



POWER ENGINEERS CONSULTING, PC

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PHONE 774-643-1800

August 1, 2024

Mrs. Amy Silva
Supervising Environmental Scientist
Coastal Resources Management Council
4808 Tower Hill Road, Suite 116
Wakefield, RI 02879-1900

Subject: The Narragansett Electric Company d/b/a Rhode Island Energy
L14 and M13 Mainline Rebuild Project
Category B Assent and Freshwater Wetlands Permit Application to Rhode Island
Coastal Resources Management Council (CRMC)

Dear Mrs. Silva:

The Narragansett Electric Company d/b/a Rhode Island Energy (the Company) received an email from the Coastal Resources Management Council (CRMC) on July 26, 2024, regarding several clarifying questions and comments to the Category B Assent and Freshwater Wetlands Permit Application submitted by the Company on June 14, 2024. POWER Engineers, Inc. (POWER), on behalf of the Company, has formalized the following responses to the information request posed by CRMC and are as follows:

Question 1: *Can you confirm that the coastal wetland mitigation area is new wetland?*

Response: Yes, the proposed salt marsh mitigation area is currently upland that will be excavated and converted to salt marsh. Based on field investigations, the proposed mitigation site consists of compacted gravel fill at a depth of 8" below the surface. It is anticipated that a buried organic horizon is present below this gravel fill which will be used for the mitigation area and be available for natural regeneration of native saltmarsh vegetative growth.

Additionally, the Company has further improved and advanced the salt marsh mitigation plans and means and methods. Please see the attached updated Appendix K, Salt Marsh Mitigation Plan.

Question 2: *Also, are you doing Freshwater Wetland mitigation for the Freshwater Permanent Impacts?*

Response: The CRMC Rules and Regulations for Freshwater Wetlands outline the conditions for exempt activities involving existing structures within a jurisdictional area. These regulations permit limited maintenance and repair activities that might increase the structure's size. For example, the replacement of utility poles, including changes in their physical size, is allowed as long as there are no changes to existing or approved cleared rights of way (650-RICR-20-00-9.6.3.A.14).

As previously discussed in the Supplemental Filing to the CRMC on July 12, 2024, proposed work within CRMC jurisdiction includes approximately 548 square feet of permanent impact to coastal wetland and approximately 101 square feet of permanent impact to freshwater wetlands in the vicinity of the coast. The Company understands that utility structures are not included under the exceptions to prohibited activities and alterations to salt marsh under Section 1.2.2.C of the Red

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Book. Therefore, the Company submitted a request for a special exception and a 2:1 compensatory mitigation for permanent alteration to a coastal wetland including salt marsh. However, the Company understands that the minimal permanent impact to freshwater wetlands within CRMC jurisdiction should be permitted as exempt under §9.6.3(A)(14) of the Rules and Regulations.

Under §9.6.3(A), “repair and maintenance is limited to routine activities necessary to ensure the upkeep of structures built in accordance with all necessary Federal, State and local permits.” As discussed in the application narrative, Section 1.3 Purpose and Need, the Project is needed to address the asset condition issues of the current Lines and the deficiencies along the Lines and the aging infrastructure. If the L14 and M13 Lines are not rebuilt, the area may face future reliability issues resulting from the asset conditions of the L14 and M13 Lines. The approximately 101 square feet of permanent impact is a result of larger structures and foundations necessary to meet current Rhode Island Energy and engineering safety standards. Therefore, the Company is not proposing a freshwater mitigation plan for the Project because the understanding is that this work is exempt and permitted under §9.6.3(A)(14) of the Rules and Regulations.

However, it should be noted that mitigative measures will be provided as part of the Project. As described in Section 5.3 of the Project Narrative, the Project consists of upgrades of existing transmission lines within an existing ROW, and therefore mitigation efforts are focused on the short-term temporary construction phase of the Project, as there are no long-term impacts to mitigate for as a result of Project activities. Some of the mitigation measures to be used include the following:

- Access through wetlands will be provided by using construction mats from the existing maintained portion of the ROW.
- Excavated soils will be stockpiled and spread in approved upland areas outside all biological wetland areas and floodplains in such a manner that general drainage patterns will not be affected.
- Construction access will be limited to the existing structure locations, work pads, and proposed access routes, and will be lined with erosion and sedimentation control BMPs where needed.
- Each area will be restored following installation of the structures and installation of the new wires and conductors.

The Company will provide in-situ mitigation as part of the restoration and stabilization of the ROW. Restoration efforts, including removal of construction debris, final grading, stabilization of disturbed soil, and the installation of permanent sediment control devices, will be completed following construction. In-situ restoration of disturbed soils will allow natural revegetation and disturbed areas around structures and other graded locations will be seeded with an appropriate conservation seed mixture and/or mulched to stabilize the soils in accordance with applicable regulations. After the Project is complete, disturbed wetland areas will be stabilized using a specialized wetland seed mix and straw mulch (if needed) as outlined in Rhode Island Energy’s Environmental Guidance Document EG-303NE (Appendix F of the Category B Assent Permit Application Project Narrative), facilitating natural revegetation. Construction mats used during the Project will be thoroughly cleaned before they are reused.

Temporary impacts to wetlands will also be mitigated by the removal of construction matting by the Company after construction is completed. All reasonable attempts will be made to remove original pole structures in their entirety, including the pole butts, and if this is not feasible, the pole butt will be left in-place and cut 18” below the ground surface. Existing poles in wetlands that are

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removed after new poles are installed and operational will allow for the ground and habitat to naturally restore to original conditions as well.


Question 3: *Can we get a plan that shows where the mitigation area is located? You have submitted a very closeup and a very zoomed out locus.*

Response: Yes, attached is an aerial screenshot including the location of the salt marsh mitigation site for reference.

Access to the mitigation area will come from Anthony Road in Portsmouth, RI, where an existing access road will be restored to the right-of-way (ROW), leading from Anthony Road to proposed Structure L62. The access road from Structure L62 will lead north towards proposed Structure L59X which is located adjacent to the salt marsh mitigation site. See sheets 31-33 of the Soil Erosion and Sediment Control Plans, Appendix B in the original CRMC filing (these sheets are additionally attached to this response).

Thank you for your attention to this matter. If you have any further questions, please do not hesitate to contact me at 401-439-3020 or jamie.durand@powereng.com.

Sincerely,



James Durand
Environmental Project Manager

Cc: Marc Smith, RIE
Rich Lucia, RI CRMC
Keith Goulet, USACE

Attachments: Wetland Mitigation Area Locus Map
Soil Erosion and Sediment Control Plans—Sheets 31-33





- Salt Marsh Mitigation Area
- Project Centerline
- Transmission Line
- Existing or Proposed Power Facility
- State Highway
- Local Road
- Town Boundary

REVISIONS:



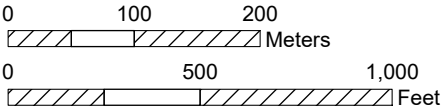
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CONTRACTOR SHALL NOT CONDUCT EARTH DISTURBANCE BEYOND THE LIMITS SHOWN ON THESE DRAWINGS WITHOUT PRIOR APPROVAL BY RI ENERGY CORPORATION'S REPRESENTATIVE RESPONSIBLE FOR EROSION & SEDIMENTATION CONTROL ON SITE. THE REVIEWING AGENCY SHALL BE NOTIFIED BY PPL ELECTRIC UTILITIES CORPORATIONS REPRESENTATIVE RESPONSIBLE FOR EROSION & SEDIMENTATION CONTROL ON SITE OF ANY CHANGES TO THE APPROVED PLAN PRIOR TO THE IMPLEMENTATION OF THOSE CHANGES.



PROJECT LOCUS MAP

Scale 1"=500' when printed at 11" by 17"



Rhode Island Energy
280 Melrose Street
Providence, RI 02907

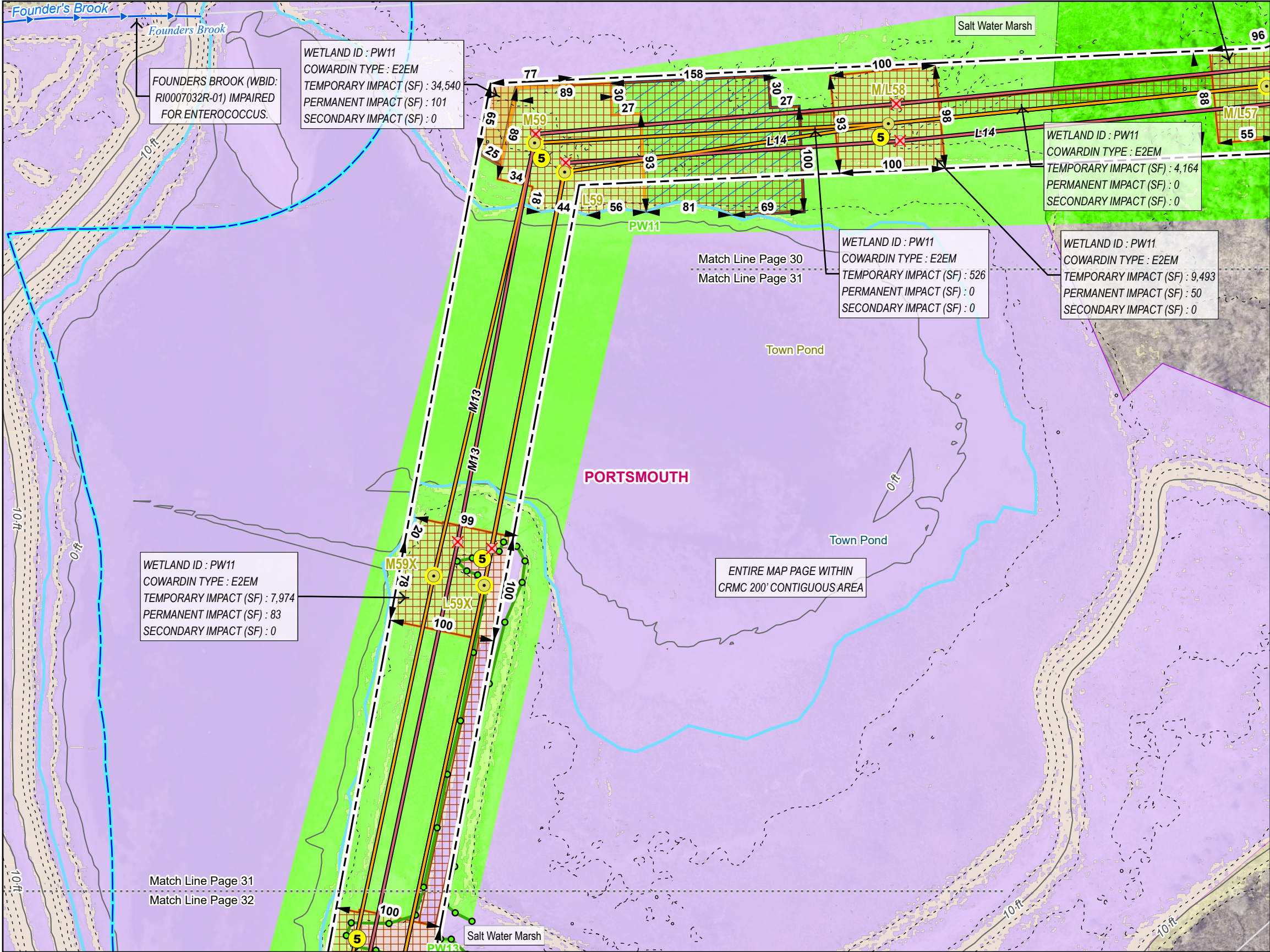
WETLAND MITIGATION AREA LOCUS MAP
L14 & M13 Mainline Rebuild Project
Rhode Island Energy
Town of Portsmouth, Rhode Island

SCALE
AS NOTED

JOB NO.
249458

DATE:
8/1/2024

SHEET
1 of 1



REVISIONS:

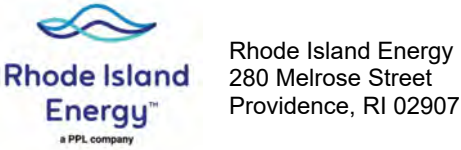
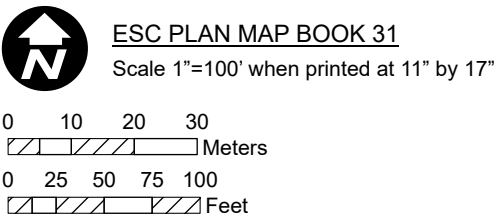
The project Limit of Disturbance (LOD) are comprised of the outer edge of all work pads, pull pads, grading areas, and road improvements within the right-of-way (ROW) shown on these plans.


Final determinations will be made in the field by Rhode Island Energy as to the extent of grading that is required for access roads and work pads, so as to minimize rock removal and earth disturbance.

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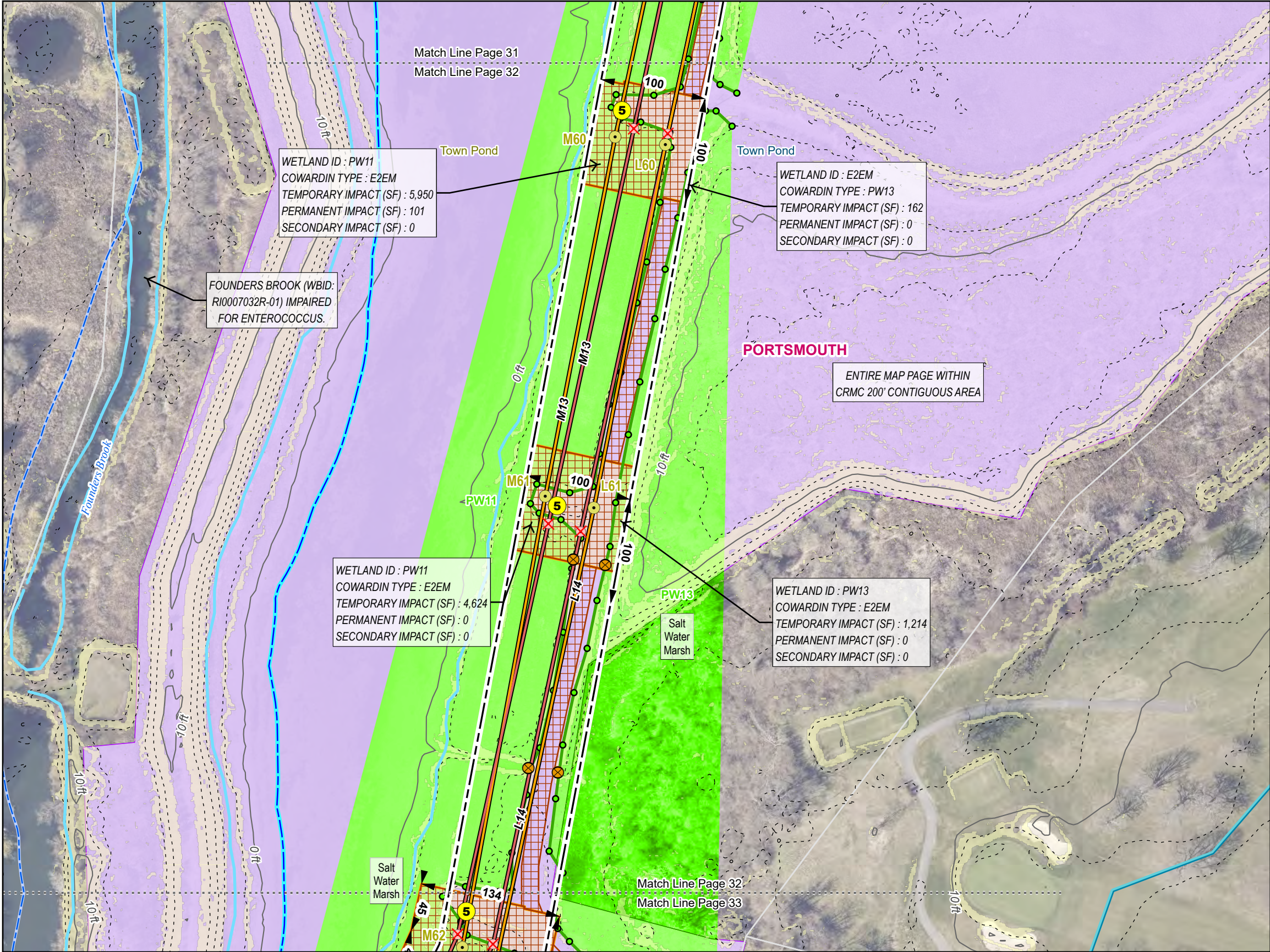
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SOIL EROSION AND SEDIMENT CONTROL PLAN			
L14 & M13 Mainline Rebuild Project			
Rhode Island Energy			
Town of Portsmouth			
State of Rhode Island			
SCALE AS NOTED	JOB NO. 249458	DATE: 6/12/2024	SHEET 31 of 47



- Proposed Structure
- Structure To Be Removed
- Proposed Structure with Concrete Foundation
- Existing Transmission Line
- Proposed Transmission Line
- Existing Right of Way
- Temporary Work Area - Mow Only
- Construction Matting
- Index Contour (10' Interval)
- Contour (2' Interval)
- 0 - 15% Slope
- > 15% Slope
- Parcel Boundary
- Culvert
- Wetland Flag
- Wetland Border
- Mean Annual High Water Line
- River/Stream Jurisdictional Area (200')
- 200 ft CRMC Contiguous Area
- Field Delineated Wetland
- FEMA - 100 Year Floodplain
- Local Conservation Area
- State Conservation Area
- 5 Install temporary mud box.

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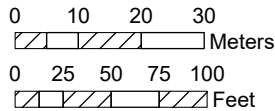
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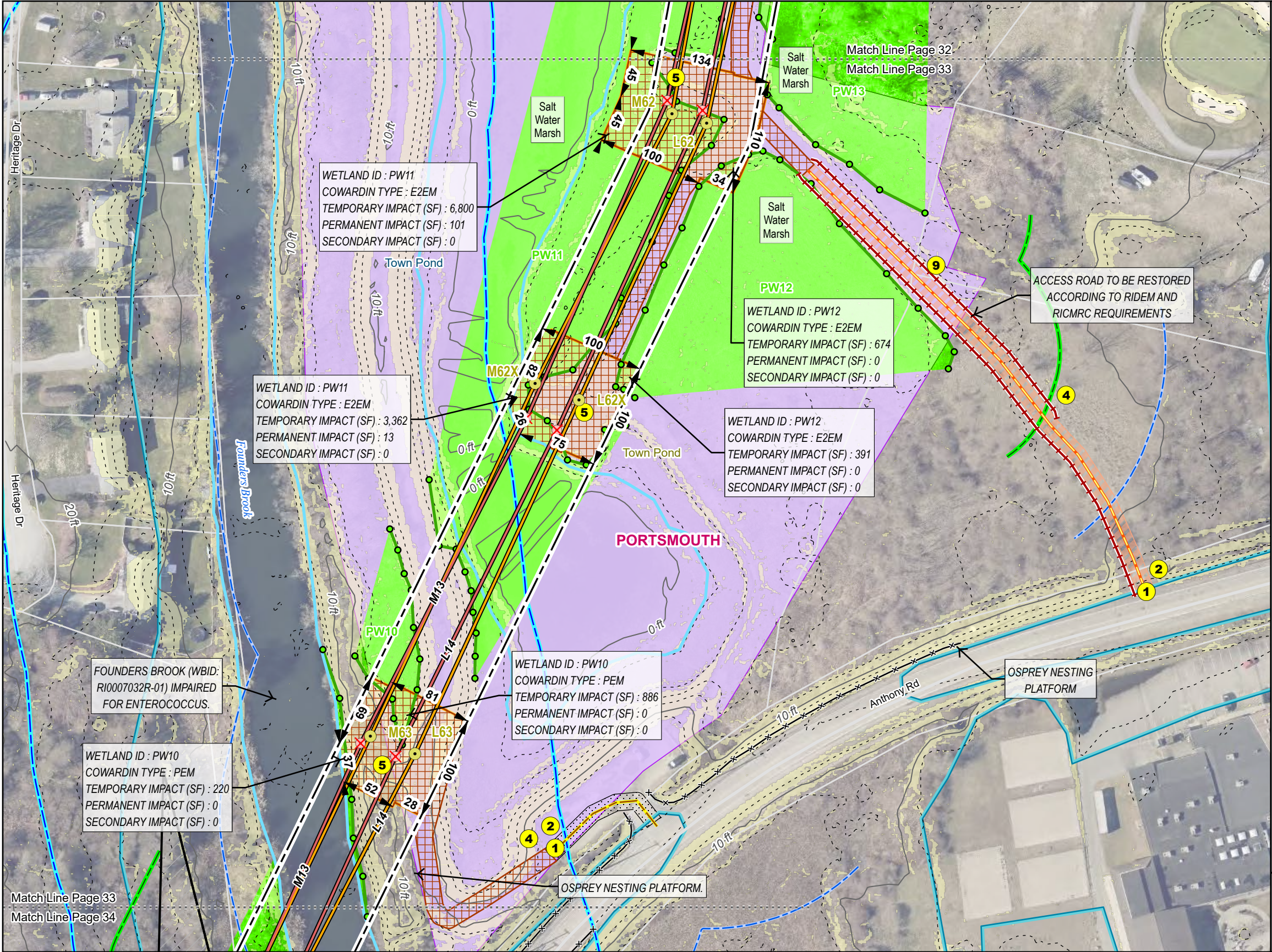
ESC PLAN MAP BOOK 32
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SOIL EROSION AND SEDIMENT
CONTROL PLAN
L14 & M13 Mainline Rebuild Project
Rhode Island Energy
Town of Portsmouth
State of Rhode Island

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- Proposed Structure
- Structure To Be Removed
- Proposed Structure with Concrete Foundation
- Existing Transmission Line
- Proposed Transmission Line
- RIE Owned Land
- Existing Right of Way
- No Improvements - Existing Access (15' Wide)
- Minor Improvements - "Type 1 - RIE Standard Road", grade and scrape per specifications (15-feet and 6 inches either side) and add depth of stone per standard Type-1 specifications
- Perimeter Sediment Control
- Minor Improvements - "Type 1 - RIE Standard Road", grade and scrape per specifications (15-feet and 6 inches either side) and add depth of stone per standard Type-1 specifications
- No Improvements - Existing Access (15' Wide)
- Temporary Work Area - Mow Only
- Construction Matting
- Minor Road
- Index Contour (10' Interval)
- Contour (2' Interval)
- 0 - 15% Slope
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- 200 ft CRMC Contiguous Area
- Field Delineated Wetland
- FEMA - 100 Year Floodplain
- Local Conservation Area
- State Conservation Area
- 1 Install Stabilized construction ingress/egress
- 2 Install temporary concrete wash station.
- 4 Dewatering Area
- 5 Install temporary mud box.
- 9 Perimeter Sediment Controls

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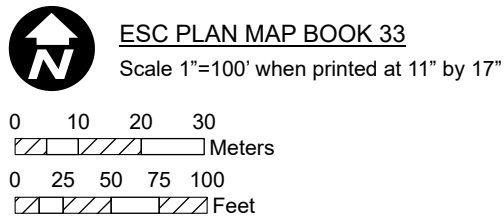
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