding habitat."

WET-17. Filter fabric shall be installed under temporary wetland fill areas to isolate fill from the natural hydric soils.

We request that this condition be modified as follows:

"Filter fabric shall be installed under temporary wetland fill areas to isolate temporary earthen fill from the natural hydric soils. Filter fabric, silt socks and/or straw wattle material shall be used in conjunction with timber mats in areas where surface waters are crossed.

WET-20. All refueling of equipment shall occur outside of surface waters or wetlands during construction. Machinery shall be staged and refueled in upland areas only.

There are sometimes instances where equipment cannot be feasibly moved (such as drilling equipment) from wetlands prior to fueling. In such instances spill containment measures are taken. We request that this condition be written as follows:

"All refueling of equipment shall occur outside of surface waters or wetlands during construction. Machinery shall be staged and refueled in upland areas only. When equipment cannot practicably be moved away from a wetland, refueling in a wetland can be allowed if secondary containment is provided in accordance with the guidance in DES Fact Sheet WD-DWGW 22-6, dated 2010, and all other practices described in that Fact Sheet are complied with."

WET-25 Any further alteration impact areas for the project beyond the application materials received September, 2017, that are subject to RSA 482-A jurisdiction will require a new application and further permitting.

RSA 482-A:3 XIV(e) allows for changes to the proposed or previously approved acreage of the permitted fill or dredge area as long as the change is not a significant amendment (i.e. a change of less than 20 percent). Linear projects the size of SRP often require minor modifications in impact areas. Eversource believes that the submittal of an entirely new application for a minor modification places an unnecessary hardship on the Applicant. We request that the Department modify this condition and revert to the standard under the statute RSA 482-A:3 XIV(e) as well as prior practice before the SEC. *See e.g.*, Merrimack Valley Reliability Project, Docket 2015-05.

WET-41. Eelgrass Survey: To assess the impact of work associated with laying cable in Little Bay on eelgrass, the Applicant shall conduct an eelgrass survey in the Little Bay estuary the summer before construction commences and approximately one year after work is completed. At least ninety (90) days prior to the scheduled date for conducting the pre-construction survey, the Applicant shall submit a plan...

We request that this condition be modified as follows:

Eelgrass Survey: To assess the impact of work associated with laying cable in Little Bay on eelgrass, the Applicant shall conduct an eelgrass survey in the Little Bay estuary the summer before construction commences ~~and approximately one year after work is completed~~. At least ninety (90) days prior to the scheduled date for conducting the pre-construction survey, the Applicant shall submit a plan describing

- *how, when and where the survey will be conducted;*
- *how results will be assessed to determine impact on eelgrass;*

- *how and when results will be reported to NHDES;*
- *mitigation measures that will be implemented based on eelgrass impacts and recovery; and*
- *when the data will be input electronically into the NHDES Environmental Monitoring Database.*

The Applicant shall then implement the approved plan. To the maximum extent practicable, the methodology for conducting the survey shall be consistent with recent surveys conducted for the Piscataqua River Estuaries Program (PREP). Results of the pre-construction survey shall be submitted to NH DES no less than thirty (30) days prior to the scheduled cable installation date and shall be approved by NHDES prior to cable installation in Little Bay. Eversource will also propose a post-construction survey to be approved by NHDES.

Modifications to this condition may be allowed at the discretion of NHDES.

WET-46. NHDES Shellfish Program Monitoring and Reporting Requirements.

To allow for agreed upon modifications to the shellfish monitoring plan we request that conditions 46b1 through 46b5 be qualified with the following:

"Unless otherwise authorized by NHDES..."

WET-50. Training: At least thirty (30) days prior to the scheduled start of cable installation in Little Bay, the Applicant shall conduct a training program for construction staff, contractors, sub-contractors, environmental inspectors, the independent environmental monitor, and NH DES staff. The training program shall include, but not limited to, a review of the cable installation methods, spill prevention and cleanup responses, allowable environmental conditions and measures (i.e., contingency plans) that will be implemented in the event that environmental conditions are exceeded.

We request that this condition be modified to read:

"Not more than thirty (30) days prior to the start of construction..."

WET-54. Wind: Beginning at least twelve (12) hours prior to planned cable installation activities, the independent environmental monitor shall monitor the latest National Weather Service weather forecast for Great Bay/ Adams Point. If sustained wind speeds in excess of fifteen (15) mph are forecast, the environmental monitor shall, based upon predicted and observed conditions within Little Bay, and in conjunction with NH DES, decide if cable installation should be allowed to commence.

Request that the wind speed in this condition be increased to 20 mph per experience of ESS Group, Inc. *See* Supplemental Pre-Filed Testimony of Payson Whitney and Matthew Ladewig at page 7 (July 20, 2018). As described in the Supplemental Pre-Filed Testimony submitted by ESS, "using the Beaufort Wind Scale, a 15 mph wind is a moderate breeze that results in small waves, which is fairly comment even on nice weather days." Id. "A wind speed of 20 mph (a fresh breeze on the Beaufort Wind Scale that results in moderate waves) may be a more appropriate threshold." Id. We concur with ESS's conclusions.

WET-55. Cable Depths and As-Builts: To the maximum extent practicable, the maximum jet plow and hand-jetting trench depths shall be in accordance with the Document 1 of the supplemental information filed with the Site Evaluation Committee on June 30, 2017 titled "Revised Modeling Sediment Dispersion from Cable Burial for Seacoast Reliability Project, Upper Little Bay, New Hampshire, June 2017. Of the approximate 4265 total feet of cable to be buried under Little Bay, no

more than approximately 2431 feet shall be buried with a maximum of 5 feet of cover and the remaining cable shall be buried with a maximum of 3.5 feet of cover. As-Builts (including plan and profiles) showing the actual depths and locations of the cable as well as the location of concrete mattresses shall be provided to NH DES within sixty (60 days) following completion of cable installation. If directed by NH DES, as-built information for the portion of cables installed by jet plow (not hand-jetting) shall be provided to NH DES after each individual cable installation and prior to the next cable installation.

We request this condition be revised as follows:

To the maximum extent practicable, the maximum jet plow and hand-jetting trench depths shall be in accordance with the depths defined in the design drawings submitted July 27, 2018, and in conjunction with the Document 1 of the supplemental information filed with the Site Evaluation Committee on June 30, 2017 titled "Revised Modeling Sediment Dispersion from Cable Burial for Seacoast Reliability Project, Upper Little Bay, New Hampshire, June 2017. As-Builts (including plan and profiles) showing the actual depths and locations of the cable as well as the location of concrete mattresses shall be provided to NH DES within sixty (60 days) following completion of cable installation. If directed by NH DES, as-built information for the portion of cables installed by jet plow (not hand-jetting) shall be provided to NH DES after each individual cable installation and prior to the next cable installation.

WET-59. Minimum Time Between Cable Installations: After a cable is buried by jet plowing, installation of the next cable by jet plowing shall not commence for at least five (5) days.

We request that this condition be modified as follows:

Minimum Time Between Cable Installations: Unless authorized by NHDES, after a cable is buried by jet plowing, installation of the next cable by jet plowing shall not commence for at least five (5) days.

WET-60. Screen on Jet Plow Intake: The end of the jet plow intake pipe shall be equipped with a screen with openings no greater than ¼-inch in diameter.

Based on clarification that we received from our contractor, we request that this condition be struck. Two-inch-mesh screens are typically used to prevent coarse debris from entering the pump. Screens smaller than 2 inches present mechanical challenges in shallow water such as will be encountered in Little Bay.

WET-61. The salt marsh vegetation shall be removed with at least 18 inches of soil intact in blocks as large as practicable to be set aside, right side up, in a windrow to be protected from desiccation to ensure replacement and support existing functions.

We request that this condition be modified as follows:

"The salt marsh vegetation shall be removed to the maximum depth allowable by the substrates, and under the direction of the Environmental Monitor. The blocks will be as large as practicable to be set aside, right side up, and protected from dessication to ensure successful replacement and to support existing functions."

WET-64 and WET-71 through 81

These conditions pertain to mitigation projects in the Towns of Durham and Newington. Since funds for

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13 Legends Drive
Hooksett, NH 03106

these projects will be distributed through the ARM Fund at the discretion of the NHDES, we request that these conditions be struck.

WET-65. The living shoreline and salt marsh restoration shall be monitored for a minimum of five (5) years. Performance standards shall be established and approved by NH DES and the ACOE to evaluate the project.

We request "living shoreline and" be struck from this condition, as it relates to the Wagon Hill Farm mitigation for the Town of Durham.

WET-67. The approval is not valid until NH DES receives payment of $349,834.26 dollars into the Aquatic Resource Mitigation Fund ("ARM"). The total may be revised during final design and the SEC permitting process. The final payment amount shall be confirmed by NHDES and the one-time payment received within 120 days of the SEC certificate.

See updated dollar amounts on attached PDF.

WET-68. The mitigation package may include the designation of mitigation funds to the Towns of Durham and Newington. The preliminary payment amounts equal $213,763.28 and $120,990.23 respectively. The two projects will provide benefit to tidal and non-tidal resources and the combination of funds going to these efforts meet the requirements of RSA 482-A:28.

See updated dollar amounts on attached PDF.

SHORE-1 in all 3 shoreland permits. All work shall be done in accordance with plans by Normandeau Associates dated Jan. 7, 2016 and received by the NHDES on April 14, 2016.

Update dates to reference "as modified in Applicant's January 11, 2017 response to NHDES's data request dated November 30, 2016.

SHORE-2. This permit does not authorize the removal of trees or saplings within the waterfront buffer that would result in a tree and sapling point score below the minimum required by RSA 483-B:9, V,(a),(2),(D),(iv)

Request this be struck.

Sincerely,

Eversource Energy

Kurt I. Nelson
Sr. Licensing and Permitting Specialist

EVERSOURCE ENERGY

13 Legends Drive
Hooksett, NH 03106

APPENDIX A.

Requested Text Corrections to DES Final Conditions

Site Evaluation Committee Docket No. 2015-04
NHDES Final Decision

***All the DES numbers here are from the Original DES Permit APP from the Original SEC Filing

All New Numbers from Supp 2 Docs 5/8 - Little Bay Impax & Rev DES Permit Form

SEACOAST RELIABILITY PROJECT, NHSEC DOCKET # 2015-04
WETLANDS BUREAU
607,777 SF **2018 FINAL DECISION**

PPROVAL WITH THE FOLLO 598,307 SF **ONS:**

PROJECT DESCRIPTION: 307,154 SF

269,987 SF

Dredge and fill a total of 643,358 square feet (14.7 acres) of wetlands, surface waters, and upland tidal buffer zone, including 637,188 square feet of temporary impacts for installation of timber access mats and stream crossings in freshwater wetlands (342,816 square feet), excavation within the upland 9470 SF buffer zone (21,166 square feet), and hand trenching and jet plowing to install a submarine cable in the Little Bay estuary (273,206 square feet); 6,170 square feet of total permanent impacts for transmission structure installation in freshwater wetlands (823 square feet) and upland tidal buffer zone (11 square feet), and placement of concrete mattresses over shallow cable installation in Little Bay (5,336 square feet); for construction of a new 12.9 mile 115v transmission line within the existing ROW and 8,681 SF designated cable crossing, extending from Madbury Substation, through the towns of Durham and Newington, to the substation in Portsmouth. Kv

778 SF

Compensatory mitigation for permanent and US Army Corps of Engineers wetland impacts consists of a one-time payment of $349,834.26 dollars into the Aquatic Resource Mitigation Fund ("ARM") based on the impacts determined to date. The funds may be designated to a project in the Town of Durham for a living shoreline and salt marsh restoration effort at Wagon Hill Farm, and to a project in the Town of Newington for conservation of a 10 acre parcel near Knight's Brook.

From Supp 2 Doc 5 - Little Bay Impax Report

PROJECT SPECIFIC CONDITIONS:

GENERAL CO July 25, 2018

1. All work shall be in accordance with plans dated September 14, 2017, submitted as part of the application to the New Hampshire Site Evaluation Committee on April 14, 2016 and supplemental information ~~dated September 15, 2017 and~~ received by the NH Department of Environmental Services (NHDES) on April 14, 2016 and September 15, 2017.
2. At least thirty (30) days prior to the start of construction, the Applicant shall conduct a training program for construction staff, contractors, sub-contractors, envir[illegible] July 27, 2018 independent environmental monitor, and NHDES staff. The training program shall include, but not limited to, spill prevention and cleanup responses, a review and description of the allowable environmental conditions and methods to be implemented during construction, and contingency plans that will be implemented in the event that environmental conditions are exceeded.
3. At least sixty (60) days prior to the start of construction, final diversion and dewatering plans shall be provided for the crossing of College Brook for NHDES review and approval.
4. Appropriate siltation/erosion/turbidity controls shall be in place prior to construction, shall be maintained during construction, and remain in place until the area is stabilized. Silt fence(s) must be removed once the area is stabilized.

From Supp 1 - Doc 1

55. Cable Depths and As-Builts: To the maximum extent practicable, the maximum jet plow and hand-jetting trench depths shall be in accordance with the Document 1 of the supplemental information filed with the Site Evaluation Committee on June 30, 2017 titled "Revised Modeling Sediment Dispersion from Cable Burial for Seacoast Reliability Project, Upper Little Bay, New Hampshire, June 2017. Of the approximate 4265 total feet of cable to be buried under Little Bay, no more than approximately 2431 feet shall be buried with a maximum of 5 feet of cover and the remaining cable shall be buried with a maximum of 3.5 feet of cover. As-Builts (including plan and profiles) showing the actual depths and locations of the cable as well as the location of concrete mattresses shall be provided to NHDES within sixty (60 days) following completion of cable installation. If directed by NHDES, as-built information for the portion of cables installed by jet plow (not hand-jetting) shall be provided to NHDES after each individual cable installation and prior to the next cable installation.
56. Silt Curtains: To the maximum extent practicable, silt curtains shall be used to minimize turbidity during installation of the underground cables in the Little Bay Estuary. As a minimum, silt curtains shall be installed when divers hand-jet the cables on the west side of Little Bay and along approximately 311 feet (of the total 541 feet) of cable that is to be hand jetted on the east side of the estuary. At least ninety (90) days prior to removal of the silt curtains, the Applicant shall consult with and receive NHDES approval of, a plan to remove the silt curtains in a manner that will minimize turbidity associated with resuspension of the sediment deposited within the silt curtains due to hand-jetting. Monitoring to determine the effectiveness of the plan shall comply with the Water Quality Monitoring and Adaptive Management Plan (condition 45).
57. Water-lift devices to assist the diver operated hand-jetting of sediment in Little Bay shall not be used.
58. Timing of Hand-Jetting and Jet Plowing: Unless otherwise authorized by NHDES, and to limit the combined impacts of construction activities on Little Bay water quality, hand-jetting shall not be conducted for the period beginning six hours before and ending six hours after jet plow cable installation or within six hours of turbidity criterion exceedances at the mixing zone boundary in the vicinity of the hand-jetting operation(s).
59. Minimum Time Between Cable Installations: After a cable is buried by jet plowing, installation of the next cable by jet plowing shall not commence for at least five (5) days.
60. Screen on Jet Plow Intake: The end of the jet plow intake pipe shall be equipped with a screen with openings no greater than ¼-inch in diameter.

SALT MARSH AND SHORELINE RESTORATION

61. The salt marsh vegetation shall be removed with at least 18 ~~inch~~ not feasible. Fringe marsh has 6" or less of peat underlain by cobble and ledge as large as practicable to be set aside, right side up, in a windrow to be prot ensure replacement and support existing functions .
62. After the utility line is installed in the trench, the blocks of soil ar ced back with exceptional care being taken to reestablish the same surfac nding marsh.
63. Final estimates of the area of salt marsh to be restored and linear feet of shoreline shall be provided for review and approval by NHDES and ACOE.
64. Preliminary plans of the living shoreline and salt marsh restoration shall be submitted and approved by NHDES and ACOE.

65. The living shoreline and salt marsh restoration shall be monitored for a minimum of five (5) years. Performance standards shall be established and approved by NHDES and the ACOE to evaluate the project.
66. Seed mix used within the restoration areas shall be a wetland seed mix appropriate to the area and shall be applied in accordance with manufacturers' specifications.

WETLANDS MITIGATION

From Supp 2 - Doc 5

67. The approval is not valid until NHDES receives payment of $349,834.26 dollars into the Aquatic Resource Mitigation Fund ("ARM"). The total may be revised during final design and the SEC permitting process. The final payment amount shall be confirmed by NHDES and the one-time payment received within 120 days of the SEC certificate.
68. The mitigation package may include the designation of mitigation funds to the Towns of Durham and Newington. The preliminary payment amounts equal $213,763.28 and $120,990.23 respectively. The two projects will provide benefit to tidal and non-tidal resources and the combination of funds going to these efforts meet the requirements of RSA 482-A:28.
69. The final mitigation payment as determined during final design and SEC permitting process would be made to NHDES to be held in an account specific to each project. Payment shall be provided to NHDES after SEC approval, upon determination of final impact amounts, and prior to construction.
70. Any funds remaining after the Durham and Newington projects are completed shall revert to the ARM fund for use in the next ARM Fund competitive grant round.
71. This permit is contingent upon the execution of conservation easement on 10 acres of land in Newington as depicted on plans and i[cite more recent doc - Amendment 1, App 34a, App C., dated March 29, 2017] Normandeau Associates as received by NHDES on October 18, 2016.
72. The draft deed for the conservation p[ ]gton shall be reviewed and approved by NHDES and the ACOE prior to appr[ ]must follow a forest management plan and shall only be conducted specifica[ ]nagement.
73. The conservation parcel proposed in Newington shall have a minimum of a 100 foot no-cut buffer adjacent to aquatic resources and there shall be no increase in agriculture on the property. If these measures cannot be achieved the funds will revert to the ARM Fund for issuance during a future competitive grant round.
74. The conservation parcel proposed in Newington shall be protected through a conservation easement to the Town of Newington within 240 days of the issuance of the SEC certificate.
75. Following permit issuance and prior to recording of the conservation deed, the natural resources existing on the conservation parcel proposed in Newington shall not be removed, disturbed, or altered without prior written approval of NHDES and the easement holder.
76. The conservation deed to be placed on the conservation parcel proposed in Newington shall be written to run with the land, and both existing and future property owners shall be subject to the terms of the restrictions.
77. The plan noting the conservation easement with a copy of the final easement language shall be recorded with the Registry of Deeds Office for conservation parcel proposed in Newington. A copy of the recording from the County Registry of Deeds Office shall be submitted to NHDES prior to the start of construction.
78. The Applicant shall prepare a final baseline documentation report that summarizes existing conditions within the conservation area. Said report shall contain photographic documentation of

the easement area that have been taken in the absence of snow cover, and shall be submitted to the NHDES within 240 days of the issuance of the SEC certificate to serve as a baseline for future monitoring of the area.

79. The conservation area shall be surveyed by a licensed surveyor, and marked by monuments [stakes].
80. NHDES shall be notified of the placement of the parcel boundary monuments to coordinate on-site review of their location.
81. Activities in contravention of the conservation easement shall be construed as a violation of RSA 482-A, and those activities shall be subject to the enforcement powers of NHDES (including remediation and fines).

INVASIVE PLANTS

82. Precautions shall be taken to prevent import or transport of soil or seed stock containing nuisance or invasive species such as Purple Loosestrife, Knotweed, or Phragmites. The contractor responsible for work shall appropriately address invasive species in accordance with the NHDOT "Best Management Practices for Roadside Invasive Plants (2008)".
83. To prevent the introduction of invasive plant species to the site, the Applicant's contractor(s) shall clean all soils and vegetation from construction equipment and matting before such equipment is moved to the site.
84. The Applicant shall control invasive plant species such as Purple loosestrife (Lythrum salicaria) and Common reed (Phragmites) by measures agreed upon by the NHDES Wetlands Program if any such species is found in the stabilization areas during construction or during the early stages of vegetative establishment.

FINDINGS:

1. NHDES recommends granting a waiver of Env-Wt 304.11(b) which limits the timi tidal water between November 15 and March 15 based on support in writing by Department (NHF staff..
2. This project is cla per administrative rule Env-Wt 303.02(c), as wetla impacts are great et and Env-Wt 303.02 as work is proposed in tidal waters. .
3. On April 14, 2016, NHDES received a wetlands application (file #2016-00965) that requested 643,358 square feet of wetlands, surface waters, and upland tidal buffer zone impact as part of the 12.9 mile project, of which 6,170 square feet is permanent impact, and 637,188 square feet is temporary.
4. The project proposes all work to be within an existing powerline right-of-way (ROW).
5. NHDES finds the need for the proposed impacts has been demonstrated by the Applicant per administrative rule Env-Wt 302.01, as described and detailed in the wetlands and SPGP applications.
6. NHDES finds that the project is necessary to provide a parallel path to enhance the existing 115kV loop between the Deerfield and Scobie Pond Substations in order to address reliability concerns in the New Hampshire seacoast region, which has been identified by the Independent System Operator-New England (ISO-NE).
7. The Applicant, working with ISO-NE, conducted a Needs Assessment study ("Needs Assessment") finding that the New Hampshire seacoast region requires additional transmission capacity to support the reliable delivery of electric power to meet the region's current demand and future increased demand.

Outdated impact numbers (correct for Apr 12 application)

April 12 is the date of the app and when we delivered

607,777

9,470

598,307

8. The Applicant's Needs Assessment found that there were violations of the transmission system criteria in the seacoast area under certain potential system operating conditions. As a result, a Solution Study was conducted to identify potential solutions to correct the violations.
9. The Applicant's Solution Study provided solution alternatives, one of which included the Madbury to Portsmouth project. ,The Madbury to Portsmouth project was selected by ISO-NE as the preferred alternative solution, consistent with regional transmission planning standards as the lowest cost and best alternative.
10. The Applicant indicates their application and plan is the alternative with the least adverse impact to areas and environments under the department's jurisdiction per administrative rule Env-Wt 302.03(a)(2), and with Conditions ("NHDES Permit Conditions")and are listed in greater detail as follows:
    a) Permanent impacts to freshwater wetlands are minor (823 square feet) and have been avoided or minimized where possible. 778SF
    b) Temporary impacts to surface freshwater are associated with temporary access across freshwater wetlands to the work sites along the existing ROW.
    c) The majority of small streams will be temporarily bridged with timber matting and temporary culverts necessary in only two locations.
    d) Construction Best Management Practices (BMP's), on-site monitoring and restoration of temporarily impacted areas will be employed.
    e) Permanent impacts to estuarine wetlands (5,336 square feet) have been avoided or minimized where possible. The impacts associated with the placement of the concrete mattresses are limited to surficial protection measures that are required by the National Electrical Safety Code for submarine cables that cannot be buried to the required depth due to bedrock or other limiting material. 8681 SF
    f) Impacts to estuarine wetlands are restricted to an existing cable crossing corridor which has been utilized in the past and contains de-energized cables that are obsolete.
11. The Applicant has provided the type, classification, and function and value of the impacted wetlands as required by Env-Wt 302.04(a)(3) and Env-Wt 302.04(a)(17).
12. The Applicant has characterized the type of wetlands to be impacted as: freshwater wetlands (49%) associated with the project are combinations of palustrine scrub-shrub and emergent with other combinations of scrub-shrub, emergent, forested, and open water. Estuarine wetlands associated with the project are primarily intertidal flat, subtidal, saltmarsh, and rocky shore. The Applicant indicates the functions and values of the impacted wetlands will not have an adverse impact by employing construction BMP's, on-site monitoring, and restoration of temporarily impacted wetlands.
13. On November 10, 2016, and after NHDES review of the proposed project, additional information was requested in the form a written Progress Report to the Site Evaluation Committee (SEC), in which several comments specifically requested that the Applicant provide additional information to clarify the project and further avoid and minimize wetland and surface water impacts.
14. The Applicant provided partial responses to the NHDES Progress Report on January 11, 2017 and June 30, 2017.
15. On March 29, 2017, the Applicant requested an amendment to the wetlands application to modify the project in four ways: (a) siting an additional 2,680 square feet of the project underground across the Darius Frink Farm in the Newington Center Historic District and in the Hannah Lane residential neighborhood; (b) altering the route for the underground design in Newington through Gundalow

Landing; (c) relocating the site of the underground-to-overhead transition structure in Newington and; (d) altering segments of the overhead design to accommodate concerns raised by the NH Department of Transportation, residents, and town officials.

16. On August 1, 2017, and after NHDES review of the Applicant's responses of January 11, 2017 and June 30, 2017, additional information was requested in the form a written Progress Report to the Site Evaluation Committee (SEC), in which several comments specifically requested that the Applicant provide additional information to clarify the project and further avoid and minimize wetland a[607,777]water impacts.
17. On September 15, 2017, the Applicant provided responses to the NH[Septmeber 19, 2017 was the submittal date]gust 1, 2017.
18. Based on the latest revised plans submitted on September 15, 2017, [illegible]g 643,358 square feet of wetland impact as part of the project, of which 6,170 square feet is permanent wetland impact, and 637,188 square feet is considered temporary wetland impact that will be restored upon completion.
19. The Applicant has coordinated directly with the Natural Heritage Bureau (NHB) regarding impacts to plant communities from [598,307] project, and the Applicant will directly coordinate with the NHB prior to and during construction to minimize other potential impacts to sensitive plant species and exemplary natural communities. Additional coordination and review and approval as required by NHDES Permit Conditions are intended to address the requirements of Env-Wt 302.04(5) and (7)e.
20. The Applicant has coordinated directly with the NH Fish and Game Department (NHFGD) regarding impacts to sensitive species and habitats from the proposed project, and the Applicant will directly coordinate with the NHFGD prior to and during construction to minimize other potential impacts to sensitive species and habitats. Additional coordination, review and approval as required by NHDES Permit Conditions are intended to address the requirements of Env-Wt 302.04(a)(7).
21. The Applicant has provides support with plan and example that each factor listed in Rule Env-Wt 302.04(a), Requirements for Application Evaluation, has been considered in the design of the project and through NHDES Permit Conditions.
22. All temporary wetland impact areas will be stabilized and restored once construction is completed in each section, and in accordance with the Temporary Impacts Restoration Plan as described in Section 3.3.6 of the Natural Resource Impact Assessment dated March 2017 and Salt Marsh Protection and Restoration Plan plans dated June 30, 2017. NHDES understands that the temporary nature of the surface areas to be impacted and these areas will be fully addressed through plan and approved associated permit conditions addressing Env-Wt 302.04(a)(6).
23. The Applicant will coordinate with the U.S. Coast Guard, Pease Development Authority-Division of Ports and Harbors and NH Marine Patrol to ensure that a Notice to Mariners is issued to minimize impacts on public commerce, navigation, recreation and the extent to which the project interferes with or obstructs public rights of passage or access to address the requirements of Env-Wt 302.04(a)(8) and Env-Wt 302.04(a)(10).
24. Per Env-Wt 501.01(c), abutter notification is not required for projects within ROW's.
25. All work is within the Applicant's existing ROW which convey the right to construct and replace transmission lines in support of the reliability of the transmission system. The majority of the wetland impacts are temporary and restored upon completion of work and Best Management Practices ("BMP's") will be employed throughout construction to minimize the impact upon abutters

and fully addressed through plan and approved associated permit conditions addressing Env-Wt 302.04(a)(11).

26. The Applicant prepared a Visual Assessment ("VA") dated October 7, 2016 which demonstrated that the project will not have an unreasonably adverse effect on aesthetics to address the requirements of Env-Wt 302.04(a)(9).
27. The Applicant has demonstrated that the project will benefit the health, safety, and well-being of the general public by improving the existing network of electrical delivery system in seacoast New Hampshire to address the requirements of Env-Wt 302.04(a)(12). The project will facilitate the transfer of power through the seacoast region to ensure the availability of sufficient electricity during high demand periods, which frequently occurs during the summer months.
28. Pursuant to RSA 482-A:11,IV, the associated prime wetlands permitting process is waived, for projects occurring within designated prime wetland located in Newington. The Applicant has demonstrated that the project represents primarily temporary wetland disturbance and minimal permanent impact for necessary installation of a public utility and will not affect the functions and values of the prime wetlands. Temporary impacts to the prime wetlands will be restored to original condition upon completion of work.
29. Compensatory mitigation for wetland impacts may include the preservation of approximately 10 acres of land on a 13 acre parcel on Old Post Road (Map 17/Lot 15) that borders an existing conservation parcel and encompasses a section of Knights Brook Prime Wetland. Compensation for impacts in the Salmon Falls-Piscataqua service area includes a payment into the Aquatic Resource Mitigation (ARM) Fund of $349,834.26. The funds may be designated to the Town of Newington for conservation of the 10 acre parcel near Knight's Brook, as described above, and a project in the Town of Durham for a living shoreline and salt marsh restoration effort at Wagon Hill Farm.
30. The mitigation package described above also accounts for all secondary wetland impacts (e.g. clearing upland buffer adjacent to wetlands), as determined and required by the Army Corps of Engineers.
31. Overall, NHDES has determined that the proposed mitigation plan meets the intent of the Mitigation Rules of Chapter 800.
32. Public hearings will be held by the New Hampshire SEC to allow citizens the opportunity to comment on the overall project.
33. The New Hampshire SEC has jurisdiction over the entire project and therefore will ultimately decide if the project is approved or denied.
34. NHDES' decision is issued in letter form and upon approval by the NH SEC, and receipt of the ARM fund payment, the NHDES shall issue a posting permit in accordance with Rule Env-Wt 803.08(f).
35. The payment into the ARM fund shall be deposited in the NHDES fund for the "Salmon Falls-Piscataqua Rivers" watershed per RSA 482-A:29.
36. The surface waters (including wetlands) affected by the Activity, are surface waters under Env-Wq 1702.44 and are therefore subject to New Hampshire Surface Water Quality Standards (Env-Wq 1700).

SEACOAST RELIABILITY PROJECT, NHSEC DOCKET # 2015-04
SHORELAND PROTECTION PROGRAM
FEBRUARY 28, 2018 FINAL DECISION

RECOMMEND APPROVAL WITH THE PERMIT CONDITIONS INCLUDED WITH THE ENCLOSED 7 PAGE LETTER FROM NHDES TO THE NHSEC DATED NOVEMBER 30, 2016.

Should reference new plans and permit application from Applicant's 01/11/17 response to DES's 11/30/16 data request.

Little Bay - Newington

SHORELAND IMPACT PERMIT 2016-00968

Permittee:	**Public Service of New Hampshire** **c/o Kurt Nelson** **13 Legends Drive** **Hooksett, NH 03106**
Project Location:	**44 Gundalow Landing, Newington** **Newington Tax Map/Lot No. 22 / 5**
Waterbody:	**Little Bay**

6,078 SF per SRP response to DES Data Request 1/11/17

This is from the original filing/permit

E: 05/12/2016 EXPIRATION DATE: 05/12/2021

Based upon review of the above referenced application, in accordance with RSA 483-B, a Shoreland Impact Permit was issued. This permit shall not be considered valid unless signed as specified below.

PERMIT DESCRIPTION: Impact 15,918 sq. ft. within the protected Shoreland in order to run transmission lines within a right-of-way. The project includes the removal of trees and trenching.

THIS APPROVAL IS SUBJECT TO THE FOLLOWING PROJECT SPECIFIC CONDITIONS:

1. All work shall be in accordance with plans by Normandeau Associates dated January 7, 2016and received by the NH Department of Environmental Services (DES) on April 14, 2016.
2. This permit does not authorize the removal of tre[illegible] waterfront buffer that would result in a tree and sapling point score bel[illegible] ed per RSA 483-B:9, V, (a), (2), (D), (iv).
3. No more than .7% of the area of the lot within th[illegible] all be covered by impervious surfaces unless additional approval is obt[illegible]
4. All activities conducted in association with the c[illegible] t shall be conducted in a manner that complies with applicable criteria of [illegible] hapter Env-Wq 1400 and RSA 483-B during and after construction.

Should reference new plans and permit application from Applicant's 01/11/17 response to DES's 11/30/16 data request.

5. Erosion and siltation control measures shall be installed prior to the start of work, be maintained throughout the project, and remain in place until all disturbed surfaces are stabilized.
6. Erosion and siltation controls shall be appropriate to the size and nature of the project and to the physical characteristics of the site, including slope, soil type, vegetative cover, and proximity to wetlands or surface waters.
7. No person undertaking any activity in the protected shoreland shall cause or contribute to, or allow the activity to cause or contribute to, any violations of the surface water quality standards established in Env-Ws 1700 or successor rules in Env-Wq 1700.
8. Any fill used shall be clean sand, gravel, rock, or other suitable material.

Oyster River - Durham

SHORELAND IMPACT PERMIT 2016-00969

Permittee:	**Public Service of New Hampshire** **c/o Kurt Nelson** **13 Legends Drive** **Hooksett, NH 03106**
Project Location:	**Main Street, Durham** **Durham Tax Map/Lot No. 12 / 7-2**
Waterbody:	**Oyster River**

This is from the original filing but no changes at Oyster River crossing

APPROVAL DATE: 05/12/2016 **EXPIRATION DATE: 05/12/2021**

Based upon review of the above referenced application, in accordance with RSA 483-B, a Shoreland Impact Permit was issued. This permit shall not be considered valid unless signed as specified below.

PERMIT DESCRIPTION: Impact 29,943 sq. ft. within the protected Shoreland in order to run 12.9 miles of overhead, underground, and underwater components within a right-of-way.

THIS APPROVAL IS SUBJECT TO THE FOLLOWING PROJECT SPECIFIC CONDITIONS:

Should reference new plans and permit application from Applicant's 01/11/17 response to DES's 11/30/16 data request.

1. All work shall be in accordance with plans h ~~tes dated January~~ 7, 2016 and received by the NH Department of Environ on April 14, 2016.
2. This permit does not authorize the removal in the waterfront buffer that would result in a tree and sapling point scor equired per RSA 483-B:9, V, (a), (2), (D), (iv).
3. No more than .4% of the area of the lot with nd shall be covered by impervious surfaces unless additional approval
4. All activities conducted in association with the completion of this project shall be conducted in a manner that complies with applicable criteria of Administrative Rules Chapter Env-Wq 1400 and RSA 483-B during and after construction.
5. Erosion and siltation control measures shall be installed prior to the start of work, be maintained throughout the project, and remain in place until all disturbed surfaces are stabilized.
6. Erosion and siltation controls shall be appropriate to the size and nature of the project and to the physical characteristics of the site, including slope, soil type, vegetative cover, and proximity to wetlands or surface waters.
7. No person undertaking any activity in the protected shoreland shall cause or contribute to, or allow the activity to cause or contribute to, any violations of the surface water quality standards established in Env-Ws 1700 or successor rules in Env-Wq 1700.
8. Any fill used shall be clean sand, gravel, rock, or other suitable material.

Little Bay - Durham

SHORELAND IMPACT PERMIT 2016-00970

Permittee: **Public Service of New Hampshire**
c/o Kurt Nelson
13 Legends Dr.
Hooksett, NH 03106

Project Location: **295 Durham Point Road, Durham**
Durham Tax Map/Lot No. 20 / 12-1

Waterbody: **Little Bay**

This is from the original filing

ATE: 05/12/2016 **EXPIRATION DATE: 05/12/2021**

Based upon review of the above referenced application, in accordance with RSA 483-B, a Shoreland Impact Permit was issued. This permit shall not be considered valid unless s specified below.

17,311 SF per SRP response to DES data request 1/11/17

PERMIT DESCRIPTION: Impact 28,271 sq. ft. within the protected Shoreland in o run 12.9 miles of overhead, underground, and underwater components within a right-of-way.

THIS APPROVAL IS SUBJECT TO THE FOLLOWING PROJECT SPECIFIC CONDITIONS:

1. All work shall be in accordance with plans by dated January 7, 2016 and received by the NH Department of Environme April 14, 2016.
2. This permit does not authorize the removal of t the waterfront buffer that would result in a tree and sapling point score b ired per RSA 483-B:9, V, (a), (2), (D), (iv).
3. No more than 5% of the area of the lot within t shall be covered by impervious surfaces unless additional approval is o
4. All activities conducted in association with the ject shall be conducted in a manner that complies with applicable criteria of Administrative Rules Chapter Env-Wq 1400 and RSA 483-B during and after construction.
5. Erosion and siltation control measures shall be installed prior to the start of work, be maintained throughout the project, and remain in place until all disturbed surfaces are stabilized.
6. Erosion and siltation controls shall be appropriate to the size and nature of the project and to the physical characteristics of the site, including slope, soil type, vegetative cover, and proximity to wetlands or surface waters.
7. No person undertaking any activity in the protected shoreland shall cause or contribute to, or allow the activity to cause or contribute to, any violations of the surface water quality standards established in Env-Ws 1700 or successor rules in Env-Wq 1700.

Should reference new plans and permit application from Applicant's 01/11/17 response to DES's 11/30/16 data request.

Appendix B. Status and Review Schedule for SRP Work Plans and Actions needed to comply with DES Final Conditions

Condition	Specific Requirement	Plan/Action	Date Submitted	Conditioned Review Period	NHDES Review Completion Date
WET-32	Protocol for encounters with RTE species	Best Management Practices and Construction Plan for Protected Wildlife and Plants	6/30/2017	60 days prior to construction	
WET-35	Project specific BMPs (matting, exclusion zones, etc.)				
WET-36	Time of year restriction				
WET-37	Coordinate with NHDES Waste Management SRCIS- identify staff contacts for project and NHDES for notification of work start and stop in Little Bay	N/A	pending	60 days prior to work in Little Bay	
WET-38	Submit Soil and Groundwater Management Plan	Soil and Groundwater Management Plan (Newington Area and Frink Farm)	pending	90 days prior to dewatering near Pease	
WET-40	Retain independent environmental monitor for Little Bay	N/A	pending	60 days prior to installing cable in Little Bay	
WET-41	Prepare eel grass survey plan	Natural Resource Existing Conditions Report (Appendix 7)	4/12/2016	90 days prior to conducting survey	
	Conduct survey summer before construction commences			1 year prior to construction	
	Submit results of survey to NHDES			30 days prior to installing cable	
	Conduct survey 1 year after completion			Approx.. 1 year after cable install	
	Submit pre and post comparison report			90 days following post construction monitoring	
WET-42	Submit Benthic Habitat Monitoring Plan	Revised Environmental Monitoring Plan for Little Bay	6/30/2017	60 days prior to construction in Little Bay	
WET-43	Prepare Benthic Infaunal Community Plan	Natural Resource Existing Conditions Report	04/12/2016	90 days prior to conducting preconstruction survey	
	Submit pre-construction monitoring results	Revised Environmental Monitoring Plan for Little Bay	06/30/2017	30 days prior to installing cable	
	Conduct post construction monitoring			September 2020	
	Submit post-construction monitoring results			within 90 days of post construction monitoring	
WET-44	Submit mixing zone plan	Revised Environmental Monitoring Plan for Little Bay	6/30/2017	60 days prior to construction in Little Bay	
WET-45	Water Quality Monitoring and Adaptive Management Plan	Revised Environmental Monitoring Plan for Little Bay	6/30/2017	90 days prior to in-water work	
WET-46a	Notification to NHDES Shellfish Program of jet plow schedule	Notification	pending	14 days prior to start of cable installation	
WET-46b1	Prepare and submit Shellfish Tissue Sampling Plan		pending	6 months prior to jet plow	
WET-46b3	Pre-construction shellfish tissue sample collection		pending	1-2 weeks prior to cable installation	
	Post construction shellfish tissue sample collection		pending	1 week after all dredging activities	
WET-47	Surface Water Quality Violation Mitigation Plan		pending	60 days from violation	

SEACOAST RELIABILITY PROJECT
LIST OF PLANS AND NHDES REVIEW/APPROVAL STATUS

Condition	Specific Requirement	Plan/Action	Date Submitted	Conditioned Review Period	NHDES Review Completion Date
WET-48	Spill Prevention and Cleanup Plan		pending	90 days prior to in water work	
WET-49	Existing Cable Removal Remedial Response Plan	Existing Cable Removal Plan	6/30/2017	90 days prior to in water work	
WET-50	Training program		pending	30 days prior to start of cable installation	
WET-51	Aquaculturist Notification	Notification	pending	14 days prior to start of cable installation	
WET-52	Notification to NH Div. Ports and Harbors and/or NH Dept. Safety Marine Patrol		pending	prior to placement of mattresses	
WET-53	Check weather forecast		pending	7 days prior to cable installation	
WET-54	Wind monitoring		pending	12 hours prior to cable installation	
WET-55	Submit cable crossing as-built to NHDES		pending	60 days from completion	
WET-56	Submit plan for removal of silt curtains		pending	90 days prior to removal of silt curtains	
WET-64	Submit salt marsh restoration plan to NHDES/ACOE for approval	Salt Marsh Protection and Restoration Plan	6/30/2017	No timeline given	
WET-67	Payment to ARM Fund or Durham Newington projects		pending	within 120 days of SEC Certificate	
WET-74	Finalize Newington conservation parcel conservation easement		pending	within 240 days of SEC Certificate	
WET-78	Prepare final baseline documentation report for conservation area		pending	within 240 days of SEC Certificate	

From:	Sarah Allen
To:	Comstock, Gregg (Gregg.Comstock@des.nh.gov); Adams, Collis (Collis.Adams@des.nh.gov); david.price@des.nh.gov
Cc:	apembroke@normandeau.com; dena.champy@eversource.com; kurt.nelson@eversource.com; joseph.sperry@eversource.com
Subject:	Little Bay modeling descriptions
Date:	Friday, June 15, 2018 7:46:00 AM
Attachments:	SRP hydrodynamic model.pdf

Gregg,

I wanted to follow up on your questions about the two models used for the Little Bay sediment dispersion analysis: hydrodynamics (Bellamy model) and sediment fate and transport (SSFATE). I have attached the relevant pages from the report entitled "Modelling Sediment Dispersion from Cable Burial for the Seacoast Reliability Project" (Appendix 35 in the April 12, 2016 SEC application). It was also appended to the DES wetland application of the same date. I also attached the reference pages because RPS ASA cites several validation reports for each model. Please note that the Bellamy model was developed specifically for the Great Bay estuary in 2003, and was used again in the GBE in 2014.

Dr Craig Swanson from RPS ASA is the senior author of the report. If it would be helpful to you, we can arrange a conversation with him to address your specific questions.

My best,

Sarah

SARAH ALLEN, *Sr. Principal Wetland Scientist*
Normandeau Associates, Inc.
25 Nashua Road, Bedford, NH 03110
603-637-1158 (direct), 603-714-3085 (cell)
sallen@normandeau.com www.normandeau.com

From: Sarah Allen
To: "Comstock, Gregg"; dena.champy@eversource.com; joseph.sperry@eversource.com
Cc: Adams, Collis
Subject: RE: 2 cables in 1 trench
Date: Thursday, May 03, 2018 8:39:00 PM

Thanks Gregg. I will forward this to Joe and others in Eversource Engineering to respond.

From: Comstock, Gregg [mailto:Gregg.Comstock@des.nh.gov]
Sent: Thursday, May 03, 2018 4:54 PM
To: Sarah Allen <sallen@normandeau.com>
Cc: Adams, Collis <Collis.Adams@des.nh.gov>
Subject: 2 cables in 1 trench

Hi Sarah,

Here's a project that buried 2 cables in the same trench at the same time (see p. 6).
http://chpexpresseis.org/docs/library/esa/NMFS%20ESA%20Sec%207%20BA%20Review%20and%20Concurrence%20Memo_091814.pdf

Gregg

Gregg Comstock, P.E.
Supervisor, Water Quality Planning Section
NH Department of Environmental Services, Watershed Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
603-271-2983
gregg.comstock@des.nh.gov

From:	Sarah Allen
To:	Comstock, Gregg (Gregg.Comstock@des.nh.gov); Adams, Collis (Collis.Adams@des.nh.gov); david.price@des.nh.gov
Cc:	apembroke@normandeau.com; dena.champy@eversource.com; kurt.nelson@eversource.com
Subject:	Seacoast Reliability Project
Date:	Wednesday, June 13, 2018 9:16:00 PM
Attachments:	RE_ Seacoast Reliability Project - Eversource.pdf SRP BMPS and Construction Plan for Protected Wildlife and Plants_091517 - DOC4 SUPP2.docx SRP Existing Cable Removal Plan June 30 2017 - DOC3 SUPP1.docx SRP Revised Environmental Monitoring Plan for Little Bay_091517 - DOC9 SUPP2.docx SRP Salt Marsh Protection and Restoration Plan June 30 2017 - DOC7 SUPP1.docx FW Fisheries BMP and TOY restrictions.msg NHBcomments_SeacoastReliability_BMP-TOY_7-31-17.pdf SRP Conditions review meeting minutes 5-23-18.docx

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Gregg, Collis and Dave,

As discussed at our last meeting, please find attached the following:

- Meeting notes from the May 23, 2018 meeting
- Word documents for:
  - Best Management Practices and Construction Monitoring for Protected Wildlife and Plants
  - Environmental Monitoring Plan for Little Bay
  - Existing Cable Removal Plan
  - Salt Marsh Protection and Restoration Plan
- Email correspondence from NHB and NHFG. The comments from NHB have been incorporated into the BMPs. I have requested confirmation from Amy Lamb.

I look forward to our next meeting on June 20, 2:00.

Thanks

Sarah

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sallen@normandeau.com www.normandeau.com

From: Sarah Allen
To: Adams, Collis (Collis.Adams@des.nh.gov); Comstock, Gregg (Gregg.Comstock@des.nh.gov); kurt.nelson@eversource.com; dena.champy@eversource.com
Subject: Seacoast Reliability Project meeting #3
Date: Wednesday, May 23, 2018 5:57:00 PM

Collis and Gregg,

Thank you for another productive meeting. We will get you the material we discussed over the next few days.

I realize I didn't read my own schedule accurately. We have listed the WQ monitoring plan (including determining the mixing zone, adaptive management, benthic habitat monitoring and macroinvertebrate monitoring) for discussion June 20. Gregg would have to be able to review and digest that material before the meeting. Is that feasible, or would we be better to swap it with #4, which includes the shellfish tissue testing (Chris Nash), mitigation for WQ violation, cable removal plan, salt marsh restoration plan, and eelgrass survey plan. Presumably less of a lift for Gregg. Please advise and I will send out the calendar invites accordingly.
Thanks
Sarah

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sallen@normandeau.com www.normandeau.com

From:	Sarah Allen
To:	Adams, Collis (Collis.Adams@des.nh.gov); Comstock, Gregg (Gregg.Comstock@des.nh.gov); david.price@des.nh.gov
Cc:	apembroke@normandeau.com; kurt.nelson@eversource.com; dena.champy@eversource.com
Subject:	SRP meeting
Date:	Friday, July 13, 2018 9:30:00 AM
Attachments:	Supplemental Whitney HDD Testimony.pdf.pdf Doc9_SRP Revised Environmental Monitoring Plan for Little Bay_091517.pdf NHDES Meeting Minutes 6-20-18.docx

Collis, Gregg and Dave,

Just a reminder of our meeting next week. The primary purpose is to discuss the proposed environmental monitoring plan, which includes the mixing zone, and the WQ, benthic habitat, and macroinvertebrate monitoring (attached again, just in case). Hopefully we'll have time to cover the cable removal and salt marsh restoration plans left over from our last meeting. We can also discuss the HDD report submitted July 1, if it makes sense.

Please find meeting notes from our last meeting attached.

Collis, I had made a note to send you the meeting date with Dori when we discussed the cable removal. It was July 28, 2017.

I will send out an invite for August 15 to cover any outstanding issues, and wrap up.

And lastly, I've attached the HDD testimony from ESS, third party reviewer for Counsel for the Public. His views were developed independently from our HDD experts, but are similar in findings.

See you next Wed, July 18, at 2:00.

Sarah

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sallen@normandeau.com www.normandeau.com

From:	Sarah Allen
To:	Adams, Collis (Collis.Adams@des.nh.gov); Comstock, Gregg (Gregg.Comstock@des.nh.gov); Mary Ann Tilton (MaryAnn.Tilton@des.nh.gov); dena.champy@eversource.com; kurt.nelson@eversource.com; joseph.sperry@eversource.com
Cc:	david.price@des.nh.gov
Subject:	SRP notes from May 3 meeting
Date:	Monday, May 14, 2018 12:10:00 PM
Attachments:	SRP Conditions review meeting 5-3-18 final.docx SRP NHDES Permit Review Schedule 5-8-18.pdf

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Hello, All.

Please find attached meeting notes and a revised agenda for the next three Seacoast Reliability Project meetings, as we discussed. Let me know if you see any omissions or errors.

Collis, would you like me to send out a calendar invite for the next meeting, and reminders for the following two (in case we can push them up)?

Thanks and see you next week.

Sarah

SARAH ALLEN, *Sr. Principal Wetland Scientist*
Normandeau Associates, Inc.
25 Nashua Road, Bedford, NH 03110
603-637-1158 (direct), 603-714-3085 (cell)
sallen@normandeau.com www.normandeau.com

From:	Ann Pembroke
To:	collis.adams@des.nh.gov; Comstock, Gregg
Cc:	Dena M. Champy; Nelson, Kurt I; Dumville, Adam; Benjamins, Maija E; Sarah Allen
Subject:	SRP permit conditions
Date:	Friday, August 17, 2018 4:12:23 PM
Attachments:	Eversource letter to NHDES regarding SRP conditions and schedule 8-17-2018.pdf

Dear Collis and Gregg:

On behalf of Eversource, here is a letter identifying various permit conditions for the SRP with our suggestions for rephrasing or changes. If you have any questions about these requests please do not hesitate to contact Kurt Nelson (603-714-3031; kurt.nelson@eversource.com), Dena Champy (508-954-2736; dena.champy@eversource.com), Sarah Allen (603-714-3085; sallen@normandeau.com) or me (contact information below).

Best regards,

Ann Pembroke

ANN E. PEMBROKE
Vice President, Senior Marine Scientist
NORMANDEAU ASSOCIATE, INC.
25 Nashua Rd., Bedford, New Hampshire 03110
(603) 637-1169 (direct), (603) 714-2264 (cell)
apembroke@normandeau.com www.normandeau.com

From:	Sarah Allen
To:	Adams, Collis (Collis.Adams@des.nh.gov); Comstock, Gregg (Gregg.Comstock@des.nh.gov); david.price@des.nh.gov
Cc:	kurt.nelson@eversource.com; dena.champy@eversource.com; apembroke@normandeau.com
Subject:	Tomorrow"s meeting
Date:	Wednesday, August 22, 2018 11:13:00 AM
Attachments:	NHDES Meeting Notes 7-27-18.docx

Hello All,

Just checking in with a reminder for tomorrow's meeting at 2:00. My thought is that we will give you an overview of the HDD alternative, and then walk through the condition summary we sent on Monday. I've also attached our notes from the July 27 meeting.

See you then.

Sarah

SARAH ALLEN, *Sr. Principal Wetland Scientist*
Normandeau Associates, Inc.
25 Nashua Road, Bedford, NH 03110
603-637-1158 (direct), 603-714-3085 (cell)
sallen@normandeau.com www.normandeau.com

NEW HAMPSHIRE DEPARTMENT OF TRANSPORTATION

District 1, 641 Main St, Lancaster, NH 03584
District 2, 8 Eastman Hill Road, Enfield, NH 03748
District 3, 2 Sawmill Rd, Gilford, NH 03249
District 4, 19 Base Hill Road, Swanzey, NH 03446
District 5, 16 East Point Drive, Bedford, NH 03110
District 6, PO Box 740, Durham, NH 03824

APPLICATION FOR DRIVEWAY PERMIT

Pursuant to the provisions of **Revised Statutes Annotated, Chapter 236, Section 13** (printed on reverse of application) and amendments thereto, and **Declaratory Ruling 2000-01**, permission is requested to: (*select one*): **Construct / Alter**
(*Indicate quantity of*) 2 driveway entrance(s) to my property on the (*select*): **North / South / East / West** side of **NH Route** 108 or **Street/Road:** _____ In the **Town of** Durham at a location which will meet the requirements for safety specified in said statutes.

The driveway entrance(s) requested is (are) for access to: Industry
Residence, Industry, Business, Subdivision, Other
Describe nature and size of industry, business or subdivision: Access for construction of utility poles and lines
_____ **Feet** (*select*): **North / South / East / West** of Utility Pole Number: _____
440 **Feet** (*select **Feet** or **Miles***): **North / South / East / West** of Road or Junction: Longmarsh Rd. and Route 108

Town Tax Map # 15 and Lot # 7-3, 21-0

As the landowner (or designated applicant) I agree to the following:

1. To construct driveway entrance(s) only for the bonafide purpose of securing access to private property such that the highway right-of-way is used for no purpose other than travel.
2. To construct driveway entrance(s) at permitted location(s).
3. To construct driveway entrance(s) in accordance with statutes, rules, standard drawings, and permit specifications as issued by the New Hampshire Department of Transportation.
4. To defend, indemnify and hold harmless the New Hampshire Department of Transportation and its duly appointed agents and employees against any action for personal injury and/or property damage sustained by reason of the exercise of this permit.
5. To furnish and install drainage structures that are necessary to maintain existing highway drainage and adequately handle increased runoff resulting from the land development and obtain all easements thereto.
6. I am the owner or a duly authorized agent of the owner of the parcel upon which the driveway will be constructed. I have provided accurate and complete title and subdivision information concerning the parcel to the Department. I understand that the Department is relying on this information in considering this application and that the Department does not perform independent title research or make judgments about title or access disputes.

- For new driveway(s), include copy of current deed and, if not the same, previous deed dated prior to July 1, 1971 of the parcel. If this parcel is part of a larger tract subdivided after July 1, 1971, then provide complete subdivision plans and deed history dating back to at least July 1, 1971.

- Attach sketch or plan showing existing and proposed driveway(s) and the adjacent highway indicating distance to town road, town line, or other readily identifiable feature or landmark and also to the nearest utility pole (including pole numbers)

_____	13 Legends Drive
Signature of Landowner (Applicant)	Mailing Address
Eversource Energy	Hooksett, NH 03106
Printed Name of Landowner	Town/City, State, Zip Code
Date: 7/6/2018	Telephone Number(s) (603) 714-3031

Contact /Agent, if not Landowner: _____

FOR OFFICE USE ONLY:
GPS N = _____ GPS W = _____
Section: _____ Width: _____ Speed: _____
Right of Way: _____ Drainage: _____ SLD: _____
Conditions: _____
Permit Number Assigned: _____

§ 236:13 Driveways and Other Accesses to the Public Way. – I. It shall be unlawful to construct, or alter in any way that substantially affects the size or grade of, any driveway, entrance, exit, or approach within the limits of the right-of-way of any class I or class III highway or the state-maintained portion of a class II highway that does not conform to the terms and specifications of a written permit issued by the Commissioner of transportation.

II. Pursuant to this section, a written construction permit application must be obtained from and filed with the department of transportation by any abutter affected by the provisions of paragraph I. Before any construction or alteration work is commenced, said permit application shall have been reviewed, and a construction permit issued by said department. Said permit shall:

(a) Describe the location of the driveway, entrance, exit, or approach. The location shall be selected to most adequately protect the safety of the traveling public.

(b) Describe any drainage structures, traffic control devices, and channelization islands to be installed by the abutter.

(c) Establish grades that adequately protect and promote highway drainage and permit a safe and controlled approach to the highway in all seasons of the year.

(d) Include any other terms and specifications necessary for the safety of the traveling public.

III. For access to a proposed commercial or industrial enterprise, or to a subdivision, all of which for the purposes of this section shall be considered a single parcel of land, even though acquired by more than one conveyance or held nominally by more than one owner:

(a) Said permit application shall be accompanied by engineering drawings showing information as set forth in paragraph II.

(b) Unless all season safe sight distance of 400 feet in both directions along the highway can be obtained, the commissioner shall not permit more than one access to a single parcel of land, and this access shall be at that location which the commissioner determines to be safest. The commissioner shall not give final approval for use of any additional access until it has been proven to him that the 400-foot all season safe sight distance has been provided.

(c) For the purposes of this section, all season safe sight distance is defined as a line which encounters no visual obstruction between 2 points, each at a height of 3 feet 9 inches above the pavement, and so located as to represent the critical line of sight between the operator of a vehicle using the access and the operator of a vehicle approaching from either direction.

IV. No construction permit shall allow:

(a) A driveway, entrance, exit, or approach to be constructed more than 50 feet in width, except that a driveway, entrance, exit, or approach may be flared beyond a width of 50 feet at its junction with the highway to accommodate the turning radius of vehicles expected to use the particular driveway, entrance, exit or approach.

(b) More than 2 driveways, entrances, exits or approaches from any one highway to any one parcel of land unless the frontage along that highway exceeds 500 feet.

V. The same powers concerning highways under their jurisdiction as are conferred upon the commissioner of transportation by paragraphs I, II, III and IV shall be conferred upon the planning board in cities and towns in which the planning board has been granted the power to regulate the subdivision of land as provided in RSA 674:35, and they shall adopt such regulations as are necessary to carry out the provisions of this section. Such regulations may delegate administrative duties, including actual issuance of permits, to a highway agent, board of selectmen, or other qualified official or body. Such regulations, or any permit issued under them, may contain provisions governing the breach, removal, and reconstruction of stone walls or fences within, or at the boundary of, the public right of way, and any landowner or landowner's agent altering a boundary in accordance with such provisions shall be deemed to be acting under a mutual agreement with the city or town pursuant to RSA 472:6, II (a).

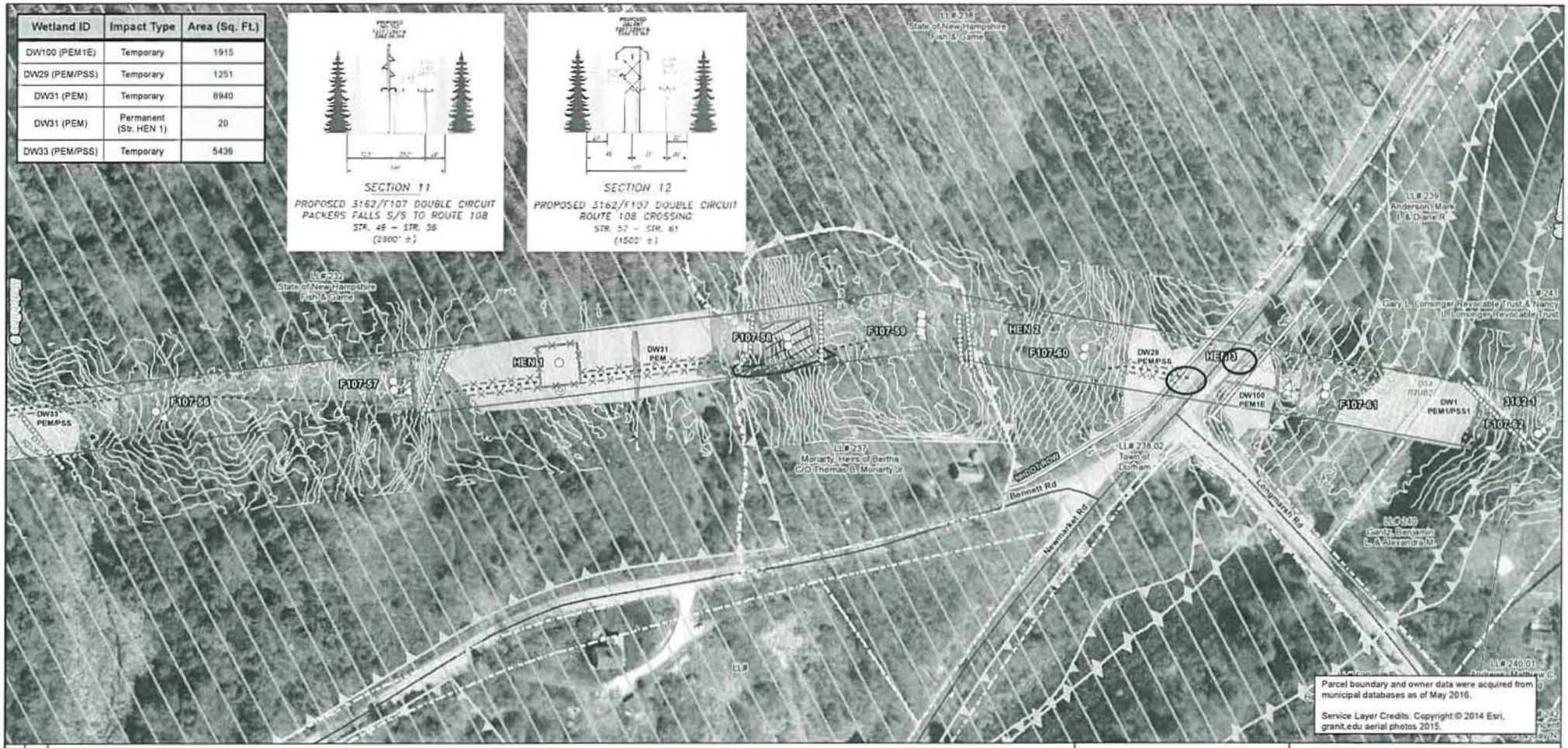
VI. The commissioner of transportation or planning board shall retain continuing jurisdiction over the adequacy and safety of every existing driveway, entrance, exit, and approach to a highway, whether or not such access was constructed or installed pursuant to a permit under this section, and, unless the access is a public highway, the owners of property to which the access is appurtenant shall have continuing responsibility for the adequacy of the access and any grades, culverts, or other structures pertaining to such access, whether or not located within the public right of way. If any such access is or becomes a potential threat to the integrity of the highway or its surface, ditches, embankments, bridges, or other structures, or a hazard to the safety of the traveling public, by reason of siltation, flooding, erosion, frost action, vegetative growth, improper grade, or the failure of any culvert, traffic control device, drainage structure, or any other feature, the commissioner of transportation or planning board or their designee may issue an order to the landowner or other party responsible for such access to repair or remove such hazardous condition and to obtain any and all permits required therefor. The order shall describe the hazard, prescribe what corrective action or alteration in the location or configuration of such access shall be required, and set a reasonable time within which the action shall be completed. Such an order shall be sent by certified mail, and shall be enforceable to the same extent as a permit issued under this section. If the order is not complied with within the time prescribed, the commissioner or planning board or their designee may cause to be taken whatever action is necessary to protect the highway and the traveling public, and the owner or other responsible party shall be civilly liable to the state or municipality for its costs in taking such action.

§ 236:14 Penalty. – Any person who violates any provision of this subdivision or the rules and regulations made under authority thereof shall be guilty of a violation if a natural person, or guilty of a misdemeanor if any other person; and, in addition, shall be liable for the cost of restoration of the highway to a condition satisfactory to the person empowered to give such written permission.

Wetland ID	Impact Type	Area (Sq. Ft.)
DW100 (PEM1E)	Temporary	1915
DW29 (PEM/PSS)	Temporary	1251
DW31 (PEM)	Temporary	8940
DW31 (PEM)	Permanent (Str. HEN 1)	20
DW33 (PEM/PSS)	Temporary	5436

SECTION 11
PROPOSED 3162/F107 DOUBLE CIRCUIT
PACKERS FALLS S/S TO ROUTE 108
STR. 48 – STR. 56
(2900' ±)

SECTION 12
PROPOSED 3162/F107 DOUBLE CIRCUIT
ROUTE 108 CROSSING
STR. 57 – STR. 61
(1500' ±)



Town Boundary
Approximate Parcel Boundary
PSNH Fee Area
Project Corridor
Work Pad

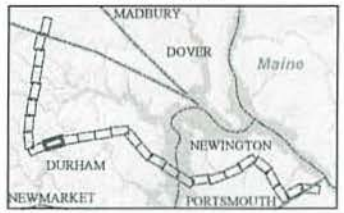
Roads
Local
Not Maintained
Private
State
Railroad

Existing Str (Remain)
Existing Str (Removed/Modified)
Access Roads
Underground Cable
Silt Curtain
Silt Fence, Hay Bale, Erosion Control Mix Berm
Straw Wattle
Wetland
Prime Wetland
Wetland Impact (PERM)
Wetland Impact (TEMP)

Stream Centerline
Stream Top of Bank
Temporary Culvert
Stonewall alignment
Temporary Mat Bridge
NH DOT Right-of-way
Historical Sites
Designated River Buffer 250'
Conservation Lands
100 Year Floodplain

Structures
Direct Embed
Drilled Pier
Relocated Distribution
Steep Slope BMPs
Tree Clearing
Stream Buffer
2ft Contour
Tidal Buffer Zone
Highest Observable Tide Line/Reference Line (4ft Contour)
Mean Lower Low Water

0 75 150 300 Feet
1 inch = 150 feet



Drawn By: dpelletier
Date : 9/14/2017
Project No: 22860.003

EVERSOURCE ENERGY

NORMANDEAU ASSOCIATES
ENVIRONMENTAL CONSULTANTS

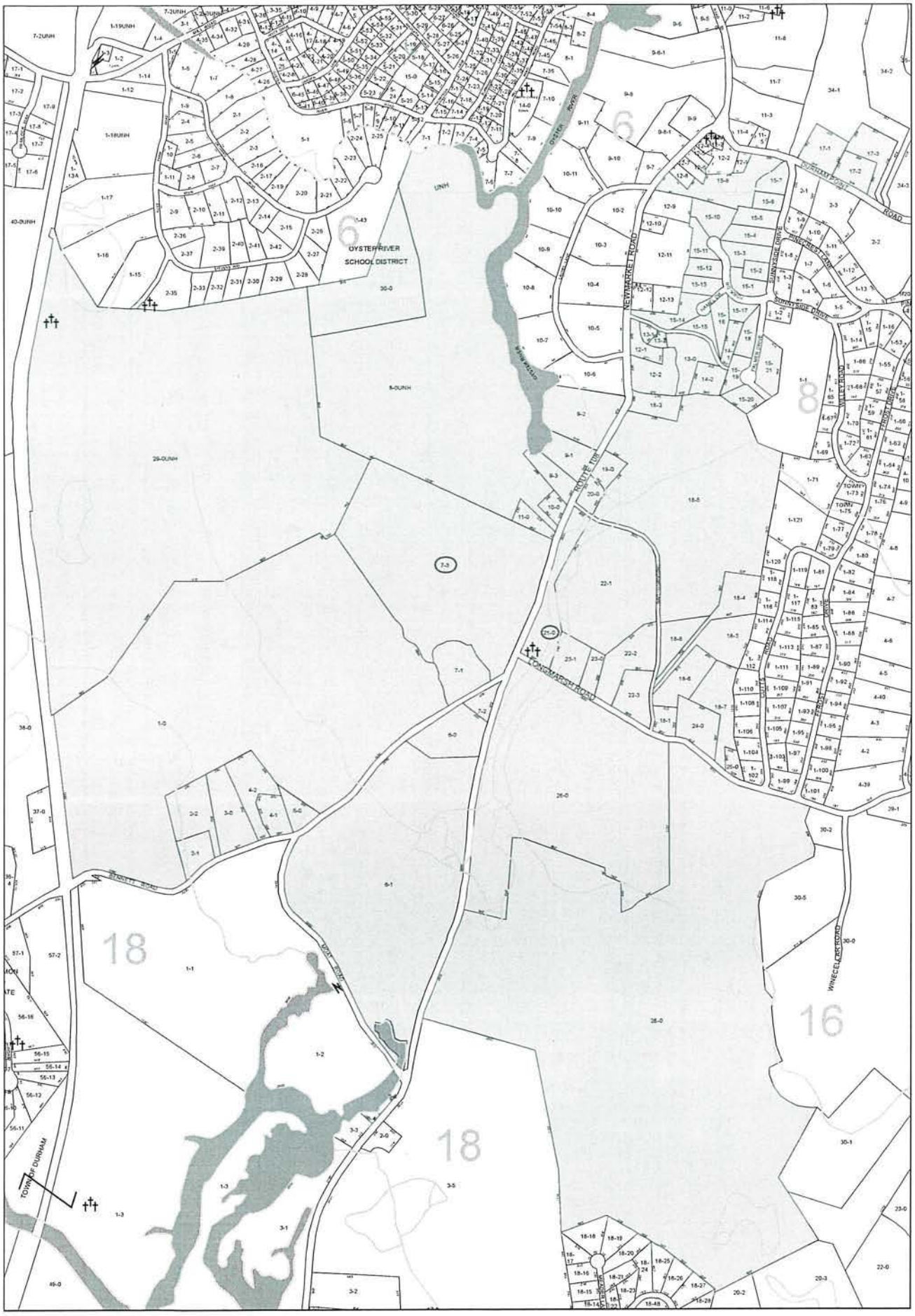
Seacoast Reliability Project

Revised Environmental Maps

STATE OF NEW HAMPSHIRE
SARAH D. ALLEN
No. 083
CERTIFIED WETLAND SCIENTIST

9/14/2017

Path: J:\Projects\PSNH_F107\MXD\SRP_MapSet_AugSupplement.mxd



This map was originally produced by Strafford Regional Planning Commission in October 2004, and was updated by the Town of Durham in December 2017.

THIS MAP IS FOR ASSESSMENT PURPOSES. IT IS NOT INTENDED FOR LEGAL DESCRIPTION OR CONVEYANCE.

Legend

- Adjacent Map Sheets
- Current Map Sheet
- Cemetery

PROPERTY MAP

DURHAM

NEW HAMPSHIRE

N

Map 15

1 inch = 757 feet

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13 Legends Drive

Hooksett, NH 03106

July 27, 2018

Melodie Esterberg, P.E.
Chief of Design Services
N. H. Department of Transportation
John O. Morton Building
7 Hazen Drive
Concord, NH 03302-0483

Re: Seacoast Reliability Project UAM Exception Request

Dear Chief Esterberg,

In a letter dated April 4, 2016, the Public Service Company of New Hampshire d/b/a Eversource Energy (PSNH) petitioned for permission to install an electric transmission line, including related conduit, cable, wires, poles, structures and devices across, over and along certain state highways pursuant to RSA 231:160 and requested issuance of a Use and Occupancy Agreement, appropriate licenses and permissions authorizing the proposed use.

A letter dated March 17, 2017 was sent as part of an Amendment ("Amendment") to the Application to the New Hampshire Site Evaluation Committee ("SEC") for a Certificate of Site and Facility ("Certificate") dated April 12, 2017 to construct and operate the Seacoast Reliability Project—a new 115 kilovolt (kV) transmission line between the Madbury and Portsmouth substations ("SRP" or the "Project"). The Amendment was submitted to the SEC on March 29, 2017.

The Project is an approximately 13-mile 115kV transmission line from Madbury to Portsmouth, NH. This is a reliability project. The purpose of SRP is to provide an additional path to enhance the existing 115 kV transmission system between the Deerfield and Scobie Pond Substations along with 115 kV transmission ties to Maine in order to address reliability concerns in the New Hampshire Seacoast Region, which have previously been identified by the Independent System Operator of the New England electric system ("ISO-NE"). PSNH, working with ISO-NE, conducted an assessment of the New Hampshire and Vermont portion of the New England transmission system to determine whether the electrical infrastructure is sufficient to reliably deliver electricity under a wide range of system conditions. The study concluded that, for the New Hampshire Seacoast Region, additional transmission capacity is needed to support the reliable delivery of electric power to meet the Region's current demand and future increased demand.

There are 7 aerial crossings of state maintained Highways for the Project as described in the April 4, 2016 letter, April 12, 2016 Application to the SEC, and March 17, 2017 letter and April 12, 2017 Amendment. The highways to be crossed include: Madbury Road in Madbury, NH Route 4 in Durham, NH Route 108 in Durham, newly constructed access ramps to the Spaulding Turnpike in Newington, the Spaulding Turnpike mainline in Newington and Woodbury Avenue in Newington.

Copies of revised Environmental Maps (Appendix 2b) and the Engineering Drawings (Appendix 5b) have been submitted to the SEC as part of the July 27, 2018 filing.

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13 Legends Drive

Hooksett, NH 03106

The amended Aerial Crossing Design Plans for State Highways are provided with Attachment A to the letter dated March 17, 2017.

On October 31, 2017, The New Hampshire Department of Transportation ("NHDOT") issued the Utility Accommodation Manual 2017 ("UAM"). This manual supersedes, "all previous utility instructions, written or oral, relative to or in conflict with this manual." The UAM added Section XII.A.4 Horizontal Clearance at Highway Structures. The requirements of this section were not included in the 2010 version of the Utility Accommodation Manual which was the guidance document at the time of the Application and Amendment. Section XII.A.4 includes a requirement that, "Aerial utility lines shall not cross highway structures or cross the roadway within 50' of a highway structure. Where existing highway structures are rehabilitated or reconstructed, existing crossing aerial utility lines shall be adjusted to meet this requirement." It also states, "Horizontal clearance requirements for aerial facilities crossing highway structures within existing crossings rights-of-way will be reviewed on a case by case basis."

Section XII.A.4 affects two proposed crossing locations at Madbury Road in Madbury, NH and NH Route 4 in Durham, NH. PSNH and NHDOT previously discussed these two locations during meetings conducted on February 7, 2017 and February 24, 2017, and the overhead designs at the Madbury Road crossing in Madbury and NH Route 4 Crossing in Durham and were modified to provide additional clearance to lessen constraints to future maintenance activities on bridge abutments at these locations. These changes were included in the Amendment, prior to the 2017 UAM publication, with the anticipation of a change in bridge clearance requirements.

PSNH currently holds a license with Pan Am Railway, Inc. to install, use, maintain, repair and remove transmission lines on their premises between Mile Posts 250.01 and 247.85 of Pan Am Valuation Section 2 Maps 59-61. The Pan Am Railway right of way width varies between 90 feet and 120 feet approximately centered on the railroad track. The width is predominantly 90 feet crossing Madbury Road and NH Route 4. The license restricts PSNH to the west side of the corridor. Additionally, PSNH, between PSNH's Madbury Substation and NH Route 4, acquired an additional 75 feet width of easement for access, installation operation and maintenance of transmission lines adjacent to the Pan Am right of way. South of NH Route 4 PSNH acquired 25 feet of rights for access, installation operation and maintenance of transmission lines, except for poles and towers, adjacent to the west edge of the Pan Am right of way. As a result, PSNH has real estate rights to install, operate and maintain transmission lines, with a width varying between approximately 85 and 115 feet.

Two bridge structures encumber the area where PSNH has real estate rights. These bridges are crossings of the Pan AM Railway track. A bridge on Madbury Road occupies approximately 55 feet of PSNH right of way. A bridge carrying NH Route 4 occupies approximately 45 feet of the PSNH right of way. PSNH, as shown on the drawings submitted with the Amendment moved the alignment of the SRP design so that the center of the line was as far from the bridge structure and abutments as possible while still maintaining clearance as required by the National Electric Safety Code (NESC) to the edge of the right of way. Additionally, as part of the modifications PSNH changed the design configuration of SRP from primarily horizontal construction to delta configuration to move all phase conductors as far from the bridge structures as possible. This results in a minimum of 24 feet of clearance from the centerline of the transmission line to the closest point of the bridge structure (generally the bridge abutment).

Meeting the 50 feet requirement of Section XII.A.4 would create extreme hardship, and be unreasonably costly to the utility consumer. PSNH is not able to procure additional real estate rights needed to meet the 50 feet requirement. Two alternatives are possible to maintain clearance within the existing rights. The first would be to underground the

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Hooksett, NH 03106

transmission circuit. The cost to underground an equivalent overhead transmission circuit is approximately 10 times. This does not necessarily include additional costs for trenchless construction methods and controls that may be required to cross the existing highways. The additional cost would be borne by PSNH and/or its rate payers as determined by the Independent System Operator.

The second method would be to place the transmission circuits in the NHDOT right of way to by-pass the bridge structures. It would be difficult to complete this design and maintain the clearance requirements as described in UAM Section VII.B. If it could be completed and meet the requirements it would require at least two additional structures and associated foundations at additional cost. A minimum of four transmission structures would be required in the NHDOT right of way. The structures would present potential impediments to NHDOT operations in the future.

According to Section III of the UAM, PSNH requests exception to the requirements in Section XII.A.4. Specifically, PSNH requests exception to the requirement that "Aerial utility lines shall not cross highway structures or cross the roadway within 50' of a highway structure." PSNH requests that this crossing be reviewed on a "case by case basis" as allowed in Section XII.A.4 because it is an existing crossing right of way. PSNH requests this exception based on the details previously described. Meeting the 50 feet requirement of Section XII.A.4 would create extreme hardship, and be unreasonably costly to the utility consumer. Please feel free to contact me with any questions.

Sincerely,

Kurt I. Nelson

Sr. Licensing and Permitting Specialist

Kurt.nelson@eversource.com

(603) 714-3031

Cc: Lynn Frazier, P.E., Louis Berger

EVERSOURCE ENERGY

13 Legends Drive

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July 27, 2018

Melodie Esterberg, P.E.
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According to Section III of the UAM, PSNH requests exception to the requirements in Section XII.A.4. Specifically, PSNH requests exception to the requirement that "Aerial utility lines shall not cross highway structures or cross the roadway within 50' of a highway structure." PSNH requests that this crossing be reviewed on a "case by case basis" as allowed in Section XII.A.4 because it is an existing crossing right of way. PSNH requests this exception based on the details previously described. Meeting the 50 feet requirement of Section XII.A.4 would create extreme hardship, and be unreasonably costly to the utility consumer. Please feel free to contact me with any questions.

Sincerely,

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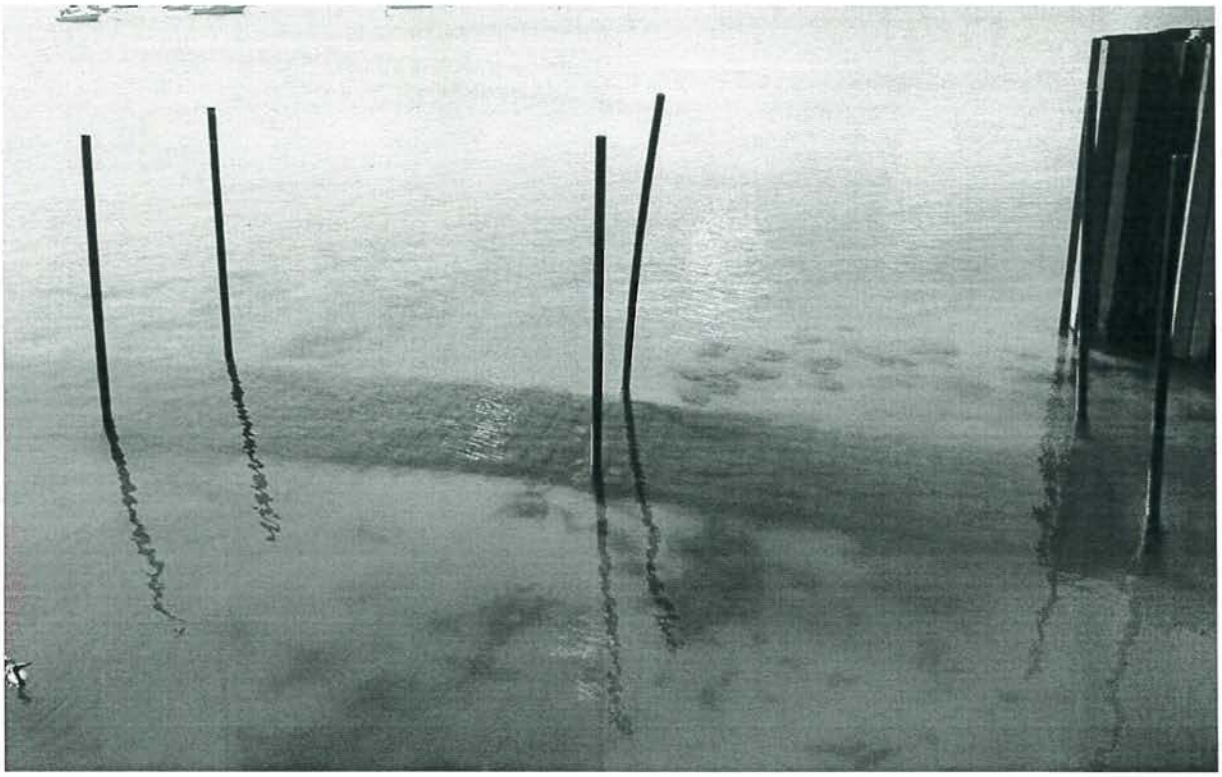
Sr. Licensing and Permitting Specialist
Kurt.nelson@eversource.com
(603) 714-3031

Cc: Lynn Frazier, P.E., Louis Berger



Mats after 1 month in water

Mats before installation

EXHIBIT 17: NIMBLE HILL ROAD, NEWINGTON (SHEET 1 OF 3)

View Location Map

Simulation Information

Base Photograph
Date: 3/10/15
Time: 2:48 pm
Weather conditions: Partly Cloudy
Image Size: 5472 x 3648 pixels

Camera Properties
Camera Make/Model: Canon EOS 6D
Sensor Dimensions: 35.8mm x 23.9mm
Lens Make/Model: Canon EF 50mm
Lens Focal Length: 50mm
Focal Length (35mm Equivalent): 52mm
Approx. Angle of View: 40° horizontal, 27° vertical
Camera Height: 5 ft (1.5 meters)

View Location Information
View Location Name: Exhibit 17
Location: Nimble Hill Road, Newington, NH
Classification: Private property
Orientation: East / Southeast
Latitude/Longitude: 43.107074°, -70.829464°
Camera elevation above sea level: 80.00' (24.38 m)
Simulation viewing distance: 21.3 in (54.102 cm)
Distance to nearest visible structure: 0.25 miles (0.40 km)
Distance to furthest visible structure: 0.33 miles (0.54 km)

Proposed Structure Information
Visible structure type: Weathering steel monopole
Visible structure numbers: F107-116 - F107-118
Height range of proposed transmission structures (visible): 70' - 75'
Height range of existing transmission structures (visible): N/A
Right of way width: 130'

Visual Simulation Notes:
1. Visual simulation is based on GIS data available at the time from USGS National Elevation Data Set, Eversource and NH GRANIT. Data is only as accurate as the original source and is not guaranteed by LandWorks.
2. This simulation depicts structures, conductors, and technical equipment as well as visibility of any associated clearing.

Technical Information
Software: Nemetschek VectorWorks 2015; SketchUp Pro 8; Adobe Photoshop CS5
Digital elevation data source: USGS National Elevation Dataset (NED) 1/3 arc-second

Aerial Context Map

Prepared by **LandWorks**, Middlebury, VT
Prepared for Eversource

EXHIBIT 17: EXISTING CONDITIONS AT NIMBLE HILL ROAD, NEWINGTON (SHEET 2 OF 3)

EXHIBIT 17: VISUAL SIMULATION OF PROPOSED CONDITIONS AT NIMBLE HILL ROAD, NEWINGTON (SHEET 3 OF 3)

EXHIBIT 22A: LITTLE BAY, DURHAM (SHEET 1 OF 7)

SEACOAST RELIABILITY PROJECT VISUAL ASSESSMENT

August 2018

View Location Map

0' 750' 1500'

Simulation Information

Base Photograph
Date: 6/29/17
Time: 1:27 pm
Weather conditions: Overcast
Image Size: 5472 x 3648 pixels

Camera Properties
Camera Make/Model: Canon EOS 6D
Sensor Dimensions: 35.8mm x 23.9mm
Lens Make/Model: Canon EF 50mm
Lens Focal Length: 50mm
Focal Length (35mm Equivalent): 52mm
Approx. Angle of View: 40° horizontal, 27° vertical
Camera Height: 3 ft (0.914 meters)

View Location Information
View Location Name: Exhibit 22A
Location: Little Bay, Durham, NH
Classification: Resource
Orientation: West/Northwest
Latitude/Longitude: 43.105557°, -70.866763°
Camera elevation above sea level: 3.00' (0.91 m)
Simulation viewing distance: 21.3 in (54.102 cm)
Distance to nearest visible structure: 0.25 miles (0.40 km)
Distance to furthest visible structure: 0.28 miles (0.45 km)

Proposed Structure Information
Visible structure type: Weathering steel monopole, 3-pole
Visible structure numbers: F107-100, F107-101
Height range of proposed transmission structures (visible): 70' (21.3 m)
Height range of existing transmission structures (visible): N/A
Visible area of concrete mattresses at Low Tide: Approx. 28'x34'
Right of way width: 100'

Visual Simulation Notes:
1. Visual simulation is based on GIS data available at the time from USGS National Elevation Data Set, Eversource and NH GRANIT. Data is only as accurate as the original source and is not guaranteed by LandWorks.
2. This simulation depicts structures, conductors, and technical equipment as well as visibility of any associated clearing.

Technical Information
Software: Nemetschek VectorWorks 2015; SketchUp Pro 8; Adobe Photoshop CS5
Digital elevation data source: USGS National Elevation Dataset (NED) 1/3 arc-second

Aerial Context Map

0' 200' 400'

Prepared by **LandWorks**, Middlebury, VT
Prepared for Eversource
08.24.2018

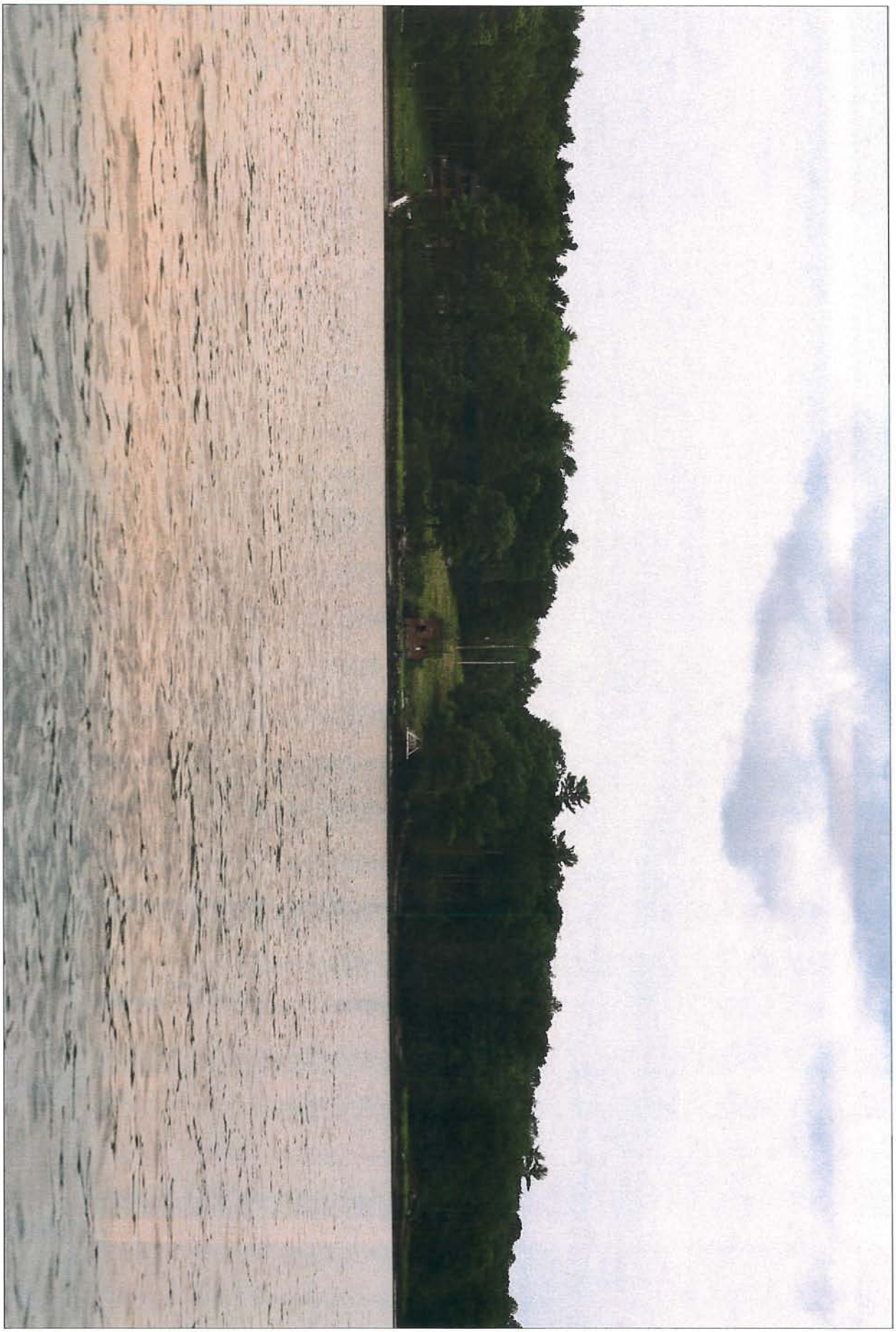


EXHIBIT 22A-1: EXISTING CONDITIONS AT LITTLE BAY, DURHAM (SHEET 2 OF 7)

NOTE: This simulation represents the proposed concrete mattress without any color tinting.

EXHIBIT 22A-1: VISUAL SIMULATION 1 OF PROPOSED CONDITIONS AT LITTLE BAY, DURHAM WITH PROPOSED "CONCRETE MATTRESS"

SEACOAST RELIABILITY PROJECT VISUAL ASSESSMENT (SHEET 3 OF 7) August 2018

EXHIBIT 22A-1: VISUAL SIMULATION 2 OF PROPOSED CONDITIONS AT LITTLE BAY, DURHAM (SHEET 4 OF 7)

NOTE: This simulation represents the proposed concrete mattress with color tinting to blend the installation in with surrounding tidal flats and shoreline conditions.

EXHIBIT 22A-1: EXISTING CONDITIONS AT LITTLE BAY, DURHAM - AT (SIMULATED) LOW TIDE (SHEET 5 OF 7)

NOTE: Approximate low tide water level (MLLW*) is simulated in this photograph. *MLLW= Mean Lower Low Water

NOTES: 1) This simulation represents the proposed concrete mattress without any color tinting. 2) This simulation shows the proposed concrete mattress at low tide with uncolored concrete.

EXHIBIT 22A-2: VISUAL SIMULATION 3 OF PROPOSED CONDITIONS AT LITTLE BAY, DURHAM (SHEET 6 OF 7)

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EXHIBIT 22A-2: VISUAL SIMULATION 4 OF PROPOSED CONDITIONS AT LITTLE BAY, DURHAM (SHEET 7 OF 7)

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NOTES: This simulation represents the proposed concrete mattress with color tinting to blend the installation in with surrounding tidal flats and shoreline conditions. 2) This simulation shows the proposed concrete mattress at low tide.