



April 30, 2015

Ref: 57666.00

Mr. Rob Evans  
Vermont Department of Environmental Conservation  
Watershed Management Division  
1 National Life Drive, Main 2  
Montpelier VT 05620-3522

Re: TDI New England  
New England Clean Power Link Project  
Grand Isle, Rutland, and Windsor Counties, Vermont  
Flood Hazard Area and River Corridor Individual Permit Application

Dear Rob:

On behalf of TDI New England ("TDI-NE"), VHB has prepared the enclosed Individual Flood Hazard Area and River Corridor Permit application, narrative, and supporting documents for the New England Clean Power Link project ("NECPL" or "Project"). The NECPL project is designed to transmit high voltage direct current ("HVDC") electricity with a capacity of 1,000 megawatts ("MW") from Canada to the New England electric grid. This electric transmission line is proposed to extend from the Canadian Border at Alburgh, Vermont to Ludlow, Vermont along underwater and underground routes. In Ludlow, the line will terminate at the proposed converter station, where electricity will be converted from HVDC to alternating current, and then extend to the existing Vermont Electric Power Company ("VELCO") 345 kV Coolidge Substation in Cavendish, Vermont, located approximately 0.3 miles to the south of the proposed converter station. The overland portion of the route will traverse through portions of one town in Grand Isle County, Vermont and twelve towns in Rutland and Windsor Counties, within existing rights-of-way (e.g., roads, railroad). The proposed alignment would intersect a total of 52 perennial streams that would be crossed. Each of these crossings has been documented and the construction method that is proposed to be used to complete the crossing has been identified.

A Stream Alteration Permit application for this work was filed with the Agency on March 6, 2015. That application package addressed, in part, some of the requirements of the State Floodplain Permit, such as identifying locations where the project crosses FEMA-designated floodways and floodway fringes or ANR-designated Fluvial Erosion Hazard ("FEH") Areas and River Corridors. Since the Flood Hazard Area and River Corridor Permit ("Floodplain Permit") came into effect on March 1, 2015, TDI-NE has held multiple meetings with the Agency to discuss the Project and compliance with the Floodplain Permit. One of the outcomes from these meetings has been the development of additional guidance that the Project will follow in order to meet the objectives of the Flood Hazard Area and River Corridor Protection Procedure, in particular to ensure that the cable is buried deeply enough within the River Corridor to protect it from damage or



exposure during an extreme event. Mike Kline, State Rivers Program Manager, provided a summary of this guidance via email on April 10, 2015. This application package has been developed based on TDI-NE's understanding of that guidance and the assumption that, due to the breadth and complexity of the Project, the Secretary would require that the Project seek coverage under an Individual Permit rather than authorize coverage under the provisions of the General Permit.

The following application materials are being provided in hard copy as well as electronically on the enclosed CD ROM:

- Flood Hazard Area and River Corridor Individual Permit Application
- Narrative and Supporting Materials
  - Perennial Stream Crossing Index Map and GIS map series
  - Table of Proposed Stream Crossings
  - Photographic Inventory of Proposed Perennial Stream Crossings, documenting existing conditions at each crossing site and the adjacent landscape
  - Typical construction details for the project
  - EPSC plan sheets for proposed Horizontal Directional Drill ("HDD") crossing locations
  - List of Abutters to Proposed Perennial Stream Crossings

The list of project abutters adjacent to crossings of perennial streams subject to jurisdiction under the Flood Hazard Area and River Corridor Permit has been prepared in accordance with the requirements of the Individual Permit and has been included in Appendix 6 of the Narrative. As we discussed during our meeting on March 17, 2015, the abutter notifications have been prepared but have not been mailed, pending further discussions with the Agency of Natural Resources and the potential for a unified notification process for the project.

Please let us know if you have any questions or need additional information.

Sincerely,

Handwritten signature of Jeffrey A. Nelson in black ink.

Jeffrey A. Nelson, CPESC, CPSWQ  
Director, Energy and Environmental Services

Handwritten signature of Robert Wildey in blue ink.

Robert Wildey, CPESC  
Water Resources Consultant

JAN/RAW/pwe  
Enclosures

cc: Billy Coster (cover letter and CD only)  
Josh Bagnato (cover letter and CD only)  
Bob Harrison (cover letter and CD only)  
Andy Raubvogel (cover letter and CD only)  
Galen Guerrero-Murphy (cover letter and CD only)