

## General Questions for CMP

from Jim Beyer

11 December 2017

1. Please describe the non-specular conductors. Where are these to be located, along the entire length of the project or only in certain locations?
2. How durable is the coating and does weathering change its appearance?
3. Despite what Section 7 of the Site Location application says at the top of page 44, there are numerous structures located within 25 feet of rivers, streams, or brooks identified on the Waterbody Crossing Table. The closest one is a structure located with one-foot of Chase Stream in Moscow. For those crossings where a structure is located within 25 feet of the river, stream, or brook please provide a site-specific erosion control plan for that crossing. Also, please provide additional information on why these structures cannot be located further from these resources. Crossings meeting this criterion are identified in the Excel spreadsheet **in red**.
4. There appears to be some discrepancies in the Waterbody Crossing Table, particularly around the streams in mile 73 on Segment 2. The table has a crossing listed of ISTR-73-04, but I could not locate that stream on the resource maps. There is a stream labeled PSTR-73-04. Please recheck the crossing table with the resource maps to make sure they are correct.
5. Between Maine Yankee and structure 3027-204 there are no proposed structures and the line appears to run on existing structures. Is this correct? Are you going to utilize the existing structures?
6. The Compensatory Mitigation package only deals with impacts to freshwater wetlands, IWWHs and SVPs. There is no discussion about compensation for impacts to other resources, such cold-water fisheries or impacts to existing recreational uses of the Outstanding River Segments. The project crosses 67 rivers, streams, or brooks which contain brook trout habitat and five Outstanding River Segments and according to the vegetation management plan all vegetation over ten feet tall will be removed. While the Department has not yet made a determination whether the impacts to these resources are unreasonable there will certainly be impacts to these resources. Please provide a mitigation package to compensate for these impacts. The Department envisions this mitigation package will be the responsibility of CMP to implement, not simply providing additional ILF monies.
7. The noise report for the Fickett Road Substation states, "Without the operation of the cooling fans, the STATCOM would be under 40 dBA at the north property line..." What would the sound levels be with the cooling fans included in the modeling? In addition, the report indicates that this portion of the project may generate tonal sounds and therefore be subject to a 5-dBA penalty meaning the sound levels would need to be less 40-dBA at the nearest protected location. The noise contour map shows the 40-dBA line

crossing the property line to the north and impacting PL1 and PL2. Please describe what noise mitigation measures will be taken to bring the project into compliance with the noise standard.

8. The noise report for the Coopers Mills Road Substation states that it is unclear whether this portion of the project will produce tonal sound, but even without a 5 dBA penalty, the anticipated sound levels will exceed the noise standards. Please analyze the sound levels from the equipment to be installed to determine if it creates tonal sound. Please describe what additional noise mitigation measure you propose to bring the project into compliance with the noise standards.
9. Table 5-18 indicates that the predicted sound level at PL2 is 45.5-dBA and at PL3 is 45.8-dBA, however the sound contour map (figure 5.5.5) indicates that the predicted sound levels at these two property lines is near 40-dBA. Please indicate which is correct.
10. Exhibit 7-3 provides information concerning impacts to IWWHs including the amount of acreage to be cleared. Please provide the cumulative amount of total of area to be cleared in IWWH.
11. Unlike the exhibit for IWWH, Exhibit 7-5 does not provide the amount of area to be cleared in the vernal pool habitats. Please provide the cumulative amount of area to be cleared in vernal pool habitats broken down by whether the pools are significant, potentially significant, or amphibian breeding areas.
12. The majority of the poles for the DC portion of the line are single-pole, self-weathering, structures that are approximately 100 feet tall. Will these structures be placed on a foundation or will they be placed in a drilled hole similar to other utility line structures? If they are to be placed on a foundation, please provide typical dimensions. Also, please provide typical dewatering plans for foundation holes, and site-specific plans for those structures within 75 feet of a protected natural resource.
13. The VCP states that there will be no accumulation of slash within 250 feet of an IWWH and impacts to scrub-shrub vegetation in and within 250 of an IWWH will be minimized. Do you mean within 250 of the wetland that creates the IWWH or do you mean 250 back from the edge of the IWWH. An IWWH includes the wetland as well as a 250-foot area around the wetland.
14. The VMP states that all woody vegetation in the wire zone, whether capable or non-capable will be cut during routine maintenance. Much of the DC line will be hung from structures that are approximately 100 feet tall, with the conductors, at the structure location approximately 75 feet above the ground. This will result in the conductors being substantially higher than other transmission lines with 45-foot tall structures. Why do non-capable species that are over ten feet tall need to be removed with 25 feet of streams and brooks, especially in that portion of the project from Beattie Township to the Forks?
15. In the vegetation maintenance restrictions within stream buffers, the VMP states that these additional restrictions will allow for taller vegetation within the 25-foot buffer area to provide additional shading and reduce impacts. With the exception of cutting by hand,

restrictions on herbicide use, and restrictions on refueling, what different practices does CMP utilize during maintenance that allows for taller vegetation to grow? The first bullet in that sections states that all woody vegetation, whether capable or non-capable will be cut.

16. In the Installation of Crossings section of the Environmental Guidelines for Construction and Maintenance Activities on Transmission Line and Substation Projects, section 4.2, Installation of Culverts states, “Compaction should be done in no less than 8-inch lifts.” Should this read, “Compaction should be done in no **more** than 8-inch lifts”?
17. In the Groundwater section of the application there is a discussion about abandoning groundwater wells. Do you know of any wells that will need to be abandoned as part of this project?
18. You will need to provide estimated quantities of construction debris and final disposal location(s).