Exception Request No.: 137

Section: WMNF Town: Easton

Highway: NH 116, Easton Road (Tier 3)

Station: 734+00 to 735+00 Drawing No.: WMNF C103

Survey Report Cross Reference No.: WMNF C103

Exception Type: Alignment in Pavement

Traffic Information

NHS: No ADT: 200

Traffic Control Type: Alt 1-way

Traffic Control Duration: Traffic control duration is estimated to be 5 days for the proposed installation,

during which one lane will be closed.

Summary of Justification for Exception

NPT is requesting an exception from the UAM guidelines for the location of the cable trench in the pavement on NH 116 (Easton Road) from STA 734+00 to 735+00 of the NPT WMNF underground alignment section. (See Exhibit A.)

Due to a conflict with an existing utility pole, construction outside the paved area is not practicable. There is not sufficient room to relocate the pole inside the outer edge of the EIS Study Area (as defined below) and place the duct bank outside the pavement. The proposed alignment is located beneath the pavement at a 5-foot offset from the utility pole to avoid future conflicts with pole repairs or replacement.

Technical Discussion of Justification of Exception

NPT must plan to install any facilities and conduct any work within 20 feet of the edge of pavement, consistent with the study area for the draft Environmental Impact Statement prepared by the U.S. Department of Energy (DOE) for purposes of reviewing NPT's application to DOE for a Presidential Permit and NPT's request for a special use authorization from the United States Forest Service. Specifically, as part of NPT's Presidential Permit process and NPT's request for a special use authorization from the United States Forest Service, the federal agencies have prepared a draft Environmental Impact Statement ("draft EIS"), and are on the verge of issuing a final EIS that is necessary to support issuance of all federal permits. The draft EIS analyzed an area of impact within 20 feet from the edge of pavement on each side of the road (the "EIS Study Area"). This study area limits the design area available to NPT. The federal agencies may only issue authorizations consistent with the analysis conducted in the National Environmental Policy Act (NEPA) process (e.g., the draft and final EIS), and therefore NPT must plan to install any facilities and conduct any work within the EIS Study Area.

The roadway alignment at this location is constrained by a utility pole (NHE2170) located on the eastern side of NH 116 (Easton Road). The existing overhead distribution line generally runs along the west side of the ROW, but crosses to the east in this vicinity for this single pole set on a steep slope above the roadway. There is not sufficient space off the pavement to install the duct bank without relocating the

pole. However, relocating this utility pole to provide sufficient area to construct the duct bank will go beyond the outer edge of the EIS Study Area for the modification of existing guys and anchors that will need to be relocated. Furthermore, the steep slope introduces additional workspace limitations as well as safety issues working above the roadway.

NPT also evaluated placing the cable trench alignment on the western side of the road in this area. However, as noted above, the overhead distribution line is located along the western side with the exception of this single pole, creating additional conflicts. Moreover, moving the alignment to the western side of the road would require two additional highway crossings. These road crossings would involve disturbance to approximately 100 feet of paved roadway, which is the same amount of pavement disturbance as the requested exception, so there is no marginal benefit to this option. In addition, there would be additional traffic impacts and additional delays associated with the construction of the two road crossings.

<u>Note:</u> NPT is requesting an exception for the portion of the alignment from station 734+00 to 735+00. In the original permit drawings, NPT proposed an alignment within the pavement for a longer portion of the roadway in this area. In response to NHDOT comments, NPT has reduced the length of the alignment within the paved area by 1200 feet to the north of the exception location and 650 feet to the south. The updated alignment will be reflected in revised drawings to be submitted at a later date.

Excavation limits and work areas are shown on the attached drawings. During construction, one lane will remain open to traffic at all times.

Impacts

The design, as proposed, will not adversely affect the design, construction, stability, traffic, safety, environmental commitments, maintenance, or operation of the highway. The alignment has been located to avoid future conflicts with pole repairs or replacement. The installation of the duct bank and pavement restoration will be designed and constructed in accordance with conditions outlined in the NHDOT's April 3, 2017 letter to the New Hampshire Site Evaluation Committee. The installation's proposed depth meets NHDOT's criteria relating to the structural box to minimize any potential conflicts with maintenance and future highway projects. A traffic control plan has been submitted to the NHDOT for this design and complies with the Manual on Uniform Traffic Control Devices.

Supporting Documentation

See attached Exhibit A showing a plan and profile view.

