

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
N12/M13 Double-Circuit Tower Separation Project
EEA No. 16467
Single Environmental Impact Report (Addendum)

Dear Ms. Vaughn:

We are in receipt of your email inquiry, dated August 14, 2023, posing some questions about the Single Environmental Impact Report filed by New England Power Company for the N12/M13 Double-Circuit Tower Separation Project (EEA No. 16467). Provided herein is New England Power's (NEP) response to your inquiry.

Question: *Could you confirm that the project still involves the below impacts:*

- *the alteration of approximately 11.55 acres of land, 11 acres of which is described as temporary impact associated with clearing and/or grading to create temporary work areas.*
- *the alteration of approximately 91,675 sf (2.10 acres) of Designated Port Area (DPA).*

NEP Response:

Acres of Disturbance

As noted in the Environmental Notification Form and again in the Single Environmental Impact Report (SEIR) filed for the N12/M13 Double-Circuit Tower Separation Project (Project), the Project will result in land disturbance of up to approximately 11.0 ac. This area encompasses the Project footprint located within the existing 1.85 mi of NEP right-of-way (ROW) located in Somerset and Fall River. NEP is seeking additional easement on private property to facilitate the construction of the Project. The easements would be used as temporary construction staging areas to include approximately 0.8 ac in Somerset at the former Montaup Power Plant property, and an expanded area of approximately 4.5 ac in Fall River at the former Shell Oil Terminal property to support the staging of materials to the west of the MBTA South Coast Rail facility. The expanded temporary construction staging area is dependent upon negotiations with the landowner. These sites are previously developed and would not be permanently altered by the construction of the Project.

Tree Removal

As presented in Section 3.1, pages 23-24, of the SEIR, the NEP ROW will require vegetation management prior to construction of the Project. The vegetation management is to include mowing, side-

trimming, tree removal in specific areas of the Project footprint, and select removal of danger and hazard trees, as determined by National Grid's Forestry Department. Vegetation management will be required along much of the 1.85 miles of the existing NEP ROW with the predominance of tree removal occurring within the areas listed below. Please refer to SEIR Appendix B, Project Figures (see Legend) for proposed tree removal locations.

For clarification, tree removal (beyond the removal of danger and hazard trees) is proposed at the following locations on the Project route:

1. NEP ROW and New Easement Located between the Fall River side of the Taunton River and the MBTA Railroad Tracks - Select tree removal will be required within the NEP ROW in Fall River to facilitate safe clearance for the DCT separation and construction requirements for the installation of the 300-foot high Y-frame structure M13N-6 (approximately 2.15 ac).
2. NEP ROW West of State Route 24 – Select tree removal to accommodate the installation of structure M13N-16 and the replacement of structure N12-16, and to facilitate the stringing of conductor over the Wilson Road Bridge and State Route 24 (approximately 0.3 ac).
3. NEP ROW East of State Route 24 Extending to the Sykes Road - Select tree removal along the southern edge of the ROW to facilitate the replacement of the existing M13 and N12 transmission structures. Residential development is located to the southeast of the NEP ROW along Wilson Road in Fall River. A visual buffer of existing trees, in the approximate range of 10 feet to 65 feet wide (located outside of the NEP ROW) will remain, if the abutting landowners do not remove the trees located on their properties (approximately 0.4 ac).

Designated Port Area

Please refer to the attached Mount Hope Bay Designated Port Area map. The boundaries of the Mount Hope Bay Designated Port Area (DPA) extend northward into Somerset and Fall River to include the sites of the former Montaup Power Plant and Shell Oil Terminal, both of which are located along the developed waterfront of the Taunton River. The existing N12-5 transmission structure and proposed M13N-5 transmission Y-frame structure are both located within the DPA, on the Somerset side of the Taunton River. Approximately 1,378 sf (0.03 ac) of previously developed land within the DPA will be displaced by the footprint of the proposed Y-frame transmission structure M13N-5. The new Y-frame structure will be located within NEP's existing ROW. Approximately 58,461 sf (1.3 ac) of temporary construction staging area will be located within the DPA in Somerset, and this staging area is located on previously developed land (i.e., asphalt, concrete).

A temporary construction staging area of approximately 4.5 ac in size is slated to be used at the former Shell Oil Terminal property in Fall River. The former Shell Oil Terminal property is located within the boundaries of the DPA. The 4.5 ac of temporary construction staging area is to occur on previously developed land (i.e., fill, gravel, asphalt, concrete).

There is no permanent alteration to land within the DPA anticipated, except for the footprint of the new Y-frame transmission structure (M13N-5) sited in Somerset. Please refer to SEIR Appendix B, Project Figures. The Project is an infrastructure crossing facility and will not interfere with navigation or other marines uses within the DPA. According to the performance standards for DPAs set forth in the Massachusetts Wetlands Protection Act and regulations at 310 CMR 10.26, when land under the ocean in DPAs is found to be significant to the protection of marine fisheries, storm damage prevention or flood control, 310 CMR 10.26(3) and 310 CMR 10.26(4) shall apply:

- 310 CMR 10.26(3) Projects shall be designed and constructed, using best practical measures, so as to minimize adverse effects on marine fisheries caused by changes in:
 - water circulation;
 - water quality, including, but not limited to, other than natural fluctuations in the level of dissolved oxygen, temperature or turbidity, or the addition of pollutants.

The Project does not involve impacts to land under the ocean. Onshore construction will include the implementation of construction best management practices to avoid adverse effects on water circulation and water quality, and to avoid adverse effects on marine fisheries.

- 310 CMR 10.26(4) Projects shall be designed and constructed, using the best practical measures, so as to minimize, adverse effects on storm damage prevention or flood control caused by changes in such land's ability to provide support for adjacent coastal banks or adjacent coastal engineering structures.

The onshore transmission facilities will be designed and installed using industry-recognized best practical measures to avoid and minimize adverse effects on storm damage prevention and flood control, as addressed in Section 4 of the SEIR – Climate Change Adaptation and Resiliency. The Project will not effect the existing wharf or coastal engineering structures that protect and armor the shoreline on the west and east sides of the Taunton River within the DPA.

Please do not hesitate to contact me at 781.907.3598, or Erin.Whoriskey@nationalgrid.com, or Jamie Durand, 401.439.3020 or jamie.durand@powereng.com, if you have any questions or require additional information.

Sincerely,



Erin Whoriskey
Lead Environmental Scientist
National Grid

Attachment – Designated Port Area Map

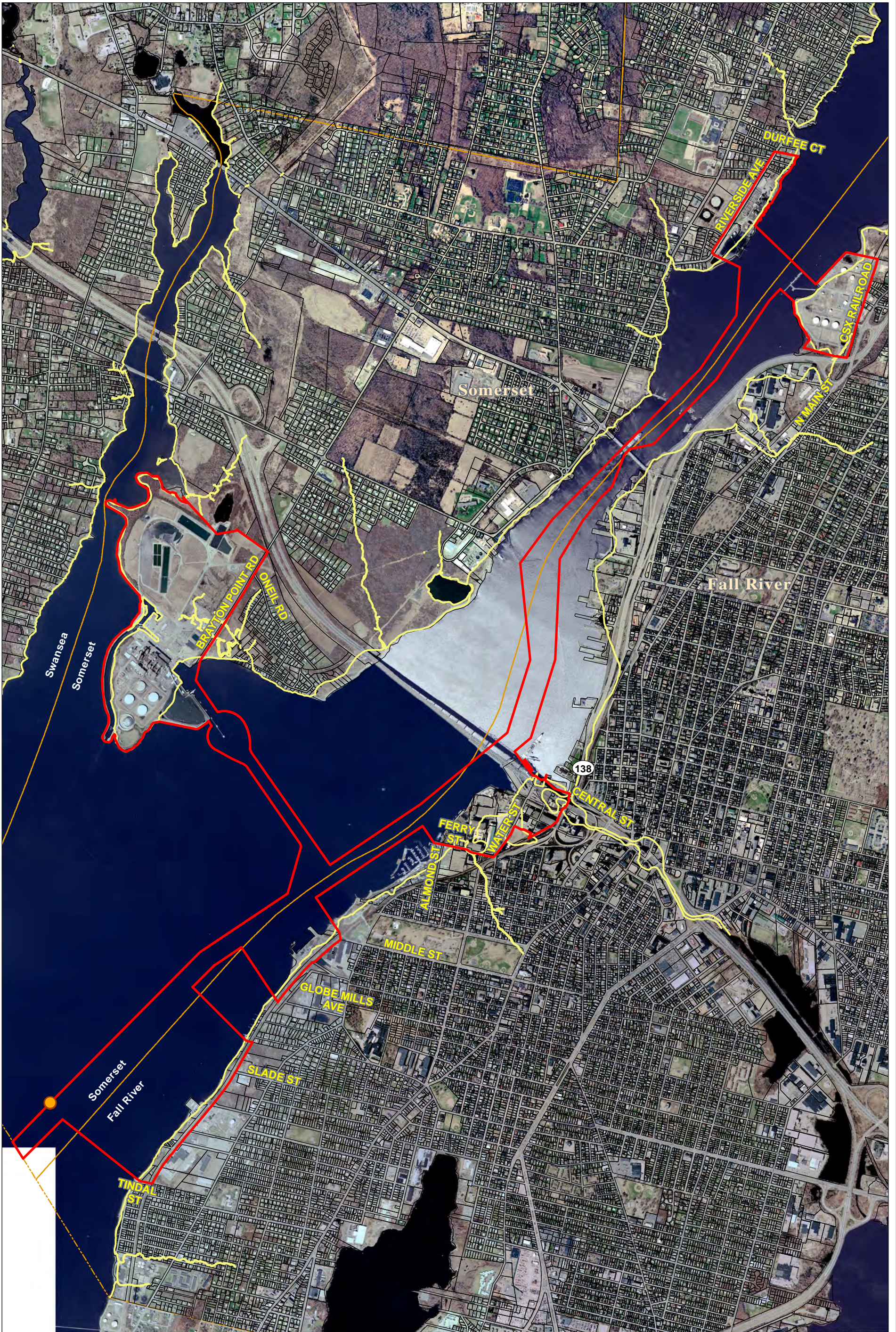
cc: Circulation List
D. Beron, NEP
J. Durand, POWER



Mount Hope Bay

Designated Port Area (DPA)

For planning purposes only. In the event of conflict between this map and the accompanying written description, CZM shall issue a written clarification pursuant to the Designated Port Area (DPA) regulations at 301 CMR 25.00.



- Point of Beginning
- Designated Port Area Boundary
- Chapter 91 Presumptive Line

- Municipal Boundary
- Assessor's Parcel



Base map: MassGIS 1:5,000 Color Ortho Imagery, 2001.
 Map coordinate system: North American Datum of 1983,
 Massachusetts State Plane Coordinate System,
 Mainland Zone (FIPS zone 2001), meters.

