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August 8, 2023

Eva Vaughan
Environmental Analysis
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Subject: New England Power Company d/b/a National Grid and
NSTAR Electric Company d/b/a Eversource Energy
Acushnet to Fall River Reliability Project
Single Environmental Impact Report Addendum – EEA No. 15941
Acushnet, New Bedford, Dartmouth and Fall River, Massachusetts

Dear Ms. Vaughn:

Pursuant to your clarification request received August 7, 2023 related to the Single Environmental Impact Report submittal of June 30, 2023 for the Acushnet to Fall River Reliability Project (AFRRP), the New England Power Company d/b/a National Grid (NEP) and NSTAR Electric Company d/b/a Eversource Energy (Eversource) (collectively, the Companies) are pleased to provide additional information regarding the NEP Bell Rock Substation Project, and the Companies' Acushnet to Fall River Reliability Project (AFRRP), as detailed below.

The Companies submitted an Expanded Environmental Notification Form (EENF) to the MEPA Office on November 15, 2018 for the Bell Rock Substation Rebuild Project (Phase 1) and the Acushnet to Fall River Reliability Project (Phase 2) (AFRRP). On November 21, 2018, the MEPA Office published notice of the EENF for public review in the Environmental Monitor, stating that public comments would be due on December 21, 2018. On December 28, 2018, the Secretary of Energy and Environmental Affairs issued a Certificate (Certificate) on the EENF filed with the Massachusetts Environmental Policy Act Unit for the Bell Rock Substation Rebuild Project and the Acushnet to Fall River Reliability Project (EEA No. 15941).

The Secretary issued a Phase 1 Waiver for the Bell Rock Substation Rebuild Project to allow the reconstruction and expansion of the station to proceed to permitting prior to completion of the Environmental Impact Report for the AFRRP. The Secretary scoped the AFRRP for the preparation of a Single Environmental Impact Report (SEIR). A Draft Record of Decision was also issued by the Secretary on December 28, 2019, and the public comment period ended on January 23, 2019. The Secretary issued the Final Record of Decision on January 25, 2019.

Construction activities associated with the Bell Rock Substation Project (Phase 1) commenced during the summer 2020 and the reconstruction and expansion of the substation are anticipated to be completed in late Q3 2023. Pursuant to your request, the sections that follow provide a review of impacts associated with both the Bell Rock Substation Rebuild Project (Phase 1) and the AFRRP (Phase 2).

Bell Rock Substation Project (Phase 1)

The total area of new land alteration for the Bell Rock Substation Project was approximately 42,898 sf (0.98 acre) which included grading, filling, stormwater features, alterations required for the Bell Rock Substation expansion and work to temporarily reroute the M13 115-kilovolt transmission line to shift the line, in order to reposition the energized overhead line away from the substation work footprint. The entirety of the Bell Rock Substation Project was located in Priority and Estimated Habitat for rare, threatened and endangered species. The Project was reviewed under the requirements of the Massachusetts Endangered Species Act, and the Natural Heritage and Endangered Species Program (NHESP) concluded that the Bell Rock Substation Project would not adversely affect the resource area habitat of state-protected rare wildlife species and would avoid a prohibited “Take” with the implementation of species-specific protection plans and seasonal tree clearing restrictions, all of which were implemented for the work.

Separate permit approvals were obtained for the Bell Rock Substation reconstruction and expansion, including a United States Army Corps of Engineers (USACE) Pre-Construction Notification (PCN), Massachusetts Department of Environmental Protection (MassDEP) Individual Section 401 Water Quality Certification (WQC), and an Order of Conditions issued by the Fall River Conservation Commission.

The wetland resource area impacts associated with the Bell Rock Substation Project are identified in Table 1 below. As detailed in the SEIR, the wetland resource area impacts were previously authorized and permitted separately from the AFRPP.

TABLE 1 BELL ROCK SUBSTATION WETLAND RESOURCE AREA IMPACTS

RESOURCE AREA	TEMPORARY IMPACTS	PERMANENT IMPACTS	SECONDARY IMPACTS
Bordering Vegetated Wetland (BVW)	11,913 square feet	4,244 square feet	4,089 square feet (conversion of forested wetland to scrub-shrub wetland)
Inland Bank (IB)	0	0	0
Riverfront Area (RFA)¹	0	0	0
Bordering Land Subject to Flooding (BLSF)¹	0	0	0

¹ Overlapping impacts in BVW have been removed

On-site wetland restoration to compensate for the permanent wetland impacts associated with the Bell Rock Substation Project was designed and consisted of the creation and restoration of approximately 5,520 square feet (0.13 acre) of historically impacted wetlands.

Acushnet to Fall River Reliability Project (Phase 2)

The total area of new land alteration for the AFRPP will consist of approximately 959,857 square feet (22.0 acres) and includes permanent impacts to upland and wetland areas associated with access, structure installation, work pads, and tree removal.

The proposed wetland resource area impacts associated with the AFRPP are identified in Table 2 below.

TABLE 2 AFRRP WETLAND RESOURCE AREA IMPACTS

RESOURCE AREA	TEMPORARY IMPACTS	PERMANENT IMPACTS	SECONDARY IMPACTS
Bordering Vegetated Wetland (BVW)	307,061 square feet	923 square feet	72,351 square feet (conversion of forested wetland to scrub-shrub wetland)
Inland Bank (IB)¹	2,180 square feet	NA	1,654 square feet 515 linear feet of tree removal along the IB of Copicut Reservoir
Riverfront Area (RFA)¹	23,587 square feet	8,866 square feet	4,606 square feet (conversion of forested areas to scrub-shrub)
Bordering Land Subject to Flooding (BLSF)¹	34,691 square feet	8,016 square feet	47,829 square feet (conversion of forested areas to scrub-shrub)

¹ Overlapping impacts in BVW have been removed

The impacts listed above are unavoidable and will be mitigated through mitigation measures developed in consultation with the applicable state agencies.

Portions of the AFRRP are located in Priority and Estimate Habitat for rare threatened and endangered species in Acushnet, New Bedford, Dartmouth, and Fall River. A total of 145 acres of the Project right-of-way traverses areas identified as NHESP Priority and Estimated habitat areas. The proposed impacts to NHESP priority and estimated habitats associated with the AFRRP are as follows:

- Permanent = 59,201 square feet (conversion of habitat cover type)
- Temporary = 860,392 square feet (construction-related disturbances)
- Secondary (Tree Clearing) = 866,579 square feet

The Companies continue to coordinate closely with NHESP pursuant to the MESA (M.G.L. c. 131A) and MA WPA (M.G.L. c. 131 § 40) to avoid and minimize impacts to state-listed species and their habitats, and to provide mitigation for any unavoidable impacts. The Companies are consulting with the NHESP on the development of a Conservation and Management Plan to mitigate for potential impacts to state-listed rare species.

The Companies intend to obtain permits for construction of the AFRRP to include a USACE PCN, MassDEP Section 401 WQC, and Orders of Conditions from the Fall River, Dartmouth, New Bedford and Acushnet Conservation Commissions.

Cumulative Analysis

The total impacts resulting from both the Bell Rock Substation Project (Phase 1) and the AFRRP (Phase 2) are identified in Table 3.

TABLE 3 COMBINED BELL ROCK SUBSTATION AND AFRRP WETLAND RESOURCE AREA IMPACTS

RESOURCE AREA	TEMPORARY IMPACTS	PERMANENT IMPACTS	SECONDARY IMPACTS
Bordering Vegetated Wetland (BVW)	318,974 square feet	5,167 square feet	76,440 square feet (conversion of forested wetland to scrub-shrub wetland)
Inland Bank (IB)¹	2,180 square feet	NA	1,654 square feet 515 linear feet of tree removal along the IB of Copicut Reservoir
Riverfront Area (RFA)¹	23,587 square feet	8,866 square feet	4,606 square feet (conversion of forested areas to scrub-shrub)
Bordering Land Subject to Flooding (BLSF)¹	34,691 square feet	8,016 square feet	47,829 square feet (conversion of forested areas to scrub-shrub)

¹ Overlapping impacts in BVW have been removed

As you are aware, MEPA, other state regulatory agencies and the local municipalities will have the opportunity to comment on the SEIR. Additionally, the AFRRP Project is under review by the Massachusetts Energy Facility Siting Board (EFSB 21-04) and the Massachusetts Department of Public Utilities (D.P.U. 21-149).

Please do not hesitate to contact me at 781 907-3598, or Erin.Whoriskey@nationalgrid.com, or Chris Newhall, 508-735-0387 or christopher.newhall@eversource.com, if you have any questions or require additional information.

Sincerely,



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Lead Environmental Scientist
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