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August 16, 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 No. 2 – EEA No. 15941
Acushnet, New Bedford, Dartmouth and Fall River, Massachusetts

Dear Ms. Vaughn:

Pursuant to your clarification request received August 15, 2023, related to the Single Environmental Impact Report submittal of June 30, 2023, for the Acushnet to Fall River Reliability Project (AFRRP, Line 114 Project), 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 responses as detailed below.

Request No. 1: *The Single EIR describes approximately 22.03 acres of new land alteration, but 27.5 acres of tree removal. Could you provide the total acreage of land alteration for both Phase 2 and the project as a whole (including areas that have been previously altered), and address the discrepancy between the acreage of new land alteration and tree clearing?*

Table 3-1 in Section 3 of the SEIR states that approximately 22 acres of permanent alteration is required for the Project. The 22 acres of land alteration includes permanent impacts for both Eversource and NEP work activities related to the installation of work pads, access routes, and structure installation, for a total permanent land alteration of approximately 2 acres. The remaining approximately 20 acres of land alteration includes secondary impact (tree removal) along the NEP corridor located outside of other overlapping impact areas. An additional 5.5 acres of secondary impacts (i.e., tree removal) is proposed outside of the permanent impact areas accounted for in Table 3-1 of Section 3, for a total of 27.5 acres of tree removal. The above-referenced land alterations are to occur within existing ROW operated and maintained by NEP and Eversource. Not accounted for in Table 3-1 in Section of the SEIR, is a total of 34 acres of temporary impact which will be restored and stabilized to pre-construction conditions once construction is complete, and was therefore not counted as new land alteration. For clarification, the total disturbance areas for the AFRRP (Phase 2) with overlapping impacts removed includes the following:

- Approximately 2 acres of permanent impact
- Approximately 34 acres of temporary impact
- Approximately 20 acres of secondary (tree removal) impact

The total disturbance areas of the combined Bell Rock Substation Rebuild (Phase 1) and the AFRPP (Phase 2) with overlapping impacts removed are as follows:

- Approximately 2.98 acres of permanent impact (approximately 0.98 acre of previous alteration at Bell Rock Substation has already occurred)
- Approximately 35.9 acres of temporary impact (approximately 1.9 acre of previous alteration at Bell Rock Substation has already occurred)
- Approximately 20.6 acres of secondary impact (approximately 0.6 acre of previous alteration at Bell Rock Substation has already occurred)

Request No. 2: *The Single EIR does not appear to identify areas of BVW replication, or the area or volume of compensatory flood storage for BLSF (as required by the Scope). Could you please either direct me to the project plan sheet that has that info, or explain why that information isn't available at this point in time?*

As described in Section 4 of the SEIR, Eversource is currently evaluating a number of locations within the existing right-of-way (ROW) to fulfill wetland replication and compensatory flood storage requirements. The locations being evaluated have been vetted from an environmental standpoint and would satisfy wetland mitigation requirements in each affected municipality. These sites are being evaluated from a legal, real estate and constructability perspective. These mitigation sites will be developed and presented in the Section 401 Water Quality Certification to be filed with the MassDEP. Wetland and compensatory flood storage mitigation plans will be prepared and submitted as a component of the Notice of Intent filings to be submitted to the municipal Conservation Commissions as well as the MassDEP.

NEP participated in discussions with the Fall River Conservation Commission and the MassDEP, and NEP is proposing to apply the “overdesign” of the wetland compensation area at the Bell Rock Substation site, in order to offset the permanent impacts proposed on the AFRPP/ Line 114 Project. For the Bell Rock Substation Rebuild Project, NEP designed a wetland compensation area that totaled approximately 5,520 square feet to offset approximately 4,244 square feet of permanent wetland loss (an overdesign of approximately 1,276 square feet). This mitigation area is located to the north of the existing Bell Rock Substation and within the same watershed as the wetland impacts proposed on the Line 114 Project in the City of Fall River.

Request No. 3: *Could you please confirm that the area of secondary impacts does not overlap with areas of temporary and/or permanent impacts.*

Secondary impacts (tree removal) totaling approximately 27.5 acres will occur within the NEP ROW. This number includes areas of overlapping permanent and temporary impacts. Approximately 7.5 acres of secondary impact overlaps with other permanent and/or temporary impacts.

Request No. 4: *The Scope also requested a discussion of providing a vegetative buffer at roadway crossings, but I didn't see this in the filing. Could you please address?*

Mowing and removal of vegetation near public roadway crossings along the ROW may be required for the purposes of access or stringing new overhead conductor. Once construction is complete, the Companies can assess where vegetative buffers can be safely allowed to re-establish without interfering with the overhead lines and ROW facilities. As described in Section 3.1.2 of SEIR, after construction of the Project, plant species that are generally encouraged to re-establish along the ROW include herbaceous and shrub species and other vegetation that has a mature height of less than approximately 12 feet on NEP ROW and 15 feet on Eversource ROW. Once these species are re-established within the ROW, they will provide a level of screening along the public roadways that intersect with the transmission ROW.

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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