



DOE/EIS-0463

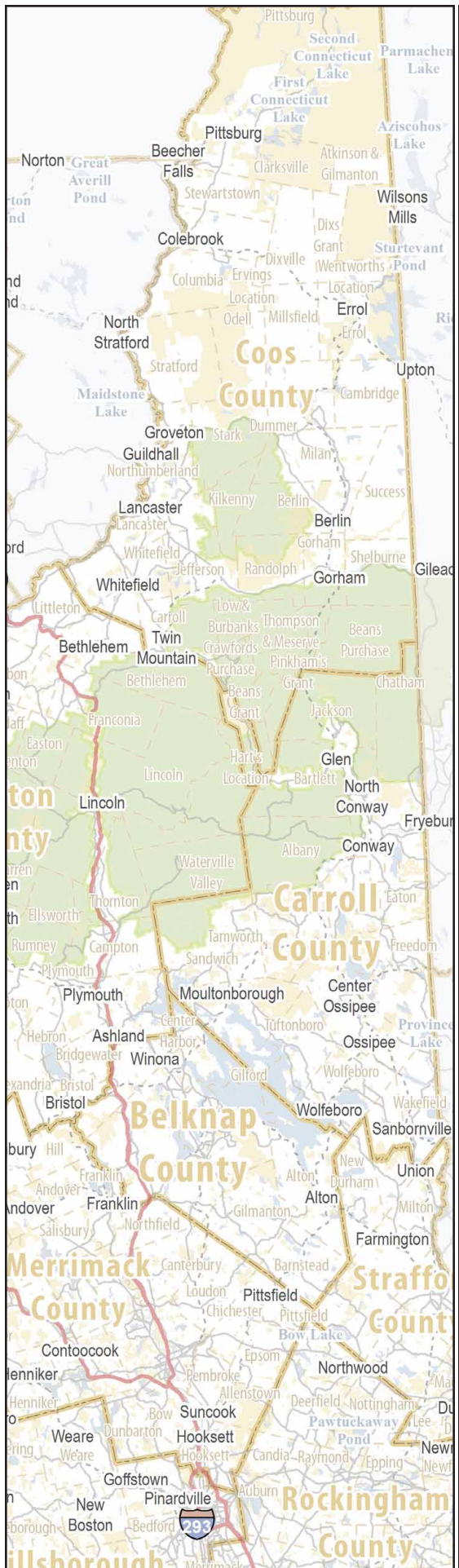
**FINAL**

**NORTHERN PASS  
TRANSMISSION LINE PROJECT  
ENVIRONMENTAL IMPACT STATEMENT**

**VOLUME 3: APPENDIX L**

**U.S. DEPARTMENT OF ENERGY  
OFFICE OF ELECTRICITY DELIVERY  
AND ENERGY RELIABILITY  
WASHINGTON, DC**

**AUGUST 2017**





**Department of Energy**  
**Washington, DC 20585**  
August 2017

Dear Sir/Madam:

Enclosed is the final *Northern Pass Transmission Line Project Environmental Impact Statement* (DOE/EIS-0463) prepared by the Department of Energy (DOE) pursuant to the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations.

The United States Forest Service (USFS) – White Mountain National Forest, United States Environmental Protection Agency (EPA) – Region 1, United States Army Corps of Engineers (USACE) – New England District, and the New Hampshire Office of Energy and Planning (NHOEP) are cooperating agencies in the preparation of the EIS.

The proposed DOE action in the final EIS is to issue a Presidential permit to the Applicant, Northern Pass LLC, to construct, operate, maintain, and connect a new electric transmission line across the U.S./Canada border in northern New Hampshire (NH).

DOE has prepared this final EIS to evaluate the potential environmental impacts in the United States of the proposed action and the range of reasonable alternatives, including the No Action alternative. Under the No Action alternative, the Presidential permit would not be granted, and the proposed transmission line would not cross the U.S./Canada border.

In addition to its Presidential permit application to DOE, Northern Pass LLC applied to the USFS for a special use permit that would authorize Northern Pass LCC to construct, own, operate and maintain an electric transmission line to cross portions of the White Mountain National Forest under its jurisdiction. The final EIS will be used by the Forest Supervisor of the White Mountain National Forest to inform the Record of Decision in regard to this requested use.

DOE will use the EIS to ensure that it has the information it needs for informed decision-making.

The final EIS will also be posted on the project EIS website, <http://www.northernpasseis.us/> and DOE's NEPA website at <https://energy.gov/nepa/listings/environmental-impact-statements-eis>.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Mills".

Brian Mills  
Transmission Permitting and Technical Assistance,  
Office of Electricity Delivery and Energy Reliability  
U.S. Department of Energy

*FINAL*

**NORTHERN PASS TRANSMISSION LINE PROJECT  
ENVIRONMENTAL IMPACT STATEMENT  
DOE/EIS-0463**

**Volume 3: Appendix L. Comment Response Document**

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**U.S. DEPARTMENT OF ENERGY  
OFFICE OF ELECTRICITY DELIVERY  
AND ENERGY RELIABILITY**



*COOPERATING AGENCIES*

**United States Forest Service – White Mountain National Forest  
United States Environmental Protection Agency– Region 1  
United States Army Corps of Engineers – New England District  
New Hampshire Office of Energy and Planning**

**August 2017**

## COVER SHEET

**RESPONSIBLE FEDERAL AGENCY:** U.S. Department of Energy (DOE), Office of Electricity Delivery and Energy Reliability

**COOPERATING AGENCIES:** United States Forest Service (USFS) – White Mountain National Forest (WMNF); United States Environmental Protection Agency (EPA) – Region 1; United States Army Corps of Engineers (USACE) – New England District; and New Hampshire Office of Energy and Planning (NHOEP)

**TITLE:** Northern Pass Transmission Line Project Environmental Impact Statement (DOE/EIS-0463)

**LOCATION:** Coös, Grafton, Belknap, Merrimack, and Rockingham counties in New Hampshire

**CONTACTS:** For additional information on this Environmental Impact Statement (EIS) contact:

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Washington, DC 20585  
Telephone: (202) 586-8267  
[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)

For general information on the DOE NEPA process, please write or call:

Mr. Brian Costner, Acting Director  
Office of NEPA Policy and Compliance, GC-54  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585  
[askNEPA@hq.doe.gov](mailto:askNEPA@hq.doe.gov)  
Telephone: (202) 586-4600 or leave a message at (800) 472-2756

**ABSTRACT:** Northern Pass Transmission, LLC (Northern Pass) has applied to the DOE for a Presidential permit to construct, operate, maintain, and connect a 192-mile (309-km) electric transmission line across the United States (U.S.)/Canada border in northern New Hampshire (NH). This final EIS addresses the potential environmental impacts of the Project (Proposed Action), the No Action Alternative, and ten additional action alternatives (Alternatives 2 through 6, with variations). The NH portion of the Project would be a single circuit  $\pm$ 320 kilovolt (kV) high voltage direct current (HVDC) transmission line running approximately 158 miles (254 km) from the U.S. border crossing with Canada in Pittsburg, NH, to a new direct current-to-alternating current (DC-to-AC) converter station to be constructed in Franklin, NH. From Franklin, NH, to the Project terminus at the Public Service of New Hampshire's existing Deerfield Substation located in Deerfield, NH, the Project would consist of 34 miles (55 km) of 345 kV AC electric transmission line. The total length of the Project would be approximately 192 miles (309 km).

**PUBLIC COMMENTS:** In preparing this final EIS, DOE considered comments received during the scoping period, which extended from February 11, 2011 to June 14, 2011, and was reopened from June 15, 2011 to November 5, 2013 (DOE accepted and considered all comments during the scoping period from February 11, 2011 to November 5, 2013), and the public comment period on the draft EIS (July 31, 2015 through April 4, 2016). Comments on the draft EIS were accepted during the 45-day period

following publication of EPA's Notice of Availability (NOA) in the *Federal Register* on July 31, 2015; the public comment period was extended until April 4, 2016 following publication of EPA's NOA of the supplement in the *Federal Register* on November 20, 2015. DOE held four public meetings on the draft EIS in Colebrook, NH on March 7, 2016; Waterville Valley, NH on March 9, 2016; Concord, NH on March 10, 2016; and Whitefield, NH on March 11, 2016. All comments were considered during preparation of this final EIS. Appendix L in Volume 3 of this EIS contains the comments received on the draft EIS and DOE's responses to these comments. This final EIS contains revisions and new information based in part on comments received on the draft EIS. Vertical bars in the margins marking changed text indicate the locations of these revisions and new information. Deletions are not indicated. Appendices J and K in Volume 2 and Appendix L in Volume 3 are entirely new parts of this EIS; therefore, they do not contain bars indicating changes from the draft EIS.

The EIS analyzes the potential environmental impacts of DOE issuing a Presidential permit for the proposed Northern Pass Project, which is DOE's proposed federal action. DOE will use the EIS to inform its decision on whether to issue a Presidential permit. Additionally, Northern Pass has applied to the USFS for a special use permit (SUP) authorizing Northern Pass to construct, operate, and maintain an electric power transmission line crossing portions of the WMNF. The WMNF Forest Supervisor will use the EIS to inform its decision regarding: 1) whether to issue a SUP under the Federal Land Policy and Management Act; 2) the selection of an alternative; 3) any need to amend the Forest Plan; and 4) what specific terms and conditions should apply if a SUP is issued.

Copies of the final EIS are available for public review at 30 local libraries and town halls, or a copy can be requested from Mr. Brian Mills. The EIS is also available on the Northern Pass EIS website (<http://www.northernpasseis.us/>). DOE will announce its decision on the Proposed Action in a Record of Decision (ROD) in the *Federal Register* no sooner than 30 days after the EPA publishes the NOA of the final EIS. The USFS will announce its draft decision on the Proposed Action in a draft ROD in the *Federal Register* shortly after the EPA publishes the NOA of the final EIS.

**APPENDIX L**  
**COMMENT RESPONSE DOCUMENT**

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# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 25, 2016

**ID:** 8819

**Date Entered:** Mar 25, 2016

**Source:** Website

### Topics:

**Name:** Rachel O'Meara

### Organization:

**Email:** jamie.rachel111@gmail.com

**Mailing Address:** 111 Bordeau Rd

**City:** North Stratford

**State:** NH

**Zip:** 03590

**Country:** US

### Comment:

Rachel O'Meara  
111 Bordeau Rd.

North Stratford, NH 03590 jamie.rachel111@gmail.com 25 March 2016

Comment letter re: Northern Pass Dear DOE,

I believe alternative 1 is the only acceptable position to take regarding the Northern Pass application for a Presidential Permit.

My first objection rests on moral grounds: this project of Hydro-Quebec which dams rivers near James Bay is destroying the Cree People culturally and literally, by destroying traditional hunting/fishing grounds and poisoning the fish they eat due to leaching of mercury from the dammed rivers. Further, if we consider life as a whole in our moral compass, the whole scale destruction of the James Bay ecosystem should be considered a crime. Eversource and Quebec will make billions from this unholy alliance. This alone should be enough to scrap this project.

Northern Pass does not have a viable route at this time. One only has to look at your map to see the convoluted path it is taking as of this writing. In its effort to shove this project down our throats, we have seen the route change countless times, without any independent environmental impact studies. I believe that even now the actual line is still fluid and incomplete. And when the route is finally declared done, will there be any thorough environmental studies done? Giant transmission lines, a giant trench/open area-it doesn't matter: ecosystems are impacted and will be impacted for as far as we can envision. Open corridors impact wildlife of all kinds including plants. I further do not believe

1045-1

Thank you for your comment. Potential impacts in Canada from the construction and operation of electricity infrastructure, including hydropower generation and transmission in Canada, are beyond the scope of this NEPA analysis. NEPA does not require an analysis of potential environmental impacts that occur within another sovereign nation that result from actions approved by that sovereign nation. Additionally, the construction and operation of Hydro-Quebec power generation projects and electricity transmission line projects in the bulk Hydro-Quebec system will occur regardless of and independent to whether DOE issues a Presidential permit for the proposed Northern Pass Project international border crossing. For these reasons, potential environmental impacts in Canada are not addressed in this EIS. Section 1.5.4.1 of the Final EIS has been updated in response to this comment.

1045-1

the line should pass through our public National Forest in any form, buried or not, even on roads. Our National Forests are important for habitat protection and climate change resiliency, and should not be compromised for private investment.

I think of Northern Pass as a dinosaur: a relict left over from the days of Big Industry, Big Energy. We as a species need to begin to face our own limits. If we are to continue to live on this amazing planet that sustains us, a sane

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energy policy would begin with energy conservation most importantly and local small scale decentralized energy production. Eversource could help us achieve this by promoting decentralized solar energy, more energy efficiency and less energy usage in general. In other words, maybe we don't need More energy, but Less.

On a whole different note, thinking of recent terrorist attacks in Europe, isn't a giant transmission line a perfect target for anyone wanting to cause havoc? We cannot predict our future, or Canada's-why be vulnerable in that way?

The people in the region affected by Northern Pass have consistently expressed their opposition to this project for years now. Lately in the North Country we have seen a disturbing twist in the process: Eversource not only spending millions to basically bribe people to sell their land for far more than its nominal worth, but also giving the proposed Balsams Resort millions [ with many more millions promised should NP go through]. It feels like Democracy is being railroaded at every turn.

Rachel O'Meara

1045-2

Thank you for your comment. Section 4.1.4.2 in the EIS and Section 3.1.9 of the Public Health and Safety Technical Report discuss impacts related to intentional destructive acts. Impacts to health and safety from intentional destructive acts would be unlikely to be greater than the potential impacts from events involving extreme weather. If such an act were to occur and to succeed in destroying aboveground infrastructure or other components of the project, the main consequence for the public would be the temporary loss of electrical service from the Project (i.e., the loss of the 1,090 or 1,200 MW supplied by the Project) in the ISO-NE region.

1045-2



My name is Taras Kucman. I'd like to thank the DOE and I'd like to thank the SEC for allowing me to speak this evening. I'm wearing orange, and it comes as no surprise that I am opposed to the project as it is stated. I'm a 20-year resident of Concord and I live on the right-of-way. I've been a resident and engineer and I've been a US Army engineer in the past. I was commissioned back in 1983. And I'm glad that the Corps of Engineers is represented this evening also. My point is that what's rarely brought up is the national security risk of what's being proposed here this evening. Right now it's a very simple right-of-way. It's got two sources of energy on an east and on the western boundary. They're 115,000 volt lines. They're separated by about 150 feet, and they're about 55-foot towers so if they fall down in either direction, it makes no risk or impacts nobody. However, if this project proceeds as it is planned, they will crowd that right-of-way, simply 250 feet wide, the western boundary service will be moved 40 feet closer to the residences, and the towers are going from 55 feet to 85 feet, and then the artery, the 345 kV will go right down the middle and that's where the rub is. To put it in context, I'd just like to say that we recall the blackout of 2003. You may recall that the blackout went clearly from Massachusetts up through Minnesota and way into Ontario. What caused that. That was a simple event. It was heat in the summer, August. Closed plants put additional plants on other wires. Wires sagged, shorted out the ground, blacking out power supplies. Further blackouts. The rolling blackout lasted three hours. So that by 4 o'clock everything was blacked out but the blackout stopped. Luckily, it was not a big deal. MR. HONIGBERG: Mr. Kaufman, it actually works better if you speak to the microphone. People in the back will hear you better if you speak to the microphone. MR. KUCMAN: Okay. Will do. The repairs were made and within a week everybody even out in Ontario had power back. But now I would ask that you consider in that context we had Y2K. In that context we had 9/11 and then we had this blackout. There was a lot of fear and anxiety as to what was going on. So now I would ask you to consider that in today's environment, what if someone were compelled to create a spectacular event like blowing the outside towers inward towards the Hydro-Quebec line and take the Hydro-Quebec line and then blow it so that it falls in either direction. I guarantee you as someone that's been qualified in building bridges or blowing them up, knocking down poles is not a problem. Anybody hell-bent on doing that could do it. I would ask that DHS consider what the impact of such a catastrophe would be, not in August but on a coldest evening in February. Eversource and Northern Pass may go ahead and say that hey, this has never happened. There are much greater targets, say, in Gary, Indiana, or in Toronto. I don't know if you've driven through the QEW in Toronto or if you've ever been to Gary, Indiana, but having towers like that come through New Hampshire would probably be the biggest dream that Bill Quinlan and Tom May could ever have. I just do not understand how they can rely on '20s and '30s technology so use that as a justification for increasing the return on their investment. There's no excuse for it. Automobiles replaced-- MR. HONIGBERT: Mr. Kucman, how much more do you have? Mr. Kucman: Half a minute. Automobiles replaced horse drawn carriages, cassettes replaced 8-tracks. Buried transmission lines will replace monopoles and towers. Your competitors have figured it out. Why haven't you. In closing, while TSA continues to grope women and children looking for explosives and box cutters that are not there, and the FBI is still struggling with constitutional ramifications of breaking into terrorists' Facebook accounts, terrorists are looking to astonish us again within the next spectacular event. It takes no imagination to conclude that the casualties from such an event as I have described would make 9/11 look like a fireworks celebration gone wrong. Regardless, I still believe in the premise that the key to adult learning is repetition, and in that spirit I say to you again, bury the Northern Pass completely. Aside from that, I have no strong opinion. Thank you.

1048-1

Thank you for your comment. As discussed in Section 4.1.4.2 in the EIS, transmission lines are unlikely to collapse due to weather conditions, except in extreme circumstances. Additional discussion is provided in Section 3.1.6.1 of the Public Health and Safety Technical Report. Impacts to health and safety from intentional destructive acts would not likely be greater than the potential impacts from events involving extreme weather. While collapse of lines or structures is a remote possibility, it would not create a health and safety risk, but could potentially impact the local energy system and grid.

1048-2

Thank you for your comment. Section 4.1.4.2 in the EIS and Section 3.1.9 of the Public Health and Safety Technical Report discuss impacts related to intentional destructive acts. Impacts to health and safety from intentional destructive acts would be unlikely to be greater than the potential impacts from events involving extreme weather. If such an act were to occur and to succeed in destroying aboveground infrastructure or other components of the project, the main consequence for the public would be the temporary loss of electrical service from the Project (i.e., the loss of the 1,090 or 1,200 MW supplied by the Project) in the ISO-NE region.

1049-1

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I'm Fred Brownson from Wentworth, New Hampshire. I'm here to speak to the question of the adequacy of the Environmental Impact Statement and the SEC evaluation on local, region and national security. Five points to be made. First, the failure of a grid for more than 3 or 4 days extending into weeks or months would be a catastrophic impact on the people, tens of millions of people, who are served by the grid. Number two, a rather tightly veiled secret for decades with penetrations from time to time from retired utility executives and retired government officials is the vulnerability of our electric grids to attack from those who would do harm to us, whether they be rogue nations like Korea and the iso call fate to more mature nations like Iran, China, Russia. They all have the capability to take down our grid. The amateur hacker could probably do it one day, but the vulnerability is there. Number 3, as to New England, that vulnerability becomes greater the more power we import from a foreign nation with a massive transmission and transformer infrastructure that is vulnerable to attack in an area that our government cannot defend. Fourth, the very existence of increasing dependence upon Canadian power and the economic stake that the utilities have in that creates a major barrier to the ultimate solution to security which is microgrids. And, finally, the EIS and I suspect the SEC evaluation have failed completely to address these issues. Fortunately for us, and this is my written submission this evening, Ted Koppel, who was at the top of the ABC news network for years, a terrific investigative reporter, released last year a book that made it to the New York Times bestseller list titled Lights Out. Ted examines these issues in great depth and pulls the veil of secrecy back off of this subject in a way that had not been previously been accomplished. I thank you for the opportunity to say these words this evening, and I hope you will take this Koppel book and where is the DOE? I've already sent one to the head of the SEC, and, hopefully, they'll pay some attention to it.

1049-1

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**From:** glenn <glenn@ghudson.net>  
**Sent:** Monday, April 04, 2016 9:57 PM  
**To:** draftEIScomments@northernpasseis.us  
**Cc:** glenn  
**Subject:** Northern pass EIS

I write in regard to the 'Project' (Northern Pass) and the Socioeconomics Technical Report for the Draft Environmental Impact Statement

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The following quote informs my understanding of what issues might be of concern to the DOE;

*The Department of Energy (DOE) is charged with advancing the national, economic, and energy security of the United States; promoting scientific and technological innovation in support of that mission; and ensuring the environmental cleanup of the national nuclear weapons complex.*

> National... The addition of several hundred miles of exposed HV lines to the national grid, especially as much of it would pass through areas difficult to observe yet fairly easy to access would create a significant security exposure. Not only to local attack by ne'er-do-wells, but to more significant attack such as large solar flares (Carrington Effect) EMP, etc. At best, this Project should not go forward. If it does, to minimize added security risk to the National Grid, the PROJECT should be required to bury the line for its entire length.

> Economic... We are told that increases in energy availability spur increases in economic activity. That may well be true, but what is lost in this accounting is the fact that more economic activity in and of itself does not necessarily benefit a Society. The US GDP may be a fair accounting of wealth generated, but unfortunately it does not reveal the horribly uneven distribution of that wealth which disproportionately goes to the very richest. Neither does GDP account for the costs of products and activities that inflict harm on a society, nor the real cost of depletion and destruction of natural resources. I submit that in addition to the types of data and conclusions reported in the Draft Statement it is necessary to seriously question the justification of slashing NH in half to help grow such an economy. Our economy would do better to focus on fairness and conservation before expansion.

Economic Security > It is difficult for me to assess the economic security ramifications of the PROJECT given that the source of the power, and much of the transmission of the power exist outside the borders of the United States and could become entwined in political and national aspirations over which the US would have no control. I find no positive aspect of that situation.

>Energy Security... As mentioned above, I think building the PROJECT would add vulnerability to the National Grid. Security considerations do not appear in the Draft Statement as far as I could see. Given the highly publicized vulnerabilities I find it unfathomable that we are planning to engage talent and resources enlarging the grid instead of using such resources to secure the grid. Making the Grid secure means to me that it must be made resilient, redundant, replaceable and evolvable. It must also be partitioned/segmented in a way that prevents cascading failure. I know there are available discussions much more sophisticated than I could muster but my belief is that Energy Security is inhibited simply by entertaining projects of questionable expansion and that our nation should get serious very quickly about securing the grid.

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In your statement you discuss issues related almost entirely to property/monetary gains and losses. What you fail to account for, and which I feel must be considered, is the fact that this Project is a vicious assault

1051-1

Thank you for your comment. Section 4.1.4.2 in the EIS and Section 3.1.9 of the Public Health and Safety Technical Report discuss impacts related to intentional destructive acts. Impacts to health and safety from intentional destructive acts would be unlikely to be greater than the potential impacts from events involving extreme weather. If such an act were to occur and to succeed in destroying aboveground infrastructure or other components of the project, the main consequence for the public would be the temporary loss of electrical service from the Project (i.e., the loss of the 1,090 or 1,200 MW supplied by the Project) in the ISO-NE region.

1051-1

against what many of us consider our sacred mother earth and the life it sustains. The experience of the heart is as valid and intelligent as the cogitations of the mind. The calculations described in your text and portrayed in your graphs are no more 'correct' than the pain in our hearts.

I read the IES. I followed some of the references. I got quite upset because I realized I was engaged in: "throw so much meaningless 'data' at them they won't be able to see what is really going on". This is a key tactic when big powerful entities oppose the individual. I mean no disrespect, but common, ordinary NH citizens simply do not have the time, money or necessity to amass such 'Projections'... professionals are hired to do such work. Given the volatility of our planet, I expect witches and cat entrails could predict out 2025 future as well as the math does. ( I mean.... who chooses, evaluates, and limits the 'weighted predictors' in your Multiple Regressions? "A Microspatial Approach to Impact Measurement"... really?)

The simple reality is that NH is the target of a well funded, corporate attack by a professed suitor whom no matter how often we scream "No! No! ! No!" continues the assault.

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Everywhere... if you look you will see it everywhere.  
 Hiding in the cities... dying in the arctic...  
 Poisoned in the prairies and the waters...  
 Falling in the forests.  
 It struggles gloriously against the onslaught of its own  
 Beloved spawn

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Glenn Hudson native of NH

Comment read at the Department of Energy / New Hampshire Site  
Evaluation Committee Hearing at the Grappone Center Concord, NH  
on March 10, 2016

My name is Taras Kucman and I would like to thank the members of the NHSEC and the DOE for giving me the opportunity to comment on the Northern Pass Project.

I oppose the project as proposed.

I am a 20 year resident of Concord living on the PSNH right of way, and a former US ARMY Engineer Officer and I can appreciate the Corp of Engineers being represented here . While my fellow Granite Staters have made compelling arguments, exposing glaring pitfalls in the Northern Pass project as it negatively affects property values, tourism, and our environmental treasure, I am urging the burial of the Northern Pass Project for National Security reasons.

Right now it's a very simple ROW with two (2) 115 kV transmission lines running along the east and west boundaries, separated by more than 150 ft. Both transmission lines, since their creation, have never posed a National Security risk. They have been, by design, separated so that their lines will never touch.

If the Northern Pass Project proceeds as planned, that will all change. The western 115 kV service will be pushed out 40 ft. to provide clearance for the Hydro-Quebec 345KV artery centered between the 115KV transmission lines.

To provide context, I ask you to recall the August 2003 blackout which knocked out service from Massachusetts west through NY, PA, OH, MI, WI, MN and deep into Ontario, CN. An estimated 45 million Americans and 10 million Canadians were left without power for at least 7 hours, many were without power for up to two days and the rural areas were without power for a week. This was due to a 345kV transmission line fault caused by natural forces like summer heat and the unwitting Ohio power generation closures for maintenance. Transmission lines sagged and grounded out to vegetation. The localized black out took out other power generators while overloading others. Lines continued to sag and ground out. This avalanching spanned 3 hours by the time the blackout was complete at 4:00PM. All of this was seemingly unforeseeable, as heat and human error were the contributing factors. Luckily, the repairs and the restoration of power were not a big deal as all repairs were completed within a week. Clearly, this was a freak accident.

I would now ask, if someone were hell bent on creating spectacular mischief, could they blow both 115kv towers in the ROW inward toward the 345kv HQ service? Could they also blow the HQ towers in alternating directions to create a through fault among all three services? I ask that you imagine the impact and magnitude of such a spectacle. These faults would not take 3 hours, but milliseconds. Are the grid system breakers robust enough to prevent transformer substation catastrophic failures? Are the systemic relays robust enough and responsive enough to divert power and secure the rest of the grid? Those questions I CANNOT answer. Have these questions been asked and answered by anyone? As a former officer however, trained and qualified in building bridges as well as blowing them up, knocking poles over is something we can do in our sleep. With little additional effort, HQ tower abutments and supports would be destroyed delaying restoration of power by weeks and months. I would ask that DOE

1052-1

Thank you for your comment. Section 4.1.4.2 in the EIS and Section 3.1.9 of the Public Health and Safety Technical Report discuss impacts related to intentional destructive acts. Impacts to health and safety from intentional destructive acts would be unlikely to be greater than the potential impacts from events involving extreme weather. If such an act were to occur and to succeed in destroying aboveground infrastructure or other components of the project, the main consequence for the public would be the temporary loss of electrical service from the Project (i.e., the loss of the 1,090 or 1,200 MW supplied by the Project) in the ISO-NE region.

1052-1

Comment read at the Department of Energy / New Hampshire Site  
Evaluation Committee Hearing at the Grappone Center Concord, NH  
on March 10, 2016

1052-1 cont'd

as well as DHS ponder the breadth & depth and of such a catastrophe. Now imagine if this happened, not on a hot August afternoon, but on the coldest evening in February.

Eversource and Northern Pass can argue that such an event has never happened in the US, and that there are far greater targets, such as those, in say, Gary, Indiana, or Toronto CA. For those who haven't been to Gary or driven down the QEW in Toronto, I can assure you that having those towers running through New Hampshire would be Bill Quinlan's and Tom May's greatest \_\_\_ dream. And while they may be right, ANYONE focused on crippling New England and New York, could not overlook targeting an unsecured, and crowded ROW like the one you are proposing today. I reject Northern Pass' premise that overhead transmission lines are the only "cost effective" modes of delivering power. Put another way, "this is the way it's always done" DOES NOT PASS MUSTER! The power lines constructed in the 20's and 30's were built according to best practices and state of the art technology available at that time. Northern Pass has NO EXCUSE for subjecting New Hampshire and the entire northeastern power grid to the risks 100 year old OBSOLETE and ANTIQUATED technology poses, for the sake of maximizing their Return on Investment (ROI).

Automobiles replaced horse drawn carriages, cassettes replaced 8-track tapes and buried transmission lines will replace monopoles and towers. Your competitors have figured it out, why haven't you?

In closing

While TSA continues to grope women and children looking for explosives and box cutters that are not there, and the FBI is struggles with the constitutional ramifications of breaking into terrorist Facebook accounts, terrorists are looking to ASTONISH us AGAIN with the next spectacular event. It takes NO IMAGINATION to conclude that the casualties from the event I have described, would make 9/11 look like a fireworks celebration gone wrong.

REGARDLESS, I still believe in the premise that the key to adult learning is "REPETITION" and in that spirit I say TO YOU AGAIN "Bury the Northern Pass Completely"

ASIDE FROM THAT I HAVE NO STRONG OPINION!

Thank you,

Most Sincerely,

Taras Kucman

1052-1  
Continued

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**From:** Taras Kucman <tkucman@gmail.com>  
**Sent:** Saturday, April 09, 2016 4:58 PM  
**To:** info@northernpasseis.us  
**Subject:** Fwd: Northern Pass - A BAD proposition

Hello Donna,  
I am an abutting intervenor from Concord with national security concerns which I have shared with the Union Leader. I am not sure if they will be posted. Please share with your readers.  
Thank you in advance.  
Taras.

----- Forwarded message -----  
From: "Taras Kucman" <[tkucman@gmail.com](mailto:tkucman@gmail.com)>  
Date: Apr 6, 2016 9:49 PM  
Subject: Northern Pass - A BAD proposition  
To: <[letters@unionleader.com](mailto:letters@unionleader.com)>  
Cc:

One week ago, an amateur playing with incendiary devices in Tyngsboro, MA. launched Eversource helicopter searches and FBI investigations for other failed, "sinister" acts. I have been telling the NHSEC, Eversource, and the Department of Energy, in person, repeatedly, that professionals familiar with high explosives, hell bent on spectacular devastation crippling New Hampshire and the Northeast Grid, would not fail.

In all honesty, the devastation resulting from a terrorist attack on (2) 115kv lines and (1) 345kv Canadian NP line, crowded within a narrow 250 foot wide unsecured and unprotected Right of Way, is above Eversource's paygrade to describe or comprehend. The Department of Homeland Security or the Department of Energy would be best qualified to answer this question, preferably before the fact. None the less, it is incumbent upon the NH Site Evaluation Committee to echo my question, and demand a thoughtful answer from a disinterested party, before they render a final decision on the NP application.

Let's face it, as an exporter of energy for years, NH needs NP as much as it needs floppy disks or ice trays. Eversource's promise to deliver \$80M in annual savings to rate payers in NH, amounts to \$5.50 per month per person; an ASTOUNDING offer backed by a Power Purchase Agreement, which doesn't exist today.

I would urge that Eversource BURY THE NORTHERN PASS ENTIRELY in NH along I93, and pay NH handsomely by the Mega-Watt hour, for our hospitality to those states which cannot consume electricity as responsibly as NH.

Taras Kucman  
Concord, NH

1053-1

Thank you for your comment. Section 4.1.4.2 in the EIS and Section 3.1.9 of the Public Health and Safety Technical Report discuss impacts related to intentional destructive acts. Impacts to health and safety from intentional destructive acts would be unlikely to be greater than the potential impacts from events involving extreme weather. If such an act were to occur and to succeed in destroying aboveground infrastructure or other components of the project, the main consequence for the public would be the temporary loss of electrical service from the Project (i.e., the loss of the 1,090 or 1,200 MW supplied by the Project) in the ISO-NE region.

1053-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Aug 17, 2015

**ID:** 8319

**Date Entered:** Aug 17, 2015

**Source:** Website

**Topics:** Health and Safety

**Name:** Timothy Duggan

**Organization:**

**City:** Concord

**State:** MA

**Country:** US

**Comment:** High Voltage Transmission Lines Fail for a variety of reasons. Most often, the failures are weather related – high winds blow trees onto lines causing the lines to detach from supporting structures and contact the ground. In some cases, the supporting structures fall taking the power lines to the ground with them. Ice storms can cripple large sections of a transmission system bringing cables and structures to the ground as experienced by HydroQuebec in 1998. The key question here is whether the company owns a wide enough ROW along the entire 187 miles to guarantee that trees will not fall onto the lines from outside of the ROW AND that towers/lines will not fall outside of the ROW onto abutters' property and potentially the abutters themselves. Wherever the ROW is not wide enough, catastrophic failure of the lines and/or towers is a real risk. Secondary questions involve the readiness of the cities and towns along the route to deal with a catastrophic transmission line failure. The obvious requirement for additional emergency equipment and first responders was almost certainly a factor when all 31 towns along the route voted against this project and its overhead lines.

The impact of High Voltage power lines on the health of people living and working nearby is far from settled science. There are enough studies with enough conflict in the results to give anyone with an agenda material to argue that High Voltage power lines are/are not harmful to humans. Two facts are universally accepted: High Voltage power lines produce Electromagnetic fields and High Voltage power lines produce corona ions. The World Health Organization admits that EMFs above a certain level can trigger biological effects in humans. The World Health Organization also admits that the chances of pollutant particles lodging in lung tissue is 3-10 times higher for people living downwind of High Voltage power lines. Pollutant particles exist everywhere, but close to High Voltage power lines these particles are charged sufficiently to cause them to embed in lung tissue when breathed in. While the overall impact of additional pollutant particles embedding in lung tissue can be argued, the fact that it occurs at such an increased rate is a fact.

1054-1

Thank you for your comment. Section 4.1.4.2 in the EIS discusses the design of the transmission line in relation to extreme weather. Additional discussion is provided in Sections 2.1.2 and 3.1.6 in the Public Health and Safety Technical Report. The overhead transmission line would be constructed to satisfy National Electrical Safety Code (NESC) requirements related to extreme wind and temperature conditions. Implementation of these measures should reduce the potential for downed wires due to wind and ice loading, reducing the potential for power outages. Safety measures, including shield wires, are incorporated into transmission line design to prevent flashovers or power surges due to lightning strikes. Impacts to emergency services, particularly fire response, are analyzed in Section 4.1.4.1 of the EIS and Section 3.1.6 of the Public Health and Safety Technical Report.

1054-2

Thank you for your comment. The commenter's concern is noted regarding potential power line impacts on air pollution particles. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields.

1054-1

1054-2



Exposure equals risk. Reduced exposure equals reduced risk. No exposure equals no risk. This may all seem simple and obvious, but it begs the question: why, exactly, are we taking ANY risk in the first place? (See: Purpose and Need) Regardless, why would we not want to limit the risk as much as possible to preserve the health and safety of people living near the proposed route? Of the 4 hazards: catastrophic structural failure, electric fields, magnetic fields, and corona ions – burial mitigates or eliminates 3 of them (magnetic fields are not substantially reduced by relatively shallow burial however the proximity of the cables in a buried solution has a canceling effect).

So, once again we see that the project as proposed introduces substantial environmental impact – in this case, health and safety impacts – and once again those impacts can be reduced or eliminated by burying the transmission lines. You would have to be a complete idiot not to recognize this pattern – it repeats for literally every environmental impact imaginable. Burial eliminates Health and Safety risks. Yet another reason for the company to abandon its “build it on the cheap” proposal and come back with one that is responsible and respects the health and safety of the citizens of New Hampshire: Complete burial for the entire route.

1054-2 1054-2 cont'd  
Continued

1054-3 1054-3  
Thank you for your comment. The commenter's preference for burial of the transmission line is noted. Several alternatives involving burial of the transmission line along the entire corridor are analyzed in detail in the EIS (Alternatives 3, 4a, 4b, and 4c). Alternative 7, the Proposed Action, includes burial of an additional 52 miles of transmission lines compared with Alternative 2. Section 4.1.4.2 of the EIS addresses health and safety impacts related to electric and magnetic fields.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Oct 20, 2015

**ID:** 8444

**Date Entered:** Oct 20, 2015

**Source:** Website

**Topics:** Purpose and Need, Alternatives, Health and Safety, Vegetation

**Name:** harriet forkey

**Organization:** retired

**Email:** lundy-nh@comast.net

**Mailing Address:** 104 Piscataqua road Durham NH 03824

**Mailing Address:** 480 Shem Valley Road, Alexandria NH 03222

**City:** DURHAM

**State:** NH

**Zip:** 03824

**Country:** US

**Comment:** I wish to go on record as strongly opposing Northern Pass for many reasons including: not necessary for NH power needs, no real economic value but economic loss because of the tourist and home owner effects from so many huge unsightly towers ruining the beauty and outstanding vistas and negatively impacting forests and vegetation in our state. Hydro Quebec has a bad reputation regarding secrecy of contracts and poor relationships with clients and customers. There are also problems with EMF's that have a significant effect on health & safety especially children. After much stalling and changing of proposed routes, they have offered to bury the lines an insignificant few miles. Many such projects are being fully buried but they are refusing to do the same here in NH. I strongly believe that the answer to Hydro Quebec's Northern Pass is to KILL and BURY IT AND TELL THEM TO GET OUT OF NEW HAMPSHIRE NOW!!!

1057-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

1057-2

Thank you for your comment. The commenter's concern is noted regarding potential power line impacts on air pollution particles. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields.

1057-1

1057-2

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Dec 14, 2015**

**ID:** 8606

**Date Entered:** Dec 14, 2015

**Source:** Website

**Topics:** Purpose and Need

**Name:** Corinne Pullen

**Organization:**

**Title:** ROW Home/Farm Owner

**Email:** Corinne.Pullen@yahoo.com

**Mailing Address:** 63 Old Schoolhouse Road

**City:** Canterbury

**State:** NH

**Zip:** 03224

**Country:** US

**Comment:** I am a landowner with a Right of Way Easement and Access Road in Canterbury, NH. We are very concerned about the towers aesthetically and the exposure to the electromagnetic fields. We are 2 generations living on our farm and do NOT accept the Northern Pass Transmission Project as proposed.

It would be acceptable if it was buried. Please do the right thing.

The Pullen and Cronin families

1058-1

Thank you for your comment. The commenter's concern is noted regarding potential power line impacts on air pollution particles. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields.

1058-1

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**From:** Duene <duene.cowan@comcast.net>  
**Sent:** Thursday, December 31, 2015 9:16 AM  
**To:** draftEIScomments@northernpasseis.us  
**Subject:** Northern Pass Comment

Re: Northern Pass

My name is Duene Cowan and I am a landowner along the proposed route. I have contacted the Northern Pass representatives and they have walked my property with me to show me the tree cutting that they are planning on my property. They have also performed EMF readings at locations requested by myself.

My property is located at 488 Mountain Road, Concord NH. The Eastern edge of my property is under the existing power lines. During the last large storms / hurricanes that hit our area the Eastern edge of my property which is elevated from Haywood Brook has been eroded and I have lost at least 20 feet of my property and trees to the bank erosion. The proposed cutting on my property and within the ROW granted to PSNH will exacerbate these erosion issues.

The EMF readings documented by the utility company were taken at the exact same locations that the same company took 19 years ago when I built my house. These EMF readings do not match. I am concerned that the readings are not accurate and that the increase to 345 KV from existing 115 KV and bringing these lines closer to my house will increase the EMF levels endanger our health.

For the record,  
I am not in favor of the Northern pass proposal as presented.  
I do not recognize PSNH's legal right to sharing of easement rights to a third party, for-profit foreign entity with which I have no agreement.  
I believe the cutting of natural vegetation on my property in the area of the Eastern embankment will increase erosion and decrease my property values.  
I am concerned that the EMF levels will increase and be a danger to our health.  
The cutting of my trees and the doubling of height of the towers and their placement closer to my home will decrease my property values.

Regards,

Duene Cowan  
Landowner  
488 Mountain Road  
Concord, NH 03301

1059-1

Thank you for your comment. The commenter's concern is noted regarding potential power line impacts on air pollution particles. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields.

1059-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 28, 2016

**ID:** 8940

**Date Entered:** Mar 28, 2016

**Source:** Website

**Topics:** Alternatives, Health and Safety, Wildlife, Viewshed/Scenery, Recreation, Private Property/Land Use, Taxes

### Organization:

**Comment:** I know that low cost electricity is need in the state of NH as well as New England I don't believe that it should come at the expense of the state of NH and is beautiful scenery. Also the effects it will have on land owners who are tying to sell of develop there property for the good of NH where it can bee seen it will surely drive property valves done forcing local towns to find ways to raise money to runs its school and municipalities without adding extra burden to its citizens. This will also force people to lower the prices they are asking for property they are selling maybe even forcing then to let there property go to foreclosure. Also how can Eversource say it will lower the cost of electricity for the NH residents when they cannot guarantee that after the line is in the Canadian Power company will not increase the rates it charges Eversource which I know will pass that on to the end user. Besides Eversource is already charging outrages amount to install power to new construction especially in areas that will be effected by Northern Pass I own property in a town and I will be see the northern pass Towers from my back windows and yet Eversorce wants to charge me 20,000.00 to run power over head 1,000 feet in to where I want t build my home and then tell me they don't have the money to bury the line I say make then bury it. There is also a safety issue would this create more magnetic interference which has been proven to cause illnesses in humans. Will the taxes that the lines generate compensate for the tax valves on the property that will be affected by in.. Last I would like to ask what about the scenic wonders of NH that attract tourist from all over the world will less of them come because they don't want to look a power towers when they are trying to enjoy and undisturbed view from a mountain top this could drastically effect the economy in NH which is already struggling. I know it would create temporary jobs during construction but not many permanent jobs for the area burying it would take longer and I agree cost more but would keep more people employed longer in my opinion besides I believe maintenance would be cared out by out of state companies as Trans Canada is doing right know in the western side of the state along the Connecticut river in Littleton and Monroe NH which I am told the power producing stations on the Connecticut river are only produce a small portion of the power they are capable of producing why is that and yet we want to ruin NH future with more ugly useless towers. How will it effect wildlife in NH especially during construction will it force animal populations into area where the will be more danger from vehicle crashes or drive them out of areas for good

1061-1

Thank you for your comment. Section 4.1.2 of the EIS discusses potential changes to wholesale electricity cost, as well as the potential impacts of the Project on property values and corresponding property tax assessments.

1061-2

Thank you for your comment. The commenter's concern is noted regarding potential power line impacts on air pollution particles. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields.

1061-3

Thank you for your comment. The EIS evaluates several alternatives that include burial of the Project and/or specific segments of the Project. Each of these alternatives is evaluated and compared within the Socioeconomic section of the EIS (see Section 4.1.2). The EIS additionally analyzes the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 addressed potential impacts to Visual Resources which may result.

1061-4

Thank you for your comment. Section 3.1.1.2.1 (Impacts from Construction, Terrestrial Species) of the Wildlife Technical Report states that wildlife may temporarily leave an area during construction. For the mobile species, which are displaced from the Project corridor during construction, direct adverse impacts would be short-term (wildlife would return to the transmission corridor following construction, particularly as vegetation returns) and localized (depending upon the extent of active construction activities). The potential for wildlife collisions with vehicles traveling during construction along access roads or the Project corridor could increase and cause increased mortalities and/or injuries. Additionally, in some cases, permanent relocation of

certain species to proximal appropriate habitat could occur based habitat change due to the long-term operation of the project.

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Apr 4, 2016**

**ID:** 9217

**Date Entered:** Apr 4, 2016

**Source:** Website

**Topics:** Health and Safety

**Organization:** NH resident

**Comment:** I believe overhead power lines are dangerous to human health. I lived behind high line power lines in CO and I believe it made me ill with a negative impact on my nervous system. Buried lines are safer, per below. US policy should be to bury all lines since it's in the public interest (since lacking solid research to determine safety).

Possible adverse health effects from electromagnetic fields

What are electromagnetic fields?

There is a general perception amongst many in the community that there are health risks resulting from exposure to electromagnetic fields (EMF) from power lines. All alternating electric currents generate electric and magnetic fields, collectively known as EMFs (sometimes, incorrectly referred to as electromagnetic radiation). The electric field is proportional to the voltage (which can be considered as the pressure with which electricity is pushed through the wires). The magnetic field is proportional to the current, that is, to the amount of electricity flowing through the wires. The direction of the current, and therefore that of the magnetic field, changes 50 times per second (that is, at 50 Hz).

These fields emanate from the wires delivering electricity to our homes and all devices which use electricity in the home. Many people are concerned about the alleged link between exposure to magnetic fields, in particular, and an increased risk of contracting cancer. These concerns are raised when stories appear in the media in which the words radiation and cancer are emphasized, especially when children are also involved.

Electric fields can be easily shielded, but the shielding of magnetic fields is technically difficult and therefore very expensive. Buried power lines generate lower magnetic fields than overhead power lines because of their design, not because the earth eliminates the field. The easiest way to reduce exposure to magnetic fields is to increase the distance from the source, particularly for fields generated by appliances.

Power lines include transmission lines (mounted on large steel towers) and distribution lines (mounted on concrete or wood poles placed on the road reserve).

Transmission lines generate both strong electric fields and strong magnetic fields. Distribution lines generate weak electric fields, but can generate strong magnetic fields.

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Do electromagnetic fields effect health?

Human studies have consistently shown that there is no evidence that prolonged exposure to weak

1062-1

Thank you for your comment. The commenter's concern is noted regarding potential power line impacts on air pollution particles. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields.

1062-1

electric fields (such as those found in the home or in most workplaces), results in adverse health effects. Whether chronic exposure to weak magnetic fields is equally harmless remains an open question. There is no evidence that these fields cause immediate, permanent harm.

Laboratory studies on animals and cell cultures have shown that weak magnetic fields can have effects on several biological processes. For example, they may alter hormone and enzyme levels and the rate of movement of some chemicals through living tissue. By themselves, these changes do not appear to constitute a health hazard. We do not know if, in the long term, they may have an effect on the incidence of cancer or other adverse health effects. While most studies have produced inconclusive results or no increased cancer incidence in laboratory animals following exposure to EMFs, a few studies have indicated an increased incidence.

Another way to find out whether EMFs affect human health is to conduct relevant studies on human populations.

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How are health effect studies carried out?

To determine if there is a health risk from some, as yet, unknown cause, science uses the discipline called epidemiology. Epidemiology is the study of occurrence and distribution of disease in the population (or community). The first major benefit to mankind from this science came in 1855. John Snow, a British physician, observed that death rates from cholera were particularly high in areas of London which were supplied with drinking water which had been extracted from the Thames River at points adjacent to sewage outfalls. He proposed that cholera was transmitted by an unknown agent through sewage. This discovery eventually led to proper treatment of sewage.

To do this type of study for EMFs and cancer, two groups of people need to be compared: one group which has, in the past, been exposed to EMFs while another group (the control group) has not. Because everyone in the community has been exposed, to some extent, to these fields, the exposed group is usually made up of people who live near to power lines, while the non-exposed group live further away. An observation is then made as to whether there are more cancers in the exposed group than in the non-exposed group. Simple? Unfortunately, it is not and that is why the controversy remains.

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What is the epidemiology?

The epidemiology of cancer is difficult for the following reasons:

There is a long latency period (delay) of 5 to 20 years or more between exposure and onset of the disease. Cancer usually occurs in old age because of the long latency period.

Cancer is found amongst people who have not been exposed to the causative agent because the disease is naturally occurring. For this reason carcinogenic (cancer causing) agents are often given a relative risk ratio. Cigarette smokers for example have 10 to 30 times the risk (relative risk ratio) of contracting lung cancer as do non smokers.

Not everyone who is exposed will get a cancer. Cancer incidence is relatively rare, except amongst the elderly.

There are many factors which can increase the risk of cancer. For example; poverty, cigarette smoking, alcohol consumption, occupation, sex, race, lifestyle and age.

The cause of most cancers is not known. The occurrence of cancer in an exposed group seems to be a random process. Not all cigarette smokers get lung cancer and perhaps that is why people continue to smoke despite the warnings. They are playing a lottery with their lives.

For the above reasons, to do an epidemiological study between an exposed and non exposed group for a possible cancer risk factor, one needs to meet the following criteria:

A large number of people must be included in the study (not everyone exposed gets a cancer).

The two groups must be matched in every respect except exposure to the agent under test (there are many risk factors for cancer).



The two groups must be monitored for a long time (long latency period for cancer).

Since cancer incidence is random, a statistical (mathematical) analysis of the results must be performed. This analysis will result in a relative risk factor (see above).

There are several ways in which these studies can be performed. Because of the time and cost savings involved, a retrospective cohort (group of associates) study is the most common method for EMF exposure. In this type of study a group of people who have been exposed to the agent under test and a similar group who have not been exposed are compared. One might choose electrical linesman and compare them with their next door neighbour, for example. This type of study is fraught with pitfalls, such as:

The exposed group have not had their exposure, to the agent under test, measured. It is assumed because of their occupation or proximity (say to powerlines) that they are more exposed than the control group.

It is difficult to find a control group which has the same mix of characteristics so that confounding (confusing) factors do not interfere with the result.

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What do the EMF studies show?

The results of all EMF studies to date have indicated either no association or a weak association with adverse health effects. Those studies which do indicate an increased risk of health effects claim a relative risk ratio of 2 to 3. That is as a result of exposure to powerline electromagnetic fields the risk of contracting a cancer is two to three times the risk for a non exposed person. Because of the small risk ratios found (most epidemiologists consider a single study with a relative risk ratio less than 3 as not significant) there is room for debate about whether a health hazard exists at all.

At this point it is necessary to discuss the meaning of the word association as it is used in epidemiology. Association does not mean causation. The fact that the air temperature rises when the cock crows is an association. We know that it is the rising of the sun that causes the temperature to rise, not the cock. To pass from association to causation the results of these studies should meet most if not all of the following criteria:

- The risk ratio should be high, usually 5 or greater.
- The studies should consistently demonstrate an association.
- There should be an association between the exposure and a specific disease. The association should not refer to cancer in general but a specific cancer; eg leukemia and brain cancer together is acceptable but not leukemia in one study and brain cancer in another.
- There should be a demonstrable dose effect. A dose effect means that as you increase exposure to EMF the number of cancers increases.
- There is a biological mechanism by which the agent under test can cause the associated disease; eg. cholera is caused by a bacterium, lung cancer is caused by the chemical carcinogens in tobacco tar.
- To date all of the epidemiological studies on exposure to EMF do not meet these criteria. The evidence is either weak or absent. In particular:
  - The relative risk ratio for those studies which do show an association is usually less than 3.
  - The studies are inconsistent. Many studies show no effect.
  - The health effects vary. Some studies show an increase in brain cancer while others show an increase in leukemia.
  - No dose effect has been demonstrated.
  - No biological mechanism is known for induction of cancer from exposure to EMF's.

It is for these reasons that the majority of scientists, and Australian radiation health authorities in particular, do not regard chronic exposure to 50 Hz electric and magnetic fields at the levels commonly found in the environment as a proven health risk. Moreover, the evidence we have is inconclusive and does not allow health authorities to decide whether there is a specific magnetic field

level above which chronic exposure is dangerous or compromises human health.

Some authorities advocate a policy of minimizing exposure wherever possible, providing this can be achieved at reasonably modest cost. Since this is essentially a question of judgement, such decisions are best left to the individual. Simple steps to reduce exposure are:

- using an electric blanket to warm the bed and switching it off before climbing in will virtually eliminate what could be a significant exposure;
- locating bedrooms towards the rear of the house reduces dramatically the exposure due to distribution lines in front of the house;
- moving a bed away from an external wall which has an electric hot water service on the other side will also reduce exposures;
- a distance of about 50 cm between a video screen and the user usually results in an exposure not very different from those found elsewhere in the environment.

[http://www.csu.edu.au/acad\\_sec/committees/radiation/faq/possible\\_adverse\\_health\\_effects.htm](http://www.csu.edu.au/acad_sec/committees/radiation/faq/possible_adverse_health_effects.htm)

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Aug 27, 2015

**ID:** 8349

**Date Entered:** Aug 27, 2015

**Source:** Website

**Topics:** Purpose and Need, Alternatives, Health and Safety, Viewshed/Scenery

### Organization:

**Comment:** Northern Pass is a private, merchant driven, unnecessary project. N.H. just happens to be in the way.

Either the whole project should be denied or full burial--all of it. Many of these towers would go right over

people's homes, other areas would have a Huge impact on scenic vistas. The close proximity that many of these towers would be to people's homes subjects them without choice to very possible health issues due to EMF's, which are augmented when a HVDC line runs parallel with HVAC lines. Large hydro power is neither green nor renewable.

1064-1

Thank you for your comment. The commenter's concern with potential health effects of overhead transmission lines is noted. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1064-1

1065-1

Thank you for your comment. The commenter's concern with potential health effects of overhead transmission lines is noted. Section 4.1.4.2 in the EIS addresses impacts related to electric and magnetic fields. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1065-1

I'm Glenn Gunstein from West Dummer, not to be confused with metropolitan Dummer, and we have power lines going right by our house. I talked to a couple of officials. I don't remember their names because I'm old. But one is a doctor. My wife has something called EHS, electrohypersensitivity, which doesn't allow us to have a computer, cell phone, microwave stuff like that in the house because she's very sensitive to this. It's something that's growing in the populace. But we had a concern with the towers going up higher we found out that the tower, the highest tower is going to be by our house. So right now they're below the tree line. Not too far away from the house, about 600 feet I think it was. But one of my concerns is when the towers go up, is there going to any equal effect, and also a concern with AC and DC lines, is there going to be any kind of a hybrid effect. There's been studies and AC lines, DC lines, but I was told not many studies on hybrid effect so if they flip the switch and my wife is adversely affected, we can no longer live there from that point on. And another problem with that is if we can't live there, and we have to sell the property, it's going to be, I was told, only affected by about 6 percent of your income which is convenient but 6 percent means a lot to me since we live on \$1200 Social Security as one of our percs. So 6 percent means a lot more to me than 1 percent of the Northern Pass going down and burying it under 93 which has been suggested here. So with my wife's malady, with our property values and in a property we looked for for 20 years. For something that is totally off the grid, just the beauty is the reason we lived there, but my dog and I go up and sit on the hill and look at the mountains every day, and that tower is going to be right there. Those lines are going to be cutting right in front of our home. And so the value of where we live would not be affected by 6 percent. It would probably be expected by somebody saying I don't want to live there and look at that. So we probably couldn't sell it at all. So we're in an economic and medical emergency which is totally selfish on our part but, of course, so's the Northern Pass. I would like to see it -- I know, I flip the switch. I enjoy electricity. When the power goes off, I still flip the switch, but I think there's alternatives that could be better examined. So thank you.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Jul 21, 2015

**ID:** 8197

**Date Entered:** Jul 21, 2015

**Source:** Website

**Topics:**

**Organization:**

**Comment:** It is in the best interest of New Hampshire and it's residents to stop the northern pass project

I encourage you to vote for Alternative 1 - No Action

I would be directly impacted by the "proposed plan" in that the transmission lines would be placed over my house. It is appalling to me that this is even an option in someone's eyes. My main concern is the health and safety of my family. There are many studies that directly connect leukemia in children with HV transmission lines. Aside from the obvious health hazards the value of my property will decrease substantially.

Not only will this project destroy New Hampshire's landscapes, it will also increase the countries dependence on foreign energy.

If the project is inevitable I would encourage Alternative 4a, 4b, or 4c for minimal environmental visual impact of this beautiful state.

1067-1

Thank you for your comment. Section 4.1.4.2 in the EIS addresses the potential for magnetic fields to cause cancer. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1067-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Oct 16, 2015

**ID:** 8440

**Date Entered:** Oct 16, 2015

**Source:** Website

**Topics:** Alternatives, Health and Safety, Viewshed/Scenery, Private Property/Land Use, Tourism, Quality of Life, Cumulative Effects, Noise

**Name:** Jakow Diener

**Organization:**

**Email:** jgdiener@hotmail.com

**Mailing Address:** 360 Brook Road

**City:** Bethlehem

**State:** NH

**Zip:** 03574

**Country:** US

**Comment:** I have reviewed the maps in Grafton County where I live on Brook Road. First, the map is inaccurate in that it shows the Rocks estate to the east of the towers when it is to the west of the current ROW. At first glance, it makes it seem that my property will not be affected.

The rear of my property abuts the ROW and taller towers will become visible from my property whereas they are not now. This will adversely affect my property values. In addition, high tension lines give an audible buzzing sound that will adversely affect the quality of life as well as my property values.

As an oncologist I am concerned about the adverse health effects of high tension lines as the result of evidence that suggests a higher incidence of cancer in those living in proximity to them. This certainly is undesirable.

The proposed ROW currently includes going underground just south of my property where the ROW crosses route 302 and where, I understand some kind of substation will be built within view of route 302. This will affect the tourism industry in Bethlehem that depends on same for significant business income.

There is no reason why the line cannot be buried northeast of Bethlehem, north of route 116 (Union

1069-1

Thank you for your comment. The maps contained in Appendix A of the EIS are at a regional scale and do not display the level of detail referenced by the commenter, therefore we do not believe the commenter is referring to a map contained in the EIS.

1069-2

Thank you for your comment. Section 4.1.2 of the final EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions. Additionally, potential noise impacts of the Project are analyzed within Section 4.1.7 which details the anticipated audible corona noise levels.

1069-3

Thank you for your comment. Section 4.1.4.2 in the EIS addresses the potential for magnetic fields to cause cancer. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1069-1

1069-2

1069-3

Street). The government has determined that the entire line can be buried for one tenth of what HyrdoQuebec has estimated. Therefore, for health, quality of life, property value, economic and esthetic reasons, the Northern Towers should be buried in Grafton County.

Also, why was the public meeting at the Mt. Washington Hotel scheduled for Oct 7 canceled without notice and not reschedule? A reply would be appreciated as well as a new date for the public hearing (that is not in the middle of holiday season when you expect people to be too wrapped up with the holidays to attend).

1069-4

Thank you for your comment. A meeting was never scheduled for the Mt. Washington Hotel. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE issued a NOI to prepare a supplement to the draft EIS (80 FR 58725 [September 30, 2015]). This notice extended the comment period until December 31, 2015, and postponed the public hearings. On November 20, 2015, DOE issued the supplement to the draft EIS (80 FR 72719 [November 20, 2015]). Public hearings were subsequently rescheduled for December 2015. On December 4, 2015, the public hearings were postponed and the comment period was extended until April 4, 2016. On January 29, 2016, the public hearings were rescheduled for March 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1069-4

Dolly McPhaul, M C P H A U L, Sugar Hill, and I'm here tonight to give a little different perspective. Maybe it is something new. I spent one year attending the ICC rulemaking sessions. I only missed one meeting at which the SEC members were present. The final meeting to ratify the new rules. I couldn't bear to be there and watch the Eversource rules be ratified. In my mind, Eversource is the parent company of the SEC. Here are a few examples. Pay attention. They're pretty outrageous. When the project is no longer in use, what happens to the towers. Nothing. If you are a company with wind turbines, you have to remove all structures and restore the site. That sentence is missing from transmission towers. Think about that. No requirements from the SEC for Eversource to remove the obscene Northern Pass towers. 78 miles of hideous towers. Next, there was a bill passed that said the SEC must consider cumulative impacts when making its decision. Makes perfect sense to have to consider everything in sight. Oh, oh, wait. Transmission towers were removed from that. Just think. Apparently 85 to 155 foot towers through 78 miles of New Hampshire are invisible. Isn't that great? We don't have to look at those. Even when they're dead. Third, how far should transmission towers and lines be set back from homes, day care centers and hospitals. We fought for those for two reasons: EMFs and falling tower zones. What happened. No setbacks necessary. According to the SEC, the many studies that indicate the connection between cancer, especially childhood leukemia, and transmission lines I guess don't matter with Eversource or the SEC. What are mere human lives compared with more, and I stress the word more, of the all mighty dollar for Eversource or a high paying job with Eversource for an SEC member. The SEC committee needs to go talk to Rod McAllister or Lynn Placey about where their priorities should be. As far as towers falling, we were told the odds against that happening were so minimal that there was no need to be considered, even after being shown a picture of the towers on a home and being told that 1000 steel towers collapsed in the Canadian ice storm. What happened? No setbacks. Guess we weren't Eversource. Four, another outrageous acceptance of the completed application that is not complete. They do not have control of their route, and then this circus of meetings. Meetings that are not legitimate. We can't know the facts because they're not out there. We are called to a meeting that does not have all the facts. Oh, we've been told that they will have two more meetings some time somewhere for us to hear these facts. Undoubtedly, they will be in the least accessible at the worst convenient time for people so as few will come out as possible. The people obviously do not count. And finally, for those of you who vote to accept this rape and pillage of our beautiful countryside, I feel every one of you that accepts this project should be investigated. Your acceptance of this application will in no way stop our fight against this obscene, unnecessary, for-Eversource-profits-only project. I am proposing a new group of SEC members be chosen from outside New England with no relationship to Eversource, and certainly not members of the Eversource, SEC, PUC revolving door. The first letter I ever wrote to the papers was aimed at Eversource or PSNH or Northeast Utilities or Northern Pass, whatever they were calling themselves, and it was entitled How Dare You. I have since added the SEC to the mix, and my comments are still the same. How dare you.

1070-1

Thank you for your comment. Section 4.1.4.2 in the EIS addresses the potential for magnetic fields to cause cancer. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1070-2

Thank you for your comment. As discussed in Section 4.1.4.2 in the EIS, transmission lines are unlikely to collapse due to weather conditions, except in extreme circumstances. Additional discussion is provided in Section 3.1.6.1 of the Public Health and Safety Technical Report. Impacts to health and safety from intentional destructive acts would not likely be greater than the potential impacts from events involving extreme weather. While collapse of lines or structures is a remote possibility, it would not create a health and safety risk, but could potentially impact the local energy system and grid.

1070-1

1070-2

1070-3

Thank you for your comment. The Further Amendment to Presidential Permit Application submitted by Northern Pass to DOE on August 31, 2015 contained adequate information in order for DOE to analyze the impacts of the Project under NEPA. DOE has performed its own analysis of the environmental impacts of all alternatives through this EIS, and does not rely on analyses completed by the Applicant. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way, as well as the laws, regulations, and policies surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1070-3



Thank you, Mr. Chairman, and Members of the Committee for investing your time in this process. My name is Edward Craxton. I and my wife are residents of the town of Dalton, New Hampshire, where we retired from Louisville, Kentucky. There were no mountains in Louisville, Kentucky. It is my understanding that a major part of your role is to determine if the issuance of a certificate to Northern Pass will serve the objective outlined in RSA-162-H:16 which include giving due consideration to the views of municipal governing bodies and to ensure that the site and facility will not have unreasonable adverse effect on aesthetics, historic sites, air and water quality, natural environment and public health and safety. Regarding the views of towns and governing bodies, Dalton, like Pembroke, which was previously mentioned tonight, is one of around 30 towns in New Hampshire which has registered a vote against Northern Pass. While such a vote is not binding, it clearly indicates the will of the people with regard to this project. The will of Dalton, our Selectboard, and many other towns have said a resounding no to Northern Pass and its proposed overhead transmission lines. I'd like to comment on the unreasonable adverse effects on aesthetics and natural environment. As we all know, the natural landscapes are significant assets to New Hampshire, attracting hundreds of thousands of tourists to this part of our state every year. Over the past few years I have intentionally engaged many tourists in conversation while riding up the ski lifts together or encountering them on mountain trails. The vast majority of them had not heard of the Northern Pass project, and as I described the proposed route of these overhead transmission lines, to a person they were incredulous. Why would you scar this beautiful country in that way. That's one illustration of an unreasonable adverse effect on the aesthetics and natural environment of the area, not to mention the adverse effect on the economy of the area when those tourists seek more pristine destinations. Regarding public health and safety, some of my neighbors in Dalton live in a community of 45 homes. That neighborhood, according to the maps that Northern Pass provided to us, would be within 75 feet of the proposed new overhead transmission lines. This is within the fall zone. This same neighborhood is one in which many children reside. I and the town are concerned for the public health and safety of the families living in such close proximity to proposed power lines. In the July 20, 2015 Public Health and Safety Technical Report for the Draft Environmental Impact Statement, it notes the following, and I quote. Under normal operating conditions, public safety hazards associated with high voltage transmission lines include electric shocks. These can occur by working and recreating under or near transmission lines. Electrical shocks can occur from touching transmission towers or other large metallic objects near power lines. It goes on for a few more paragraphs like that, and then continuing the quote, another potential public safety hazard associated with transmission lines is arc flashes. Arc flashes occur when electricity from a high voltage line travels between conductors through the air. The gap distance varies according to the voltage. These occur in normal conditions, but can also be caused by smoke from fires. Arc flashes can produce intense heat and light. If individuals get too close to energized power lines without touching them, an arc of electricity can form between the power line and the person and result in serious burns. MR. HONIGBERG: Mr. Craxton, how much more do you have? MR. CRAXTON: Two more paragraphs. MR. HONIGBERG: How long are the paragraphs you've been reading? MR. CRAXTON: I'll just be 30 seconds. In addition, while studies over the past 20 or more years on exposure to EMF, electromagnetic fields, from overhead power lines and demonstrated health effects have been inconclusive, some studies do show a weak association between such exposure and childhood leukemia. These above-referenced conditions created by overhead high voltage transmission lines are unacceptable in a community where adults and children live and play. In conclusion, for these and many other reasons I will not take time to enumerate, I ask that the SEC disapprove of this project. However, in the spirit of common ground and

1071-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

1071-2

Thank you for your comment. As discussed in Section 4.1.4.2 in the EIS, transmission lines are unlikely to collapse due to weather conditions, except in extreme circumstances. Additional discussion is provided in Section 3.1.6.1 of the Public Health and Safety Technical Report. Impacts to health and safety from intentional destructive acts would not likely be greater than the potential impacts from events involving extreme weather. While collapse of lines or structures is a remote possibility, it would not create a health and safety risk, but could potentially impact the local energy system and grid.

1071-3

Thank you for your comment. As discussed in Section 4.1.4.2 in the EIS, corona discharge has the potential to result in electric shocks to individuals. The project would comply with National Electrical Safety Code (NESC) and health-based exposure guidelines designed to protect against harmful levels of electric shocks.

1071-4

Thank you for your comment. Section 4.1.4.2 in the EIS addresses the potential for magnetic fields to cause cancer. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1071-1

1071-2

1071-3

1071-4

compromise, at the least, I ask the SEC to require that the entire transmission project be buried along an appropriate transportation corridor. If developers of high voltage transmission line facilities in New York, Vermont and Maine can totally bury their facilities, we can, too. Thank you.

to  
Address the SEC  
A

My name is Edward Craxton. I am a resident of the town of Dalton, NH. It is my understanding that a major part of your role is to determine if the issuance of a certificate, in this case, to Northern Pass, will serve the objectives outlined in RSA 162-H:16 which include giving due consideration to the views of municipal governing bodies and to ensure that the site and facility will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety.

As you may know, Dalton is one of around 30 towns in New Hampshire which has registered a vote against Northern Pass. While such a vote is not binding, it clearly indicates the will of the people with regard to this project. The people of Dalton and many other towns have said a resounding NO to Northern Pass and its proposed overhead transmission lines.

In 3 minutes I only have time to highlight 3 of these unreasonable adverse effects.

The natural landscapes are significant assets to New Hampshire, attracting hundreds of thousands of tourists to this part of our state every year. Over the past few years, I have engaged many tourists in conversation riding up the ski lifts together or encountering them on a mountain trail. The vast majority of them had not heard of the Northern Pass project and I as described the proposed route of these overhead transmission lines, they were incredulous. "Why would you scar this beautiful part of the country?" they ask. I submit - **that** would be an unreasonable adverse effect on the aesthetics of the area, not to mention the adverse effect on the economy of the area when those tourists seek more pristine destinations.

Some of my neighbors in Dalton live in a community of 45 homes which would be within 75 ft of the proposed new overhead transmission line. This neighborhood is one in which many children reside.

I and the Town are concerned for the public health and safety of the families living in such close proximity to the proposed power lines. In the July 20, 2015 Public Health and Safety Technical report for the Draft Environmental Impact Statement it notes the following (yellow emphasis is ours) in Section 2.1.4 titled Transmission Line Safety Issues (pg. 33):

"Under normal operating conditions, public safety hazards associated with HVAC transmission lines include electrical shocks. These can occur from working and recreating under or near transmission lines. Electrical shocks can occur from touching transmission towers or other large metallic objects near power lines. These result from voltage induced from the power line into nearby metal objects. The severity of the shock would reflect the voltage of the power line, the distance from the conductor, the

1072-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

1072-2

Thank you for your comment. As discussed in Section 4.1.4.2 in the EIS, corona discharge has the potential to result in electric shocks to individuals. The project would comply with National Electrical Safety Code (NESC) and health-based exposure guidelines designed to protect against harmful levels of electric shocks.

1072-1

1072-2

1072-2 cont'd

size and length of the object, its orientation to the line, and how well the object is grounded. (Bonneville Power Administration [BPA] 2007)”

“DC electric fields beneath HVDC lines arise in part from ion currents which may induce charges on the body of an individual, and can discharge when the person touches a grounded surface, potentially causing shock.”

“Another potential public safety hazard associated with transmissions lines is arc flashes. Arc flashes occur when electricity from a high voltage line travels between conductors through the air. The gap distance varies according to the voltage. These occur in normal conditions but also can be caused by smoke from fires (BPA 2007 and Great River Energy n.d.). Arc flashes can produce intense heat and light. If individuals get too close to energized power lines without touching them an arc of electricity can form between the power line and the person and result in serious burns (Great River Energy n.d.).”

In addition, while studies, over the past 20 or more years, on exposure to EMF (electromagnetic fields) from overhead power lines and demonstrated health effects have been inconclusive, some studies show a weak association between such exposure and childhood leukemia. Since studies can thus far neither deny nor confirm such health issues, in the interest of public health and safety, it is best that such transmission lines be located far away from such children populations or, better yet, that the lines be buried underground.

The above referenced conditions created by overhead HVDC transmission lines are unacceptable in a community where adults walk and children live and play.

For these and many other reasons I don't have time to enumerate, I ask sincerely that the SEC disapprove of this project. In the spirit of compromise, at the least, I ask the SEC to require that the entire transmission project be buried along an appropriate transportation corridor. If developers of High Voltage transmission line facilities in New York, Vermont, and Maine can totally bury their facilities, we can too.

1072-2

Continued

1072-3

Thank you for your comment. Section 4.1.4.2 in the EIS addresses the potential for magnetic fields to cause cancer. Additional discussion is provided in Appendix B of the Electric and Magnetic Fields Technical Report (included as Appendix B of the Public Health and Safety Technical Report).

1072-3

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 11, 2016

**ID:** 8734

**Date Entered:** Mar 11, 2016

**Source:** Website

**Topics:** Alternatives, Health and Safety, Vegetation

### Organization:

**Comment:** The purpose of this letter is to express my deep concern that the Northern Pass Project is a bad idea for New Hampshire as it is currently proposed. In 1978, my wife and I built a log cabin home in Dalton, NH up on a mountain side with beautiful views of the White Mountains. Our property abuts the David Dana Forest, a property owned and managed by the Society for the Preservation of New Hampshire Forests. The forest is the home to deer, bear, coyotes, fox, and many species of birds that over the years my wife and I have had the pleasure to observe. The construction of these huge towers will not only destroy views that we and others who live on this mountain have enjoyed since we built our home, but also reduce the value of our home should we wish to ever sell. More importantly in my mind is the potential effect these high voltage power lines will have on the health of humans and wildlife.

Due to comments made by landowners along the proposed route, Northern Pass officials announced that part of this line will be buried to "eliminate potential visual impacts in the White Mountain National Forest, the Franconia Notch area, the Rocks Estates area, and along the Appalachian Trail . Northern Pass will use 160 miles of existing transportation corridors, both beneath public roadways and along transmission line corridors where power lines stand today." We live less than a mile from one of these transmission corridors. We will drive under these power lines everyday to reach Whitefield, Dalton, and other locations.

As a retired physicist, I am not concerned about the magnetic fields from these lines since the proposed currents will create fields of about the same size as our Earth's magnetic field. What concerns me is the effect of corona discharge from the lines. These discharges can produce ozone, nitrogen oxide, and eventually nitric acid if water vapor is present. Because these transmission lines pass through large forested areas, the effect of such acidic air on humans, wildlife, and vegetation must be considered. These discharges can also produce audible as well as radio frequency noise . The purplish glow from corona discharges has an ultraviolet component that may be visible and disturbing to wildlife as they pass through these above ground transmission line corridors. All of the concerns I have expressed above could be avoided if Northern Pass officials would bury the entire proposed line underground. Other transmission projects such as the New England Clean Power Link in Vermont have shown a willingness to go underground completely. Thank you for permitting me to express my concerns.

1075-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1075-2

Thank you for your comment. The potential of corona discharge to produce ozone and nitrogen oxides is not an issue considered in this analysis. Ionization of air molecules surrounding the conductor ("corona effect") may produce a small amount of ozone and nitrous oxides (NOx). However, this amount would be insignificant and would not contribute to a violation of the air quality standards.

1075-3

Thank you for your comment. The potential of corona discharge to produce ozone and nitrogen oxides is not an issue considered in this analysis. Ionization of air molecules surrounding the conductor ("corona effect") may produce a small amount of ozone and nitrous oxides (NOx). However, this amount would be insignificant and would not affect wildlife populations. The related effect that could effect wildlife would be associated with magnetic fields and their affect on wildlife. Additional analysis of the effects of DC magnetic fields on wildlife are provided in Section 4.1.11 of the final EIS as well as Appendix B of the Health and Safety Technical Report.

1075-1

1075-2

1075-3

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**From:** Fred W. Martin <extra@nbeam.com>  
**Sent:** Saturday, August 29, 2015 4:13 PM  
**To:** draftEIScomments@northernpasseis.us  
**Subject:** safety

50 Village Ave  
Dedham MA 02026

Mr. Brian Mills  
Office of Electricity Delivery and Energy Reliability  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

Dear Mr. Mills:

This is a comment on the draft EIS for the Northern Pass project, favoring alternative 3 for safety reasons.

In sections 3.2.4.3 and 3.1.4.6 relative to fire hazards and worker safety, alternative 3 (burial along the proponent's proposed route) is preferable to all the other alternatives involving burial along highways, eg 4a, 4b, 4c 6a, 6b. This is because alternative 3 avoids interfering with the 24" natural gas pipeline buried in the Connecticut River valley in Coos County. The gas pipeline crosses the highway US 3 multiple times in this area. Major accidents involving a 300 yard diameter fireball occur when a backhoe unintentionally pulls on these pipelines, which operate at pressures up to 100 atmospheres, somewhat like a rubber balloon ready to pop if probed with a sharp instrument. A famous accident involving a backhoe occurred in a New Jersey auto junkyard for this reason. Trenching in the vicinity of the 24" gas pipeline is to be avoided!

As a landowner with a highway-pipeline crossing about 100 yards from my seasonally occupied house at 2369 US rte 3 in Stratford NH, I would stand an extra risk of losing the house should an accident of this kind occur during burial of the HVDC powerline along the highway.

Sincerely yours,

Frederick W. Martin

1087-1

Thank you for your comment. Section 4.1.4.1 in the EIS discusses procedures to ensure that excavation would not damage existing underground utilities. Additional discussion is provided in Section 3.1.4 of the Public Health and Safety Technical Report. The construction contractor is required to mark all areas designated for excavation. After being notified, utilities would mark the ground where their facilities exist. To ensure the safety of any existing pipelines or utilities during operation of the project, the Applicant would conduct studies during project design to determine whether the buried cable may adversely affect other utilities. If so, the Applicant would also be responsible for providing appropriate mitigation measures.

1087-1

**To: NH Site Evaluation Committee – Public Hearing (Concord), Docket N. 2015-06 - Northern Pass Transmission – Eversource**

**Date: March 10, 2016**

I am in opposition to the Northern Pass proposed plan to construct overhead transmission towers and distribution lines through the City of Concord for the following reasons: (1) aesthetics, (2) safety, and (3) economics.

**(1) Aesthetics:**

If this project with its proposed overhead lines is allowed to go forward it will establish a visual blight on the city of Concord for the next 40 years or the foreseeable future. NH's capital city will no longer be known as the fair city it is; it will be known as the city with the ugly 125 foot towers and multiple lines. Due to the level topography of the heights area these towers will be visible for extended distances.

**(2) Safety:**

Relocation of existing distribution towers from the center of the ROW to its western boundary will place private homes within the fall zone of these towers. It will place Concord citizens in direct danger should they fail due to weather conditions or other factors. For an excellent example, you have to look no further than the 1993 ice storm that raced up the New England coast and into Canada. Here is a picture taken from the May 1998 issue of the National Geographic. You can readily see how the 4 to 6 inches of ice totally collapsed the giant steel towers. A future storm of this type could cause tower failures resulting in death and destruction. This is a health and safety issue that must be addressed.

**(3) Economics:**

Construction of the proposed towers and lines will diminish not only property values of adjacent property owners but also the 22% of property owners who will be within direct view of these towers. It will further inhibit residential development and recruitment of business and industry to this area of the city. No one wants to pay good money to view massive towers and electric lines. For example, I refer you to the February 22, 2016 issue of the Concord Monitor. Tom Aspell (Concord's city manager), speaking of the short distribution towers on South Main Street, is quoted as saying, the whole block would have greater potential for development if the city takes the wires underground. Now, keep in mind, the distribution poles on South Main Street are only approximately 20 to 30 foot tall. The proposed NP towers will be 5 to 6 times that height at 125 feet or higher and have multiple transmission and distribution lines.

I would like to conclude by saying the proposed overhead towers and wires will create aesthetic, safety and economic problems for the City of Concord if allowed to be constructed. It is therefore recommended, if this project is to go forward, the lines must be buried through the entire eight miles in the City of Concord.

Thank you for your consideration.

Lynn A. Woodard, P.E., (retired)  
13 Edward Dr., Concord, NH  
603-224-9421

1090-1

Thank you for your comment. Visual impacts in Concord are discussed in the EIS (Section 4.4.1). Potential visual impacts in urban areas were overstated in the draft EIS. Because the Concord area is urban, there was no estimation of screening from land cover which leads to an overstatement of visibility in the developed areas of Concord. The analysis has been updated for the final EIS to include additional data reflecting the height of land cover in Concord which better represents the visibility of the Project. The viewshed analysis also considers topography, as well as land cover, to determine potential visibility.

1090-1

1090-2

Thank you for your comment. Section 4.1.4.2 in the EIS discusses the design of the transmission line in relation to extreme weather. Additional discussion is provided in Sections 2.1.2 and 3.1.6 in the Public Health and Safety Technical Report.

1090-2

The overhead transmission line would be constructed to satisfy National Electrical Safety Code (NESC) requirements related to extreme wind and temperature conditions. Implementation of these measures should reduce the potential for downed wires and tower collapse due to wind and ice loading, reducing the potential for power outages. Safety measures, including shield wires, are incorporated into transmission line design to prevent flashovers or power surges due to lightning strikes.

1090-3

1090-3

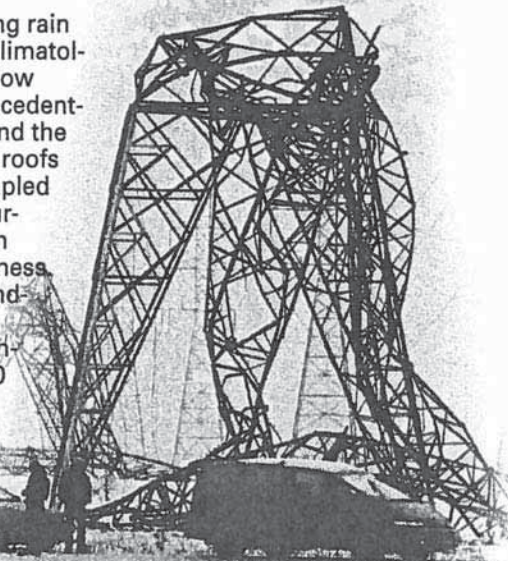
Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.



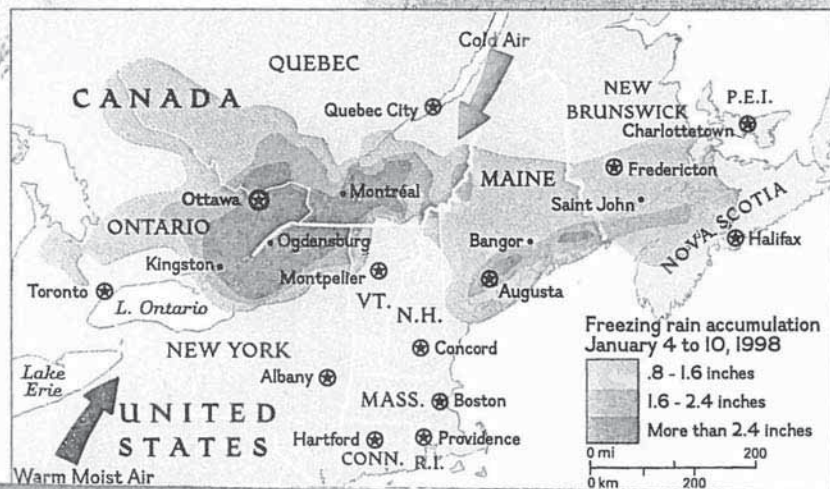
## WINTER STORMS

"Canada is used to cold, but freezing rain can bring us to our knees," says climatologist David Phillips. A crippling blow came last January when an unprecedented ice storm hit eastern Canada and the northeastern U.S. Trees snapped, roofs collapsed, and utility towers crumpled (right) under a weighty two-to-four-inch coat of ice, leaving more than four million people in frozen darkness.

Winter's bite in the East is legendary. In the freak March blizzard of 1888, 20-foot drifts entombed Manhattan pedestrians. More than 400 people died. In 1993 the "Storm of the Century" affected 26 states from Florida to Maine and eastern Canada and closed every major airport on the East Coast. The West, too, knows the harsh grip of winter. Back in 1921 Silver Lake, Colorado, got 75.8 inches of snow in 24 hours, a U.S. record that still stands.



CANAPRESS-PHOTO SERVICE  
(J. BOISSINOT)





Good evening. My name is Lynn Woodard, W O O D A R D. I live in Concord, New Hampshire. I am in opposition to the Northern Pass proposed plan to construct overhead transmission towers and distribution lines through the city of Concord for the following reasons, and these reasons are part of the statutory requirement that you review and consider. Aesthetics, safety, and economics, and I'll be brief on these three subjects. First, aesthetics. If this project with its proposed overhead lines is allowed to go forward, it will establish a visual blight on the city of Concord for the next 40 years or the foreseeable future. New Hampshire's capital city will no longer be known as the fair city it is. It will be known as the city with the ugly 125-foot towers in multiple lines. Due to the level of the topography of the Heights area, these towers will be visible for an extended distance. Now, safety. Relocation of existing distribution towers from the center of the right-of-way to its western boundary will place private homes within the fall zone of these towers. It will place Concord citizens in direct danger should they fail due to weather conditions or other factors. For an excellent example, you have to look no further than the 1993 ice storm that raced up the New England's east coast into Canada. There is a picture taken from the May 1998 issue of the National Geographic which I have here and I've included it in my letter to you. You can readily see how the 4 to 6 inches of ice totally collapsed the giant steel towers. A future storm of this type could cause power failures resulting in death and destruction, and I'm not kidding because we have a lot of homes that are very close to the right-of-way line now that these things are going to be relocated to the western edge. This is a health and safety issue that must be addressed and certainly you're here to hear this and hopefully you'll take into consideration. Economics. Construction of the proposed towers and lines will diminish not only property values of adjacent property owners but also the 22 percent of property owners who will be within the direct view of these towers. It will further inhibit residential development and recruitment of business and industry to this area of the city. No one wants to pay good money to view massive towers and electric lines. For example, I refer you to the February 22nd, 2016, issue of Concord Monitor where the Concord City Manager was speaking concerning the redevelopment of downtown Main Street and basically said, the short distribution towers on South Main Street should be buried. These short distribution lines, these are only 20 to 30 feet high, okay? And it would have a greater potential for development if the city would take these wires underground. Now, keep in mind the distribution poles on South Main Street, like I said, are only 20 to 30 feet tall. The proposed Northern Pass towers will be five to six times this height at about 125 feet or higher and have multiple transmission and distribution lines. MR. HONIGBERG: Mr. Woodard, how much more do you have? MR. WOODARD: I'm concluding right now. Thank you. I would like to conclude by saying the proposed overhead towers and wires will create aesthetic, safety and economic problems for the city of Concord if allowed to be constructed. It is, therefore, recommended if this project is to go forward these lines must be buried through the entire 8 miles of the City of Concord. Thank you for your consideration.

1096-1

Thank you for your comment. Visual impacts in Concord are discussed in the EIS (Section 4.4.1). Potential visual impacts in urban areas were overstated in the draft EIS. Because the Concord area is urban, there was no estimation of screening from land cover which leads to an overstatement of visibility in the developed areas of Concord. The analysis has been updated for the final EIS to include additional data reflecting the height of land cover in Concord which better represents the visibility of the Project. The viewshed analysis also considers topography, as well as land cover, to determine potential visibility.

1096-1

1096-2

1096-2

Thank you for your comment. Section 4.1.4.2 in the EIS discusses the design of the transmission line in relation to extreme weather. Additional discussion is provided in Sections 2.1.2 and 3.1.6 in the Public Health and Safety Technical Report. The overhead transmission line would be constructed to satisfy National Electrical Safety Code (NESC) requirements related to extreme wind and temperature conditions. Implementation of these measures should reduce the potential for downed wires and tower collapse due to wind and ice loading, reducing the potential for power outages. Safety measures, including shield wires, are incorporated into transmission line design to prevent flashovers or power surges due to lightning strikes.

1096-3

1096-3

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1101-1

Thank you for your comment. The Applicant would be responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Alternative 3 was analyzed in the final EIS despite potential issues with legal rights to use the existing transmission ROW to ensure all reasonable alternatives were considered. As detailed in Sections 1.1.3 and 1.3 of the EIS, Northern Pass has applied to the USFS for a Special Use Permit authorizing Northern Pass to construct, operate, and maintain an electric power transmission line crossing portions of the WMNF and is part of the USFS' Purpose of and Need for Action on this EIS.

1101-2

Thank you for your comment. As discussed in Section 4.1.4.2 of the EIS, transmission lines are unlikely to collapse due to weather conditions, except in extreme circumstances. Impacts to health and safety from intentional destructive acts would not likely be greater than the potential impacts from events involving extreme weather. To ensure the safety of any existing pipelines or utilities during operation of the project, the Applicant would conduct studies during project design to determine if the presence of the buried cable could adversely affect existing utilities. If so, appropriate mitigation would be provided.

I'm not sure what I bargained for when I agreed to do this earlier, but I thought it was important to share with the subcommittee a couple of concerns the Forest Society has with two parcels of land that we own in Coos County that are directly impacted by Northern Pass. Our 2000-acre Washburn Family Forest in Clarksville has 6 miles of frontage on the Connecticut River. You didn't get a chance to see it today because the skies weren't clear, but this is part of a truly exceptional scenic gateway as you've heard many others talk about into the town of Pittsburg. It would truly be a shame to allow this gateway to be scarred. Furthermore, Northern Pass proposes to build its power line below part of our land and you actually drove over the green steel bridge today as part of the tower, and you drove over land that is part of the Washburn Family Forest where Northern Pass proposes to build the power line 50 to 70 feet below the surface of the land. Now, it so happens that the state holds a transportation easement over this land by virtue of road layout approved jointly by the selectmen of Pittsburg, Stewartstown and Clarksville in 1931. We believe Northern Pass does not have the legal right to build the project through our land as they propose. Without our permission, this would constitute an unconstitutional taking. We are, therefore, defending our property rights in the only legal setting where the New Hampshire Constitution provides for such relief. In the Coos County Superior Court. If the court rules in our favor, Northern Pass can't dig in our dirt. If Northern Pass can't dig in our dirt, it's likely that the entire corridor currently proposed for Coos County will be in some jeopardy. When we suggested that the SEC under its rules, that this issue rendered the application incomplete, you chose to decide otherwise, but the legal dispute is real. No case with such a set of facts has been decided before by a New Hampshire court. The Forest Society continues to believe that it's inappropriate and a waste of resources for all of us to be investing so much time and money into this matter while the court is considering our case. Finally, I'd like to bring your attention to the concerns we as a landowner have with the proposed use of the PSNH right-of-way through more than a mile of our Kaufmann Forest in Stark. In this 150-foot wide right-of-way held by PSNH and the Portland Natural Gas Pipeline Company, there is presently a 115 kilovolt overhead transmission line on wooden poles well below tree line and a 24-inch natural gas pipeline buried four feet below the ground. Northern Pass proposes to remove the existing above ground transmission facility and replace it with an entirely new set of steel structures well above tree line to post a new enhanced AC transmission line. Northern Pass also proposes to erect a second set of structures within the 150 foot right-of-way to host the new HVDC line, also well above the tree line. Many of the individual towers for both facilities will be above 150 feet in height. As Mr. Beland of Stark noted earlier this morning, there's a very practical question as to how many transmission facilities can be safely located within this 150-foot right-of-way. There's a question about whether a consequence of what Northern Pass proposes represents an unreasonable adverse impact on aesthetics, and there's a question about just how safe it is to collocate all three of these facilities in the existing right-of-way. If Northern Pass is built in Stark as proposed, the natural landscapes of the town of Stark will change dramatically. If Northern Pass as proposed in Stark were built, will private property be harmed if any of these new towers fall outside of the right-of-way or if they fall on each other or fall in a way that disrupts the gas pipeline. We think that what Northern Pass proposes for our land in Stark is not only an unreasonable adverse impact on aesthetics, but also an unreasonable adverse impact on public safety. As the SEC subcommittee contemplates the Northern Pass application, we ask that you consider these questions about property rights, aesthetics, public safety, and natural resources much more comprehensively. New Hampshire only has one chance to get the decision on this application right. To make a well-informed decision on the Northern Pass application, the SEC needs to set a very high bar for the substance of its review. Thank you.

1101-1

1101-2

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Apr 4, 2016**

**ID:** 9210

**Date Entered:** Apr 4, 2016

**Source:** Website

**Topics:** Health and Safety

**Organization:** Northern Pass Transmission LLC

**Email:** maryanne.sullivan@hoganlovells.com

**Mailing Address:** 781 N. Commercial Street

**City:** Manchester

**State:** NH

**Zip:** 03101

**Country:** US

**Comment:**

**COMMENTS OF NORTHERN PASS TRANSMISSION LLC  
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT  
TRANSMISSION LINE SAFETY ISSUES**

The Draft Environmental Impact Statement (“DEIS”) could be read to suggest that there are significant safety issues associated with normal operation of a high voltage transmission line such as the one Northern Pass Transmission LLC (“Northern Pass” or the “Project”) intends to construct. In particular, the DEIS seems to suggest that normal operations pose a risk of shocks and of arc flashes. DEIS at 3-24. If that is the intended message, Northern Pass disagrees. As described below, Northern Pass requests that the Final EIS be clarified on a few key issues related to transmission line safety.

The DEIS seems to acknowledge, although not as clearly as seems warranted, that the safety risks it identifies can be avoided or minimized by compliance with standards set by the National Electrical Safety Code (“NESC”). Northern Pass agrees with this point, and indeed believes such safety measures are routinely employed in the industry. Northern Pass recommends that the Final EIS acknowledge this point clearly.

More specifically, the Final EIS should acknowledge that the shock risks to which the analysis refers are nuisance shocks, not shocks of a type that pose a threat to life or limb. The Final EIS should also recognize that proper grounding of transmission structures prevents even these nuisance-type shocks in almost all cases. Northern Pass transmission structures will all be grounded, and thus they will not present any significant risk of a nuisance shock. Specifically, the Project will be designed in accordance with Rule 234g of the 2012 NESC, which establishes limits for electro static discharge to prevent the risk of nuisance shock.

Likewise, arc flashes are not normally associated with a high voltage transmission line, as the DEIS might be read to imply. An arc flash might occur if there were both heavy ionization and a heavy concentration of particulate matter in the air beneath a high voltage transmission line. Conditions such as those would be associated with an event like a forest fire, a structure fire or a gasoline tank fire. Even in such cases, EPRI has noted: “A tall fire column is necessary to produce hot ionized gases sufficiently close to the conductors to cause flash overs.” EPRI Transmission Line Reference Book, 345 kV and Above, Section 8.14 at 384 (2nd ed. 1982).

The DEIS also seems to suggest that the proximity of a person to an energized line can cause an arc flash and result in serious burns to an individual. Someone walking in a ROW does not create a risk of an arc flash. This Project is designed so that someone can walk under the transmission lines without a concern for safety. A person would have to climb a transmission structure and come within close proximity to an energized conductor to create the risk of an ach

1106-1

Thank you for your comment. Information regarding the National Electrical Safety Code (NESC) has been clarified in Section 4.1.4.2 in the final EIS.

1106-2

Thank you for your comment. Information regarding shocks has been clarified in Section 4.1.4.2 in the final EIS.

1106-3

Thank you for your comment. Information regarding arc flashes and safety risk to individuals has been clarified in Section 4.1.4.2 in the final EIS.

1106-1

1106-2

1106-3

1106-3 cont'd

1106-3  
Continued

flash. Here, the transmission structures will be designed to deter unauthorized climbing, and the safety hazard associated with climbing the structures will be clearly posted.

In short, there is nothing normal about the risks the DEIS describes, and they do not constitute significant safety risks that would be associated with the operation of Northern Pass.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Sep 22, 2015

**ID:** 8391

**Date Entered:** Sep 22, 2015

**Source:** Website

**Topics:** Purpose and Need

**Organization:** University of Colorado

**Comment:** Developing the Northern Pass Transmission Line would be beneficial to those living in the New England region as it brings a better quality and more efficient energy source. By utilizing primarily hydropower, it creates an opportunity that would lead those residing in the area a more efficient source of energy without the need of the use of utilizing natural gas, which is not a local source in that region. With that being said, this project puts into use the concept of straying away from the natural gas option for energy and starts to diversify and look into different energy sources to help maintain and power the region. As it was stated, currently, 45% of the energy that is used in the region is supplied by natural gas, a source that is not local to the region. With the implementation of this project, the area will benefit by having its very own local energy source and uses low-carbon, non-intermittent power, which in this case is 98% hydropower. The draft EIS also mentions that by moving to this lower carbon energy source, it would help in reducing the amount of greenhouse gas emissions. And by using a non-intermittent power source for the region, it increases the reliability and efficiency of other services that are directly connected to the grid.

As with any project that requires construction near roadways, one issue that would be hard to overcome is the impact to transportation and traffic. Due to the development of this transmission line being underground, many roads will be affected and traffic would have to be deterred for a great amount of time. With the different alternatives listed, the number of affected roadways, ranging from local streets to major highways differ greatly from 216 to 605 affected roadways. With the amount of transmission lines being added ranging from distances of up to 190 miles and lane closures pertinent, this will cause a great inconvenience for the users of those particular roads as this project would take a good length of time to complete.

With that being said, I believe that the best alternative to this problem would be the Alternative 2, the proposed action. While the project will install a 187 mile transmission line, it has the least amount of impact on the concern that I have on hand, which are the number of roads that would be impacted with this alternative. It also provides the least impact on the ground as it only proposes 6 miles of buried roadwork, which in turn could make it more efficient in completing the project in a smaller frame of time. Since this alternative mainly focuses on crossing the Canada/U.S. border, it will benefit both countries as well as it would provide to the amount of 1,200 MW of power in both directions.

I believe this draft EIS is very clear in stating all of the facts, the needs and purposes of this project, a wide variety of alternatives, and more importantly, mitigation measures. When describing each of the

1114-1

Thank you for your comment. Impacts to traffic and transportation during construction of the Project are discussed in Sections 4.1.5.1 and 4.2.5 of the EIS, and in Section 3 of the Traffic and Transportation Technical Report. Impacts to roadways would be minimized with the implementation of applicant proposed measures (See Appendix H), including the implementation of a transportation management plan for traffic control.

1114-1

different alternatives associated with the project, the different mitigation measures to the affecting subtopic, such as social impacts, environmental impacts and pricing, were clearly stated along with the issue that each alternative could potentially propose. The addition of the maps in the appendix made it very clear of the locations these transmission lines would go through depending on each of the different alternatives, which made it easier for one to understand what each alternative transmission line route is doing.

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Apr 4, 2016**

**ID:** 9208

**Date Entered:** Apr 4, 2016

**Source:** Website

**Topics:** Health and Safety, Private Property/Land Use, Tourism

**Organization:** Northern Pass Transmission LLC

**Email:** maryanne.sullivan@hoganlovells.com

**Mailing Address:** 781 N. Commercial Street

**City:** Manchester

**State:** NH

**Zip:** 03101

**Country:** US

**Comment:**



**COMMENTS OF NORTHERN PASS TRANSMISSION LLC  
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT  
TOURISM AND LAND USE IMPACT ANALYSIS**

Northern Pass Transmission LLC (“Northern Pass” or the “Project”) submits this comment on two distinct issues addressed in the Draft Environmental Impact Statement (“DEIS”): impacts on tourism and impacts on land use. In each case, the DEIS suggests that there will be small impacts, but it bases these conclusions on assumptions only, despite the fact that its analysis fails to demonstrate there are impacts.

**Tourism**

The DEIS explains that DOE undertook a qualitative study of the factors that affect tourism in New Hampshire. The study showed that tourism in New Hampshire is affected by macroeconomic considerations such as consumer confidence, the unemployment rate and the price of gasoline. The study also noted that tourism is affected by weather, e.g., snow cover for winter downhill sports. DOE’s study of the issue did not show that transmission lines are among the factors that affect tourism.

Northern Pass agrees with these conclusions. A tourism study, undertaken by the Nichols Tourism Group (“the Nichols Study”) to support the Project’s permitting application before the New Hampshire Site Evaluation Committee (“SEC”), confirms and reinforces those conclusions.<sup>1</sup> It identified additional factors that also affect visitors’ decisions on where they will travel: ease of destination access; range and diversity of tourism products; recently introduced tourism products; scale of marketing initiatives; overall value for the money; and the overall brand identity of the destination. The Nichols Study notes that never in 20 years of tourism-related work have the authors experienced any concern being raised about the presence of power lines.<sup>2</sup>

Northern Pass also agrees with the observation in the DEIS that there are no “authoritative, peer-reviewed studies” that provide quantitative estimates of effects of a transmission line on the tourism industry. DOE notes that it looked at the EISs for other transmission lines for their analysis of impacts on tourism. What it found in those documents is speculation about the kinds of effects a transmission line project might have on tourism, not any

1115-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that “while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable.”

1115-1

<sup>1</sup> The Nichols Study submitted in the SEC proceeding was done by Nichols Tourism Group, with assistance from the National Laboratory of Tourism and eCommerce at the University of Florida. See <http://www.northernpass.us/assets/filings/Volume%20XXXIV/Appendix%2045%20Northern%20Pass%20and%20New%20Hampshires%20Tourism%20Industry.pdf>.

<sup>2</sup> Id. at 8-9.

1115-1 cont'd

actual evidence of impacts. Reinforcing the absence of academic or other studies showing an adverse effect on tourism from transmission lines, the Nichols Study also could identify no instance in approximately 250 tourism-related assignments undertaken by the Nichols Group over a period of 20 years when transmission lines were identified as a negative influence on tourism demand.<sup>3</sup>

Finally, the DEIS purports to rely on “anecdotal evidence” that transmission lines do not affect tourism. The one example it points to, the “Old Man of the Mountain” case study, supports the conclusion that tourism is driven by macroeconomic factors, not by the presence or absence of a single feature in the scenery. More persuasively, the Nichols Study analyzed whether tourism was affected by the construction of two different transmission projects: the Phase II project in New Hampshire in the late 1980s to 1990, and the Maine Power Reliability Program. (As the Nichols Study notes, New Hampshire competes directly with Maine for tourism; thus, the Maine example is highly relevant.) Both cases involved the construction of large, high voltage transmission projects. In both cases, the Nichols Study found that both the number of tourism-related establishments and employees in tourism in the areas where the lines were added *increased* both during and in the years following construction of the new transmission lines. Indeed, the Nichols Study showed that the increase in tourism development and employment in the areas where the transmission lines were located outpaced tourism development and employment in other areas of New Hampshire and Maine respectively for the same periods.<sup>4</sup>

Visitor surveys undertaken as part of the Nichols Study likewise reinforce the conclusion that the presence or absence of visible power lines is not an important factor in selecting a tourism destination.<sup>5</sup>

In the face of both the analysis in the DEIS itself, which revealed no qualitative or quantitative evidence that the presence of transmission lines can affect tourism, the DEIS arbitrarily finds that “it is reasonable to conclude that the Project may have some level of impact to tourism within New Hampshire.” The analysis in the DEIS itself and in the Nichols Study make clear that this is a wholly unsupported conclusion that should not be included in the Final EIS. There is simply no basis for concluding that the presence of power lines has any effect on tourism.

<sup>3</sup> Id. at 8 – 9.

<sup>4</sup> Id. at 19 – 22.

<sup>5</sup> Id. at 24 – 27.

1115-1  
Continued

1115-2

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that “while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable.”

1115-2

## Land Use

Northern Pass concurs in the conclusion of the DEIS that, where the Project uses existing transmission or roadway corridors, there will be no change to the prevailing land use in the area. Northern Pass also agrees with the conclusion in the DEIS that underground construction in public roads will have short-term impacts on traffic. Northern Pass will closely coordinate with state and local officials to minimize those impacts. Finally, Northern Pass agrees that the overall potential impacts are less for Alternative 7 than for the Alternative 2. Notably, the new proposed route under Alternative 7 is fully consistent with the USFS Forest Plan Standards for the White Mountain National Forest.<sup>6</sup>

On the other hand, Northern Pass is having difficulty understanding the basis for the findings in the DEIS with respect to impacts on land use – albeit estimated to be small – during the operational phase. Specifically, Northern Pass disagrees with the suggestion in the DEIS that there is any land use impact to conservation lands, except those Northern Pass pointed out in its January 11, 2016 Comment concerning those DEIS Alternatives that assume it is feasible to bury the transmission line along I-93. As Northern Pass explained there, it does not believe that underground construction along I-93 is feasible:

[B]ased on its visual examination of the relevant area, Northern Pass has concluded that, except for a narrow shoulder, the area between the I-93 roadway and the outer edge of the I-93 ROW is undisturbed. To construct Northern Pass in that area would require extensive tree, vegetation and ledge removal, measures that are largely unnecessary along the state roads Northern Pass has designated in its project design in the area of the WMNF. Wetland areas likewise also appear to be located along the outer edge of the LAROW and would be impacted as well. Finally, the required clearing and terrain alteration would likely permanently alter the experience of travelers along the I-93 corridor without achieving any benefits that could not be achieved using the state roads Northern Pass has proposed, where the environmental impacts would be temporary and much reduced.

It was in order to avoid this kind of impact on conservation lands, among other reasons, that Northern Pass concluded it should propose building an additional 52 miles of the Project underground in other public roadways where there is available, sufficient, already-disturbed area so that it could avoid any impact on conservation lands. Thus, when the DEIS says there will be impacts on the use of conservation lands, Northern Pass does not know what conservation lands the DEIS references.

<sup>6</sup> See Comments of Northern Pass Transmission LLC on Draft Environmental Impact Statement White Mountain National Forest and Franconia Notch (April 4, 2016) for a more complete discussion of this issue.

1115-3

Thank you for your comment. The commenter's observations are noted regarding the potential impacts to roadway corridors. Northern Pass' coordination with state, federal, and local officials in order to minimize or avoid impacts on transportation is noted in the EIS in Appendix H: Applicant-Proposed Impact Avoidance and Minimization Measures. Forest Plan consistency and Forest Plan Amendments are described in Appendix C of the EIS.

1115-4

Thank you for your comment. As noted in the Land Use Technical Report, data from the Complex Systems Research Center at the University of New Hampshire was utilized to identify conserved land parcels in or adjacent to the project corridors using Geographic Information Systems (GIS) software. Section 3.1.6.2 of the EIS explains that for the purposes of this analysis conservation lands include parcels that are mostly undeveloped and protected from future development. Overlapping areas between conservation lands and the Project were quantified and the ownership (municipal/county, federal, state, private, etc.), public access, and land status of the potentially impacted conservation lands were considered. Furthermore, the Land Use Technical Report provides a list and map of identified conservation lands in or adjacent to the Project corridors. Sections 4.1.6, 4.2.6, 4.3.6, 4.4.6, and 4.5.6 of the EIS analyze potential construction and operational impacts to these identified conservation lands.

1115-5

Thank you for your comment. Section 2.3.12 of the final EIS have been updated to better clarify the details regarding the size and location of the converter and transition stations of Alternative 7.

With respect to the 40 miles of new ROW that the Project will entail in the North Country of New Hampshire, that area is primarily forested and managed for uses such as timber harvesting operations, recreation and energy facilities. The Project will co-exist with these activities, and the ROW in that area will remain as vegetated open space. There will be no change in land use.

Alternative 7, the proposed route that Northern Pass now supports in lieu of Alternative 2, will have reduced land use impacts that should be noted. For its 1,200 MW design, Northern Pass had estimated that it would occupy 30 acres of a former Franklin campground site for its converter station. With the change in technology that is associated with putting 60 miles of the Project underground, it will now occupy only 10 acres of the Franklin site for the converter station. To avoid offsite noise or visual impacts, Northern Pass is locating the converter station away from the site boundaries.<sup>7</sup> Additionally, as the Supplement to the EIS notes, Alternative 7 involves the addition of new transition stations at Bethlehem and Bridgewater. However, both these transition stations and those required under Alternative 2 will occupy an area of 75 feet by 130 feet, roughly one third of the area the DEIS estimates.<sup>8</sup> Thus, the total of six transition stations required under Alternative 7 will occupy approximately one-half the land area the DEIS estimated would be occupied by the four transition stations envisioned under Alternative 2.

1115-5

<sup>7</sup> See Pre-filed Direct Testimony of Derrick Bradstreet, Joint SEC Application of Northern Pass and PSNH, at 100, <http://www.northernpass.us/assets/filings/Volume%20II/NHSEC%20Docket%20No%202015-06%20Pre-Filed%20Testimony.pdf>. Northern Pass notes that the DEIS assumed the converter station would occupy 42 acres at the Franklin site. DEIS at 2-13. Northern Pass does not know the basis for that estimate.

<sup>8</sup> Compare Pre-filed Direct Testimony of Derrick Bradstreet, Joint SEC Application of Northern Pass and PSNH, at 104, with DEIS at 2-11.

1118-1

Thank you for your comment. As noted in Section 1.7.3.1 of the EIS, the State of New Hampshire Site Evaluation Committee (SEC) is an eleven member committee representing state agencies and the public that review and act upon applications to construct energy facilities. This is a non-federal process in which DOE has no role. According to the New Hampshire Office of Energy and Planning study, "The New Hampshire Energy Facilities Siting Process," municipal and regional planning commissions and municipal governing bodies "have no decision-making power in the [energy facilities siting] process for projects within their boundaries" (NHOEP 2013a). A review of municipal and regional master plans was conducted as part of the EIS process and a summary is contained in the Administrative Record.

1118-1

Bill Schomburg. I imagine the SEC is here tonight so that the record might show that this permitting agency has at least listened to the people of New Hampshire regarding the Northern Pass project. Has the Site Evaluation Committee read the master plans of the 31 towns presently under attack by Northern Pass? Has the site Evaluation Committee found anything in our master plans that justify the Northern Pass or do our master plans created by New Hampshire citizens contradict the economic master plans of Hydro-Quebec and Eversource. New Hampshire RSA 674:1 states that the master plan will, quote, guide the development of the municipality and that it shall contain a set of statements which articulate the desires of the citizens affected by the master plan, not only for their locality but for the region and the whole state. It shall contain a set of guiding principles and priorities. That's the end of the quote. The master plan is the resource document helping to determine whether proposals of change are consistent with the views of the townspeople. It serves as a guide for the community to use in shaping its future. If the Site Evaluation Committee is really trying to capture the beliefs of our citizens, read these master plans and then act on them for the people who created them, not for Northern Pass. That was my prepared couple of paragraphs. During this procedure, I became aware once again of what Ray Burton said two months after this scheme was hatched, and I trust Ray Burton. He said Northern Pass should fold its tents and get out of town, and I think he said it correctly. And I also know that Governor at that time John Lynch who was a part of this scheme, he did say, quote, if the people of New Hampshire don't want this, it will not happen. Thank you.

WHITEFIELD – MARCH 11, 2016 People have been talking about the “winners” and the “losers” in the Northern Pass project. I live among the “winners” where cables are proposed to be buried along Rt 116 through Franconia and Easton. And I’d like to explain why my neighbors and I don’t feel like “winners” at all.

First, there is the fact that in our area our homes are sited fairly close to the road where these lines would go in. I estimate that about 1/3 of our homes are within 50 feet of the road. Some sit on stacked stone foundations. Some have wells in the front yard, at around say 30 feet from the excavation...which will include blasting and drilling. Eversource has said they will be taking videos of wells and foundations – in anticipation of damage claims. Damage claims? And we’re winners in this?

We’re also concerned that although Eversource has said that while they will try to bury the lines under the pavement, they will sometimes use adjacent land. That means that in some of our front yards, they’ll be removing vegetation permanently in order to keep roots away from the lines. Again, no winning here.

Next, consider what’s happening to our property values. Many folks have an 80/20 split, mortgage financing to equity in their homes. But the banks don’t share your pain when something like this hits your property value. So an overall loss of 10% in the value of your home, wipes out 50% of your equity. Half of your investment is gone, overnight, because you opened a letter from Eversource that says the Northern Pass is going at the end of your driveway. Now that’s winning like Charlie Sheen.

1120-1

Thank you for your comment. Section 4.1.6.1 of the EIS analyzes the land use impacts of the underground transmission cable in public roadway corridors and Section 4.1.12.1 of the EIS analyzes vegetation impacts of the underground transmission cable in public roadway corridors. The impacts discussed in these sections cover the potential impacts of burying the cable under the road surface or parallel to the road surface, as appropriate. Impacts within these areas would occur entirely within the public roadway corridor and would not extend onto private lands or front yards.

1120-2

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1120-1

1120-2

Then you go to an info session and learn that huge property tax payments are being used to entice local governments to approve of this route. Millions of dollars are going here, going there to one group or another that can push this project along. Yet you, the people actually affected are completely ignored -- ignored while you are the ones suffering the impact of the project. You bear the risks of excavation, blasting, dust and debris through years of construction. You'll forever bear the risk of accidental dig-ins (people around here use backhoes). You'll watch the value of your home equity eroded. And no one even contemplates compensation to you. Somehow that feeling of being crushed by political expediency...I don't think that's what winning feels like.

One way to turn things around and make us into winners...is to use alternative 4A and bury this whole line using the existing industrial corridor of I93. The I93 route is shorter. It has less environmental impact. <sup>Fewer</sup> Historical sites would ~~not~~ need to be evaluated. A host of problems from construction damage to dig-in risks would be reduced. Traffic flow there would even keep the line safer from people who might intentionally want to disrupt the grid. And using I93 preserves property values. There is no need to tear another industrial corridor through the North Country. Bury this project down I93 instead.

Barbara Meyer, Easton NH

Good Evening.

My name is David Van Houten. I have lived in Bethlehem since 1972. We have a small farm consisting of a house and outbuildings situated in a field, with adjacent woodlot. The view is of field, trees, and sky in all directions; the place has a bucolic character. This pleasant setting defines the quality of our daily lives, and also contributes a great deal to the real estate value of the property. It also represents no small investment on our part.

The Applicant proposes to erect tall poles bearing power lines approximately 1500 feet to the west of our house. There is a distinct possibility that the structures will rise above the tree line, and be visible from the homestead. The result would be the transformation of a rural landscape into one that gives a more industrial impression. We have no doubt that it would lower the market value of our property. The Applicant has not contacted us to inform us of this change to our place, either to seek our opinion, work with us to mitigate the impacts in their plans, or offer compensation for lost value. They propose this development in order to make money, if it goes through it will cost us tens of thousands of dollars, and they can't even bother to call us to talk it over. I hope you don't wonder why we are angry.

The Applicant proposes to site the project on an easement conveyed to PSNH in 1947 and 1953 which cuts through our property, identified as Lot 40 on Bethlehem Tax Map 404. There is no mention of Northern Pass, Hydro Quebec, or the right of PSNH to assign their easement privileges to a third party. We conclude that the Northern Pass proposal falls outside the terms of the original deeds, and suggest that the Applicant withdraw any route across our land from consideration.

I see from the long list of Petitions to Intervene that this is a common concern of NH land owners. I am compelled to point out that the Site Evaluation Committee should not have judged this application to be complete until there was further clarity concerning the Applicant's legal right to the land - 301.03 ( c ) (6). A dispute between a landowner and the Applicant is a legal matter, and would have to be resolved by the courts. I request that this proceeding be suspended until this issue has been decided.

In following the Site Evaluation's record of decisions on appeals of a similar nature, I notice that such appeals have pretty much been brushed aside, and I suppose this one will be treated in a similar manner. Surprise me.

1122-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions. Potential impacts to property value in the Central Section, where Bethlehem is located, are discussed in Section 4.3.2 of the EIS.

1122-1

1122-2

Thank you for your comment. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way and the law, regulation and policy surrounding the use of easements and public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report. Analysis of the terms of specific landowners' deeds is outside the scope of this EIS.

1122-2

1122-3

1122-3

Thank you for your comment. As noted in Section 1.7.3.1 of the EIS, the State of New Hampshire Site Evaluation Committee (SEC) is an eleven member committee representing state agencies and the public that review and act upon applications to construct energy facilities. This is a non-federal process in which DOE has no role.



# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 30, 2016

**ID:** 9088

**Date Entered:** Mar 30, 2016

**Source:** Website

**Topics:** Purpose and Need

**Organization:** citizen

**Comment:** Dear Whom this May Concern--

I attended a public hearing in Deerfield, NH on 16 March 2016 to listen to the revised proposed Northern Pass Project. As a graduate of Georgetown University, where I studied the intersection of socioeconomic development and environmental protection, this meeting and the comments presented at this Deerfield Meeting, as you can imagine, clearly depicted the dichotomy we are facing in the 21st Century: less natural resources (in this case, land) and more demands from economic growth (residential sprawl and energy needs).

**Purpose:** My first comment revolved around need. The CEO of the proposed Northern Pass project presented a slide that showed current transmission lines in New England. One line already exists from Canada, through northern VT, and then crosses into NH on the western side of the state. When I asked why this current transmission line could be expanded to transfer more energy to southern New England, the response I got was this particular transmission line is already at full capacity (a reported 90%) and cannot transfer any more energy. This is a generic answer. In this century, we cannot look at problems like these like we did in the 1950s: need more growth? go cut down those trees over there and build whatever you need. We need to think innovatively. We need to think out of the box. Can we imagine innovative ways of expanding the energy transmission capacity of this preexisting line? Perhaps burying a new line, building bigger conventional transmission lines, bigger cables, among other ideas that I am sure the engineers can come up with if they put their minds to it. My main theme here is that we cannot maintain our status quo of socioeconomic development. We need to start thinking strategically about where and how projects are placed. I do not think the revised Northern Pass project is such a project. It is a prime example of what the 1950s model of growth and expansion looked like.

**Environmental Concerns:** My second comment is with respect to the environment. Part of the proposed line will cross into two different State Parks. The CEO who gave his presentation said that 60 miles of the line will be buried, mostly in these parks. Do we really realize the impact that this line will have on the wildlife, ecosystem, and biodiversity of the region in these State Parks, even if the line is buried here? Construction will be present for 1-2 years, driving out bigger wildlife and disrupting these areas that the State has already set aside as protected land. This does not even bring into account invasive species, an issue the state of NH is facing everywhere, from the forests to lakes. I am also concerned that near Deerfield, is Bear Brook State Park, which also will have conventional

1125-1

Thank you for your comment. Sections 4.1.11, 4.2.11, 4.3.11, 4.4.11, and 4.5.11 of the EIS analyze impacts to wildlife. Sections 4.1.12, 4.2.12, 4.3.12, 4.4.12, and 4.5.12 of the EIS analyze impacts to vegetation, including invasive species. Sections 4.1.6, 4.2.6, 4.3.6, 4.4.6 and 4.5.6 of the EIS analyze impacts to conservation lands and values. These discussions cover the impacts to these resources in total, including areas within state parks and other conservation lands. In addition, Bear Brook State Park is specifically considered in both the recreation analysis, in Sections 3.4.3 and 4.4.3.2 of the EIS, and the visual analysis, in Section 3.4.1 of the EIS. Furthermore, Bear Brook State Park is specifically identified, mapped and considered as potentially impacted conservation lands in the Land Use Technical Report.

1125-1

lines passing through it, not to mention, nearby, 160 ft transmission poles. This type of construction and permanent scar on the landscape defies all of the reasons why these lands (both the Whites and Jercho up north and Bear Brook) were designated as State Parks in the first place. Think about it, do you think more people who want to get out into the woods, will continue to do so if the signs of humanity and urban life are everywhere in Bear Brook and up north?

Hydro Power: This is one of my most major long term concerns. Hydro Power is not a 'clean' energy source. Let me repeat, hydro power is not a 'clean' energy source. It is correct to say that it has a smaller carbon foot print than coal or oil, but it is not renewable. Many studies are coming out that show that the sediment build up on the inside wall of the dam, takes in toxic chemicals, not to mention nitrogen and phosphorus, so when the dam is past its life span and the dam is breached or removed, those toxins and chemicals move downstream and destroy the ecosystem and wildlife. This does not even consider the effect that a hydro electric project has on downstream wildlife and the ecosystem when it is installed. Fish populations and biodiversity are decimated. Because of these reasons, it is inaccurate to say that hydropower is a 'clean' energy. This discussion does not even touch on the fact that in 10, 20 and even 30 years, water is going to be the gold of the 21st Century. Do you really think, as the US and Canadian populations increase, Canada will be exporting electricity generated from water, when it discovers it has high domestic needs for that same resource? If Canadian hydropower was discontinued in any of these time frames, the Northern Pass would prove obsolete and all of this work would have been for nothing. Keep that in mind. Water is the key to life and demand for it will only rise in the future. And this is not domestic water we are pulling from...

There are a number of other issues that I think worthy of discussing, but for the sake of brevity, I will cut this short. My last comment is: Would you want this if it was in your backyard?

Please keep that in mind as you review the Northern Pass Project.

Sincerely,  
Onni Irish

1125-1  
Continued 1125-1 cont'd

1125-2

1125-2

Thank you for your comment. Potential impacts in Canada from the construction and operation of electricity infrastructure, including hydropower generation and transmission in Canada, are beyond the scope of this NEPA analysis. NEPA does not require an analysis of potential environmental impacts that occur within another sovereign nation that result from actions approved by that sovereign nation. Additionally, the construction and operation of Hydro-Quebec power generation projects and electricity transmission line projects in the bulk Hydro-Quebec system will occur regardless of and independent to whether DOE issues a Presidential permit for the proposed Northern Pass Project international border crossing. For these reasons, potential environmental impacts in Canada are not addressed in this EIS. Section 1.5.4.1 of the Final EIS has been updated in response to this comment.

Laura Bonk. I live in Concord, New Hampshire, and I'm here to speak for the southern half of the state in this project. The proposed high voltage transmission line, Northern Pass, will pass through a few thousand feet of Bear Brook State Park in Allenstown, New Hampshire. This proposed project will create an unreasonable adverse effect on the aesthetics and the natural environment of Bear Brook State Park. Furthermore, the proposed Northern Pass will violate the original transfer deed from the federal government. For these reasons, I am opposed to this project as currently presented. Bear Brook State Park is the largest developed State Park in New Hampshire. It is currently more than 10,000 acres and lies within both Merrimack and Rockingham Counties. The park contains pond beaches, 40 miles of trails, a 101-site campground, group picnic areas and a museum complex. The Civilian Conservation Corps within the State Park is listed on the National Register of Historic Places. Furthermore, this large state park lies within 15 miles of Manchester, New Hampshire, the state's largest city. It provides nearby recreational access to our large population centers, and it's a very busy place as families can easily access this State Park. I encourage you to visit it on a warm summer weekend. The proposed towers will be significantly above the current tree line. They will be visible from numerous places within the park including both Catamount and Hall Hills, popular day hikes. The view of these towers will undoubtedly disturb the visitor's experience to this natural environment. The proposed towers negatively impact the enjoyment of this state resource. Bear Brook State Park is of no less importance than the White Mountain National Forest. It provides much of the same amenities for our citizens and is much closer to our population centers. In 1943, in the middle of World War II, the State of New Hampshire accepted the Bear Brook land from the federal government with the following conditions in the original deed. Provided always that this deed is made upon the express condition that the State of New Hampshire shall use this property exclusively for public park, recreational and conservation purposes. The proposed Northern Pass project is not a recreational or conservation project. It is a project to benefit the shareholders of Eversource Energy. As such, it violates the original deed in which the State of New Hampshire accepted these lands. Thus, it should not proceed as currently proposed. This Saturday, March 2nd at 10 a.m. please meet me in the snowmobile parking lot, Bear Brook State Park, Deerfield Road in Allenstown. I'll be very happy to walk you through the park and show you the impact of this proposed project on our state's treasured natural resource. Please be prepared for mud. Thank you.

1128-1

Thank you for your comment. Sections 4.1.6, 4.2.6, 4.3.6, 4.4.6 and 4.5.6 of the EIS analyze impacts to conservation lands and values. These discussions cover the impacts to these resources in total, including areas within state parks and other conservation lands. In addition, Bear Brook State Park is specifically considered in both the recreation analysis, in Sections 3.4.3 and 4.4.3.2 of the EIS, and the visual analysis, in Section 3.4.1 of the EIS. Furthermore, Bear Brook State Park is specifically identified, mapped and considered as potentially impacted conservation lands in the Land Use Technical Report. Analysis of the terms of specific landowners' deeds is outside the scope of this EIS.

1128-1

1128-2

Thank you for your comment. Sections 4.1.6, 4.2.6, 4.3.6, 4.4.6 and 4.5.6 of the EIS analyze impacts to conservation lands and values. These discussions cover the impacts to these resources in total, including areas within state parks and other conservation lands. In addition, Bear Brook State Park is specifically considered in both the recreation analysis, in Sections 3.4.3 and 4.4.3.2 of the EIS, and the visual analysis, in Section 3.4.1 of the EIS. Furthermore, Bear Brook State Park is specifically identified, mapped and considered as potentially impacted conservation lands in the Land Use Technical Report. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way and the law, regulation and policy surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report. Analysis of the terms of specific landowners' deeds is outside the scope of this EIS.

1128-2

Laura M. Bonk PO Box 194 Suncook, NH 03275 bonk@alum.mit.edu (603) 340-3524

TO: New Hampshire Site Evaluation Committee (NH SEC Docket No. 2015-06) and  
United States Department of Energy

March 10, 2016

Dear Sirs:

The proposed high voltage transmission line, Northern Pass, will pass through a few thousand feet of Bear Brook State Park in Allenstown, New Hampshire. This proposed project will create an unreasonable adverse effect on the aesthetics and the natural environment of Bear Brook State Park. Furthermore, the proposed Northern Pass will violate the original transfer deed from the federal government. For these reasons, I am opposed to this project as currently presented.

Bear Brook State Park is the largest developed state park in New Hampshire. It is currently more than 10,000 acres and lies within both Merrimack and Rockingham Counties. The park contains: pond beaches, 40 miles of trails, a 101 site campground, group picnic areas and a museum complex. The Civilian Conservation Corps site within this state park is listed on the National Register of Historic Places. Furthermore, this large state park lies within 15 miles of Manchester, New Hampshire—the state's largest city. It provides nearby recreational access to our large population centers and is a very busy place as families can easily access this state park.

The proposed towers will be significantly above the current tree line. They will be visible from numerous places in the state park including both Catamount and Hall Hills—both popular day hikes. The view of these towers will undoubtedly disturb the visitor's experience to this natural environment. The proposed towers negatively impact the enjoyment of this state resource. Bear Brook State Park is of no less importance than the White Mountain National Forest. It provides much of the same amenities to our citizens and is much closer to our population centers.

In 1943, the State of New Hampshire accepted the Bear Brook lands from the federal government with the following conditions:

*"Provided always, that this deed is made upon the express condition that the State of New Hampshire shall use this property exclusively for public park, recreational, and conservation purposes."*

The proposed Northern Pass project is not a recreational or conservation project. It is a project to benefit the shareholders of Eversource Energy. As such, it violates the original deed from which the State of New Hampshire accepted these lands. Thus, it should not proceed as currently proposed.

This Saturday, March 12, 2016 at 10 a.m. please meet me in the Snowmobile Parking lot, Bear Brook State Park, Deerfield Rd., Allenstown, New Hampshire and I will happily walk with you to show you the impacts of this proposed project on our state's treasured natural resource.

Sincerely,



Laura M. Bonk, MS, MBA

1129-1

Thank you for your comment. legal rights along the alternatives fall under the purview of the court system and are also beyond the scope of this analysis. The Applicant will be responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Sections 3.1.6.3 and 3.1.6.4 of the final EIS discuss rights-of-way and the law, regulation and policy surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report.

1129-1

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Mar 29, 2016**

**ID:** 8959

**Date Entered:** Mar 29, 2016

**Source:** Website

**Topics:** Wildlife, Viewshed/Scenery, Water / Wetlands, Soils, Recreation

**Organization:**

**Comment:** It should be totally unthinkable to use National Forest lands for such a purpose. The National Forests are multi-use, but those multiple uses should conform to purposes that are consistent with conservation and public recreation. A better solution was found in Vermont. I heartily endorse the positions taken by the Appalachian Mountain Club which I will not repeat here in the interests of brevity. The government must come to its senses at a time when industry refuses to do so. Thank you in advance.

1130-1

Thank you for your comment. The commenter's opinion regarding the use of National Forest System lands is noted. The USFS' purpose of, and need for, action is expressed in Chapter 1, Section 1.3 of the EIS. Consistency with the WMNF Forest Plan is analyzed in Appendix F of the EIS.

1130-1



# Pittsburg

NEW HAMPSHIRE

New Hampshire's Northernmost Town

Sight Evaluation Committee

March 7, 2016

Good evening,

My name is Steve Ellis and I am the chairman of the Select Board in the Town of Pittsburg. I am also a retired Senior President and National Director of Sales for a major insurance company responsible for maintaining the portfolio of \$13 billion. As you know Northern Pass plans to enter the U.S. over Halls Stream in Pittsburg and erect twenty towers before it is buried under the Connecticut River.

Pittsburg is a community that survives on tourism where people can escape to enjoy our abundant wild life and scenic vistas. There are many unique things about our town. We are the largest geographic township in New England. We are considered the snowmobile capitol of New England having over 200 miles of groomed trails and hosting vintage snowmobile races. We are part of the "Ride the Wilds" trail which covers over 1000 miles for ATV use. We have many fishing habitats including lakes, ponds, streams, bogs and a river. We have a trophy fishing area on the Connecticut River that attracts anglers from all over the world and we have miles of beautiful hiking trails.

Without any consideration of our natural resources Northern Pass plans to ruin our pristine vistas. In February of 1998 the State of New Hampshire recognized the importance of keeping Pittsburg and the Great North Woods from being developed. They established an easement on 146,000 acres of the Connecticut Lakes Headwaters and established the Connecticut Lake Headwaters Citizen Committee to monitor compliance with the terms and conditions of the easement.

We wish Northern Pass also recognized this importance by leaving our landscape untouched by simply burying the lines. It is only two miles from the entrance into the United States to the Connecticut River where a directional bore will bury the line under the Connecticut River. If not buried the towers erected up to that point will be seen for miles as you enter our town on Route 3.

The biggest insult to our town however, is disturbing our historic land where the towers will be erected namely the Indian Stream Republic Territory. In 1783 the Treaty of Paris established the border between the U.S. and Canada. It was not clear and in 1832 this border dispute caused double taxation for the inhabitants of which is now a section of Pittsburg. They had enough and revolted and created their own sovereign nation with

Town of Pittsburg | 1526 Main St | Pittsburg, NH 03592 | 603-538-6697 voice & fax

TownOffice@Pittsburg-NH.com www.Pittsburg-NH.com

Our Town is an Equal Opportunity Provider

1132-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 of the EIS addresses potential impacts to Visual Resources which may result.

1132-2

Thank you for your comment. As noted in the Land Use Technical Report, data from the Complex Systems Research Center at the University of New Hampshire was utilized to identify conserved land parcels in or adjacent to the project corridors using Geographic Information Systems (GIS) software. This dataset represents the best available statewide data regarding conservation lands in New Hampshire. Overlapping areas between conservation lands and the Project were quantified and the ownership (municipal/county, federal, state, private, etc.), public access, and land status of the potentially impacted conservation lands were considered. Based on this analysis, the project is not expected to impact the Connecticut Lakes Headwaters easement. Potential visual impacts in the Northern Section (where the Connecticut Lakes Headwaters are located) are discussed in Section 4.2.1 of the EIS. Impacts to the broader landscape are analyzed throughout the EIS.

1132-3

Thank you for your comment. The commenter's concerns regarding land in Pittsburg, NH known as Indian Stream Republic Territory are noted. The federal NEPA review, the federal Section 106 process, and the NH SEC process are separate, independent processes, each with its own schedule. DOE is addressing potential adverse effects to historic properties, including historic properties of religious and cultural significance to federally-recognized Indian tribes, in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations. For more information, see Sections

1132-1

1132-2

1132-3

3.1.8 of the EIS and 1.5.1 of the Cultural Resources Technical Report.

1132-3 cont'd

their own Constitution and Congress and named it the Indian Stream Republic. For over 175 years this land has remained untouched but now Northern Pass want to change that.

In conclusion, I ask you not to let Northern Pass destroy our beautiful vistas which will have an adverse effect on our economy. Do not let them destroy the Indian Stream Republic Territory which has been preserved for over 175 years. This is sacred land to our town and citizens.

The solution is very simple, bury the lines so that both Northern Pass objectives and ours will be achieved.

Thank you.



Stephen J. Ellis, Chairman

1132-3  
Continued



I'm Brad Thomas, live at 599 Noyes Rd (Just off Bear Rock Rd) in Stewartstown. My wife, Daryl, and I built our retirement home in 2008+09. Prior to that we had a camp in Clarksville since 1975. The last six years of fighting Northern Pass has been an on going battle and certainly NOT what we envisioned w/ retirement. The rest of lives will not be what we planned for if this project proceeds. We have a direct view from the front deck of our home to the Transition<sup>®</sup> + area where the 90' ~~to~~ 130' towers pop out of the ground. 1200' of our property borders on Bear Rock Rd (buried cables) proposed.

For the record, Daryl + I are adamantly against this project + ~~and~~ <sup>and</sup> will not rest until complete burial along State R.O.W. occur.

I have two points to make:

2.

From: Brad Thompson  
 Nags Rd / Bear Rock Road  
 Stewartstown, N.H.

At meetings that you, the Site Evaluation Committee (S.E.C.) held prior to DEC 10, 2015 you had to [redacted] ask the question: "Do you, Northern Pass Transmission LLC and Ever-Source (N.P.T.) have a <sup>complete</sup> defined route that you own, have R.O.W. over or have leased for the <sup>190</sup> ~~180~~ miles of D.C. and then A.C. current to travel. If the answer <sup>from NP</sup> was "yes" then you, the S.E.C., were [redacted] grossly misled. In the summer of 2015 NPT realized that they had a serious problem. Their planned <sup>overhead</sup> route thru Clarksville and Stewartstown was in serious trouble. There existed local folks who would NOT sell land that NPT desperately needed in order to fulfill the requirement by SEC [redacted]. Out of cooperation NPT resorted to a Plan B - announce to go underground along Old County Road, Crempoke Road, Northhill Road and <sup>state highway</sup> Bear Rock Road to satisfy the S.E.C. requirement of having a defined route.

The new route, when announced, was justified by NPT as [redacted] "we hear what the people of the North Country are <sup>saying</sup> saying". [redacted] NPT had no choice. Plan B was it. [redacted] N.P.T. does not have permission to use these roads in Stewartstown. They blatantly misled you when they said they did on their application.

[redacted] consider postponing these the SEC needs to <sup>delaying</sup> delaying

1133-1

Thank you for your comment. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way and the law, regulation and policy surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report, covering the process and necessary permits or approvals for use of Federal Highway System, State Highway System and Local Road Rights-of-Way. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. If the Project route were to change due to inability of the Applicant to obtain property rights or easement access, DOE would revisit the prior NEPA analysis (i.e., Northern Pass EIS) and determine if additional NEPA analysis (e.g., supplemental EIS) would be warranted.

1133-1

0.3

hearings until a complete route is defined.

- Use, the abutters of the four town roads own to the centerline of the roads subject to the easement of the public in the roads over the land. The general ~~rule~~<sup>rule</sup> is that the abutting landowner owns to the centerline of the road unless there is clear language to the contrary or if the Town of Stewartstown or State of New Hampshire took a fee interest in the roads. The town of Stewartstown has publicly stated that they "do not hold fee title interest in these roads and that property owners have legal property rights to these roads". Northern Pass should have addressed this issue with property owners prior to claiming that they had an approved route. They did not.

I, with help, have found four ~~New Hampshire~~<sup>New Hampshire</sup> Supreme Court cases that strongly support this position of land ownership:

1. Amazon Makipaca v. Henry Worthen, et al 1816
2. Thomas Leavitt v. Amos Towle 1835
3. City of Lacombe v. Joseph J. Moim 1943
4. Duchesnay v. Silva 1978

In all four cases the court upheld for the landowner. He owns the dirt under the "Right of Way".

At a meeting that I requested in 2015, I met with Jim Wagner ~~whom~~<sup>whom</sup> ~~was~~<sup>is</sup> associated with NPT. I asked Jim how he could justify "digging up my dirt"? His response was that transporting electricity along these town R.O.W. is part of the

B4.

definition of a R.O.W. I do understand that inherent to the R.O.W. in addition to road are overhead or underground electric, telephone, cable TV, and gas lines. ~~lines!~~ However, I will argue that these lines are intended to serve the homes and property that the roads serve. The intention of this R.O.W. is not to allow a "For profit, stock held Corporation" to transport a product (electricity) from where it's manufactured (Quebec, Canada) to its ultimate marketplace (Southern New England).

Along the whole 6.1 miles of proposed buried electric line in Stewartstown, Eversource has zero customers. We are all serviced by New Hampshire Electric Co-op. NPT and Eversource have no need or right to be overhead, on, or under the R.O.W. and certainly no right to dig up our land without permission - which they do not have.

2.

In <sup>allowed</sup> For NPT to begin construction by digging up our land would be a clear case of taking our land by Eminent Domain. Our state of New Hampshire legislature has sent the very clear message that taking our land by a for profit, stock held, private Corporation is against ~~the laws of the state of N.H.~~ ~~the laws of the state of N.H.~~

Let's suppose for a moment that George Hodge (owner of one of four active farms left in Stewartstown) decides to liquidify his manure at his barn and transport it via 4" buried pipe

1133-2

Thank you for your comment. Constraints related to use of existing road corridors for burial of the transmission line are discussed in the EIS under several road-related alternatives. The text notes that permit and permissions for such use would be required from federal, state, and local agencies (e.g., Section 3.1.6.4). If the Project route were to change due to inability of the Applicant to obtain property rights or easement access, DOE would revisit the prior NEPA analysis (i.e., Northern Pass EIS) and determine if additional NEPA analysis (e.g., supplemental EIS) would be warranted.

1133-2

5.

To his upper fields on County and Northhill Roads.  
 Once pumped up these roads the manure would be  
 mechanically spread on the fields. Without permission <sup>from</sup>  
 Mr. Hoge would have no right to dig up our roads. <sup>the</sup>  
 He is a "for profit farming business. I ask you <sup>land our</sup>  
 ladies and Gentlemen ~~\_\_\_\_\_~~

in This Scenario What is the difference Between Transporting  
 electricity and Transporting manure <sup>thru</sup> "thru our land"?

~~\_\_\_\_\_~~ most ~~\_\_\_\_\_~~ to stop  
~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~  
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~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~ ~~\_\_\_\_\_~~

In closing, we should feel no comparison for  
 a For Profit <sup>business</sup> ~~Corp.~~ To deeply scar our  
 be-loved North Country.

Mr. Quinlan I say to you

"Pull The ~~Pl~~ Plug" ~~Now~~!

Brad + Daryl Thompson  
 599 Noyes Road  
 Stewartstown, N.H.  
 Cell 387-1426 (Brad)

1134-1

Thank you for your comment. As noted in the Land Use Technical Report, data from the Complex Systems Research Center at the University of New Hampshire was utilized to identify conserved land parcels in or adjacent to the project corridors using Geographic Information Systems (GIS) software. This dataset represents the best available statewide data regarding conservation lands in New Hampshire. Overlapping areas between conservation lands and the Project were quantified and the ownership (municipal/county, federal, state, private, etc.), public access, and land status of the potentially impacted conservation lands were considered. Sections 4.1.6, 4.2.6, 4.3.6, 4.4.6, and 4.5.6 of the EIS analyze potential construction and operational impacts to conservation lands and the conservation values they contain. Both the Kauffmann Tract and the Nash Stream Forest are specifically identified as conservation lands and analyzed in the Land Use Technical Report. Potential impacts to conservation areas in the Northern Section, where these resources are located, are discussed in Section 4.2.6 of the EIS. Visual impacts in the Northern Section are discussed in Section 4.2.1 of the EIS. Recreation impacts in the Northern Section are discussed in 4.2.3 of the EIS.

**To:** The Site Evaluation Committee of New Hampshire  
**From:** William D Felling on behalf of members of the Percy Summer Club of Stark, New Hampshire  
**Date:** March 10, 2016

Members of the Site Evaluation Committee, and Concerned Citizens of the great State of New Hampshire. My name is Bill Felling.

I am here tonight to urge you to look very closely at the entire path of destruction Hydro-Quebec and its partner Eversource plan to wreak on our state, the great state of New Hampshire.

New Hampshire is famous for its mountains, its forests, and its natural beauty. Its citizenry, over the course of centuries, has been careful stewards of the lands across the state in order to ensure a quality of life unparalleled for generations to come. Whole swaths of forests have been preserved from development through easements. Pastures are protected. Entire mountain ranges cover our state with extraordinary majesty. Lakes, rivers and streams are enjoyed by people and wildlife existing together.

The Northern Pass project as proposed threatens what New Hampshire residents have prized, all for the sake of greed. Billions of dollars are projected to be realized by private companies at our expense. Our citizens will not have long term jobs. Our electric rates will not go down. We, the residents of New Hampshire, do not win. Anything.

I am here to speak for the members of the Percy Summer Club, whose properties are located on the western shore of Christine Lake in Stark. According to the Society for the Protection of New Hampshire Forests, Christine Lake is the closest thing to a wilderness lake in the state. The lake is open to the public, is a trout fishery and hosts nesting loons. Ospreys and bald eagles are often seen.

Almost 30 years ago, the members of the Percy Summer Club worked with the state of New Hampshire and the Forest Society to ensure that the water- and viewsheds of Christine Lake would be permanently protected, preserving this unique area for future generations. Easements on Percy Summer Club land combined with state management of the Nash Stream tract and longtime club member John Kauffmann's donation of the nearly 2,000 acre Kauffmann Forest surrounding the lake have made that vision a reality.

Until today, that is, when Northern Pass proposes to erect a series of towers, over 100' in height, using the existing PSNH Right of Way, which runs along the ridge on the entire southern shore line of the lake. Unlike the current towers in the ROW, these new towers will be visible from the lake itself as well as from the surrounding trails and mountains. Whether swimming, fishing, boating or hiking, the transmission towers will become a permanent part of the experience of Christine Lake. The ROW runs directly through the Kauffmann Forest, making a mockery of John's lifelong efforts to secure the viewshed.

When the ROW was originally granted to Public Service of New Hampshire, there was in fact a **public service** involved - the need to provide reliable electricity to residents of Coös county. While no one is busy taking scenic sunset photos of the existing power lines, we all understand their purpose and the fact that they serve a legitimate local need. Not so with Northern Pass. While it can be argued that this project will benefit energy markets in southern New England, that should not be a license to permanently mar the precious landscape of northern New Hampshire. Especially when Northern Pass has already acknowledged that the technology

1134-1

1134-1 cont'd

exists to bury this new and intrusive power line - they are, after all, proposing to do exactly that on some few sections. Clearly, the transition from PSNH to Eversource has removed "public service" from more than their name.

I urge you to deny this project as presented. The SEC through RSA 162-H:16 must find that this project "will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety". There is nothing reasonable in any portion of the proposal by Northern Pass. There is nothing natural about the proposal running from Canada through our beautiful state. This project simply does not meet the tests of the Site Evaluation Committee, and importantly, the citizens of New Hampshire.

Do the right thing for the residents of New Hampshire. Deny this application.

1134-1  
Continued

Thank you, Mr. Chairman, for allowing me to leave the meeting earlier and moderate a school meeting and then come back. For the record, my name is Richard Rick Samson. I live at 804 Piper Hill Road, Stewartstown, New Hampshire, and I am the Coos County Commissioner for District 3 which begins in Groveton and runs to Pittsburg and Errol to the Maine border to the Connecticut River separating New Hampshire and Vermont. I have just a couple of thoughts that I'd like to mention before I read my testimony, and one question my constituents have asked me is why was this meeting and tour scheduled for the night before town meeting in New Hampshire. Who decided the site visit tour and why did it not include the real visual impacts of our most scenic area. The Coos loop has been mentioned here several times tonight, and the Coos loop upgrade will not benefit the public, but will benefit Bayroot LLC, Wagner, Eversource, and Hydro-Quebec, and the reason would be for Wagner's plan to put wind towers on their property. Eversource is challenging utilities all over the state of the assessments that are being put on them, and they're asking for abatements on utility structures. So the promise of tax benefits to communities, I believe, is false. The towns of Pittsburg, Clarksville, Stewartstown, Columbia, Stratford and Groveton have all voted at their town meetings in the past several years to oppose the proposed Northern Pass project. It is also in the Stark 2016 town warrant, article 16, to oppose any further overhead development of alternating current or direct current high voltage transmission lines within the borders of the town of Stark. In Stark, all such future electric transmission lines must be placed underground within power line rights of ways or within yet to be established power line corridors and installed in a manner approved by the State of New Hampshire Public Utility Commission and/or the Department of Transportation. At this time there are no, there are no, no transmission lines in Pittsburg, Clarksville or Stewartstown. The only thing there is transbution lines. As Northern Pass shown disregard and disrespect for upper Coos County by a lack of communication with local elected officials? No Northern Pass officials or representatives have contacted the Coos County Commissioners which serve as the Selectboard for the unincorporated places. According to RSA 162-H: 16 IV (b) requires the committee to consider the views of municipal governing bodies on the project's impact on the ordinary growth of the region and economic impacts as well. Would the Site Evaluation Committee require Northern Pass to identify who Northern Pass feels are the stakeholders? The residents, landowners and business owners in my district that are negatively affected most by this proposed project have not been given due consideration or input. Northern Pass's refusal to meet with the above-mentioned parties and opponents to honestly and openly discuss this proposed project shows a lack of concern for the residents of upper Coos County. I would respectfully request the Site Evaluation Committee require Northern Pass to have open, honest and sincere discussions with any elected and affected local officials and affected opponents. If Northern Pass is to be built, let us do what is right and honest for all the residents of our state and benefit our state and not corporate greed. Enough false information has been generated by proponents of this ill-conceived proposed project. The Site Evaluation Committee required that the Coos Wind Park have their financing in place and a decommissioning fund set up before approval. The Coos Wind Park is now 75 percent owned by Brookfield Power of Toronto, Canada. The total decommissioning fund is \$875,000 for 33 high elevation wind turbines. The fund will not begin to decommission the 33 turbines. If permitted, will Northern Pass remain owned by Northern Pass or will it eventually be sold to Hydro-Quebec as was the case with the Wind Park? MR. HONIGBERG: Mr. Samson, just how much more do you have? Excellent. MR. SAMSON: Is it the responsibility and obligation of the Site Evaluation Committee to protect not only the Applicant but also to protect the residents and our state? We the people are the caretakers of New Hampshire and included is the Site Evaluation Committee. My closing comment would be, I respectfully request

1140-1

Thank you for your comment. Section 3.1.6 covers the types of land uses that were analyzed in the EIS. Municipalities were considered for each geographic Section (e.g., Sections 3.2.6.1, 3.3.6.1, and 3.4.6.1), and municipalities were considered throughout the Land Use Technical Report. Specific approaches (i.e., overhead vs. underground installation) at specific locations are more appropriately the purview of the New Hampshire SEC.

1140-2

Thank you for your comment. The state law cited and the comment concern the role of the New Hampshire Site Evaluation Committee (SEC). While the comment is acknowledged, as discussed in Section 1.7.3.1 of the EIS, the SEC "is a non-federal process in which the DOE has no role." Because the SEC process and the SEC are separate and distinct from the NEPA process and the Department of Energy, the actions requested of the SEC are outside the scope of this EIS.

1140-1

1140-2



that Mr. Quinlan meet with the Coos County Commissioners and representatives to discuss Dixville and Millsfield which you intended to go through. The smart way to keep people passive and obedient is to strictly limit the spectrum of acceptable opinion or to allow very lively debate within that spectrum. And is that what is being done here? I ask. Thank you.

1141-1

Thank you for your comment. The commenter's opinion regarding Alternative 3 is noted. Section 4.3.6.3 of the EIS discusses the easement negotiations with each individual land owner that may be required to implement Alternative 3.

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-----Original Message-----

From: Kris pastoriza [<mailto:krispastoriza@gmail.com>]

Sent: Tuesday, July 28, 2015 7:21 AM

To: Mills, Brian

Subject: Coment on Draft EIS, Alternative 3

Alternative 3, underground in proposed action alignment, should not be in the Draft EIS:

"Finally, there is an important legal impediment to underground construction along the proposed route. Northern Pass has the right to use the existing PSNH ROW in accordance with and under the conditions of the easements on record. While all of the easements along the Project path allow for overhead lines, very few provide rights to construct underground facilities. More than 600 easements would have to be modified for Northern Pass to be authorized to install an underground line. With the passage of legislation in New Hampshire that removed eminent domain rights for the Project, as described in Section 4.2.1 above, it is extremely unlikely that underground rights in existing ROW could be secured along the entire proposed route."

p. 75 [http://media.northernpasseis.us/media/northern\\_pass\\_amended\\_application\\_-\\_final\\_082313.pdf](http://media.northernpasseis.us/media/northern_pass_amended_application_-_final_082313.pdf)

1141-1

1143-1

Thank you for your comment. The Applicant would be responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Alternative 3 was analyzed in the final EIS despite potential issues with legal rights to use the existing transmission ROW to ensure all reasonable alternatives were considered. As detailed in Sections 1.1.3 and 1.3 of the EIS, Northern Pass has applied to the USFS for a Special Use Permit authorizing Northern Pass to construct, operate, and maintain an electric power transmission line crossing portions of the WMNF and is part of the USFS' Purpose of and Need for Action on this EIS.

My name is Jack Savage. I represent the Society for the Protection of New Hampshire Forests. We'd like to make a brief comment on the Draft EIS to add to those made by my colleague Will Abbott on Monday evening in Colebrook. We commend the DOE for including analysis of a variety of alternatives to the proposed route of Northern Pass. We note that two potential alternate rights, one along rail corridors and an overhead alternative in Clarksville and Stewartstown were determined in the Draft EIS to be impractical in part because the Applicant would likely have difficulty in acquiring necessary property rights to implement those alternatives. The overhead alternative we note was determined to be problematic because of a conservation easement held by the State of New Hampshire. DOE in the Draft EIS also noted that alternative 3, burial within the PSNH right-of-way, would be made difficult because PSNH's easements, quote, do not grant the Applicant the authority to install or operate underground transmission cables within the land governed by the right-of-way easements. Furthermore, we understand the Applicant is required to obtain a special use permit to bury under or along roadways through the White Mountain National Forest in part because the federal government owns the land on either side and under the roadway. In essence, Northern Pass must seek permission from that landowner to bury along the roadway. Since the release of the supplemental Draft EIS in November, the Forest Society has filed suit against Northern Pass LLC in Coos County Superior Court seeking an injunction against the Applicant's proposed use of land we own, the Washburn family forest, to construct their project for use by Hydro-Quebec. Two other conserved properties we own, the Kauffman Forest in Stark and the Rocks Estate in Bethlehem, present potential challenges to the Applicant's ability to construct the preferred route, and certain conservation easements we hold on property along the proposed route specifically prohibit construction as proposed by the Applicant. The New Hampshire SEC has acknowledged that it does not have the authority to resolve these legitimate property rights issues. As an elective transmission project, Northern Pass is prohibited under New Hampshire from using eminent domain. It is reasonable to assume that the Applicant's preferred route would be difficult to implement, even if permitted by the SEC. At best, it is uncertain. Consequently, we would ask that the DOE acknowledge these issues in its Final EIS analysis of the Applicant's preferred route. In particular, we urge the DOE to compare and contrast in the EIS the current preferred route, Alternative 7 to Alternative 4 A, one that would use I-93 where the state owns land underneath and along the roadway, thus minimizing property rights issues of individual landowners. We believe that this analysis will further support our request that the DOE look at alternative international border crossing in Derby, Vermont. Thank you very much.

1143-1

1150-1

Thank you for your comment. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way and the law, regulation and policy surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report, covering the process and necessary permits or approvals for use of Federal Highway System, State Highway System and Local Road Rights-of-Way. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. If the Project route were to change due to inability of the Applicant to obtain property rights or easement access, DOE would revisit the prior NEPA analysis (i.e., Northern Pass EIS) and determine if additional NEPA analysis (e.g., supplemental EIS) would be warranted. For the purposes of eminent domain, the New Hampshire Public Utilities Commission has authority to rule on matters of eminent domain for electric transmission lines pursuant to Chapter 498-A of the Eminent Domain Procedures Act.

Good evening. My name is Brad Thompson. I live at 599 Noyes Road just off Bear Rock Road in Stewartstown. My wife Daryl and I built our retirement home in 2008 and 9. Prior to that we had a camp in Clarksville since '75. The last five and a half years of fighting Northern Pass has been an ongoing battle and certainly not what we envisioned with retirement. We have a direct view from our front deck of the transition point area number 4 which is where it comes out of the ground on Bear Rock and East Road. From there, the 90-foot tall towers pop out of the ground and head out away from us. Twelve hundred feet of our property borders on Bear Rock Road where the buried cables are proposed. For the record, my wife and I are adamantly against this project and will not rest until complete burial along state right-of-ways have occurred. I have two points I'd like to make. At meetings that you, the Site Evaluation Committee, held prior to December 18th, 2015, you had to ask the question, do you, Northern Pass Transmission and Eversource, have a complete defined route that you own or have right-of-way over or have leased for the 190-plus miles of DC and then AC current to travel. If the answer for Northern Pass was yes, then you, the Site Evaluation Committee, were grossly misled. In the summer of 2015, Northern Pass realized that they had a serious problem. Their planned overhead loop from Clarksville and Stewartstown was in serious trouble. There existed local folks who would not sell their land that Northern Pass desperately needed in order to fulfill the requirement by SEC. Out of desperation, Northern Pass resorted to Plan B. They announced they would go underground along Old County Road, Creampoke Road, Northhill Road and State Highway Bear Rock Road to satisfy the Site Evaluation Committee requirements of having a clearly defined route. The new route when announced was justified by Northern Pass as, we hear what the people of the North Country are saying and we've reacted. Northern Pass really had no choice. Plan B was their only choice. Northern Pass does not have the permission to use the roads in Stewartstown. They blatantly misled you when they said they did in their application. For this reason, the Site Evaluation Committee needs to seriously consider delaying these hearings until a completed route is defined. We, the abutters, on four town roads own to the centerline of those roads subject to the easements of the public in the roads over the land. The general rule is that the abutting landowner owns to the centerline of the road unless there's clear language to the contrary or if the town of Stewartstown or the State of New Hampshire took a fee interest to the roads. The town of Stewartstown has publicly stated that they do not hold fee title interest in those roads, and the property owners have legal property rights to the roads. Northern Pass should have addressed this issue with property owners prior to claiming they had an approved route. They did not. I, with some professional help, found four New Hampshire Supreme Court cases that strongly support this position of land ownership, and I'm listing them on the sheet that I passed in to the stenographer. In all four cases, the court upheld for the landowner. He owns the dirt under the right-of-way. At a meeting that I requested in early 2015, I met with Jim Wagoner and Sara who are associated with Northern Pass. I asked Jim how he could justify digging up my dirt. His response was the transporting electricity along these town rights-of-ways is part of the definition of a right-of-way. I do understand that inherent to the right-of-way in addition to the, in addition to the road being built on it, are overhead or underground electric, telephone, cable TV, and gas lines. However, I will argue that these lines are intended to serve the homes and properties that the town roads serve. The intention of the right-of-way is not to allow a for profit, stock held corporation to transport a product, electricity, from where it's manufactured, Quebec, Canada, to its ultimate marketplace, southern New England. MR. HONIGBERG: Mr. Thompson, how much more do you have? MR. THOMPSON: Half a page. MR. HONIGBERG: How many pages have you gone through so far? MR. THOMPSON: Three. MR. HONIGBERG: Finish up, please. MR. THOMPSON: Along the whole 6.1 miles of proposed buried electric line in Stewartstown, Eversource has zero

1150-1

1150-1 cont'd

customers. We are all serviced by, New Hampshire Electric Co-op services all of the properties. Eversource and Northern Pass have no need or right to be overhead, on or be under the right-of-way and certainly no right to dig up our land without permission. My second point is quick. If burial is allowed, Northern Pass digging up our land would be a clear case of taking our land by eminent domain. Our State of New Hampshire legislature has sent the very clear message that taking our land by a for profit, stock held corporation is illegal. In closing, my wife and I feel no compassion for a for profit business to deeply scar our beloved North Country. Mr. Quinlan, I say to you, it's time to pull the plug and bury it. Thank you.to begin construction by

1150-1  
Continued

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Northern Pass  
**Date:** Tuesday, April 5, 2016 6:53:48 AM

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-----Original Message-----

From: Fred Yahoo [<mailto:fredkenison@yahoo.com>]

Sent: Monday, April 04, 2016 7:30 PM

To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>

Subject: Northern Pass

Good afternoon. Northern Pass should not be allowed to pass overhead through existing easements. Those easements (including the one on my property) were negotiated to carry overhead lines of a scale much smaller than those of the Northern Pass. EMF's are directly scaled to the electricity carried in power lines, and the Northern Pass electricity is manifold larger than previously carried in the easements. Buried lines are much more insulated simply by being buried. Market forces will allow the purportedly higher cost of buried lines to be covered by the end users if the electricity is as needed as we are being told it is.

The rights of property owners with easements granted in times when the power lines being proposed were smaller, with smaller poles, and smaller EMF potential should not be ignored.

Thank you.

Fred Kenison

81 Sanborn Road

Concord, NH 03301

Cell 603-225-7886

1152-1

Thank you for your comment. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. The potential impact of EMFs are analyzed in Section 4.1.4.2 of the EIS and the location of the Project within the PSNH easement is analyzed in Section 2.3 of the EIS.

1152-1

Good evening. My name is David Van Houten. I have lived in Bethlehem since 1972. We have a small farm consisting of a house and outbuilding situated in a field with adjacent wood lot. The view is a field, trees and sky in all directions. The place has a bucolic character. This pleasant setting defines the quality of our daily lives and also contributes a great deal to the real estate value of the property. It also represents no small investment on our part. The Applicant proposes to erect tall poles bearing power lines approximately 1500 feet to the west of our house. There is a distinct possibility that the structures will arise above the tree line and be visible from the homestead. The result would be a transformation of a rural landscape into one that gives a more industrial impression. We have no doubt that it would lower the market value of our property. The Applicant has not contacted us to inform us of this change to our place, either to seek our opinion, work with us to mitigate the impacts in their plans, or offer compensation for lost value. They propose this development in order to make money, and if it goes through it will cost us tens of thousands of dollars, and they can't even be bothered to call us to talk it over. I hope you don't wonder why we are angry. The Applicant proposes to site the project on an easement conveyed to PSNH in 1947 and 1953 which cut through our property identified as Lot 40 on Bethlehem tax map 404. There is no mention of Northern Pass, Hydro-Quebec or the right of PSNH to assign their easement privileges to a third party. We conclude that the Northern Pass proposal falls outside the terms of the original deeds and suggest that the Applicant withdraw any route across out land from consideration. I see from the long list of petitions to intervene that this is a common concern for New Hampshire landowners. I am compelled to point out that the Site Evaluation Committee should not have judged this application to be complete until there was further clarity concerning the Applicant's legal right to the land. Rule 301.03(c)(6). A dispute between a landowner and the Applicant is a legal matter and would have to be resolved by the courts. I request that this proceeding be suspended until this issue has been decided. In following the site evaluation record of decision on appeals of a similar nature, I notice that such appeals have been pretty much brushed aside, and I suppose this one will be treated in a similar manner. Surprise me. Is there anybody who isn't opposed to Northern Pass?

1153-1

Thank you for your comment. The EIS and Visual Impact Assessment Technical Report analyze potential impacts to visual resources resulting from the Project. Visual impacts in the Central Section are analyzed in Section 4.3.1 of the EIS. Potential impacts to property values are analyzed in Section 4.1.2 of the EIS.

1153-1

1153-2

Thank you for your comment. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. As noted in Section 1.7.3.1 of the EIS, the State of New Hampshire Site Evaluation Committee (SEC) is an eleven member committee representing state agencies and the public that review and act upon applications to construct energy facilities. This is a non-federal process in which DOE has no role. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way and the law, regulation and policy surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report.

1153-2



1154-1

Thank you for your comment. The Applicant is responsible for securing all necessary rights and land use approvals to utilize any route permitted by the SEC. Sections 3.1.6.3 and 3.1.6.4 of the EIS discuss rights-of-way and the law, regulation and policy surrounding the use of public rights-of-way for a potential transmission route. Greater detail regarding the pertinent laws, regulations and policies is provided in Section 1.5 of the Land Use Technical Report.

**PERCY LODGE AND CAMP GROUND – UPPER AMMONOOSUC RIVER**  
**338 Percy Road, Stark, NH 03582-6451 – 603-636-1662**

February 21, 2016

Office of Electricity Delivery and Energy  
 Reliability (OE-20)  
 U.S. Department of Energy  
 1000 Independence Ave., SW  
 Washington, DC 20585

ATTENTION: Brian Mills, Senior Planning Advisor

Dear Mr. Mills:

This letter is in response to the Northern Pass Proposed Route. I have written a letter to you, dated December 22, 2015, expressing our concerns over the negative effect of the NPT. This letter is to inform you of the on-going efforts to inform New Hampshire Public Utilities Commission (PUC) that the Deed Easement, dated May 24<sup>th</sup>, 1946, which is being used by PSNH, (now Eversource) to Lease said Deed Easement to Northern Pass Transmission, LLC. PSNH, does not have the legal right to lease the easement to NPT because the easement did not grant such rights to PSNH, Kevin Spencer, Member and Mark Lagasse, Manager/Registered Agent, of LAGASEPENCE REALTY, LLC, own the rights. On February 19, 2016, in response to the timely filing of Docket No. DE 15-464, Public Service Company of New Hampshire d/b/a Eversource Energy, submitted to NHPUC, a Partial Objection to the Petition to Intervene. NHPUC issued an ORDER OF NOTICE for a Prehearing Conference, on February 19, 2016 at 1:30 p.m. before the Commission located at 21 S. Fruit Street, Suite 10, Concord, NH. Kevin Spencer and Mark Lagasse, of LAGASEPENCE REALTY, LLC, (the "Movants") were present at this conference, with their legal counsel of Attorney Arthur B. Cunningham.

The results of this conference, generated another objection from PSNH d/b/a Eversource Energy to the PUC. PSNH in requesting that the Commission: (1) Deny the Movant's reply; (2) Deny the motion to dismiss this proceeding; (3) Issue an order appropriately limiting the scope of the docket and the scope of the Movant's intervention, if granted; and (4) Order such further relief as may be just and equitable.

1154-1



1154-1 cont'd

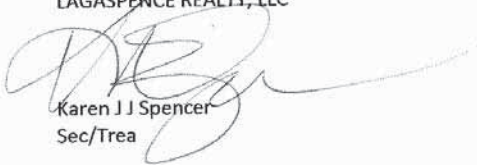
Page Two

To state again, PSNH d/b/a Eversource Energy, does not have the right to lease to NPT, because they do not own the property. I wish that other property owners, which have the PSNH easements, understood how important it is that they present their rights as property owners, to stop this Northern Pass Project.

I am aware of the Public Hearing with the State of New Hampshire Site Evaluation Committee, in Colebrook, NH on March 7, 2016 and in Whitefield, NH on March 11, 2016. We have also submitted the Docket No. 2015-06, for Motion to Intervene.

Yours very truly,

LAGASPENCE REALTY, LLC



Karen J J Spencer  
Sec/Trea

1154-1  
Continued

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Oct 25, 2015

**ID:** 8453

**Date Entered:** Oct 25, 2015

**Source:** Website

**Topics:** Alternatives

**Name:** Susan Erickson

**Organization:** private citizen

**Email:** sajerrickson@comcast.net

**Mailing Address:** 51 Oak Hill Rd

**City:** Concord

**State:** NH

**Zip:** 03301

**Country:** US

**Comment:** I live at at 51 Oak Hill Rd Concord. Since I live right near Turtletown Pond I am also Very concerned about the Northern Pass. I have signed a petition to show how much I am against the proposed wires above land and so close to residents. This donated land should be researched to make sure (at the very least) that there weren't rules about noise being allowed in this conservancy area.

Today I want to make sure you are aware that there will be a continuous buzzing sound forever (from the wires)...that all of us who look to that area for its serenity and nature conservancy will have to endure on top of lowered property values. My daughter is a chemical and environmental engineer and she understands how these things work. I'm not even sure people living right next to the wires realize there will be constant noise pollution and the company has not told us up front. I have gone to their informational meetings.

Most citizens are not aware the amount of NOISE produced by unburied wires. It is wrong to let this project go through without being buried in east Concord by Turtletown Pond and I need you to step up and back us up. We resent being taken advantage of. Most noteworthy is the fact that this electricity is meant to be a conduit for use in other places not NH. Please think this through carefully and make the right moral and ethical decision.

1159-1

Thank you for your comment. Applicable federal and state regulations pertaining to noise are described in Section 1.5 of the Noise Technical Report. Any specific requirements at the Turtletown Pond Conservation Area would need to be addressed by the applicant in the state siting process and through the county and local zoning processes.

1159-2

Thank you for your comment. Noise impacts from aboveground portions of the Project are described in Section 4.1.7 of the EIS, and in Section 3.2.2.5 of the Noise Technical Report. The audible noise due to the corona effect would not exceed the EPA guidance level of 55 dBA for outdoor areas beyond the transmission route.

1159-1

1159-2

I went to the meetings at the Holiday Inn and can assure you that the company did not deal with the noise issue. The "corona" of 55 decibels max is the allowable amount by the EPA. This project will be about 44 decibels and that is loud enough to make a difference to homes and people who love the serenity and peacefulness this area offers. Over time this decibel amount would become annoying to anyone living in proximity. Not to mention that selling a property near this "corona" area would be next to impossible.

Please BURY the lines in East Concord. Sincerely, Susan Erickson

1159-3

Thank you for your comment. Additional information pertaining to noise and property values has been added to Section 4.1.7 of the final EIS, and to Section 3.2.2.5 of the Noise Technical Report. Additional analysis of potential impacts to property values is presented in Section 4.1.2 of the EIS.

1159-3

1160-1

Thank you for your comment. Details regarding the methods used for measuring noise impacts are described in the Noise Technical Report. Additional clarification has been added to Section 1.4 of the Technical Report regarding how the audible noise corona was determined. Audible noise due to the corona effect would not exceed the EPA guidance level of 55 dBA for outdoor areas beyond the transmission route.

Thank you. My name is David Sakura. I'm a resident of Thornton. I have a specific question that relates to Section 9, I believe, but let me, I believe it's Section 9. During a recent ski trip to Quebec, I noticed that the high voltage power lines that were along in the countryside were emitting a loud crackling sound that was possibly due to the atmospheric conditions of the day. This audible corona noise was clearly heard through the trees for up to 200, 300 yards from the power lines. I thought as I was approaching the power lines that there was a river or a stream running nearby, and, in fact, it was the audible corona noise. The DOE has used the EPA audible guidance level of 55 decibels as the standard for outdoor areas, and estimates that the above ground alternatives provided for Northern Pass do not exceed this standard. My question is, what is the basis for determining the audible corona noise either by actual estimates by Northern Pass, and these estimates or actual numbers were incorporated into the EIS, and are there any periods during the year when the actual audible corona noise exceeds the EPA guidance level. If so, what steps will be taken to mitigate this impact on the abutting community and will these mitigating proposals be incorporated into the final version of the EIS. Thank you very much.

1160-1

QUESTIONS FOR THE DOE/SEC PUBLIC HEARING  
MARCH 9 2016

1. During a recent ski trip to Quebec, I noticed that the HV power lines were emitting a loud cracking-like sound that was possibly due to the atmospheric conditions of the day. This audible corona noise was clearly heard through the trees for up 200 to 300 yards from the power lines. The DOE has used the EPA audible guidance level (55 dBA) as the standard for outdoor areas and estimates that the above ground alternatives do not exceed the standard. What is the basis for determining the audible corona noise (by either actual measurement or estimates) by Northern Pass and are there any periods during the year, when the actual audible corona noise exceeds the EPA guidance level. If so, what steps will be taken to mitigate this impact on the abutting community? ~~Also will the SEC consider the low intermittent corona noise a nuisance factor in its review of the Northern Pass application. If not, why not, since a large number of abutters to the proposed power line will be impacted?~~

*Sakura*

1161-1

Thank you for your comment. Details regarding the methods used for measuring noise impacts are described in the Noise Technical Report. Additional clarification has been added to Section 1.4 of the Technical Report regarding how the audible noise corona was determined.

1161-1



November 30, 2015

Brian Mills, Senior Planning Advisor  
Office of Electricity Delivery and Energy Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Ave, SW  
Washington, DC 20585

**RE: Northern Pass Transmission Project, Draft Environmental Impact Statement and Supplement Notice of Public Hearing**

Dear Mr. Mills:

I am writing to share comments on the Northern Pass Transmission Project as part of the National Environmental Policy Act (NEPA) review and as a consulting party in the Section 106 review of the National Historic Preservation Act (NHPA).

The New Hampshire Preservation Alliance is the statewide non-profit in New Hampshire that strengthens communities and stimulates local economies by helping our members and constituents protect and revive historic buildings and places.

We are deeply concerned about the persistent delay in the release of information on historic and cultural resources. An email that your office recently sent to Consulting Parties in the Section 106 process indicated that the upcoming hearings on the Draft EIS, scheduled for December 15, 16, and 17, are an opportunity to gather public comment regarding the review of historic resources. We question how this is possible since we have not seen any data beyond the Project Area Forms which were reviewed back in June and July by the NH Division of Historical Resources. At that time, they recommended significant revisions to the methodology and also urged more in-depth data-gathering and analysis. To our knowledge, since then there has been nothing new from the consultants. When will their complete evaluation of the potential effects of the Northern Pass project on historical resources be available to Consulting Parties?

We know others have asked that the DEIS public hearings be rescheduled, and that another meeting be added in a location well north of Whitefield. We agree that these changes would send a positive message to stakeholders and enable broader public participation in the process.

1170-1

Thank you for your comment. Section 1.5.1.1 and Appendix B in the Cultural Resources Technical Report have been revised to summarize the status of DOE's compliance with Section 106 of the National Historic Preservation Act (NHPA). In addition, several sections relevant to the WMNF in the Technical Report have been revised to present: (1) the results of the project area forms (PAFs) prepared for Alternative 2; the supplemental PAFs prepared for Alternative 7, the Proposed Action; and of the Supplemental Phase IA archaeological investigation for Alternative 7; and (2) comments by the New Hampshire Division of Historical Resources (NHDHR) and the state historic preservation office (SHPO) on DOE's identification efforts for Alternative 2 and Alternative 7. Section 1.4.8 of the Technical Report has been revised to discuss NHDHR's scope of work for addressing cultural landscapes for the Northern Pass Project.

DOE is coordinating its compliance with Section 106, in a manner consistent with 36 C.F.R. Section 800.8, with the pertinent standards of the National Environmental Policy Act of 1969 ("NEPA") pursuant to 40 C.F.R. Sections 1500-1508. DOE's final EIS will contain the appropriate level of information on cultural resources, informed by DOE's Section 106 process for the proposed Northern Pass project.

1170-2

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process. Four public hearings were held on the draft EIS: Monday, March 7, 2016 in Colebrook, NH; Wednesday, March 9, 2016 in Waterville Valley, NH; Thursday, March 10, 2016 in Concord, NH; and Friday, March 11, 2016 in Whitefield, NH. Review of Project Area Forms is part of the Section 106 consultation process. Section 106 consultation is a separate review process from the NEPA environmental review. The Section 106 meetings originally scheduled for December 2015

1170-1

1170-2

were postponed until February 2016. Two meetings were held, one in Laconia, NH and one in Whitefield, NH. Comments from the public regarding historic and cultural resources have been accepted throughout the Section 106 process, including in conjunction with NEPA comment periods. DOE has engaged the Consulting Parties throughout the Section 106 review process. Additional information regarding the Section 106 process for this project is available at <http://www.northernpasseis.us/consultations/section106>.

1170-2 cont'd

We would also welcome another set of meetings once the revised Project Area Forms and the more-detailed data-gathering that they recommend becomes available.

The New Hampshire Preservation Alliance is eager to take part in both the Section 106 and NEPA federal reviews but we are frustrated that both processes seem so slow and disjointed.

Therefore, we ask that the historical data be completed and made available as soon as possible so that it can be of the most use in the Draft EIS process and that the seemingly-stalled Section 106 process can begin to make headway as well.

We look forward to actively participating in these consultation processes, and hope that the necessary review materials will be shared—or delays communicated—to provide for an efficient and cooperative process.

Thank you for your attention to these requests.

Respectfully submitted,

Maggie Stier  
Field Services Representative

cc: Rebecca Harris and Elizabeth Merritt, National Trust for Historic Preservation  
Charlene Vaughn and Reid Nelson, Advisory Council on Historic Preservation  
Elizabeth Muzzey, New Hampshire Division of Historical Resources  
Governor Maggie Hassan, NH Statehouse

1170-2  
Continued

1170-3  
1170-3

Thank you for your comment. Section 3.1.8 of the EIS provides additional information about the Section 106 process. Section 1.5.1.1 and Appendix B in the Cultural Resources Technical Report have been revised to summarize the status of DOE's compliance with Section 106 of the National Historic Preservation Act (NHPA). In addition, several sections relevant to the WMNF in the Technical Report have been revised to present: (1) the results of the project area forms (PAFs) prepared for Alternative 2; the supplemental PAFs prepared for Alternative 7, the Proposed Action; and of the Supplemental Phase IA archaeological investigation for Alternative 7; and (2) comments by the New Hampshire Division of Historical Resources (NHDHR) and the state historic preservation office (SHPO) on DOE's identification efforts for Alternative 2 and Alternative 7. Section 1.4.8 of the Technical Report has been revised to discuss NHDHR's scope of work for addressing cultural landscapes for the Northern Pass Project.

DOE is coordinating its compliance with Section 106, in a manner consistent with 36 C.F.R. Section 800.8, with the pertinent standards of the National Environmental Policy Act of 1969 ("NEPA") pursuant to 40 C.F.R. Sections 1500-1508. DOE's final EIS will contain the appropriate level of information on cultural resources, informed by DOE's Section 106 process for the proposed Northern Pass project.



# Northern Pass EIS Website Comment Receipt

1173-1

Thank you for your comment.

**Refers to Comment placed on Mar 28, 2016****ID:** 8869**Date Entered:** Mar 28, 2016**Source:** Website**Topics:** Historic/Cultural**Name:** Mike Augusta**Organization:****Email:** mikeaugusta@yahoo.com**Mailing Address:** 49 Long Hill Road**City:** Deep River**State:** CT**Zip:** 06417**Country:** US

**Comment:** Historic/Cultural is only one of the topics I might have selected from the box above. There is precious little forest north of Route 2 in New Hampshire that doesn't already bear the stamp of civilization and sprawl, so it is essential to let the Nash Stream area remain as natural as possible, as an example of the northern forest as it existed prior to 1800 and as an example of the forest that created the historical and cultural traditions of the settlers of Northern New England.

1173-1

## COMMENT CARD

NH Site Evaluation Committee, Docket No. 2015-06  
Public Hearing, RSA 162-H:10, I-c

RE: Joint Application of Northern Pass Transmission LLC  
& Public Service Company of New Hampshire d/b/a Eversource Energy  
for a Certificate of Site and Facility

LOCATION (circle one): Meredith (March 1); Colebrook (March 7); Concord (March 10);  
Holderness (March 14); Deerfield (March 16)

FIRST NAME: Rebecca LAST NAME Harris

STREET ADDRESS: 7 Farewell Hall Marketplace, 4<sup>th</sup> Floor

TOWN: Boston STATE MA ZIP 02109

EMAIL ADDRESS: rharris@savingplaces.org

If you wish to provide written comments for the record, please provide your comments below:

One of our ongoing concerns is about the effects the project will have on the state's historic places <sup>and</sup> potential cultural landscapes and rural historic districts. While information was submitted about historic places ~~and~~ identification and meaningful evaluation of cultural landscapes and potential historic districts is essentially absent in the DEIS and the SEC materials. Guidance for identifying and evaluating these resources is available from the National Park Service.

There are also fundamental flaws in the methodology used in the DEIS with respect to the identification and evaluation of historic resources, which we'll detail in a separate comment letter.

Given these points, it is currently impossible for the DOE

1176-1

Thank you for your comment. Cultural landscape studies are being conducted through the Section 106 (of the National Historic Preservation Act of 1966 ("NHPA")) process in accordance with guidance from NH DHR regarding how cultural landscape studies should be identified and documented. These studies will evaluate the significance, integrity, and National Register eligibility of any cultural landscapes that exist within the Pemigewasset River Valley and the Suncook River Valley. In light of these studies, NPT will also determine whether additional cultural landscapes are present in the Great North Woods Project Area or other areas in the vicinity of the proposed Northern Pass project. NH DHR's guidance is based on California's General Guidelines for Identifying and Evaluating Historic Landscapes. Section 3.1.8 of the EIS provides additional information about the Section 106 process, including consideration of cultural landscapes.

1176-2

Thank you for your comment. The federal NEPA review, the federal Section 106 process, and the NH SEC process are separate, independent processes, each with its own schedule. DOE is coordinating its compliance with Section 106 and the applicable NEPA requirements in a manner consistent with 36 C.F.R. Section 800.8 and, to the extent practicable, *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106*. DOE's final EIS contains the appropriate level of information on cultural and historic resources, informed by DOE's Section 106 process to the extent possible, for the proposed Northern Pass project. Both the NEPA review and Section 106 process inform DOE's decision whether or not to issue a Presidential permit for the proposed Northern Pass project. The draft Project Area Forms ("PAF") were developed in response to NPT's 2013 Amended Application and finalized in accordance with the NH Division of Historical Resources' Determination of Eligibility committee review process. DOE supplemented the final PAFs to reflect NPT's further amended Presidential permit application (August 2015). The information from all of the PAFs prepared is incorporated into the EIS, as appropriate, as well as the Technical Report. Section 3.1.8 of the EIS provides additional information about the Section 106 process. Additionally, the information from the completed PAFs has been incorporated into the EIS as well as the Cultural Resources Technical Report. Section 1.5.1.1 and Appendix B in the Cultural Resources Technical Report have been revised reflect the status of DOE's compliance with NHPA Section 106. Appendix B also has been revised to summarize the additional investigations to identify

1176-1

1176-2

historic properties, assess potential adverse effects, and avoid, minimize, or mitigate those effects.

of the SEC to effectively evaluate the historic resources and landscapes that may be impacted by Northern Pine. The DOE needs to issue an additional Supplement to the DEIS once the Project area Form and individual Survey forms that are being prepared for the federal Section 106 review of the National Historic Preservation Act are complete.

Failure to address these issues would clearly fail to satisfy the standards for considering the project's impacts under NEPA.

We also urge the SEC to consider all of the information submitted as part of the Section 106 review.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Apr 2, 2016

**ID:** 9166

**Date Entered:** Apr 2, 2016

**Source:** Website

**Topics:** Historic/Cultural

**Name:** Matthew Emerson

**Organization:** Five Colleges Inc.

**Title:** Five Colleges Inc.

**Email:** emersonmze@gmail.com

**Mailing Address:** 65 Mechanic Street

**City:** Amherst

**State:** MA

**Zip:** 01002

**Country:** US

**Comment:** Please consider other alternative routes outside of the proposed white mountain corridor for the powerline project. There are significant historical and cultural properties and "spaces" in this extensive white mountain landscape from Whitefield through the Franconia Notch area and south. Many of these would need to be studied by professional archaeologists ( following section 106 mandates) to mitigate development damage and/or encroachment. The visual impact of built towers and powerlines and related maintenance buildings on this landscape is disruptive for visitors as the WMNF is a four season recreational and stress relieving landscape for millions of Americans who live within one days travel.

Matthew Emerson Ph.D. R.P.A.  
Professional Archaeologist

1179-1

Thank you for your comment. Chapter 2 of the EIS presents an analysis of a range of reasonable alternatives for the proposed Northern Pass Project, including alternative routes through the WMNF. As no proposed alternative route was provided by the commenter for the impacts analyses, including potential adverse effects to historic resources, no change to the final EIS has been made as a result of this comment.

1179-2

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 of the EIS addresses potential impacts to Visual Resources which may result.

1179-1

1179-2

Nancy Martland. Good evening. I'm going to be addressing my remarks strictly to the SEC because I think this is the only chance I'm going to have to actually speak to you face to face, and I've had a chance to speak to the DOE. My name is Nancy Martland. I live in Sugar Hill, New Hampshire, and I'm here this evening partly because I'm be out of town when my town has its hearing but also partly because I live in a town that now has a buried line, and I don't think it's right that some towns are spared overhead lines and some towns are not. I understand that this is a statutory regulatory permitting process. However, I hope that your decision will rest on more than dotting the regulatory i's and crossing the t's more than a process operated mainly so far as I can see by lawyers for lawyers. As Bob Baker said, do we matter? We're here. Do we matter? The highly controversial nature of this project requires that you who hold our futures in your hands exercise extreme care as you weigh the issues involved in this case. If I were in your shoes, I th people like me are fighting Northern Pass so hard. So maybe I can help with that a little. I cannot impress upon you strongly enough that we know that the decision that you make on Northern Pass is one we will have to live with for the rest of our lives. Long after you've returned to your homes and moved on, we will still be here as will our children and their children living with your decision. Allowing this project to deface our land when there is a perfectly reasonable low impact alternative would be a travesty and that is why we fight. It's impossible to grasp the notion of a beach by looking at individual grains of sand, and it's impossible to understand the full scope and impact of Northern Pass by looking only at its details. Fair judgment and your own rules require you to comprehend the beach, not just the grains of sand. For example, the big picture is essential to your required findings of impact on aesthetics and historic properties which must include an examination of effects on the landscape as a whole. So I'd like to talk I might be wondering why to you in the time I have left about the concept of cultural landscapes, and I believe Ms. Monroe gave you some materials that I have taken from the National Park Service. I'm going to speak on it briefly, but you can look into it more fully in the material. Cultural landscapes are a class of historic properties eligible for placement on the National Register of Historic Places. According to the National Park Service guidelines, and I quote, cultural landscapes and range from thousands of acres of rural tracts of land to a small homestead with a front yard of less than one acre. Like historic buildings and districts, these special places reveal aspects of our country's origins and development with their form and features and the ways they were used. Cultural landscapes also reveal much about our involving relationship with the natural world, and I believe on the bus tour today, you got a glimpse of a number areas that qualify as cultural landscapes. Our landscape is so important that the National Trust for Historic Preservation has designated the scenic landscapes of New Hampshire as a national treasure. The trust notes regarding Northern Pass, and I'm quoting again, if the transmission line is built, it should not be at the expense of the character and spirit of the Granite State's special places. We live in an age of technology and innovation. By making use of this technology, surely a solution can be found that puts place before power lines, end quote. MR. HONIGBERG: Ms. Martland, how much more do you have? MS. MARTLAND: I can skip to my final. I have another paragraph. Can I do that? MR. HONIGBERG: Go for it. MS. MARTLAND: Cultural landscapes are distinct from other types of historic properties, this is really important, such as buildings or historic districts. They're of great value but cannot alone define the qualities of the North Country. What we have here can not be reduced simply to discrete building or sites. It involves the landscape that is majestic and intimate and has drawn people here from all over the world for close to 200 years. Our landscape defines us here in the North Country. It is scenic, it is historic, and it is culturally significant. Please be certain that you consider the integrity of the New Hampshire's landscape in this context as you weigh the information regarding aesthetics and historic properties that will come before you as a result of this decision. I believe that our

1181-1

Thank you for your comment. Cultural landscape studies are being conducted through the Section 106 (of the National Historic Preservation Act of 1966 ("NHPA")) process in accordance with guidance from NH DHR regarding how cultural landscape studies should be identified and documented. These studies will evaluate the significance, integrity, and National Register eligibility of any cultural landscapes that exist within the Pemigewasset River Valley and the Suncook River Valley. In light of these studies, NPT will also determine whether additional cultural landscapes are present in the Great North Woods Project Area or other areas in the vicinity of the proposed Northern Pass project. NH DHR's guidance is based on California's General Guidelines for Identifying and Evaluating Historic Landscapes. Section 3.1.8 of the EIS provides additional information about the Section 106 process, including consideration of cultural landscapes. Section 1.4.7 has been added to the Cultural Resources Technical Report to discuss the New Hampshire Division of Historical Resources' (NH DHR) scope of work for addressing cultural landscapes for the Northern Pass Project. Additionally, Appendix B in the Technical Report has been revised to reflect stipulations in the Programmatic Agreement that address the identification and evaluation of cultural landscapes. Cultural landscapes will be identified and evaluated for eligibility for the National Register of Historic Places using NH DHR's scope of work.

1181-1

1181-1 cont'd

cultural landscape should be protected from the disfigurement that overhead power lines would inflict upon them. Of course, as everyone in this room knows, damage could be avoided almost completely if Northern Pass elected to bury all of its lines rather than just segments. Thank you. Sorry I went over.

1181-1  
Continued

SEC Hearing Remarks March 7, 2016

Colebrook, New Hampshire

Nancy Martland

Address to SEC

like I can't

I'm new a b/c I can't find it's not to divide an state to #F

I understand that this is statutory regulatory permitting process. winners

However, your decision must rest on more than dotting the regulatory losers

I's and crossing the T's; more than a process operated by lawyers for lawyers. <sup>mainly</sup> ~~SEC~~ <sub>SEC</sub>

Its highly controversial nature requires that you, who hold our

futures in your hands, exercise extreme care as you weigh the issues

involved in this case. <sup>point</sup> If I were in your shoes, I think I might be

wondering why people like me are fighting Northern Pass so hard.

<sup>So maybe I can hear with that</sup> I cannot impress upon you strongly enough that the decision you make

on Northern Pass is one we will live with for the rest of our lives. Long

after you have returned to your homes, we will still be here, as will our <sup>like with early</sup>

children and their children. Allowing this project to deface our land

when there is a perfectly reasonable low-impact alternative would be a

travesty. And that is why we fight. <sup>Environ - charges that their objection are not made more than the source of this power.</sup>

It's impossible to grasp the notion of a beach by looking at individual

grains of sand; it's impossible to understand the full scope and impact

of Northern Pass by looking only at its details. Fair judgement and your

own rules <sup>(for example)</sup> require you to comprehend the beach, not just the grains of

sand. The big picture is essential to your required findings of impact on

aesthetics and historic properties, which must include an examination

of effects on the landscape as a whole.

So, I'd like to talk to you about the concept of Cultural Landscapes.

<sup>Harriet</sup> Cultural Landscapes are a class of historic properties eligible for

placement on the National Register of Historic Places. According to

the National Park Service's guidelines:



1185-1

Thank you for your comment. Cultural landscape studies are being conducted through the Section 106 (of the National Historic Preservation Act of 1966 ("NHPA")) process in accordance with guidance from NH DHR regarding how cultural landscape studies should be identified and documented. These studies will evaluate the significance, integrity, and National Register eligibility of any cultural landscapes that exist within the Pemigewasset River Valley and the Suncook River Valley. In light of these studies, NPT will also determine whether additional cultural landscapes are present in the Great North Woods Project Area or other areas in the vicinity of the proposed Northern Pass project. NH DHR's guidance is based on California's General Guidelines for Identifying and Evaluating Historic Landscapes. Section 3.1.8 of the EIS provides additional information about the Section 106 process, including consideration of cultural landscapes. Section 1.4.7 has been added to the Cultural Resources Technical Report to discuss the New Hampshire Division of Historical Resources' (NH DHR) scope of work for addressing cultural landscapes for the Northern Pass Project. Additionally, Appendix B in the Technical Report has been revised to reflect stipulations in the Programmatic Agreement that address the identification and evaluation of cultural landscapes. Cultural landscapes will be identified and evaluated for eligibility for the National Register of Historic Places using NH DHR's scope of work.

**Cultural landscapes can range from thousands of acres of rural tracts of land to a small homestead with a front yard of less than one acre.**

Like historic buildings and districts, these special places reveal aspects of our country's origins and development through their form and features and the ways they were used. Cultural landscapes also reveal much about our evolving relationship with the natural world.

Our landscape is so important that The National Trust for Historic Preservation has designated the Scenic Landscapes of NH as a National Treasure. The Trust notes, regarding Northern Pass:

"If the transmission line is built, it should not be at the expense of the character and spirit of the Granite State's special places. We live in an age of technology and innovation. By making use of this technology, surely a solution can be found that puts place before power lines."

Cultural Landscapes are distinct from other types of historic properties, such as buildings or historic districts, which are of great value, but cannot alone define the aesthetic and historic qualities of the North Country. What we have here cannot be reduced simply to discrete buildings or sites. It involves a landscape that is majestic yet intimate, that has drawn people here from all over the world for close to two hundred years. Our landscape defines us here in the North Country. It is scenic, it is historic, and it is culturally significant. It belongs to all of New Hampshire. It belongs to YOU. It is our greatest asset and the preservation of its integrity is essential to our livelihoods and well-being. It is one fabric, one tissue and must be treated in your analysis as an entity in its own right under the National Park Service definition of Cultural Landscape.

Please be certain that you consider the value of NH's landscape in this context as you weigh the information regarding aesthetics and

*I've provided the SEC with further documentation at this link. I've also provided the SEC with further documentation at this link. I've also provided the SEC with further documentation at this link.*

*In fact LDC is the site*

*integrity*

1185-1

1185-1 cont'd

historic properties. I believe you will find that our Cultural Landscapes should be protected from the disfigurement that overhead power lines would inflict upon them. Of course, this damage could be avoided completely if Northern Pass elected to bury all of its line rather than just ~~one~~ segments.

*As everyone else  
would know*

1185-1  
Continued

National Park Service reference:

<http://www.nps.gov/tps/how-to-preserve/briefs/36-cultural-landscapes.htm>

National Trust for Historic Preservation reference:

<https://savingplaces.org/places/scenic-landscapes-of-new-hampshire#.Vtb25THSnIU>

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Aug 25, 2015

**ID:** 8346

**Date Entered:** Aug 25, 2015

**Source:** Website

**Topics:** Wildlife

**Organization:**

**Country:** US

**Comment:** "tracks of two or three lynx traveling together along the existing ROW" found by Normandeau Associates in Whitefield, indicate the line should be buried to avoid that section. Though U.S. Fish and Wildlife service knew of this, they do not mention it in their report to the DOE, nor do they mention the documented lynx presence in WMNF in Lincoln, near the existing line. Karner Blue butterfly is known to occur on the existing ROW in Concord, so the line should be buried to avoid Concord. Four species of concern may occur in other locations on the ROW, including New England Cottontail, Bicknell's Thrush, Northern Long-Eared Bat and the small-footed bat. Consideration of these species early in the design process would indicate burial of the whole line, to avoid future project delays or alteration of operations.

1190-1

Thank you for your comment. The discussion of lynx presence within the project area is consistent with data utilized by the USFWS and NHFG.

1190-2

Thank you for your comment. Endangered Species Act consultation with U.S. Fish and Wildlife Service for the Project was ongoing at the time of publication of the draft EIS. Updated and additional discussion of impacts and mitigation for the Karner blue butterfly and wild lupine has been added to the revised Wildlife Technical Report for the final EIS. Additional information was added to the following sections of the final EIS: Section 2.5.11 (Wildlife), Table 2-16 (Determination Summary of Project-wide Effects for Federally-Listed Wildlife Species); Section 2.5.12 (Vegetation), Table 2-19 Comparison of Project-Wide Effects for State-Listed Plant Species; Section 4.1.11 (Wildlife), Table 4-60, Determination Summary of Project-wide Effects for Federally-Listed Wildlife Species; Section 4.1.12 (Vegetation), Table 4-63, Comparison of Project-wide Effects for State-Listed Plant Species; Section 4.4.11.2 (Wildlife, Alternative 2), Terrestrial Species, Section 5.1.11.3 (Wildlife, Alternative 2), Scope of Analysis, Past, Present, and Reasonably Foreseeable Future Actions; Section 5.1.11.4 (Alternative 3); Section 5.1.11.11 (Alternative 6a); 5.1.11.12 (Alternative 7); and in the Wildlife Technical Report in Sections 3.4.2.1.3 (Listed Species under Alternative 2), as well as other respective Listed Species sections for each project alternative in the Southern Section.

1190-1

1190-2

1190-3

1190-3

Thank you for your comment. Chapter 4 of the final EIS and Section 3 (Direct and Indirect Environmental Consequences) of the Wildlife Technical Report summarizes impacts to wildlife including fragmentation and potential habitat loss due to the long-term operation of the project. Additionally, potential impacts to species of concern, such as the New England Cottontail, Bicknell's Thrush, Northern Long-Eared Bat and the small-footed bat are discussed in Section 3 (Direct and Indirect Environmental Consequences) of the Wildlife Technical Report. As stated in Section 1.7.3.1 of the EIS, in addition to the DOE review of the project under NEPA, DOE acknowledges the Applicant must receive approval for the project from the State of New Hampshire's Site Evaluation Committee and obtain all federal and state regulatory authorizations/permits pertaining to wildlife prior to construction.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Jul 23, 2015

**ID:** 8208

**Date Entered:** Jul 23, 2015

**Source:** Website

**Topics:**

**Organization:**

**Comment:** With regard to any environmental impact, it's less impactful than building a road because any wildlife will have an easier path to traverse with no risk of a car strikes. The edge of the route, essentially what NP will become is a very long field, is very biologically productive.

I discount any sort of viewshed impact as whining by the local NIMBY groups.

With regard to impact under NHPA, NH was 90% clearcut in the early 1800s and farmed for sheep, as demonstrated by the rock walls that criss cross the state. When the Northwest Territories opened up and were pacified, NH farmers picked up and went west.

The existing forests are a 150-200 year old caricature of what they used to be. To say, seriously, that cutting a 400 foot swath of this generation of trees is a 'bad thing' is ludicrous. The entire state was logged industrially and industriously until nearly no trees were left. The NP route is of no NHPA impact.

1191-1

Thank you for your comment. With respect to the specific comment about the historical context of tree clearing in New Hampshire, the Phase 1A reports were developed to include environmental and cultural contexts and data that may be used to identify areas of Pre- and Post-Contact archaeological sensitivity. These reports were submitted to NHDHR and are factored into the analysis in the EIS.

1191-1

1195-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

1195-2

Thank you for your comment. Commentor's concerns about the Indian Stream Republic Territory are noted. DOE is addressing potential adverse effects on resources associated with the Indian Stream Republic Territory in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations. This includes resources associated with the Indian Stream Republic Territory if they were identified within the area of potential effects ("APE") [36 C.F.R. Section 800.16(d)].

For more information on how DOE is addressing potential adverse effects on these types of resources, see Sections 1.6, 2.5.8, and 3.1.8 of the FEIS. Additionally, if resources associated with the Indian Stream Republic Territory were identified within the APE: Sections 1.4.1, 1.4.3, 1.4.4, 1.4.6, and 1.4.7 of the Cultural Resources Technical Report contain information on the methodologies that have been, or will be, employed for considering potential adverse effects on such resources; Section 3.1.2 of the Cultural Resources Technical Report contains information on potential impacts of the proposed project on such resources; and Appendices B and C contain information on the studies that have been, or will be, conducted as part of the assessment of adverse effects of the proposed project on such resources.

Thank you. My name is Steve Ellis, and I am the Chairman of the Selectboard for the town of Pittsburg. I'm also a retired Senior Vice President and National Director of Sales for a major insurance company. As you know, Northern Pass plans to enter the US over Halls Stream in Pittsburg and erect 20 towers before it is buried under the Connecticut River. Pittsburg is a community that survives on tourism, where people can escape to enjoy our abundant wildlife and scenic vistas. There are many unique things about our town. We have the largest geographic township in New England. We're considered the snowmobile capital of New England, having over 200 miles of groomed trails and hosting vintage snowmobile races. We are part of the Ride the Wilds trail which covers over 1000 miles for ATVs. We have many fishing habitats, including lakes, ponds, streams, bogs and the Connecticut River. We have a trophy fishing area on the Connecticut River that attracts anglers from all over the world, and we have miles of beautiful hiking trails. Without any consideration for our natural resources, Northern Pass plans to ruin our pristine vistas. In February of 1998, the State of New Hampshire recognized the importance of keeping Pittsburg and the Great North Woods from being developed. They established an easement of 146,000 acres of the Connecticut Lake Headwaters and established the Connecticut Lake Headwaters Citizen Committee to monitor compliance with the terms and conditions of the easement. We wish Northern Pass also recognized this importance by leaving our landscape untouched, by simply burying the lines. It is only two miles from the entrance into the United States to the Connecticut River where a directional bore will bury the line under the Connecticut River. If not buried, the towers erected up to that point will be seen for miles as you enter our town on Route 3. The biggest insult to our town, however, is the disturbing our historic land where the towers will be erected; namely, the Indian Stream Republic territory. In 1783 the Treaty of Paris established the border between the US and Canada. It was not clear and in 1832 this border dispute caused double taxation for the inhabitants of which is now a section of Pittsburg. They had enough and revolted and created their own sovereign nation with their own Constitution and Congress and named it the Indian Stream Republic. For over 175 years, this land has remained untouched. But now Northern Pass wants to change that. In conclusion, I ask you not to let Northern Pass destroy our beautiful vistas which will have an adverse effect on our economy. Do not let them destroy Indian Stream Republic territory which has been preserved for over 175 years. This is sacred land to our town and citizens. The solution is very simple. Bury the lines, so both Northern Pass objectives and ours can be achieved. Thank you for your attention.

1195-1

1195-2

Town Meeting - March 11, 2014

Ammy Heiser

NP

**ARTICLE 15** - To see if the Town of Pembroke shall state its opposition to any new overhead development of alternating current and direct current high voltage transmission lines within its borders; and in turn manifest the Town's strong preference for the burial of such lines, in a manner consistent with state and federal requirements, under rights of way and power line corridors now existing or to be established. Although burial in all instances is preferred, this statement of opposition shall not apply to distribution lines carrying electrical power and other utility lines, such as telephone and cable television, for Town residential or commercial use.

**MOVED: Tina Courtemanche SECONDED: Vincent Greco**

Marie Straiton spoke in support of this article stating that the project now is intending to use the existing right- of-way erecting 59 new towers of over 135 feet in height. This will affect 40 properties in the Town of Pembroke. She urged the voters to join 33 other communities and demand the burial of the electric transmission lines.

Charles Schmidt stated that there is a bill in the house that is addressing the idea of burying the lines in the states transportation corridors. He also stated that other states have in fact demanded the burial of the transmission lines, not as long as it would be in NH, but they have done it.

Wayne Burt spoke about how the wind farms have scarred the beauty of NH and this would look even worse.

**VOTE: YES ARTICLE #15 ADOPTED**

1196-1

1196-1

Thank you for your comment.

Lately I've been reading about many places across America which have been turned into "Sacrifice Zones." Sacrifice Zones are cities or entire states that corporations and governments have decided to simply sacrifice, places, to them, that are not worth saving. Cities like Flint, Michigan; Scranton, Pennsylvania; Camden, New Jersey; and states like West Virginia. Many mountain tops in West Virginia have been blown off so that the coal companies can easily get to the coal with the fewest possible employees. Pennsylvania, where well water is now so toxic it can be set on fire due to fracking. All these cities and states are grim reminders that American corporations pick winners and losers when it comes to their interests.

Now a huge energy corporation, Eversource, has joined forces with a foreign government and they have decided that New Hampshire is the next Sacrifice Zone for their profit. We are expected to simply resign ourselves to giant power lines being built over the most beautiful areas of our state and just ignore private property rights to satisfy the corporate interests of Eversource and Hydro Quebec.

There are many plans on the books to cover New Hampshire in other transmission line projects, wind towers on our ridgelines and gas pipelines with the energy to be exported outside the state. Well, I am here to tell you, that's not happening in New Hampshire. I don't care what the Federal Government decides, I don't care that our own governor won't stand up and protect her state from being pillaged by giant corporations, I don't care that Nashua and Manchester Chambers of Commerce don't think the northern part of the state is worth protecting, and I don't care that the governors of Massachusetts and Connecticut think that New Hampshire is expendable for their energy needs. The people of this state will never allow this. No area of New Hampshire will be sacrificed from the Canadian border to Deerfield. We will not stand for any losers.

Eleanor Roosevelt once said, "Nobody can abuse you without your consent." We do not consent to having any part of our state trashed so that other people can make a lot of money. The only way to stop this travesty is for we the people to stand up and say no. I'm asking everybody here to ask anyone who is running for public office in New Hampshire, especially the candidates for governor, what their stand is on these giant energy projects and what they're going to do to stop them. One candidate is the CEO of Waterville Valley. Ask him. I know it seems futile to get a governor to ever take a stand on Northern Pass, but it's not enough just to be opposed or say flowery things about the beauty of New Hampshire. If we don't want to become another sacrifice zone for giant energy corporations, we have to take action and demand action from our government leaders. The future of NH depends on it.

Pamela Martin  
Plymouth, NH

1197-1

Thank you for your comment. Socioeconomic impacts are addressed in the EIS. The EIS also includes an analysis of potential disproportionate impacts on minority and low-income residents of New Hampshire (see Section 4.1.9 of the EIS). It is assumed that Northern Pass will acquire all necessary land use permissions or title to lands needed to site the Project (see Section 4.1.6 of the EIS)

1197-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Jul 25, 2015

**ID:** 8215

**Date Entered:** Jul 25, 2015

**Source:** Website

**Topics:** Purpose and Need, Alternatives, Health and Safety, Viewshed/Scenery, Economic, Tourism, Environmental Justice

### Organization:

**Comment:** The Northern Pass project is a private, for-profit venture. It was never proposed for the "good of the people" but rather for the profit of the corporations. Hydro Quebec has excess energy and wants to export it to the U.S. for the huge profits it promises. Eversource wants to build it and transmit it and they plan to make billions from this venture. New Hampshire is simply a pass through state because the electricity is not intended for us. The environment of northern Quebec has been devastated by the installation of these massive dams and reservoirs. And the state of NH will be devastated by the aesthetic insult of these 2,200 steel towers and access roads through some of the most tourism-dependent areas of the state. I am opposed to the entire project, buried or otherwise. It is unnecessary and an insult to the people of NH. If southern New England wants more energy, they can take it through VT, ME or out to sea by undersea cable. Or, better yet, how about everybody start conserving energy and we concentrate on local solar energy.

1198-1

Thank you for your comment. Potential impacts in Canada from the construction and operation of electricity infrastructure, including hydropower generation and transmission in Canada, are beyond the scope of this NEPA analysis. NEPA does not require an analysis of potential environmental impacts that occur within another sovereign nation that result from actions approved by that sovereign nation. Additionally, the construction and operation of Hydro-Quebec power generation projects and electricity transmission line projects in the bulk Hydro-Quebec system will occur regardless of and independent to whether DOE issues a Presidential permit for the proposed Northern Pass Project international border crossing. For these reasons, potential environmental impacts in Canada are not addressed in this EIS. Section 1.5.4.1 of the Final EIS has been updated in response to this comment.

1198-2

Thank you for your comment. The EIS and Visual Impact Assessment Technical Report analyze potential impacts to visual resources resulting from the Project. Visual impacts are summarized in Section 2.5.1 of the EIS, and are further evaluated under each geographic section and alternative (see Sections 4.1.1, 4.2.1, 4.3.1, 4.4.1, and 4.5.1 of the EIS).

| 1198-1

| 1198-2



Good evening and thanks again for having us all up here tonight. My name is John Petrofsky. I'm a portfolio manager and equity analyst. I live in Washington, D.C., but I'm originally from Stewartstown and currently own land in Stewartstown. Similar to what a lot of people have said tonight, I have concerns that a lot of resources and impacts are still being overlooked. I'd like to focus on several specific impacts Northern Pass would have on just a two-mile stretch by my house in the Bear Rock area of Stewartstown. That's just two miles out of 180 miles of this proposed project. First, construction of the line would damage the headwaters to the west branch of the Mohawk River, one of only 16 bodies of water in the state specifically managed to protect wild brook trout, a state species of special concerns. Second, both the line and the proposed transmission station would damage the natural historic feature known as Bear Rock. Bear Rock is an important culture and historic feature and would be significantly impacted if not completely destroyed. As has already been mentioned, there are also caves in the immediate vicinity of Bear Rock called Bear Caves, and possible impact of these has not been looked into as far as I know. After it passed through Bear Rock, the line would disrupt additional areas of historical important, including remnants of some of the first homesteads in the area. Also both the buried and overhead portions of the line in Stewartstown would potentially destroy the drinking water sources for multiple homeowners by blasting rock in and around the aquifers that feed our springs and artesian wells. Next, the line would pass over Diamond Pond Road, severely impacting the aesthetics along a very scenic road leading to one of Stewartstown's most important tourist destinations, Diamond Pond, which is renowned for its beauty as well for being a great fishing and snowmobiling destination. Finally, the overhead lines would climb over the top of Sugar Hill and cut through one of the largest intact forest lots in the entire state. This is just the impact over two miles. What about the other 178 miles? Listen to my fellow citizens up and down the state. They're pointing out a similar level of adverse impact on the length of this proposed project. There's no amount of mitigation that Northern Pass could do to make this project worth the price we'll have to pay. However, I do believe that most of us if forced to could accept this project if and only if it's buried in the rights of way along routes 3 and 93 or along 91 as some people have mentioned tonight. I strongly encourage the DOE to limit its Final EIS to Alternatives 4 A and alternative 4c. All of the other alternatives carry too many negative impacts for a project that isn't wanted and isn't need. And I'd also like to add one thing since I thought I'd only have three minutes, but as an equity analyst and portfolio manager and what I do is I evaluate companies all the time, right? So Northern Pass has said it will cost a billion extra dollars to bury the line all the way. Well, if they'd done that 2 or 3 years ago they would have made \$400 million a year on that line which would have paid for itself and more. Right? I don't know, but if I was a shareholder of the company, which I'm not, I'd be calling for a change of management or at least shorten the stock.

1200-1

Thank you for your comment. The Eastern Brook Trout (EBT) was added to Tables 3-14 and 4-61 of the final EIS, as the EBT is now considered a Species of Greatest Need of Conservation (it was not listed during preparation of the draft EIS); additional discussion regarding impacts from thermal loading was also included in these sections of the final EIS. Potential thermal impacts from tree clearing are also considered in Section 4.2.13 in the subsection for Surface Water. In the Wildlife Technical Report, Tables 2, 37 and 39 were revised to included the EBT as a SGNC species. Additional discussion regarding impacts from loss of riparian areas was also added to Sections 3.1.1.1 and 3.2.2.1.1 of the Wildlife Technical Report.

1200-1

1200-2

1200-2

Thank you for your comment. The commenter's concern regarding Bear Rock is noted. Bear Rock is not an archaeological or architectural resource, so it is not addressed in Section 3.2.8 or 4.2.8. Bear Rock could be a contributing natural feature to a cultural landscape, see 3.1.8, and will be considered through the cultural landscape studies to be conducted as part of the Section 106 process (see Section 3.1.8.3 for methodology). DOE is addressing potential adverse effects to historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations. This process is described in Sections 1.6 and 1.7.3.2 of the EIS.

1200-3

1200-4

1200-3

Thank you for your comment. Updated analyses regarding potential impacts to drinking water supply can be found in Sections 2 and 3 of the Water Resources Technical Report. Potential impacts to drinking water sources from blasting impacts include potential spills or leaks to groundwater wells and are summarized in Section 4.1.13 in the final EIS, with more details provided thereafter under each alternative in each geographic section. The Applicant has committed to preparing a blasting plan to identify appropriate procedures and best management practices (BMPs) to protect groundwater and public and private water supply wells. Appendix H of the final EIS has been revised to reflect these changes. Should the project be approved, specific standards and methods required by the New Hampshire Department of Environmental Services would be established during the subsequent state permitting process.

1200-4

Thank you for your comment. The EIS discusses the importance

of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 of the EIS addresses potential impacts to Visual Resources which may result.

To the DOE

Hearing in Whitefield NH

Date: 03/10/2016

Respectfully submitted: John Petrofsky

Thank you to the DOE for inviting us here to share our views.

My name is John Petrofsky. I am a portfolio manager and equity analyst, and live in Washington D.C, but I'm originally from Stewartstown, NH and currently own land in Stewartstown NH

I'd like to focus on several specific impacts Northern Pass would have on just a two mile radius surrounding my house in the Bear Rock area of Stewartstown. That's just two miles out of 180 for this proposed project.

First, construction of the line would damage the headwaters of the West Branch of the Mohawk River, one of only sixteen bodies of water in the state specifically managed to protect wild brook trout, a state species of special concern.

Second, both the line and the proposed transmission station would destroy the natural historic feature known as Bear Rock, granite outcropping with several pronounced cliff faces. Bear Rock is both a culturally, and historically, important feature, and would be significantly impacted, if not completely destroyed.

There are also caves in the immediate vicinity of Bear Rock, and the possible impact on these has not yet even been raised.

After it passed through Bear Rock, the line would disrupt additional areas of historical importance, including remnants of some of the first homesteads in the area.

Both the buried and the overhead portions of the line would potentially destroy the drinking water sources for multiple home owners, by blasting rock in and around the aquifers that feed our springs and artesian wells.

Next the line would pass over Diamond Pond road, severely impacting the aesthetics along a very scenic road leading to one of Stewartstown's most important tourist destinations, Diamond Pond, which is renowned for its scenic beauty, as well as for being a fishing and snowmobiling destination.

1201-1

Thank you for your comment. The Eastern Brook Trout (EBT) was added to Tables 3-14 and 4-61 of the final EIS, as the EBT is now considered a Species of Greatest Need of Conservation (it was not listed during preparation of the draft EIS); additional discussion regarding impacts from thermal loading was also included in these sections of the final EIS. Potential thermal impacts from tree clearing are also considered in Section 4.2.13 in the subsection for Surface Water. In the Wildlife Technical Report, Tables 2, 37 and 39 were revised to included the EBT as a SGNC species. Additional discussion regarding impacts from loss of riparian areas was also added to Sections 3.1.1.1 and 3.2.2.1.1 of the Wildlife Technical Report.

1201-2

Thank you for your comment. The commenter's concern regarding Bear Rock and the Bear Rock School is noted. Bear Rock was not considered during preparation of the draft EIS because it is a natural feature that does not appear to constitute an archaeological or architectural resource that could be considered a potential historic property. The Bear Rock School was not considered during preparation of the draft EIS because, in its current location, it is outside the area of potential effects [36 C.F.R. Section 800.16(d)]. Potential adverse effects to historic properties and/or cultural resources, including resources of cultural or religious importance to federally-recognized Indian tribes, are being addressed directly as a part of DOE's consultation process in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulations (36 C.F.R. Part 800). Related investigations to identify historic properties, which may include cultural landscapes, within the area of potential effects ("APE") [36 CFR Section 800.16(d)] for the proposed Northern Pass project are on-going. Appropriate activities will be conducted in accordance with the Section 106 programmatic agreement developed specifically for the proposed Northern Pass project to: (1) properly evaluate identified historic properties for National Register of Historic Places (NRHP) eligibility, (2) assess potential effects from the proposed Northern Pass project on identified historic properties (which include NRHP-listed or NRHP-eligible properties), and (3) avoid, minimize, or mitigate any adverse effects to identified historic properties within the APE.

1201-3

Thank you for your comment. Updated analyses regarding potential impacts to drinking water supply can be found in Sections 2 and 3 of the Water Resources Technical Report.

Potential impacts to drinking water sources from blasting impacts include potential spills or leaks to groundwater wells and are summarized in Section 4.1.13 in the final EIS, with more details provided thereafter under each alternative in each geographic section. The Applicant has committed to preparing a blasting plan to identify appropriate procedures and best management practices (BMPs) to protect groundwater and public and private water supply wells. Appendix H of the final EIS has been revised to reflect these changes. Should the project be approved, specific standards and methods required by the New Hampshire Department of Environmental Services would be established during the subsequent state permitting process.

1201-4

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 of the EIS addresses potential impacts to Visual Resources which may result.

Finally the over lines would climb over the top of Sugar Hill, and cut through the middle of one of the largest intact forest blocks in the entire state.

This is just the impact over two miles. What about the other 178? Listen to my fellow citizens up and down the state. They are pointing out a similar level of adverse impact along the length of this proposed project. There is no amount of mitigation that Northern Pass could do to make this project worth the price we'll have to pay.

However, I believe most of us could accept this project if, and only if, it was buried in the rights of way for routes 3 and 93. I strongly encourage the DOE to limit its final EIS to alternatives 4a and 4c. All of the other alternatives carry too many negative impacts for a project that isn't wanted and isn't needed.

1201-5

1201-5

Thank you for your comment. The commenter's opinion is noted regarding the landscape impacts of the Project. The EIS acknowledges the potential impacts to a variety of natural resources from the Project. Impacts to vegetation are discussed throughout Chapter 4 of the EIS, and Section 3 of the Vegetation Resources Technical Report.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Sep 14, 2015

**ID:** 8380

**Date Entered:** Sep 14, 2015

**Source:** Website

**Topics:** Purpose and Need, Viewshed/Scenery, Recreation, Taxes, Historic/Cultural, Economic, Tourism

**Name:** Neil Irvine

**Organization:** Town of New Hampton

**Title:** Chairman

**Email:** selectmen@new-hampton.nh.us

**Mailing Address:** 6 Pinnacle Hill Rd

**City:** New Hampton

**State:** NH

**Zip:** 03256

**Country:** US

**Comment:** To paraphrase Daniel Patrick Moynihan, former US Ambassador to the UN & India and US Senator for New York; we are entitled to our own opinions, but we are not entitled to our own facts. We respectfully submit that the evaluation of the Northern Pass project focus on the facts, and offer the following facts in opposition to the Northern Pass as it is currently proposed.

Fact: The Northern Pass is a private "participant funded merchant project". It is at its core a project between an energy producer and an energy distributor to get product to market, nothing more. Any talk about tax revenues, jobs or energy cost reductions are there to muddy the waters and attempt to put lipstick on a pig. There is no public need for the project, therefore, it is the position of the Town of New Hampton that any disruption, inconvenience or financial impact be borne in its entirety by the applicant.

However, if local benefit is to be part of the discussion then we must consider the following facts; quoting from the DOE Draft EIS Summary, Page S-15 "alternatives that would be constructed underground along existing roadways would impose the fewest environmental impacts [...]" It goes on to say, "Because of the higher construction cost, the underground alternatives would [...] provide

additional tax revenue to local taxing jurisdictions.” It also states, “The overhead alternatives would be expected to create between 5,000 and 6,000 short-term jobs [...] and approximately 900 permanent jobs, while the underground alternatives would be expected to create between 9,000 and 10,000 short-term jobs [...] and between 1,300 and 1,500 permanent jobs. Additionally, on page S-19, Table S-3 we see that the impact of the burial option on property values and associated property tax payments is zero.

Fact: New Hampton, like a great many other Towns, is currently involved in litigation initiated by the utility companies, including Eversource, regarding tax assessments of assets within our Town. To date New Hampton has had to pay in excess of \$27,000 in legal expenses for the privilege of prevailing in the courts. Northern Pass tells us that the Towns will receive a much needed influx of tax revenue. However, if “What is Past is Prologue” every Town forced to host this project will receive their annual tax abatement filing and be tied up in litigation for years offsetting any perceived benefit.

Fact: In 1987 the town of New Hampton created and adopted the Pemigewasset Overlay District. A zoning district, providing protection for the environmentally sensitive corridor along the Pemigewasset River. After the US Congress passed the Pemigewasset River Study Act in 1990, the Pemigewasset qualified for designation as a Wild and Scenic River in 1993. A designation the voters of New Hampton supported at Town vote in March of the same year. While the move to have the river designated as such was unsuccessful, it does not change the fact that the Pemigewasset should be recognized for possessing outstandingly remarkable scenic, recreational, fish and wildlife, historic and cultural values. As stewards of the States resources, it is incumbent upon us to defend against actions that would adversely impact the value, in all of its meanings, of the river.

Fact: Northern Pass, despite its recent attempt at rebranding and rhetoric about listening to the people of New Hampshire has elected to place a tower within the Designated Scenic Easement for the Pemigewasset River in New Hampton and ignore the historical and cultural significance of identified Native Indian sites on the banks of the Pemigewasset, most notably the “Long Carry” site, identified in the NH Division of Historic Resources inventory as 27-BK-0010, and recorded in the expeditionary journals of Capt. Baker 1712 and Capt. Peter Powers 1754. Additionally, Dr. Ellen Cowie, Principal Investigator and Director of the Archaeology Research Center, University of Maine observed in her 2008 Phase 1B report that, “...lines of evidence [...] indicate probable Late Paleo-Indian occupation circa 8000-7000 BC.” The insistence of Northern Pass on the above ground option for 69% of the route is not a “forward nhplan,” it is a willful disregard for the history of New Hampshire and a willful rejection of the voice of the people of New Hampshire.

Fact: New Hampton is a gateway community for the Lakes Region and the White Mountains. For many visitors to New Hampshire their first glimpse of the majesty of the North Country as they travel North on I-93 comes around mile marker 73 where the Eversource RoW crosses I-93 into New Hampton. Currently the RoW is occupied with wooden pole structures, typically 55’ in height. Northern Pass proposes to frame that vista with 3 steel lattice towers approximately 100’ tall. Similarly, at mile marker 71 where the line again crosses the highway, Northern Pass proposes to replace the existing 55’ wooden pole structures with a series of steel monopoles up to 115’ in height, collocated with 3 steel lattice structures each in excess of 100’ tall, the tallest measuring 125’. Visitors travelling West to Newfound Lake on Route 104 will be exposed to a similar treatment of the existing RoW as it crosses both Route 104 and the Pemigewasset River into New Hampton, with 120’ monopoles replacing the existing wooden structures and steel lattice towers of 100’ & 125’ on either side of the Pemigewasset River. The industrialization of the rural character of our Town and State is again a willful dismissal of the voice of the people of New Hampton and the State of New Hampshire.

1202-1

Thank you for your comment. The commenter's concerns regarding potential impacts from the proposed Northern Pass project in the vicinity of the Pemigewasset River, such as the designated scenic easement along that River, as well as potential effects to American Indian archaeological sites such as the Long Carry site are noted. The Pemigewasset River was considered during preparation of the DEIS and is discussed in Sections 3.3 and 4.3 of the final EIS. The Long Carry site was not included in this EIS because it is outside the study area for archaeological resources, which is the direct area of potential effects (“APE”) [36 CFR Section 800.16(d)]. NH DHR concurred with DOE's finding that the Long Carry Site is not in the direct APE. DOE is coordinating its compliance with Section 106, in a manner consistent with 36 C.F.R. Section 800.8, with the pertinent standards of the National Environmental Policy Act of 1969 (“NEPA”) pursuant to 40 C.F.R. Sections 1500-1508. The Section 106 process is described in Sections 1.6 and 1.7.3.2 of the EIS. No updates have been made to the final EIS regarding this resource.

1202-1

1202-2

Thank you for your comment. Visual impacts in New Hampton are analyzed in Section 4.3.1 of the EIS. Two new Key Observation Points (KOPs) in New Hampton have been added to the final EIS, one along I-93 northbound (KOP NH-2) and one at the Pemigewasset river crossing (NH-3).

1202-2

Fact: Northern Pass Transmission LLC does not answer to the people of New Hampshire. It answers to the stakeholders of the project and to the shareholders of the parent companies. Voluntarily, it will seek to do the absolute minimum to mitigate the impacts and costs of the project, while maximizing its earnings. If the Northern Pass Transmission Line is to be located within New Hampshire then it is incumbent upon us as custodians of our communities and of the State to impose upon Northern Pass the measures which will bring about the maximum protections, of our environment and economies, while securing for our communities the best possible outcomes in jobs and tax revenues.

Therefore Alternative 4A which calls for the burial of the transmission line in its entirety, while being “disadvantageous to the Applicant” results in maximum benefit to the affected communities and is consistent with the position taken by the Town of New Hampton that any inconvenience or financial impact be borne in its entirety by the applicant.

?

Respectfully submitted

Neil G. Irvine  
Nathaniel H. Sawyer  
Kenneth A. Mertz

Selectboard, Town of New Hampton

1202-3

1202-3

Thank you for your comment. Appendix H of the EIS includes a list of Applicant-Proposed Impact Avoidance and Minimization Measures considered in the EIS process. The analysis of potential impacts in this EIS assumes that these measures would be applied during implementation of the Project, if approved. DOE's and USFS's decisions would be conditioned on the implementation of these APMs, as well as any other requirements identified by other permitting processes (including the New Hampshire Site Evaluation Committee review, consultation with the U.S. Fish and Wildlife Service, etc.).



# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Dec 4, 2015**

**ID:** 8575

**Date Entered:** Dec 4, 2015

**Source:** Website

**Topics:** Wildlife, Historic/Cultural

**Name:** Zachary Boyajian

**Organization:** NH Adjutant General's Dept / NH Army National Guard

**Title:** Environmental Program Manager

**Email:** zachary.l.boyajian.nfg@mail.mil

**Mailing Address:** 1 Minuteman Way

**Mailing Address:** ATTN: NGNH-FMO-ENV

**City:** Concord

**State:** NH

**Zip:** 03301-5607

**Country:** US

**Comment:** December 4, 2015

Dear Mr. Mills,

Thank you for the opportunity to comment on the DRAFT Northern Pass Transmission Line Project Environmental Impact Statement dated July 2015. The State of New Hampshire Adjutant General's Department (TAG) owns and manages approximately 214.0 acres of land in Pembroke identified on Town of Pembroke Tax Map 632, Lot 18; Tax Map 632, Lot 18-14; and Tax Map 632, Lot 18-15; approximately 3,800 feet (~0.75 mile) of which is located along the proposed transmission line in the Southern Section between MP 160 and MP 170 (as depicted on Map 6 of the Proposed Action). The above-referenced TAG property is the future home of the NH Army National Guard (NHARNG) Regional Training Institute, which is currently under construction expected to be completed in Spring of 2016.

The NHARNG Environmental Office is responsible for taking appropriate actions to ensure that all

TAG/NHARNG activities on TAG-owned properties are in compliance with applicable federal, state and local environmental laws and requirements. The above –referenced Pembroke property has some unique biological resources (including wildlife species) which are actively being managed and could likely be impacted by the proposed project. Below are comments as they relate to impacts from the proposed action on known sensitive resources on this TAG property:

#### Wildlife-

The TAG/NHARNG has documented and manages a variety of rare wildlife species along the existing powerline easement within the site boundaries. Species include the Eastern hognose snake (*Heterodon platirhinos*), Smooth green snake (*Liochlorophis vernalis*), Wood turtle (*Glyptemys insculpta*), Whip-poor-will (*Antrostomus vociferous*), Cobweb skipper (*Hesperia metea*), Dusted skipper (*Atrytonopsis hianna*), Edward’s hairstreak (*Satyrium edwardsii*), Karner blue butterfly (*Lycaeides melissa samuelis*) and Sleepy duskwing (*Erynnis brizzo brizo*). Table H-1 in Appendix H and Table H-1 of the DEIS discusses “Applicant-Proposed Impact Avoidance and Minimization Measures” (APMs) to avoid and/or minimize impacts to rare species during construction, but does not either propose or address the employment of these avoidance measures during long-term routine vegetation maintenance. To best protect these vulnerable species TAG recommends including time of year restrictions to protect known populations of rare species during the conduct of routine maintenance of the Transmission line. If work cannot be performed during these times, a field survey must be conducted by a trained professional to ensure no impacts to species.

Table H-1 in Appendix H on Page H-5 of the DEIS references certain protective measures to be employed around known nesting areas for Blanding’s, Spotted and Wood turtles and common nighthawk. Measures are also included for known Hognose and Black Racer snake habitats. Please note that both the Smooth green snake (*L. vernalis*) and Eastern hognose snake (*H. platirhinos*), as well as the Whip-poor-will (*A. vociferous*) are documented and known to utilize the existing powerline corridor within the TAG-owned property. TAG strongly recommends including protective measures for both nesting and hibernacula to ensure protection of these species. These protective measures should be employed both during construction and routine vegetation maintenance activities long-term.

According to recent communication with Eversource in March of 2014, vegetation along the existing transmission line is managed on a four year cycle via mechanical control methods. In Section 2.3.2 (Alternative 2- Proposed Action) references and describes that vegetation maintenance will be conducted every three years within cleared areas. With the accelerated timing of vegetation clearing, the importance of rare, threatened and endangered species protection during maintenance activities is vitally important to the conservation of these species. The NHARNG Environmental Office is available to coordinate with your team prior to the construction activities to ensure the protection of the above-referenced species known to occur on the TAG-owned Pembroke property.

The Migratory Bird Treaty Act (MBTA) prohibits the taking or killing of migratory birds, eggs and nests and is under the jurisdiction of the US Fish & Wildlife Service. Section 1.7.2.2 of the DEIS (U.S. Fish and Wildlife) states that appropriate consideration must be given for MBTA species, yet these considerations are not described within the DEIS document. Bird surveys conducted by the TAG/NHARNG have identified a variety of bird species utilizing the existing powerline easement for breeding. We request that Northern Pass more fully describe (in detail) the protective measures that will be implemented both during the proposed construction activities for the proposed Transmission line, as well as those that are to employed during the expected long-term operational maintenance that will follow once construction of the new Transmission line is fully complete, to ensure that known

1206-1

Thank you for your comment. Appendix H: Applicant-Proposed Impact Avoidance and Minimization Measures of the EIS includes statements that indicate protective measures would be applied during construction and operation of the Project, including any time-of-year restrictions for certain protected species. For example, "The Applicant will comply with other protective measures identified during consultation with the relevant state and federal agencies and as specified in the permit conditions."

1206-2

Thank you for your comment. As required under NH state law (RSA 212-A:7), Northern Pass would utilize protective measures to avoid or minimize impacts to state listed species, as stated in the Applicant-Proposed Impact Avoidance and Minimization Measures (see Appendix H of the EIS).

1206-3

Thank you for your comment. As stated in the EIS, Northern Pass would implement measures during construction and operation of the project, as required in all state and federal permit conditions. Details related to vegetation management can be found in Northern Pass' NH SEC filing, and any coordination or consultation with NHARNG should occur with Northern Pass.

1206-4

Thank you for your comment. Impacts to migratory bird species that are protected under the MBTA are outlined throughout the Wildlife Technical Report. Additional detail about proper mitigation efforts were added to the Wildlife Technical Report in Sections 3.2.2, 3.2.3, 3.3.2-12, 3.4.2, 3.4.3, 3.5.2. Applicant-Proposed Impact Avoidance and Minimization Measures in Appendix H of the EIS includes statements that indicate proper mitigation measures would be implemented: Clearing of trees and other vegetation will be the minimum necessary to satisfy the electrical safety clearance requirements, and take place in fall and winter to the extent practicable, to minimize impacts to nesting migratory birds. When clearing must be done during the nesting season, Environmental Monitors will inspect the work area for obvious bird nests and flag these for avoidance.

1206-1

1206-2

1206-3

1206-4

bird species on TAG property are sufficiently protected as required by the MBTA.

#### Cultural /Archaeological-

Table H-1, Appendix H of the DEIS on Pages H-2 and H-3, referenced as “Cultural and Historic” describes APMs that would be employed in accordance with Section 106 of the National Historic Preservation Act, including that a cultural resources management plan (CRMP) would be developed, and that the CRMP “will provide plans for the identification-through any necessary additional field work – of archaeological and historic resources that may be adversely affected by the project, as well as to identify the steps that should be taken to further avoid or minimize impacts on those resources.”

There are at least three known recorded archaeological sites that are eligible for the National Register of Historic Places within the above-referenced Transmission line corridor as it passes through the above-referenced TAG-owned property in Pembroke. The proposed sampling strategies and field-testing schemes that were implemented for the Phase 1A archaeological investigations conducted by SEARCH, Inc. (NHDHR Project Review Number RPR-4680) and referenced in a report dated September, 2014, and the Phase 1B archaeological survey that was conducted for the Project by Victoria Bunker, Inc. (NHDHR Project Review Number RPR 1448) and referenced in a report dated June, 2014 did not adequately and completely survey the general area where at least three (3) known isolated find archaeological sites have been documented and recorded with NHDHR.

In specific, these 3 sites are: 27-MR-349 (the “Structure 18 Lithic Find” site), 27-MR-350 (the “Orient Fishtail Find” Site), and 27-MR-398 (the “Pembroke Isolated Finds”) site. More archaeological survey work is recommended in this area of the Transmission Line ROW corridor, within the high terraced area, approximately 350 meters from the Soucook River, in the sensitivity area designated as “Pem 9”, depicted in Figures 9a, 9b, 9c and 9d of the Phase 1B report by Victoria Bunker, Inc.; and designated as “Segments 192 and 193” in the Phase 1A report by SEARCH, Inc. .

Following both a careful review of those reports and a field reconnaissance of the above-referenced areas, we believe there is a potential that additional archaeological resources exist within this segment of the ROW corridor and that the three (3) above-referenced “isolated” archaeological sites may be related. Further archaeological study is needed in order to confirm that, and should be conducted before the Final EIS is prepared.

1206-4

Continued 1206-4 cont'd

1206-5

1206-5

Thank you for your comment. Commentor’s concerns about archaeological resources in Pembroke are noted. DOE is addressing potential adverse effects on archaeological resources in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations. This includes archaeological resources such as the three archaeological sites in Pembroke if they were identified within the area of potential effects (“APE”) [36 C.F.R. Section 800.16(d)].

For more information on how DOE is addressing potential adverse effects on archaeological resources, see Sections 1.6, 2.5.8, and 3.1.8 of the FEIS. Additionally, if archaeological resources such as the three archaeological sites in Pembroke were identified within the APE: Sections 1.4.1 and 1.4.2 of the Cultural Resources Technical Report contain information on the methodologies that have been, or will be, employed for considering potential adverse effects on such resources; Section 3.3.2 of the Cultural Resources Technical report contains information on potential impacts of the proposed project on such resources; and Appendices B and C of the Cultural Resources Technical Report contain information on the studies that have been, or will be, conducted as part of the assessment of adverse effects of the proposed project on such resources.

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Oct 14, 2015**

**ID:** 8435

**Date Entered:** Oct 14, 2015

**Source:** Website

**Topics:** Economic

**Organization:** stewartstown land owner

**Comment:** my concern is i dont know how far away does the line have too be from native indian resting grounds?because up on north hill in stewartstown. in the north hill cemetry. is a famous north country native indian burried there.

1207-1

Thank you for your comment. Commenter's concerns about potential impacts from the proposed Northern Pass project on the North Hill Cemetery are noted. The North Hill Cemetery was considered during preparation of the draft EIS. DOE is addressing potential adverse effects to historic properties, including historic properties of religious and cultural significance to federally-recognized Indian tribes, in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations. For more information, see Sections 3.1.8 of the EIS and 1.5.1 of the Technical Report.

1207-1

ASHLAND HERITAGE COMMISSION  
P.O. BOX 517  
ASHLAND, N.H. 03217

March 11, 2016

Brian Mills  
Office of Electricity Delivery and  
Energy Reliability (OE-20)  
US Department of Energy  
1000 Independence Avenue SW  
Washington DC 20585

Dear Sir;

The Ashland Heritage Commission is sending this letter to express its concern about the adverse impact the Northern Pass power line project could have on historic structures in Ashland, notably the railroad bridge and the highway bridge over the Pemigewasset River connecting Ashland and Bridgewater. In the current plans for the project, the overhead power line would cross the river just downstream (south) of the railroad bridge and within sight of both bridges, and the transition station would be built in Bridgewater just northwest of both bridges.

Our search of the NH Division of Historical Resources archives did not find any evidence that either bridge has ever been the subject of an historic inventory form or a determination of eligibility. But, we are certain that both would be found eligible for the National Register of Historic Places.

The railroad bridge was built for the Boston & Maine Railroad to replace a wooden covered bridge that burned in January of 1902. A new steel bridge was designed by John Storrs, the well known New Hampshire engineer, fabricated by the American Bridge Company in 1902, and erected in early 1903. It has been little changed since then. Glenn Knoblock chose the railroad bridge as one of the 37 New Hampshire bridges he featured in his

1209-1

Thank you for your comment. Commenter's concerns about potential impacts from the proposed Northern Pass project on the railroad bridge and Route 3 bridge in the Ashland area are noted. The railroad bridge and the Route 3 bridge were considered during preparation of the draft EIS, but were not identified as historic properties within the area of potential effects ("APE") [36 C.F.R. Section 800.16(d)].

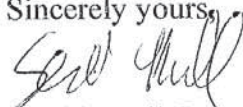
1209-1

book HISTORIC IRON AND STEEL BRIDGES IN MAINE, NEW HAMPSHIRE AND VERMONT (pages 125-126), an indication of its historical importance. In 2002, the NH Division of Historical Resources found, in reviewing an area form for the Boston, Concord & Montreal Railroad, prepared for a railroad bridge in New Hampton, that the surviving portion of the railroad line would be eligible, stating "Given the line's historical significance and intact integrity from Concord to Plymouth, at least that section of the BC&M appears to be eligible for the National Register as a linear transportation district." The DOE Committee decided that more research was needed to determine what to include in such a district, But, the Ashland-Bridgewater bridge, always one of the most important structures on the rail line, would certainly be a major contributing structure in such a district, and would no doubt also be eligible for the National Register as an individual structure.

The Route 3 highway bridge, known locally as Union Bridge, was designed by state highway engineers, fabricated by the American Bridge Company, and erected in 1938, to eliminate sharp turns at each end of the existing bridge and to raise the highway over the railroad tracks in Bridgewater. In 1988, a committee of officials from the State Historic Preservation Office, the N.H. Department of Transportation and the Federal Highway Administration, reviewing the bridge along with other steel deck truss bridges for an HISTORIC BRIDGES INVENTORY, concluded that it had sufficient historical and technical significance and integrity to be inventoried on the National Park Service Registration Form. This was not a determination of eligibility, but it does indicate that the bridge possesses those qualities of significance and integrity that would place it on the National Register.

We believe that the review process for the power line should consider the National Register eligibility of both bridges and should carefully examine the impact of the project on these important historic structures.

Sincerely yours,



David Ruell, Recording Secretary  
Ashland Heritage Commission

1209-1 1209-1 cont'd  
Continued

To: Site Evaluation Committee of NH  
From: Susan E. Percy/R. P. Field Rider  
Date: March 10, 2015

#### Testimony

Southern out-of-staters have instituted a policy to use green energy.

Northern Pass proposes to meet this policy by sourcing Canadian electricity and transmitting it through our North Country. They want it to be cheap.

It is intellectually dishonest to argue that the Northern Pass line that's proposed to be installed in the North Country of New Hampshire must be of towers and overhead hung wires to meet these policy requirements in Connecticut and New Jersey. It is dishonest to say that the cost of burying the remaining and proposed above ground line cannot be borne by the electricity supplier, the transmission company and the ratepayers. That was the same old argument that caused the original proposal to be all of strung wire on above ground towers.

Burying the entire route of transmission lines is a technology that is the single method to be used for other new electricity lines proposed in the Northeast. A buried line is safe infrastructure.

Burying the transmission line arguably increases costs to the electricity supplier, out of state consumers, and to the distributors of the electricity. The electricity suppliers and the electricity distributors want to increase revenues and decreasing expenses by installing inexpensive tower and hung line transmission. Of course they would.

However, landowners and residents and visitors to New Hampshire's North Country majesty are disrespected by this project as proposed. Many people who live in the North Country and most who visit and vacation here do so because of the natural, unspoiled beauty it offers. These folks live and visit and

areas contain variously high and low populations and economic activity that differs from town to town.

Northern Pass's distinction between 'high value' areas and 'low value' areas is disturbing.

Those areas not designated as 'high value' areas are to have low-cost, highly visible towers and hung transmission lines installed there.

By burying the line only in areas currently defined as 'high value' portions of the transmission route, this project dooms the as-yet undesignated 'low value' North Country geography.

The residents and visitors and vacationers to these areas proposed for above ground industrial towers and transmission lines, those of us in the 'low value' areas, would effectively be involuntarily obligated to subsidize the out-of-state users of this electricity and the transmitting companies.

'The high value' areas have higher population count, more economic vitality, more visitation, and more political clout than those relegated to suffer the insidious long-term impact that towers and hung lines cause.

It puts our wellbeing and future prospects in a position subordinate to others in the designated 'high value' areas. More importantly it makes us subordinate to out-of-staters and foreign electricity suppliers who will be the only long term beneficiaries of the inexpensive above ground system of towers and hung transmission lines. The costs Northern Pass 'saves' by installing towers and hung transmission lines will be borne many times over, effectively subsidized, by the areas in which the towers and strung lines are installed.

Though difficult to quantify, these subsidy costs are real costs to New Hampshire and to us. And these costs continue for the decades-long life of the towers.

The incremental expense of burying the remaining proposed above ground tower and hung wire route may be large. But it is an absolute amount that will be capitalized by Northern Pass. It will be depreciated and amortized over a finite period of time at

1215-1

1215-1

Thank you for your comment. The state law cited and the comment concern the role of the New Hampshire Site Evaluation Committee (SEC). While the comment is acknowledged, as discussed in Section 1.7.3.1 of the EIS, the SEC "is a non-federal process in which the DOE has no role." Because the SEC process and the SEC are separate and distinct from the NEPA process and the Department of Energy, the actions requested of the SEC are outside the scope of this EIS.



cost will be measured in a timeframe much shorter than the decades and longer costs to those of us who must live with the physical presence of the towers and lines.

We who live in and visit and value the North Country cannot depreciate and amortize the unburied line impact, the towers, or the visual degradation. That impact doesn't go away. It stays. The subsidy we're being asked to pay, that's being imposed on us, .... is perpetual.

You must deny the proposal, or approve it with the condition that the entire line be buried.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 10, 2016

**ID:** 8732

**Date Entered:** Mar 10, 2016

**Source:** Website

**Topics:** Alternatives, Health and Safety, Vegetation, Wildlife, Water / Wetlands, Soils, Traffic, Quality of Life, Air Quality, Cumulative Effects, Forest Service Lands, Environmental Justice

**Name:** Amanda Hollenbeck

**Organization:** Ms.

**Email:** amandaleehollenbeck@gmail.com

**Mailing Address:** 19 South Spring St

**Mailing Address:** Apt 1

**City:** Concord

**State:** NH

**Zip:** 03301

**Country:** US

**Comment:** I personally think it is a horrible idea to increase destruction of our planet. We don't have another one and just because we can build something doesn't mean we should.

"Construction and operation of the Project could create and/or increase risks related to: spills/leaks of hazardous materials, petroleum products, and hazardous wastes; exposure of contaminated soils or groundwater; damage to underground pipelines and utilities; fire hazards; fire support services; worker safety; EMFs; extreme weather events and natural disasters; and general public safety concerns. These risks could be either short-term impacts from construction or maintenance activities, or long-term impacts resulting from operation of the Project. These risks could impact worker and public safety, as exposure to contaminated materials or a damaged transmission line can be dangerous."

This is taken from the DOE's own document. No thanks! There are too many negative impacts as well as serious risks related to this project. There ARE alternatives in which we can work on diversifying New England's electric supply.

Under all action alternatives, construction of the project would result in emissions of nitrogen oxides, carbon monoxide, and CO2. Vegetation removal and destruction would further increase the environmental impact due to the loss of CO2 uptake capacity. Loss of forest cover from this project

1220-1

Thank you for your comment. Impacts from construction, including the loss of CO2 uptake capacity, are addressed in Section 1.4 of the Air Quality Technical Report and Section 4.1.10 of the EIS.

1220-2

Thank you for your comment. The commenter's opinion regarding the loss of biodiversity is noted. Potential adverse as well as beneficial impacts on biodiversity from the Project are discussed in several sections of the EIS. See, for example, Section 4.1.11 for wildlife and Section 4.1.12 for vegetation, plus related geographic areas. Biodiversity arising from species of concern receives additional consideration due to state and federal laws and regulations. Biodiversity is also discussed in Section 3 in the Technical Reports for wildlife and vegetation.

| 1220-1

| 1220-2

could result in long-term loss of biodiversity. Invasive plant species could be introduced and spread due to this project. Fragmentation of contiguous vegetation communities and mature blocks of forest associated with this project is a major concern of mine since many species rely on contiguous lands. Water resources affected by construction would include watersheds, surface water, groundwater, floodplains, and wetlands.

We should try to keep our energy local. There is plenty of wind here in New England! What about solar? Improving efficiency is commonly overlooked, but yet it is the easiest and most environmentally friendly way (in part) to confront this problem. How tight are most houses in NH? How many are losing heat in the winter due to inadequate design or insulation? How many outdated appliances are currently in use? There could be more incentives for people to update their appliances and tighten up their home and businesses.

I strongly oppose all alternative actions for this project because of its destructive nature - in light of alternatives like solar, efficiency, wind and everything else. Again, just because we can, doesn't mean we should.

| 1220-3

1220-3

| 1220-4

Thank you for your comment. Potential impacts from invasive plant species are noted in Sections 4.1.12 and 4.5.12 of the EIS. The Applicant has committed to Applicant-Proposed Impact Avoidance and Minimization Measures to minimize the introduction or spread of invasive species during construction and operation of the Project (see Appendix H of the EIS). Related measures are listed under the categories of soils, vegetation, water resources and floodplains, wetlands, and invasive species. Invasive species are also discussed in the Vegetation Resources Technical Report. USFS standards and guidelines require permittees to prevent introduction of invasive species and to have plans to control such species (see Appendix F of the EIS).

1220-4

Thank you for your comment. The discussion of impacts resulting from habitat fragmentation was checked to ensure potential impacts are adequately accounted for in the impact discussion. The following sections of the final EIS were updated: final EIS Section 2.5.11 and for the Wildlife Technical Report in Sections 4.1.11 (Environmental Impacts, General Environmental Impacts, Wildlife); 4.2.11 (Environmental Impacts, Northern Section, Wildlife), 4.3.11 (Environmental Impacts, Central Section, Wildlife), 4.4.11 (Environmental Impacts, Southern Section, Wildlife), and 4.5.11 (Environmental Impacts, WMNF Section, Wildlife).

**Linda Upham-Bornstein, Ph.D.**

185 Mount Prospect Road  
Lancaster, New Hampshire 03584  
Email: lubornstein@gmail.com

March 11, 2016

Mr. Brian Mills  
National Electricity Delivery Division  
Office of Electricity Delivery  
and Energy Reliability  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585

Dear Mr. Mills:

Re: Proposed Northern Pass Transmission Line

Having reviewed the *Supplement to the Draft Northern Pass Transmission Line Project Environmental Impact Statement* (Supplemental EIS), I am writing to advise you of my continued strenuous opposition to the proposed Northern Pass Transmission Project, which the Supplemental EIS refers to as Alternative 7. I object to the construction of an above-ground transmission line across nearly 130 miles of New Hampshire for the personal and public policy reasons that I articulated in my September 6, 2015 letter to the New Hampshire Site Evaluation Committee, a copy of which I attach hereto and incorporate by reference herein. I urge the Department of Energy to deny a Presidential Permit for the Northern Pass Project as proposed.

The Supplemental EIS confirms that Alternative 7 is not in the public interest and that full burial of any transmission line pursuant to Alternative 4a will create many more public benefits and cause much less harm to the public than Alternative 7. For example, Alternative 4a will generate far greater economic benefits than Alternative 7 in that full burial of the entire transmission line under Alternative 4a will create 46% more annual construction jobs over three years and 50% more permanent FTE jobs, will have 50% more annual economic impacts and nearly 50% more economic impacts from construction, and will generate 54% more statewide annual property tax revenues than the proposed transmission project under Alternative 7. (Supplemental EIS, 6 – 7) In contrast, Alternative 7 will cause considerably greater environmental damage than Alternative 4a in that (1) the loss of carbon dioxide uptake from vegetation removal and the resulting adverse impacts on air quality will be six times greater, (2) the adverse impacts to wildlife and vegetated habitats will be four times greater, (3) the negative impacts to forest lands will be almost seven times greater, and (4) the disturbance to prime and important farmland will be twice as much. (Supplemental EIS, 15 – 17, 22)

I request that the Department of Energy deny a Presidential Permit for the Northern Pass Project as proposed in Alternative 7 and that it consider granting a permit only if the entire transmission line is buried in accordance with Alternative 4a.

Sincerely,

Linda Upham-Bornstein, Ph.D.

1221-1

Thank you for your comment. The socioeconomic consequences of the Project are analyzed in detail in Section 4.1.2 of the EIS. The analysis presented in the final EIS was updated to reflect current market conditions and inputs.

1221-2

Thank you for your comment. Section 4.1.10 specifically addresses both construction emissions and the potential loss of CO2 uptake as a result of vegetation removal, by alternative. This section of the EIS as well as the Air Quality and Greenhouse Gas Technical Report were updated using current (January 2017) Project parameters and assumptions. While there is a difference between the alternatives, all action alternatives could result in a net benefit to air quality and greenhouse gas (GHG) emission totals (see Section 4.1.10.2) within the ISO-NE region as a result of the reduction in fossil fuels needed for electricity production.

1221-3

Thank you for your comment. Chapter 4 of the EIS and Section 3 of the Wildlife Technical Report summarizes impacts to wildlife from construction of the Project under a variety of alternatives that have varying lengths of aboveground and burial sections.

1221-1

1221-4

Thank you for your comment. A general discussion of potential impacts to vegetation is provided in Section 4.1.12 of the EIS, with more detail provided under each alternative in each geographic section. Comparisons of vegetation impacts among alternatives are also summarized in Section 3, Table 23, of the Vegetation Resources Technical Report.

1221-2

1221-3

1221-4

1221-5

1221-5

Thank you for your comment. Impacts to prime and important farmlands are discussed in EIS Section 4.1.14 (and related geographic areas) and Section 3 of the Geology and Soils Technical Report. Impacts under Alternative 4a and Alternative 7 are outlined throughout Sections 4.1.14, 4.2.14, 4.3.14, 4.4.14, and 4.5.14 of the EIS. The commenter correctly notes that Alternative 7 would have a greater impact on prime and important farmlands than Alternative 4a. The EIS process is intended to analyze and evaluate potential project impacts to a variety of resources.

The U.S. Department of Energy hearings on the Draft Environmental Statement (DEIS) for Northern Pass.  
Whitefield, Friday, March 11, 2016

Question for Northern Pass Project:

What is the expected annual return on assets and the expected annual return on equity of the Northern Pass Project (1) as currently proposed and (2) if the entire transmission line is buried? Please answer this question directly and with specificity; Northern Pass has run these numbers and has this financial information in its possession. If Northern Pass is going to contend that burial of the entire transmission line makes the Project not economically viable, interested parties and the public are entitled to disclosure of the financial and other information that forms the basis for its contention so that they can evaluate the reliability of that information and challenge it.

Submitted by,  
Linda Upham-Bornstein, Ph.D.  
185 Mount Prospect Rd.  
Lancaster, NH

1221-6

Thank you for your comment. Socioeconomic impacts for all of the alternatives are addressed within Section 4.1.2 of the EIS. This section additionally provides the ability to compare estimated project construction costs for all alternatives evaluated. The EIS analysis does not attempt to determine the proponent's return on investment or temporal requirement to achieve a return, as this is beyond the scope of this EIS.

1221-6

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Feb 3, 2016**

**ID:** 8691

**Date Entered:** Feb 3, 2016

**Source:** Website

**Topics:**

**Organization:**

**Comment:** Dear DOE,

When the federal government announced tougher power plant emissions regulations, I believed it was good for New Hampshire, and also a compelling case for approving the Northern Pass. My opinion has not changed and I urge others to support Northern Pass because it will dramatically lessen emissions and ease our impending energy crisis.

According to ISO New England, our region faces an aging stock of power generators. Plants that currently produce nearly 4,200 megawatts will retire by June 2019. Our dependence on natural gas for electricity is already too high. Approximately 50% of our power today is generated by burning natural gas, which leaves us vulnerable to wild price spikes in the winter when natural gas goes first to heating.

We need to make up for the thousands of megawatts being lost by the closing of Vermont Yankee, Pilgrim Nuclear Power Plant and coal-fired facilities across the region. But we need environmentally friendly alternatives that diversify our power sources. Hydroelectricity is a clean, renewable solution.

By delivering 1,090 megawatts to our grid, Northern Pass is just one way we can begin to solve our energy shortage. Best of all, unlike some proposals that would have ratepayers foot the bill for new infrastructure, Northern Pass' construction will be paid for entirely by the private developers.

I hope that other NH residents and energy regulators will support Northern Pass because it is a strong option to provide the affordable, environmentally friendly energy that New England desperately needs.

Christine Hagen

1236-1

Thank you for your comment. The commenter's opinions are noted regarding the current energy market in New England as well as support for the Project.

1236-1

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Apr 4, 2016**

**ID:** 9211

**Date Entered:** Apr 4, 2016

**Source:** Website

**Topics:** Vegetation, Wildlife

**Organization:** Northern Pass Transmission LLC

**Email:** maryanne.sullivan@hoganlovells.com

**Mailing Address:** 781 N. Commercial Street

**City:** Manchester

**State:** NH

**Zip:** 03101

**Country:** US

**Comment:**

**COMMENTS OF NORTHERN PASS TRANSMISSION LLC  
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT  
WILDLIFE AND VEGETATION ANALYSIS**

Northern Pass Transmission LLC (“Northern Pass” or the “Project”) submits this comment on the analysis contained in the U.S. Department of Energy (“DOE”) Draft Environmental Impact Statement (“DEIS”) of the impacts of the Project on wildlife and vegetation in the Project area. In support of its permitting application to the New Hampshire Site Evaluation Committee (“SEC”), Northern Pass undertook a parallel analysis to that performed for the DEIS of the potential for the Project to affect wildlife and vegetation.<sup>1</sup> There is a high degree of agreement in the key findings of DOE’s team of experts and those of the Northern Pass team. However, it is also not surprising that the two teams of experts have made differing findings in some respects. The purpose of this comment is to point out where there may be some issues that the DEIS team should be informed of and to identify areas where some clarification may be warranted.

**Wildlife**

Northern Pass agrees with the conclusion of the DEIS that its Project is not likely to have long-term adverse effects on wildlife. Northern Pass further agrees that, for the federally listed species that may be found in the Project area including Canada lynx (*Lynx Canadensis*), northern long-eared bat (*Myotis septentrionalis*), Karner blue butterfly (*Lycaeides melissa samuelis*), and small whorled pogonia (*Isotria medeoloides*), the Section 7 consultations under the Endangered Species Act, combined with the Best Management Practices (“BMPs”) that Northern Pass has committed to implement to avoid, minimize and mitigate any impacts, will ensure that the Project is not likely to have adverse effects on those listed species.

The DEIS includes in Section 3.1.11 a comprehensive table of the migratory bird species found in New Hampshire. The DEIS indicates that many of them could occur in all four sections into which the DEIS divides the Project for analysis. Northern Pass believes, based on its knowledge of the range and habitat preferences of New Hampshire birds, that this overstates the likely presence of the listed bird species along the Project route. A number of the listed species are alpine species (Bicknell’s, American pipit), and the GIS analysis and field work Northern Pass team performed reveals that there is no suitable alpine habitat for such species along most (and perhaps all) of the right-of-way (“ROW”). Similarly, the DEIS suggests that Fowler’s toad may occur in multiple sections of the Project route, but its range, based on current and historic

<sup>1</sup> See <http://www.northernpass.us/assets/filings/Volume%20XXX/Appendix%2035%20Rare%20Threatened%20and%20Endangered%20Plants%20and%20Exemplary%20Natural%20Communities%20Report%20Redacted.pdf>; <http://www.northernpass.us/assets/filings/Volume%20XXXI/Volume%2031%20-%20Wildlife%20Report%20and%20Impact%20Assessment%20Redacted.pdf>.

1257-1

Thank you for your comment. As indicated in the comment, Chapter 4 of the EIS and Section 3 of the Wildlife Technical Report summarize impacts to Canada lynx, northern long-eared bat, Karner blue butterfly, and small whorled pogonia from construction and operation of the Project. Also, Appendix H (Applicant-Proposed Impact Avoidance and Mitigation Measures) of the EIS summarizes the Applicant-Proposed Impact Avoidance and Minimization Measures that Northern Pass has committed to in order to minimize impacts to protected species. As stated in Section 1.7.3.1 of the EIS, in addition to the DOE review of the project under NEPA, DOE acknowledges the Applicant must receive approval for the project from the State of New Hampshire’s Site Evaluation Committee and obtain all federal and state regulatory authorizations/permits pertaining to wildlife prior to construction.

1257-2

Thank you for your comment. Section 2.1, Affected Environment, New Hampshire, of the Wildlife Technical Report explicitly states, "species whose habitat is not present within the study area, such as alpine or marine/estuarine species are not discussed in this Technical Report and, therefore, have been removed from Table D-1 in Appendix D." The American pipit is mentioned in Table 2 (Protected Species in New Hampshire and Their Potential Occurrence within the Project Sections), Table 14 (Summary of Federally and State Listed Protected Bird Species Potentially Present in the Project), Table 37 (Protected Species in New Hampshire and the Primary Construction-Related Effects) and Table 39 (Listed Species in New Hampshire and the Primary Operation and Maintenance-Related Effects) of the Wildlife Technical Report. A footnote has been added to Tables 2 and 14 for this species indicating that no alpine habitat is traversed by the project. Bicknell's Thrush is discussed throughout the Wildlife Technical Report. However, as indicated in Section 2.2.4.1.1 (Federally Listed Species, Birds), of the Wildlife Technical Report, DOE conducted species-specific surveys for Bicknell’s thrush in two areas within the Northern Section in June 2014 where habitat modeling suggested the habitat was suitable for the species. These areas were in the Northern Section at higher elevations; no Bicknell’s thrushes were detected. Lastly, both the Wildlife Technical Report and the final EIS have been updated to show the Fowler's toad only occurring in the Southern Section of the project.

1257-1

1257-2



records as published in the Wildlife Action Plan, includes only the southern section of the Project area.

When the Northern Pass team undertook its fresh water mussel survey, it did so pursuant to a work plan approved by the New Hampshire Fish and Game Department and US Fish and Wildlife Service. That work plan called for Northern Pass to sample the subset of perennial streams or rivers with expected Project-related access road crossings or tree clearing, as well as known or potential habitat for dwarf wedgemussel (*Alasmidonta heterodon*), brook floater (*Alasmidonta varicosa*), and eastern pearlshell (*Margaritifera margaritifera*). It appears that the mussel survey described in the DEIS included sampling of all streams that were of sufficient size to support mussels and that would be crossed by any of the alternatives. It is thus not surprising that the DEIS survey team found more listed species.

Where the mussel survey stations sampled by the Northern Pass team and the DEIS team overlapped, the findings were generally similar, except for the Soucook River, where the DEIS survey revealed several mussels of a rare species, and the Northern Pass survey found only common species. Northern Pass then completed a follow-up survey in the Soucook River in the vicinity of the existing ROW, and found one listed mussel that we had not previously observed. However, Northern Pass anticipates no impacts on the mussel population in the Soucook River. The Best Management Practices (“BMPs”) and other standard protective measures that Northern Pass has committed to implement will protect the integrity of the river banks and ensure no degradation of water quality over either the long- or short-term that might have an adverse effect on mussel populations.

The DEIS appropriately does not include a fish survey, nor does it model potential increases in water temperature. However, the DEIS acknowledges that vegetation clearing near rivers and streams associated with the Project could have an effect on water temperatures, which in turn could have an adverse effect on the fish population. Northern Pass agrees with that conclusion and also with the conclusion in the DEIS that Project commitments to employ erosion and sedimentation control BMPs, restore stream crossings and comply with all applicable federal and state regulations should ensure that the Project has minimal effects on aquatic resources.

Northern Pass further notes that, while such level of detail is not appropriate in an EIS in support of its application to the New Hampshire Site Evaluation Committee (“SEC”), it undertook a detailed fish survey and temperature study. Its combined approach of temperature data collection and SSTEMP modeling (a USGS freeware program that allows the user to input site specific habitat and water quality parameters and generate estimated temperature increases for short stream reaches) will enable the Project and the New Hampshire Fish and Game Department to assess impacts to coldwater fisheries under proposed conditions, thus facilitating

1257-2 cont'd

1257-2  
Continued

1257-3

1257-3

Thank you for your comment. For the purpose of documenting the effects of the project on mussels under NEPA, the surveys conducted by DOE's consultant were adequate, and, as noted in the comment, resulted in similar findings. Both the EIS and the Wildlife Technical Report include Applicant-Proposed Impact Avoidance and Mitigation Measures that state, "The Applicant will comply with other protective measures identified during consultation with the relevant state and federal agencies and as specified in permit conditions." As stated in Section 1.7.3.1, New Hampshire Site Evaluation Committee, of the EIS, in addition to the DOE review of the project under NEPA, DOE acknowledges the Applicant must receive approval for the project from the State of New Hampshire's Site Evaluation Committee and obtain all federal and state regulatory authorizations/permits pertaining to wildlife prior to construction.

1257-4

1257-4

Thank you for your comment. As indicated in the comment, Section 4 (Environmental Impacts) of the EIS and Section 3 (Direct and Indirect Environmental Consequences) of the Wildlife Technical Report summarizes impacts to fish from construction of the Project. Also, Appendix H of the EIS summarizes the Applicant-Proposed Impact Avoidance and Mitigation Measures that Northern Pass has committed to minimize impacts to water resources and general and protected aquatic protected species.

1257-5

1257-5

Thank you for your comment. As stated in Section 1.7.3.1 of the EIS, in addition to the DOE review of the project under NEPA, DOE acknowledges the Applicant must receive approval for the project from the State of New Hampshire's Site Evaluation Committee and obtain all federal and state regulatory authorizations/permits pertaining to wildlife prior to construction.

the identification of impact avoidance, minimization, and mitigation measures during Project design.<sup>2</sup>

### Vegetation

Northern Pass concurs with the conclusions in the *Vegetation Technical Report* accompanying the DEIS that: i) “no population level impacts are expected” to rare plants; and ii) the Project “may impact individuals but is not likely to result in a trend towards federal listing or loss of viability” of any plant species. Nevertheless, there are some differences between DOE’s Technical Report and the Northern Pass vegetation reports that should be noted, and some clarifications in the Final EIS may be warranted.

It is not clear whether DOE’s technical vegetation consultant obtained information on Exemplary Natural Communities in the Project Area from the New Hampshire Natural Heritage Bureau (NHB), as Northern Pass did. In New Hampshire, only the NHB can designate a community as Exemplary. If it has not done so, DOE may wish to obtain this confidential information from NHB. Any plant community that the DOE’s consultant believes could be exemplary based on field data and could be described as a potential exemplary natural community, should be reviewed and confirmed by NHB.

The technical report states that one state-listed plant, beaked sedge (*Carex rostrata*), was “potentially” found in the Project area in Whitefield. The vegetation consultants for the DEIS apparently observed a single plant and were not able to confirm the identification because they could not collect a sample. Northern Pass did not find this plant, but it would be helpful to know exactly where it was found, so that Northern Pass could take appropriate steps to protect it during construction. The DEIS team found one other state listed species along the Project route, wild lupine (*Lupinus perennis*, ST). Northern Pass also found spiked needle grass (*Aristida longespica* var. *geniculata*, SE), blunt-leaved milkweed (*Asclepias amplexicaulis*, ST), and licorice goldenrod (*Solidago odora*, SE), species that the DEIS does not identify as present. Knowing the location of these species is critical so that construction impacts can be avoided and minimized to the extent practicable, and the temporarily disturbed areas restored appropriately, as Northern Pass has proposed. Impacts to these species would be greater under Alternative 3, the underground route in the existing ROW, than in Alternative 7, the route that Northern Pass now proposes, which combines overhead in the ROW with underground in state roads.

While the conclusions in the DEIS with respect to impacts to non-exemplary plant communities are in most respects generally reasonable, the calculations with respect to the size of the areas that may be affected seem to be substantially overstated, and the DEIS does not

<sup>2</sup> <http://www.northernpass.us/assets/filings/Volume%20XXIX/Appendix%2033%20Fisheries%20and%20Aquatic%20Invertebrates%20Resource%20Report%20and%20Impact%20Analysis.pdf>.

1257-5 cont'd

1257-5  
Continued

1257-6

Thank you for your comment. Both the EIS (Section 3.1.12) and the Vegetation Resources Technical Report (Section 1.4.5) note the use of information from New Hampshire Natural Heritage Bureau, including exemplary natural communities. The commenter’s suggestion is noted regarding identification of exemplary communities and subsequent notification of Natural Heritage Bureau. For each geographic section, exemplary natural communities within each alternative study area are presented throughout Chapter 4 of the EIS and in Section 3 of the Vegetation Resources Technical Report. During field surveys, DOE’s consultant did not identify any additional exemplary natural communities that would need review or confirmation by Natural Heritage Bureau.

1257-6

1257-7

Thank you for your comment. The plant species of concern considered and detected during field surveys for the EIS are described in general in Section 3.1.12 of the EIS. The wild lupine (state threatened) and beaked sedge (state endangered) were identified as occurring in the Project corridor. Section 3 of the Vegetation Resources Technical Report notes that plant species inventories can prove the presence of a species, but at the geographic scale of the surveys required for the Project, inventories cannot prove the absence of a species with certainty, i.e., the possibility exists that other state-listed plant species may have missed detection. The Technical Report considered the potential occurrence of other state-listed plant species that were provided by New Hampshire Natural Heritage Bureau (NHNHB), including spiked needle grass and blunt-leaved milkweed, but did not consider licorice goldenrod (see Appendix B of the Technical Report) because it was not on the list provided by NHNHB. The Applicant has agreed to a variety of measures to avoid impacts to species of concern to the extent practicable (see Appendix H of the EIS). The locations of species of concern and their habitat would be treated as confidential and the identity and precise location of rare species will not be revealed on construction drawings, but will be provided to the Applicant prior to construction. DOE does not have siting authority for the Project. In this case, the New Hampshire Site Evaluation Committee has siting authority for the Project in the state of New Hampshire. Additionally, the USFS has siting authority for portions of the Project located in the White Mountain National Forest. (For further discussion, see Sections 1.1-1.3 of the final EIS.)

1257-7

1257-8

1257-8

Thank you for your comment. The vegetation analysis in the final EIS and Vegetation Resources Technical Report has been updated to represent more detailed project design and disturbance calculations. In particular, additional detail is now available regarding the area of permanent and temporary disturbance for towers.

1257-8 cont'd

explain how they were derived. For example, on page 107 of the Vegetation Technical Report the DEIS identifies 45 acres of permanent loss of vegetation communities associated just with “towers” in the southern section alone. This is distinguished from the estimated 82 acres of conversion of forested communities in the section of newly cleared ROW. The additional permanent vegetation loss from the structures alone would be limited to the foundation footprints, which are 7 to 12 feet in diameter. This will be far less than the estimated 45 acres of impact.

The technical report associated with the DEIS appears to assume that burying the transmission line in public roadways would require clearing trees and wetlands. For example, in its description of the impacts of Alternative 5c, the DEIS states: “If the cable were to be buried in the road shoulder, 16 acres of the 31 acres impacted are mowed ROW, 8 acres are forested habitats and 0.5 acres are wetland communities. The forestlands would be permanently removed, although many areas would return to a scrub-shrub/young sapling state, providing many important functions of wildlife habitat, prior to being cleared again.” This conclusion is contrary to Northern Pass’ plans for construction. Only along I-93, because of the special rules associated with construction along an interstate highway, would construction along a public road impact currently undisturbed areas. *See* Northern Pass Comment on DEIS dated January 11, 2016. This is among the reasons that Northern Pass does not support construction of the Project along the I-93 corridor. Northern Pass has selected public roads for the underground portion of the route it now proposes (Alternative 7) because it will be able to limit construction to already disturbed areas without mature or natural vegetation communities.

1257-8  
Continued

1257-9

Thank you for your comment. The vegetation analysis in the EIS and Vegetation Resources Technical Report has been updated to represent more detailed project design and disturbance calculations to reflect the details about road burial construction techniques that had not been submitted by the applicant at the time of the publication of the DEIS. In particular, additional detail is now available regarding the area of permanent and temporary disturbance and road burial location. Section 4.1.12.1 of the EIS describes the assumptions used to evaluate impacts to vegetation.

1257-9

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Mar 21, 2016**

**ID:** 8754

**Date Entered:** Mar 21, 2016

**Source:** Website

**Topics:** Wildlife

**Name:** Paul Doscher

**Organization:** NH Council of Trout Unlimited

**Title:** Secretary

**Email:** padoscher@comcast.net

**Mailing Address:** 274 Poor Farm Road

**City:** Weare

**State:** NH

**Country:** US

**Comment:** Please see the attached comments from the New Hampshire Council of Trout Unlimited.



March 16, 2016

Brian Mills  
*Senior Planning Advisor*  
Office of Electricity Delivery and Energy Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585

**Comments on the Northern Pass DEIS from NH Trout Unlimited Council**

The NH State Council of Trout Unlimited (TU), is pleased to offer comments and our recommendations related to the Northern Pass Draft Environmental Impact Statement.

TU is the nations largest coldwater conservation organization, with 155,000 members nationwide and approximately 1600 members in New Hampshire. TU's Mission is to protect, restore, reconnect and sustain the nations coldwater fisheries and employs over 200 staff in locations across the nation who work on science based habitat projects in collaboration with federal, state and local government, businesses and private landowners. Our members volunteer more than 615,000 hours of time annually in this effort.

There are 8 chapters of Trout Unlimited in New Hampshire and the State Council acts as the coordinating body for the chapters and addresses issues of statewide

significance to our coldwater fisheries. Angling is a major form of outdoor recreation in New Hampshire, and TU regularly works with New Hampshire Fish and Game to both promote responsible angling and improve habitat for our coldwater species.

#### Comments on the Northern Pass DEIS:

TU's principle concern regarding Northern Pass is the potential impact native and wild Eastern Brook Trout (EBT), a species of "Greatest Conservation Need" in the 2015 NH Wildlife Action Plan. The EBT has also been a focal species for extensive interagency and NGO research (See the Eastern Brook Trout Joint Venture. <http://easternbrooktrout.org>) because of its dramatic declines throughout its original range. While EBT has been eliminated through much of its range, northern New England remains a relative stronghold for this fish and an area where habitat protection and restoration are deemed especially important.

TU employs a scientific staff that has done extensive research on the impacts of climate change on coldwater species, including EBT. It is now clear that as the climate warms, trout are especially at risk because of their temperature limited habitat requirements. For example, EBT are known to become temperature stressed at levels exceeding 65 degrees F, and mortality can result when temperatures remain above 70 degrees F for any extended period.

The DEIS appears to make no mention of the potential impacts to EBT from above ground transmission corridors that cross small, coldwater tributaries of our major streams. Recent research by NHEF, the White Mountain National Forest and others has demonstrated that these coldwater streams are critical cold-water refugia for EBT and other species during hot summer periods, when larger stream temperatures exceed the requirements of EBT.

These small streams often remain cold primarily because of complete canopy cover from the forested landscape. Where canopy cover is eliminated, on warm sunny days, solar radiation can create stream temperatures that exceed that needed for EBT. This can have two negative impacts: First the sun exposed streambed and stream water become too warm for EBT survival. Second, this "pulse" of warm water travels downstream making additional distances of stream habitat too warm for EBT survival. This can result in both mortality of small "young of year" EBT and prevent larger fish from travelling upstream to colder water refuges.

If such clearings are temporary, and trees are permitted to re-grow and provide shade, the impact can be short term (measured in years), but if power line corridors are frequently cut to keep vegetation low, the impact can be permanent, resulting in the loss of both upstream and downstream EBT habitat.

Based on a review of the maps provided by Northern Pass, it appears that no less than 4 cold water tributaries of the Upper Connecticut River and 8 cold water

1265-1

Thank you for your comment. The Eastern Brook Trout (EBT) was added to Tables 3-14 and 4-61 of the final EIS, as the EBT is now considered a Species of Greatest Need of Conservation (it was not listed during preparation of the draft EIS); additional discussion regarding impacts from thermal loading was also included in these sections of the final EIS. Potential thermal impacts from tree clearing are also considered in Section 4.2.13 in the subsection for Surface Water. In the Wildlife Technical Report, Tables 2, 37 and 39 were revised to include the EBT as a SGNC species. Additional discussion regarding impacts from loss of riparian areas was also added to Sections 3.1.1.1 and 3.2.2.1.1 of the Wildlife Technical Report.

1265-1

tributaries to the Androscoggin River will be impacted by new above ground power line corridors and will be subject to the above mentioned exposure to temperature impacts. It is likely that there are more small headwater streams that may be affected by the corridor that do not appear on the maps, because they are small enough not to be shown on the scale of the maps provided.

Further, it appears that north of the White Mountain National Forest, the maps provided show at least an additional 19 stream crossings by the existing power line corridor to be used by Northern Pass that could be impacted if the cleared right of way is expanded. Further south, the maps show approximately 22 tributary stream crossings north of Concord. As stated previously, coldwater tributary streams in the northerly portions of the state are in most cases the highest quality EBT habitat remaining in the state. (Note: the materials supplied by Northern Pass for their NH SEC application indicate a larger number of crossings of perennial streams than appear on the maps provided on the Northern Pass web site)

We do not know the specific impacts on individual streams as the DEIS fails to discuss this issue at all. In fact, the DEIS says:

*(Alternative 2) "Impacts to aquatic species could result from direct mortality or injury to individuals and sensory disturbance. With implementation of the APMs (Applicant Proposed Measures) listed in Appendix H, such as the implementation of a SWPPP (Storm Water Pollution Prevention Plan) , avoidance of in-stream disturbance, and restoration of aquatic habitat following construction impacts to aquatic species as a whole would be minimized"*

TU feels that the thermal impacts of clearing the right of way is a substantial missing component in the DEIS and wonders whether DOE even considered this thermal impact on EBT and other coldwater dependent species in the preparation of the DEIS. This issue is neither mentioned in any of the evaluations of the alternatives nor is it listed among the issues dismissed from consideration.

TU's Preferred Alternative:

It is clear that any construction alternative has the potential to create short term impacts on EBT and other coldwater species. Storm events that overwhelm the SWPPP measures are not uncommon and climate change has increased the frequency of such events in the past few decades.

Because any construction poses short term impacts, TU is primarily concerned that whatever Alternative is chosen, that Best Management Practices not only be proposed, but diligently adhered to at every stage of construction.

Our concern about longer-term impacts is greatest for the above ground Alternatives. We specifically note that the DEIS shows that the amount of land area that would be impacted by the project is greatest for the applicants preferred alternative, Alternative 2.

1265-1 cont'd

1265-1  
Continued

1265-2

Thank you for your comment. The Eastern Brook Trout (EBT) was added to Tables 3-14 and 4-61 of the final EIS, as the EBT is now considered a Species of Greatest Need of Conservation (it was not listed during preparation of the draft EIS); additional discussion regarding impacts from thermal loading was also included in these sections of the final EIS. Potential thermal impacts from tree clearing are also considered in Section 4.2.13 in the subsection for Surface Water. In the Wildlife Technical Report, Tables 2, 37 and 39 were revised to include the EBT as a SGNC species. Additional discussion regarding impacts from loss of riparian areas was also added to Sections 3.1.1.1 and 3.2.2.1.1 of the Wildlife Technical Report.

1265-2



1265-2 cont'd

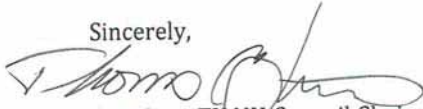
For example, in the Northern Section, (where EBT populations are strongest and currently the highest quality EBT habitat in NH is found) the DEIS states:

*"... removal of 64 acres (26 ha) of various forest types, including conifer, deciduous and mixed hard/softwood forests, within 100 feet (30 m) of a stream would result in secondary impacts to surface waters. "*

Underground alternatives, have considerably lower long term impacts on surface waters, and in most cases (except where roads are not used) would occur in already disturbed areas. The underground alternatives clearly pose a lower long-term threat to coldwater fisheries, given the much smaller area of watershed that would be affected by construction.

**In light of the above concerns, the NH TU Council strongly urges the DOE to select one of alternatives 4a, b, c, 6a or 6b as the preferred alternative.** Further we oppose the construction of the proposed above ground transmission line anywhere in Coos or Grafton County and any other location where existing wild and native EBT populations are most robust and where above ground construction has the greatest potential to negatively effect this species of special concern.

Sincerely,



Tom Ives, TU NH Council Chair  
On behalf of the NH TU Council

Cc: Dr. Jack Williams, Chief Scientist, Trout Unlimited  
Dr. Shawn Rummell, Field and Research Manager, Trout Unlimited  
Keith Curley, Vice President for Eastern Conservation, Trout Unlimited

1265-2  
Continued

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 12, 2016

**ID:** 8735

**Date Entered:** Mar 12, 2016

**Source:** Website

**Topics:** Vegetation, Wildlife, Environmental Justice

**Name:** pamela martin

**Organization:**

**Email:** martinp003@gmail.com

**Mailing Address:** 280 Old Hebron Road

**City:** Plymouth

**State:** NH

**Zip:** 03264

**Country:** US

**Comment:** Eversource has made the claim that this project is clean renewable energy. That is not true. Conservation New Hampshire, Nature Conservancy, Sierra Club, Greenpeace, Environment Connecticut, Environment Council of Rhode Island, Clean Water Action, New England Clean Energy Council, Vermont Natural Resources Council, Pew Environmental Group, International Rivers Network, Natural Resources Defense Council, Nature Quebec, Manitoba Wildlands, Canadian Parks and Wilderness Society, Rivers Foundation, Union of Concerned Scientists, National Institute for Research, Friends of the Earth, The Energy Justice Network, The Indigenous Environmental Network, Wittenberg Center for Alternative Resources, and Alliance Romaine. These are all environmental organizations that have all come out in opposition to industrial hydroelectricity. According to the Hydropower Reform Coalition, a consortium of 150 conservation, recreation and faith organizations oppose industrial hydro power due to its effect on the ecosystem. It is not clean energy and does nothing to combat global climate change. In fact it contributes to it.

International Rivers Organization: "Dams ravage floodplains which are among the richest and most productive ecosystems on Earth. Freshwater systems such as rivers, wetlands and lakes are already more seriously affected by species extinction than any other major ecosystem, and dams are one of the main reasons for this." The Canadian boreal forest is being destroyed even faster than the Amazon Rain forest.

1273-1

Thank you for your comment. Potential impacts in Canada from the construction and operation of electricity infrastructure, including hydropower generation and transmission in Canada, are beyond the scope of this NEPA analysis. NEPA does not require an analysis of potential environmental impacts that occur within another sovereign nation that result from actions approved by that sovereign nation. Additionally, the construction and operation of Hydro-Quebec power generation projects and electricity transmission line projects in the bulk Hydro-Quebec system will occur regardless of and independent to whether DOE issues a Presidential permit for the proposed Northern Pass Project international border crossing. For these reasons, potential environmental impacts in Canada are not addressed in this EIS. Section 1.5.4.1 of the Final EIS has been updated in response to this comment.

1273-1

Patrick McCully, Executive Director of the International Rivers Network: "Canada should not destroy its rivers for electricity or for dollars from exporting electricity to the US. Both countries have massive potential for reducing electricity use through improving efficiency and for replacing dirty coal plants with clean renewables such as wind and sustainable biomass."

Joel Heath, University of British Columbia: "None of these dams [built for U.S. export markets] have any water management policies whatsoever." Dr. Heath said he wishes his American neighbors understood what was taking place to the north before rushing headlong into buying power many would view as clean or renewable. "A lot of these projects are being greenwashed as renewable energy, but they're not really. They're destroying river systems."

Union of Concerned Scientists website: Global warming emissions are produced during the installation, operation and dismantling of hydroelectric power plants.

Éric Duchemin, a consultant for the Intergovernmental Panel on Climate Change: "The green image of hydro power as a benign alternative to fossil fuels is false. Everyone thinks hydro is very clean, but this is not the case."

John Bennett of Sierra Club Canada opposes the Northern Pass project. Bennett said building out this transmission corridor only "undermines" the world's energy future and "hooks people to the past. Power should be generated close to where it's being used.

Manitoba Wildlands Director, Gaile Whelan Enns: "It is now well recognized that building dams, with power lines – and reservoirs, destroys boreal, taiga and tundra ecosystems; affects fish populations and wildlife habitat; causes mercury contamination in fish, in humans, and in wildlife that eat fish."

Industrial hydro electricity is not considered renewable by the state of New Hampshire. The only option for Northern Pass is the NO BUILD option.

1273-2

Thank you for your comment. As stated in Section 1.7.3.1 of the EIS, in addition to the DOE review of the project under NEPA, DOE acknowledges the Applicant must receive approval for the project from the State of New Hampshire's Site Evaluation Committee and obtain all federal and state regulatory authorizations/permits pertaining to wildlife prior to construction.

1273-2

I'll try to hang in there. My name is Linda McDermott, and I own property in Franconia. We went to Franconia where we spent our honeymoon 23 years ago. We fell in love with the laidback culture and peacefulness of the town and the serenity of the sounding mountains. This is emotional talking. MR. KERVITSKY: Take your time. MS. MCDERMOTT: We talked about retiring here or nearby, and we soon purchased a home that we can enjoy the mountains now and into our retirement. It was difficult finding a home in the area. However, because we were careful to avoid the power line rubble and always referred to the Northern Pass, what's happening in your town. We drove around quite a bit and we looked at homes, we'd see the power lines and we felt pretty sad for the homeowners. But anyways. So Franconia wasn't being affected so we felt safe with our purchase. Now Northern Pass is proposing to build underground throughout the town of Franconia. While I'm somewhat okay with that because there won't be ugly towers, I feel it would be an unnecessary disruption to the small quiet town when there is less populated and straighter less expensive alternative routes available. I feel the entire Northern Pass should be buried. Also along 116 where they want to bury the pass, there is an extensive network of wetlands that bear, moose, deer, beaver, I'm sure other animals, live and nest that would be affected by disrupting the ground there. When Hydro-Quebec decided to send electricity to enter the US, I felt, I feel it chose the least expensive way to do so thinking it would be easy, passive New Hampshire. I feel Hydro-Quebec knew the underground cost and avoided it just so it could get the job off the ground and it started using money to influence people. In this day and age, it is preposterous to me that these lines are not underground. Other companies have done it in Maine and Vermont. With all the millions of money Hydro-Quebec has spent to date buying up people, donating to causes and conservation on top of it, and other programs, including the New Hampshire Forward plan plus the recent \$2,000,000 investment in the Balsams, it seems this money could have been earmarked to spend on burying the Northern Pass in the first place. Plus I'm curious about the cost to maintain above ground structures versus underground. My last observation is this. Hydro-Quebec is a corporation, and a corporation is not a person, I get that. But people run Hydro-Quebec and Eversource and the people who are benefiting from the profits will do so for many years to come. Their lives will be improved over time, they'll have a good job, they'll buy things, they'll send their kids to good schools, maybe outgrow their current homes, purchase larger ones, get bigger yards, and so on. The American dream. But people in New Hampshire who are directly impacted by Northern Pass will not. Many below the Notch will lose their homes, businesses, yards, views, et cetera. Above the notch is the same except that there's a unique bond with the people in North Country, unique bond people in the North Country have with the land that you don't understand, and putting a massive protest tower with humming electromagnetic lines will not only rip the heart out of New Hampshire but rip the heart and soul out of these people. It will be like taking a child away from them. They have nurtured, cultivated and loved the land for generations. Or they came here, or some people came here not long ago to do that. They have sacrificed for their land. They have eaten off the land, they have used the land to educate their children, and they want the same for future generations. Hydro-Quebec, you have an environmental and moral responsibility to bury the Northern Pass. Hydro-Quebec's people and Eversource, business people, their identity is a business and their things. New Hampshire's people identity is their land. When I saw signs recently along 116 that said No Northern Pass on 116, I was, my heart started pounding like crazy, because I thought, oh, my God, wait a minute. We just bought a home here. We've been looking on the website to see where is the safe place to buy a home. What is going on. So I had to look into it and I was sick to my stomach until I discovered that the line was going underground. So please, put the line underground for these other families because I'm sure that this is making them sick as well.

1288-1

Thank you for your comment. Impacts to wildlife utilizing wetland habitats are discussed throughout Section 4, Environmental Impacts, of the EIS and Section 3, Direct and Indirect Environmental Consequences of the Wildlife Technical Report.

1288-2

Thank you for your comment. The commenter's opinion is noted regarding the project participants, the Project, and its potential impacts.

1288-1

1288-2

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Jul 24, 2015

**ID:** 8212

**Date Entered:** Jul 24, 2015

**Source:** Website

**Topics:**

**Organization:**

**Comment:** Northern Pass is an "unneeded" energy project that in no way benefits the people of NH or our environment. This project actually harms the people of NH that depend on the unindustrialized, unspoiled natural beauty of the State to bring in tourists that support their livelihood, generating tax dollars to the State. NP also harms the environment by segregating large tracts of wilderness - which would drive wildlife further into human habitats creating conflict that never fares well for people or the animals.

The NP project is driven by a for-profit industry that is not considering the "good" of the people of NH. Legitimate democracy involves the consent of the governed. There has been significant opposition by those most impacted by this project and yet, they have no seat at the table to actually stop their communities from being used as resource colonies.

It is time to stop wasting people's time and money and reject NP so the good people of NH can get back to their lives - free from the threat of losing everything they have invested into the fine State of NH.

1296-1

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

1296-1

1296-2

1296-2

Thank you for your comment. The discussion of impacts resulting from habitat fragmentation are adequately accounted for in the impact discussion. The following sections of the final EIS were updated: final EIS Section 2.5.11 and for the Wildlife Technical Report in Sections 4.1.11 (Environmental Impacts, General Environmental Impacts, Wildlife); 4.2.11 (Environmental Impacts, Northern Section, Wildlife), 4.3.11 (Environmental Impacts, Central Section, Wildlife), 4.4.11 (Environmental Impacts, Southern Section, Wildlife), and 4.5.11 (Environmental Impacts, WMNF Section, Wildlife).

Laurie A. Couture  
1321 Bennett Way  
Newmarket NH 03857  
603-659-3889

March 16, 2016

Brian Mills  
Senior Planning Advisor  
Office of Electricity Delivery and Energy  
Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585

Dear Mr. Mills,

In the 1800's and again in the 1930's, New Hampshire experienced a level of human-induced destruction to the forests, landscape and natural habitats that is difficult now to fathom. Almost total deforestation, followed by natural destruction by the Hurricane of 1938, devastated and scarred New Hampshire's nature to a degree that it is only now in the early stages of recovery. While Eastern white pine was recorded to have reached dizzying heights of over 200 ft and hardwoods were measured to reach astonishing girths of over 22 feet in circumference, today's forests are primarily juvenile and quite small in comparison to the forests of the 1600's. I am a volunteer for the NH Big Trees Program, which is part of the UNH Cooperative Extension. The program seeks, locates and records the largest remaining trees of their species in the state of NH. Perhaps the "hunt" is so rewarding because there are so few genuinely elder, Goliath trees remaining in our state. When they are discovered, I personally find myself frozen in a state of deep respectful awe; I am beholding a rare artifact of New Hampshire when it was at its wildest and a representative of a time when humans and nature lived in balance.

The Northern Pass tower project threatens to bring yet another wave of destruction to our still-healing landscape; forests, land and habitats will be raped while they are just now developing stable, maturing ecosystems. This project, with its hundreds upon hundreds of 160 ft towers, is not welcome here. I am not interested in any energy source that will perpetrate further damage onto the forests and lands. The Northern Pass project is a form of destruction that will be a grave mistake for which there will be no recovery. While the farmers and clear-cutters of old abandoned the fields and saw mills, allowing the forests to retake the land, the Northern Pass will be a law-enforced bureaucracy that will beat back nature and will be here to stay. Not only will their towers maim, deface and harm nature itself, I am not convinced that these towers will not contribute to more dangerous electromagnetic assaults on people.

I say, "pass" on the Northern Pass project- I do not and will not support it and its harm to New Hampshire's forests, landscapes, habitats, wildlife and people.

Sincerely,



Laurie A. Couture

1307-1

Thank you for your comment. The commenter's opinion is noted regarding the landscape impacts of the Project. The EIS acknowledges the potential impacts to a variety of natural resources from the Project. Impacts to vegetation are discussed throughout Chapter 4 of the EIS, and Section 3 of the Vegetation Resources Technical Report.

1307-2

Thank you for your comment. Potential visual impacts are discussed in Section 4.1.1 of the EIS, and potential impacts from EMF are discussed in Section 4.1.4 of the EIS.

1307-1

1307-2

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Nov 14, 2015

**ID:** 8500

**Date Entered:** Nov 14, 2015

**Source:** Website

**Topics:**

**Organization:** n/a

**Comment:** What bothers me at this point is that obviously, although it to my knowledge has not been addressed, is that, if it's underground, trees and vegetation will be continuously always and forever have to be cleared so that the pipe can be repaired and/or accessed in some way that is necessary. It will never be allowed to grow back. NEVER. I am already put off by the number of ski trails and snowmobile trails. If it bothers me as a resident, it bothers at least a few visitors to NH.

1308-1

Thank you for your comment. Section 4.1.12 of the EIS notes that the primary vegetation impact from new and widened transmission corridors for the overhead portion of the Project would be clearing of forest cover and "converting these vegetation communities to scrub-shrub, herbaceous, and other earlier successional cover types." Section 3 of the Vegetation Resources Technical Report and Section 4.1.12 of the final EIS have been revised to state that forested areas impacted during construction would likely revegetate to early successional forested land during the long-term operation of the Project. Regeneration would require one to three years for herbaceous communities and three to five years for shrub communities. Vegetation within existing transmission corridors would remain largely intact, although subject to current vegetation management practices.

1308-1



*Bethlehem Conservation Commission*  
*Bethlehem, NH 03574*

March 13, 2016

Brian Mills, *Senior Planning Advisor*  
Office of Electricity Delivery and Energy Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585  
Email: [Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)

Re: Northern Pass Transmission Line Project EIS

Dear Mr. Mills:

The Bethlehem Conservation Commission would like to provide comments and the accompanying report about the environmental impact of this proposed project in the Town of Bethlehem. We have submitted the report to the New Hampshire Department of Environmental Services and the Site Evaluation Committee.

As proposed in Bethlehem, the Project would include 4.9 miles of overhead high voltage direct current (HVDC) transmission lines along the current PSNH/Eversource right of way (ROW) between the Whitefield/Bethlehem town line and NH Route 302. The Project then proposes to construct Transition Station #5 across from Miller Pond/Baker Brook Pond, where the lines will be buried along Routes 302 and 18 for 3.1 miles.

Accompanying this letter is a report commissioned by the Bethlehem Conservation Commission in November 2015 and conducted by two certified wetlands scientists. The report, "Assessment of the Transmission Line Proposal on Natural Resources within the northern half of Bethlehem, New Hampshire," documents the big picture of the adverse impacts this proposed project would have on our local environment.

We think this broader view is important because these natural systems function as a whole; on the ground, everything is connected.

**We believe the environmental impact of this project is being underestimated.** From what we can determine, all the temporary impacts are not being accounted for at this point.

In the wetlands and shoreland permit applications that the Applicant has submitted to the Department of Environmental Services, temporary impacts from staging and laydown areas, as well as temporary access roads needed to reach construction areas are not included that we can see.

1322-1

Thank you for your comment. Estimated wetland impacts have been reviewed and, where necessary, revised. These estimates include access roads and laydown areas. Changes are reflected in Table 4-66 and the accompanying text in the final EIS, and throughout Section 3 of the Water Resources Technical Report. These revisions are based on information provided in the application for Presidential permit (October 2010), as amended (August 2015). Final wetland and waterbody impacts would be based on final project design and developed through the New Hampshire State Evaluation Committee review process as well as related federal and state wetland permitting processes.

1322-1



As it is, the cumulative environmental impact of this entire Project is alarming to those of us charged with protecting the valuable water resources of our state. According to the Project's own findings, (cf. Table 89 of "Wetlands, Rivers, Streams, and Vernal Pools Resource Report and Impact Analysis") if completed as proposed, the Northern Pass Project will impact 1,972 wetlands, 315 rivers and perennial streams, 358 intermittent streams, 414 ephemeral streams, and 271 vernal pools throughout the state.

But this is not the full extent of the impact and we refer documentation in two places<sup>1</sup> to the letter of December 2, 2015, to the SEC, from Attorney Peter Roth, Counsel for the Public, which notes pre-filed testimony of Mr. John Kayser, who is the Construction Project Manager. Mr. Kayser's testimony, which was given as recently as October 16, 2015, starts on page 125.

Mr. Roth's letter notes: "Construction of the Project will require the use of laydown areas, staging areas and temporary access roads. The pre-filed testimony of Mr. Kayser indicates laydown areas can be up to fifty acres. It may also require extending existing roads in order to accommodate construction vehicles and delivery of construction materials, particularly at overhead/underground transition stations..."

"Yet the testimony does not describe how many laydown areas are needed or where they will be located. The pre-filed testimony of Mr. Kayser states the information is not known at this time... *Thus, for an unknown portion of the land that will be impacted by construction, which could be significant given the potential size of each laydown site, the Applicant is silent.* There is no discussion of the impact on wetlands, rare or endangered species, storm water or any other natural resource." The italics are mine.

At a recent public meeting in January, I talked to some of the engineers about the Project, particularly about Transition Station #5 in Bethlehem. I was concerned about possible blasting, which Mr. Kayser also mentions on page 135 of his testimony.

I came away even more alarmed because the engineers said they thought, instead of blasting, this area was going to involve "fill." There are wetlands directly behind the strip of land on Rt. 302 where the Transition Station is supposed to sit. Our concern is that a lot of the wetlands may have to be filled in order to accommodate this station. That is not part of the current applications.

In the Stormwater Management Study for that area, it reads: "Filling these soils likely requires a permit from the New Hampshire Department of Environmental Services and the U.S. Army Corps of Engineers."<sup>2</sup> Yet no such application has been submitted. So how can we be looking at the full impact?

There is another way in which we think the environmental impact of this proposed Project is being underestimated in Bethlehem and probably elsewhere. Northern Pass consultants were constrained to mapping in the ROW because of property rights. Although the applicant purports to have a relatively small impact of 0.39 acres, this does not take into account the connectivity of wetlands, streams and rivers. Therefore, the impact is being underestimated.

1322-2

1322-2

Thank you for your comment. Potential direct and indirect impacts to water resources are discussed in Sections 4.1.13, 4.2.13, 4.3.13, 4.4.15, and 4.5.13 of the EIS. Potential cumulative impacts to water resources are discussed in Section 5.1.13 of the EIS.

1322-3

Thank you for your comment. The commenter's concerns are related to the project proponent's application to the New Hampshire Site Evaluation Committee (SEC). The SEC process is separate from, and beyond scope of, this analysis.

1322-4

Thank you for your comment. Sections 4.1.13 and 4.3.13 in the EIS describe potential impacts to water resources from the Project in the Bethlehem area, including streams, wetlands, and groundwater. Best management practices (BMPs) intended to avoid or minimize impacts to those resources are included in those sections as well as in Appendix H of the EIS. BMPs such as those contained in the Project's stormwater management protection plan are specifically intended to address offsite impacts from erosion and sedimentation. Other required plans address potential impacts from spills of fuels, lubricants, and other hazardous materials. The commenter's observation regarding the protected status of the Ammonoosuc River is correct, and is noted in several areas of the Water Resources analysis in the EIS, noted above. Additional information has been included in the final EIS regarding the proximity of project components and activities to drinking water sources. The EIS process is intended to acknowledge and analyze potential project environmental impacts on a variety of resources in order to guide decisions related to project alternatives and approval. If the project is approved, specific impacts at specific locations would be evaluated in more detail during subsequent federal, state, and local oversight and permitting processes related to the resource(s) involved, such as streams, wetlands, groundwater, and drinking water sources.

1322-3

1322-4

The connectivity of the wetlands is illustrated in risks to the Ammonoosuc River. The Ammonoosuc, which flows through Bethlehem for 12 miles, is a NH Designated River, deemed worthy of special protection by the NH River Management and Protection Program under RSA 483.

In our report, the certified wetlands scientists identified five "Wetland Concern Areas," all of which involve potential adverse impacts to the Ammonoosuc River because of streams which flow either directly or indirectly into the Ammonoosuc.

Nearly 11 percent of the Town of Bethlehem is underlain with Stratified-drift aquifers and the majority of those lie along the Ammonoosuc. We are concerned that runoff, erosion, and soil compaction would contribute to the degradation of water quality in these aquifers. The map on page 11 of our report shows two specific areas where aquifers could be degraded during construction and maintenance and have lasting effects. The northern proposed Project area crosses the river, which is part of the largest aquifer in town. It is worth noting that Bethlehem has in place an Aquifer Protection Ordinance.

Our Conservation Commission did not get involved in this project until permit applications were submitted to the Department of Environmental Services. That is why we never came before the Department of Energy during its Environmental Review. For all I know, it is too late to comment. But this is so important that I'm taking time to do so now.

Sincerely,



Cheryl Jensen, Co-Chair, Bethlehem Conservation Commission

#### FOOTNOTES:

<sup>1</sup>Letter of December 2, 2015, to the Site Evaluation Committee, from Attorney Peter Roth, Counsel for the Public and in pre-filed testimony of Mr. John Kayser, who is the Construction Project Manager. Mr. Kayser's testimony, which was given as recently as October 16, 2015, starts on page 125.

<sup>2</sup>Stormwater Management Study for Transition Station #5 there is a section, Appendix G, Site Specific Soil Survey Report for the Bethlehem Transition Station (TS5) on page 7. [FULL CITATION: "**Limitations to development within the site consist of moderately steep slope leading to a wetland to the north of the house.** Course fragments within the C horizon can make the upland soils ..... difficult to excavate without a properly sized machine. **Hydric soils, consistent with wetlands, mapped as Peacham mucky peat, are also present on the north half of the parcen and presents constraints to development. Filling these soils likely requires a permit from the New Hampshire Department of Environmental Services and the U.S. Army Corps of Engineers.** Fill soils may need to be removed for proper foundation construction.

1325-1

Thank you for your comment. Section 4.1.13 in the EIS describes, in general, potential impacts to water resources from the proposed project, including soil erosion related to stream and river banks, with more detail provided under each alternative in each geographic section. Best management practices (BMPs), including silt fence installation, intended to avoid and minimize impacts to these resources are included in those and related geographic sections, as well as in Appendix H of the EIS. Impacts to vegetation (Section 4.1.12 of the EIS) and geology and soils (Section 4.1.14.1 of the EIS) also discuss issues related to water resource protection. Section 1.7.2 of the EIS discusses a variety of federal and state permits required for the Project, including the New Hampshire Rivers Management and Protection Program. See Section 1.5.2 in the Water Resources Technical Report for additional discussion of state permitting related to water resources. These permits have additional measures to protect, monitor, and mitigate impacts. If the Campton Conservation Commission takes issue with specific measures such as silt fencing, they should consult with relevant state agencies responsible for water quality regulation. Potential Project impacts at the Pemigewasset River crossings are not expected to impact the potential future designation of the river because there is already an existing road crossing and cables would likely be installed underneath existing bridges.

I'm Margaret Mumford from Plymouth. I grew up in Plymouth, I reside there, and I'm a 6th generation descendant of settlers of Bridgewater. So I came up here tonight because I was curious about the particular version where lines would be overhead here, then buried right through Main Street in Plymouth. I have no idea how I'll get to work if that happens. And then coming up against just south of Plymouth in Bridgewater. The Pemi will be crossed three times by that version of their proposal and three times in five miles along a scenic section of the river between Souhegan Park in Bridgewater and New Hampton so I was debating why would this be and it seemed to me that there's no protection of National Forest, no state forest, not many people along there, and so not many people speaking up for the Pemi. However, very steep slopes, and I think that it would be, the potential for erosion along the river will be massive there. Yes, the viewshed will be affected greatly, but I still am very concerned that Main Street of Plymouth will be torn up, buried underground. I guess underground is better, but that will be a hassle for me and my townspeople and certainly no one wants it overhead up here but overhead in Bridgewater doesn't sound very good either. So I really am for Alternative 1. I would prefer full burial if we have to put up with it, even though it will tear up our lives in Plymouth considerably. So I came up here for the viewpoint of what is going on in the North Country and how are people feeling here, but I feel that of Eversource is looking for the weak link, looking for the least resistance and changing plans to find that so I am opposed. Thank you.

1325-1

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Apr 4, 2016**

**ID:** 9209

**Date Entered:** Apr 4, 2016

**Source:** Website

**Topics:** Water / Wetlands, Design Criteria / Mitigation Measures

**Organization:** Northern Pass Transmission LLC

**Email:** maryanne.sullivan@hoganlovells.com

**Mailing Address:** 781 N. Commercial Street

**City:** Manchester

**State:** NH

**Zip:** 03101

**Country:** US

**Comment:**

**COMMENTS OF NORTHERN PASS TRANSMISSION LLC  
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT  
WATER RESOURCE IMPACTS ANALYSIS**

Northern Pass Transmission LLC (“Northern Pass” or the “Project”) submits this comment on the analysis contained in the Draft Environmental Impact Statement (“DEIS”) of the impacts the Project could have on water resources in the Project area. In most respects, Northern Pass does not challenge the analysis in the DEIS on this topic, but rather it wishes to explain why the results reported in the DEIS in this resource area are quite different than the results Northern Pass identified in its submission to the New Hampshire Site Evaluation Committee (“SEC”).<sup>1</sup>

Briefly summarized, Northern Pass performed the kind of detailed analysis required to obtain the wetlands permits it seeks for the Project. Thus, its analysis is based on very specific siting information. By contrast, the DEIS takes a high-level, conservative approach both to measuring wetland impacts from the Project and to comparing the impacts among alternatives. The DEIS analysis provides a reasonable, high-level comparison among alternatives, but the resulting impact numbers are generally higher than the impact numbers that result from using state and federal agency-approved metrics for permit applications, as Northern Pass did.

The difference in approach appears in several areas. For example, the DEIS appears to include wetland conversion (the cutting of trees in forested wetlands) in the same permanent wetland impact calculations as permanent fill. While Northern Pass acknowledges that the loss of trees in otherwise un-impacted wetland locations is a permanent change in cover type, Northern Pass identifies this as a secondary impact, consistent with the guidance from the federal regulators in the region. Secondary impacts in the DEIS appear to include clearing of uplands within 100 feet of wetlands, while the Northern Pass permit application materials only address stream and vernal pool buffer clearing, not wetland buffer clearing, in accordance with regulatory guidance Northern Pass received from the Army Corps of Engineers (“USACE”). The DEIS also quantifies clearing within 100 feet of all streams as a secondary impact, while the permitting documents are required to include clearing within 100 feet from perennial streams, 50 feet from intermittent streams, and 25 feet from ephemeral streams, again based on guidance from the federal and state agencies of jurisdiction.

1330-1

Thank you for your comment. Estimates of direct, temporary, and secondary wetland impact have been revised, as necessary. See Table 4-66 and accompanying text in the final EIS, and Section 3 of the Water Resources Technical Report. Wetland impacts were categorized under these three categories in response to a request by the U.S. Environment Protection Agency in a letter dated April 4, 2016, that contained agency comments on the draft EIS.

1330-1

<sup>1</sup> <http://www.northernpass.us/assets/filings/Volume%20XXIX/Appendix%2031%20Wetlands%20Rivers%20Streams%20and%20Vernal%20Pools%20Resource%20Report%20and%20Impact%20Analysis.pdf>

It is unclear whether the DEIS double counts wetland conversion within stream and vernal pool buffers as both a permanent and a secondary impact. If it does, however, that would appear to be an error that should be corrected in the Final EIS.

Similarly, the wetland boundaries identified in the DEIS differ from those delineated by Northern Pass in multiple locations, and this may contribute to differences in impact measurements between the DEIS and the Northern Pass SEC filing. All wetlands delineated by the Northern Pass team were either delineated or reviewed by a New Hampshire Certified Wetland Scientist in accordance with the 1987 Manual and appropriate Regional Supplement, and they were reviewed for accuracy by the USACE on a spot basis. There is no reference to the method used for delineating wetlands in the DEIS or to verification by the USACE, but Northern Pass does not understand that same level of precision to be required for an EIS.<sup>2</sup> Northern Pass assumes that less precise measurement led to the conclusion in the DEIS that there would be 17 acres of direct fill impacts, while Northern Pass calculates only 2.53 acres of permanent impact.<sup>3</sup> Similarly, the DEIS assessed stream impacts in tenths of miles, while for permitting Northern Pass was required to measure in linear and square feet. This results in a significant overestimate of potential stream impacts in the DEIS.

Many of the listed lakes and ponds in the DEIS are identified as “Unnamed Swamp/Marsh.” Northern Pass believes that those should be categorized as wetlands, consistent with the USFWS Cowardin wetland classification system specified by the New Hampshire Department of Environmental Services and USACE. All of the ponds encountered along the Project route were too small to be considered Lacustrine and were typically classified as Palustrine (PUB) wetlands – and therefore included with all the other wetlands in the Northern Pass permit applications.

<sup>2</sup> 40 C.F.R. § 1502.1(b) requires NEPA documents to “concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.” *See Webster v. U.S. Dep’t of Agric.*, 685 F.3d 411, 425 (4th Cir. 2012) (“An EIS containing vast quantities of inconsequential information can actually defeat the NEPA’s goals of informed decision-making and public participation by drowning out truly significant information with that which is insignificant. Agencies therefore face a delicate balancing act: they must include enough details about a proposed action to allow for the requisite hard look at its environmental effects without providing so much information that the EIS becomes self-defeating.”).

<sup>3</sup> <http://www.northernpass.us/assets/filings/Volume%20XXIX/Appendix%2031%20Wetlands%20Rivers%20Streams%20and%20Vernal%20Pools%20Resource%20Report%20and%20Impact%20Analysis.pdf> at 5-2. The relatively small area of direct permanent impacts reflects the extensive avoidance and minimization efforts employed by the Project team throughout the siting and engineering. *Compare* Environment & Ecology, Water Resources Technical Report for the Draft Environmental Impact Statement at 181.

1330-1 cont'd

1330-1  
Continued

1330-2

1330-2

Thank you for your comment. Methods used for delineating wetlands are generally described in Section 1.4 in the Water Resources Technical Report, and are more specifically described in the Wetlands and Waterbodies Assessment for Project Alternatives (July 2015) and Wetlands, Waterbodies, and Vernal Pools Assessment Proposed Action (July 2015). Additionally, estimates of direct, temporary and secondary wetland impacts have been reviewed and, where necessary, revised. The results are presented in Table 4-66 and accompanying text in the final EIS, and throughout Section 3 of the Water Resources Technical Report. While there are differences in acreages of wetlands delineated, many of the differences with respect to impact calculations are derived from the assumptions used in disturbance areas.

1330-3

1330-3

Thank you for your comment. Waterbodies previously identified as "Unnamed Swamp/Marsh" have been reclassified as wetlands, consistent with the U.S. Fish and Wildlife Service’s Cowardin Wetland Classification System specified by the New Hampshire Department of Environmental Services and U.S. Army Corps of Engineers. Tables 5, 11, 13, 18, 20, 25, 27, and 32 (and accompanying text) in the Water Resources Technical Report have been revised, and similar changes have been made to the final EIS Water Resources section.

The DEIS compares the Project impacts to the total acres of wetlands within Coos County, but the source of the county data is not identified. As far as Northern Pass is aware, there are no sources of county-wide data that are comparable to field-delineated wetland quantities. Thus, Northern Pass has questions about the accuracy of such a comparison.

It is the understanding of Northern Pass that the DEIS team did not have the benefit of surveying for vernal pools at the correct time of year. As a result, the number of vernal pools in the DEIS appears to be underestimated. On the other hand, it has not been demonstrated that most vernal pools in the Northern Pass project area contain protected or rare species, as the DEIS seems to suggest. Over a period of five years of seasonally appropriate studies, Northern Pass identified 271 vernal pools along the Project route, but only 23 (8 percent) were deemed high quality, where high quality is determined on the basis of the following criteria:

- Associated with state-listed or special concern species; or
- Contain two or more primary indicator species; and exhibit
  - high levels of amphibian breeding activity (25 or more egg masses) at the time of the survey;
  - adjacent habitat comprised of at least 75% undeveloped area within the first 100 feet from the vernal pool seasonal high water line (critical terrestrial habitat); and
  - adjacent habitat comprised of at least 50% undeveloped area within 750 feet of the critical terrestrial habitat.

The Northern Pass SEC and wetlands permit application material describes the species observed in field-verified vernal pools, and thus it is able to more accurately describe the limited impacts of the Project on those species.<sup>4</sup>

Northern Pass believes that there are some inaccuracies in the floodplain discussion that warrant correction in the Final EIS. The DEIS discussion of floodplains states that “Category X represents areas with moderate flood hazards and those between the limits of the base flood and the 0.2-percent annual-chance (or 500-year) flood.” This overstates the potential impact of the Project on floodplains. The FEMA website (<https://www.fema.gov/flood-zones>) notes: “The areas of minimal flood hazard, which are the areas outside the [Special Flood Hazard Area] and higher than the elevation of the 0.2-percent-annual-chance flood, are labeled Zone C or Zone X (unshaded).” This is the definition that should be used in New England, where most or all of the Zone X areas present minimal, not moderate, flood hazard.

<sup>3</sup> <http://www.northernpass.us/assets/filings/Volume%20V/Appendix%202%20NHDES%20Wetland%20Permit%20Application.pdf> at 26 – 27 of the Project Description and Existing Conditions Narrative.

1330-4  
1330-4 Thank you for your comment. Total wetland acres in Coos County were based on National Wetlands Inventory (NWI) data. While this is not directly comparable to the field delineations, it is the best available data to provide a comparison.

1330-5  
1330-5 Thank you for your comment. The commenter's observations regarding vernal pools are noted. Subject matter experts collected the best available field data in the time allotted for field surveys. More detailed discussions regarding vernal pools and related wildlife species would occur in subsequent federal and state permitting processes.

1330-6  
1330-6 Thank you for your comment. The definition for Zone X has been updated in Section 2 of the Water Resources Technical Report, and Section 3.1.13 of the final EIS.

1330-6

The DEIS also erroneously concludes that the Project will give rise to “decreased flood zone capacity due to construction of structures within floodplains (i.e., Deerfield Substation, Franklin converter station, proposed helipad, and proposed and relocated towers).”<sup>5</sup> Although a few transmission structures are in floodplains, none of the stations or site developments is in a floodplain. There will be no helipad because the Project will be constructed underground in public roads in the White Mountain National Forest. Thus, at most, the Project will have a negligible impact on flood zone capacity.

Northern Pass agrees with the assessment in the DEIS that “impacts to wells along the route are not anticipated from water withdrawal, erosion, or hazardous waste or fuel spills.” Northern Pass also agrees with the statement that wetlands habitat loss due to construction would be short-term because Northern Pass has committed to revegetate the ROW to restore pre-construction conditions. Finally, the overall conclusion of the DEIS that impacts to water resources will be minimized by implementing avoidance and minimization measures, best management practices and compensatory mitigation measures is fully consistent with Northern Pass’s own findings. The avoidance, minimization and mitigation measures that Northern Pass has committed to undertake are described in detail in its SEC application.<sup>6</sup> Of particular note is the commitment Northern Pass has made to preserve more than 1,500 acres to offset the unavoidable wetlands impacts and to make a compensatory payment of more than \$3 million to the New Hampshire Aquatic Resources Mitigation fund.<sup>7</sup> The Northern Pass compensatory mitigation plan greatly exceeds the 15:1 federal compensatory mitigation ratio for all wetland impacts.<sup>8</sup>

1330-7  
1330-7  
Thank you for your comment. Section 3 in the Water Resources Technical Report has been revised to remove references to station or site development within floodplains. Additionally, references to the use of helipads for construction of the project and associated impact numbers have been removed from both the final EIS and all Technical Reports.

1330-8  
1330-8  
Thank you for your comment. Appendix H includes Applicant-proposed impact avoidance and minimization measures related to water resources that are considered in the EIS. The analysis of potential impacts in this EIS assumes that these measures would be applied during implementation of the Project, if approved. DOE's and USFS's decisions would be conditioned on the implementation of these APMs, as well as any other requirements identified by other permitting processes (including the New Hampshire Site Evaluation Committee review, consultation with the U.S. Fish and Wildlife Service, etc.).

<sup>5</sup> Environment & Ecology, Water Resources Technical Report for the Draft Environmental Impact Statement at 98.

<sup>6</sup> <http://www.northernpass.us/assets/filings/Volume%20XXIX/Appendix%2032%20Natural%20Resource%20Mitigation%20Plan.pdf>.

<sup>7</sup> Id., Table 9, at 6-2.

<sup>8</sup> Id. at 1-1.



DONALD BILODEAU  
RT 145 #317  
CLARKSVILLE, N.H.

3/7/16

1335-1

Thank you for your comment. Section 4.2.13 in the EIS describes potential impacts to wetlands and other water resources from the Project in the Northern Section. Appendix H of the EIS describes Applicant-Proposed Impact Avoidance and Minimization Measures that would minimize or avoid wetland impacts. DOE does not have siting authority for the Project. In this case, the New Hampshire Site Evaluation Committee has siting authority for the Project in the state of New Hampshire. Additionally, the USFS has siting authority for portions of the Project located in the White Mountain National Forest. (For further discussion, see Sections 1.1-1.3 of the final EIS.)

1335-1

I'M AN ABUTTER IN CLARKSVILLE  
THERE ARE 25 TOWERS GOING THROUGH CLARKSVILLE  
FOR A TOTAL OF 2.4 MILES. NEXT TO WISWELL ROAD NEXT-  
THERE ARE (2) LATTICE TOWERS ON THE SOUTH SIDE EACH OF  
(1) LATTICE TOWER ON THE NORTH SIDE. THESE WILL BE IN  
WETLANDS.

THE REMAINING 22 MONO POLES MAY ALSO CROSS  
SOME OF THE OTHER WETLANDS THAT I HAVE SEEN WHILE  
HUNTING IN THAT AREA. NOT EXACTLY KNOWING THE PROPOSED  
ROUTE I'M NOT SURE. THE S.E.C. DID NOT STOP TODAY ON RT 145  
WHERE AT LEAST 8 TOWERS PLUS WILL BE SEEN FROM THIS <sup>SE</sup> BY  
FROM THE CEMETERY JUST SOUTH OF WISWELL ROAD WHERE  
THE REST AREA IS LOCATED. IT WOULD SEEM TO ME THE  
ADDITIONAL COST TO BURY THESE 2.4 MILES WITH 25 TOWERS  
AND FILLING WETLANDS AND RUINING THE BEAUTIFUL VIEWS  
WOULD BE WORTH IT. BETTER STILL BURY THE ENTIRE LINE  
IN THIS BEAUTIFUL STATE BY CONNECTING ALL THE DOTS.

DONALD BILODEAU

3/7/16

1358-1

Thank you for your comment. The Visual Impact Assessment Technical Report and final EIS have been updated to include an analysis of impacts in the area around Canaan, Vermont including the Connecticut River and its tributary, Halls Stream, in Pittsburg, NH (see Section 4.2.1 of the EIS). Comparable data to that used in the landscape assessment in New Hampshire is not available in Vermont, but impacts are analyzed through visibility and visual magnitude. Additionally, photographs were captured in this area of Vermont to help inform the understanding of the landscape and potential visibility. Potential visibility from the Connecticut River is considered in the landscape assessment.

1358-2

Thank you for your comment. Impacts to wetlands and water resources in Vermont have been considered and analyzed. An updated discussion can be found in Sections 3.2.13 and 4.2.13 in the final EIS, as well as in those Sections of the Water Resources Technical Report that deal with the Northern Section of the Project. The only location with potential impacts to water resources in Vermont is where the project crosses Halls Stream. However, this re-evaluation determined that there would be no impacts to wetlands in Vermont. DOE initiated its Section 106 consultation with the Vermont Division of Historic Properties (VT DHP) on June 22, 2016, and the VT DHP agreed to consult with DOE on the proposed Northern Pass Project in its role as the VT state historic preservation officer (SHPO) and in accordance with Section 106. VT DHP has provided input to DOE's on-going Section 106 consultation process, for example on June 29, 2016 in person and on September 9, 2016 through concurrence with DOE's proposed scope of work for identification efforts in Vermont, and also including the development of the Section 106 programmatic agreement for the proposed Northern Pass project, to ensure that DOE's Section 106 process appropriately addresses historic properties that are located within the 1.25 square miles of the indirect APE that extends into the state of Vermont near the town of Canaan.

Good evening. My name is Bob Baker, and I am an almost retired lawyer. I'm living in Columbia, New Hampshire. I moved here about 19 years ago or at least I acquired my home 19 years ago. Because of the majestic environment and Great North Woods. The beauty and the serenity of this area is enchanting, but it would not be the same if the Northern Pass project is permitted and built as currently designed. I say that I'm almost retired because I still have a few active cases. They involve the Northern Pass, and those clients are moving to intervene in this proceeding and they will tell their stories in the future assuming that the interventions are permitted. I speak tonight on my own power as a resident of Coos. I find this project to be ugly, unnecessary, commercial intrusion into a region. It will damage, if not destroy, the most significant assets that we all possess. Those assets are our hearts, our souls which are bound to this beautiful place. The very ethos of people is at stake. If this project is built with its above ground structures and transmission lines and strings of insulators hanging over our land, we will not feel the same about ourselves. We will never feel the same way about who we are. I beg you to stop this madness. It's been going on far too long. It's not wanted in Coos County by our communities. Don't the voices of the people count for something? Do they matter at all? I ask you to seriously consider that question. Do they matter at all. But it's not just impacting our New Hampshire towns here in Coos County. Part of our region, part of our souls, part of our communities is across the river in Canaan, Vermont. The towers that Northern Pass plans to build in Pittsburg will be erected on foundations of concrete poured high above the Connecticut River 200 yards from the Canaan, Vermont border. It will be visible. Highly visible from the Beecher Falls section of Canaan, Vermont, and in many other viewpoints in Canaan, Vermont. Northern Pass will build a road through forested mountain sides all the way from Halls Stream on the Canadian border to the Connecticut River in order to pour those foundations. The wetlands will be invaded there and the water will run off. Where will it run? Into Vermont. That's the downhill side of that hill. I have some questions for the DOE, not that you're going to answer them tonight, but I'm going to ask you this. Why hasn't Canaan in the State of Vermont been involved in the Section 106 process? Why hasn't the Vermont Division for Historic Preservation been contacted? Why hasn't Northern Pass filled out required applications in Vermont for the Section 106 process with the historic and cultural resource people in Vermont. Mr. Quinlan said tonight they don't have to. Are you sure? Why doesn't someone pick up the phone and call Vermont and ask the Historic Resources division if they think an application might be needed. MR. HONIGBERG: Mr. Baker. How much more do you have? MR. BAKER: I have just a few more observations, and I can summarize them. I'll turn in my handwritten sheet because these are questions for the SEC. Since the only way you can reach the Hall Stream road area is by the roads in Vermont, I would question, and I don't have the answer, I'm not an expert in Vermont law, but I would question whether or not the Department of Transportation in Vermont needs to be contacted for necessary permits to enter into a commercial project that would use their highways, and I don't know the answer to that, but I think it should be done. Also I think that the wetlands resources or the Department of Environmental Protection in Vermont may be interested in having an application done for this project because of water flow off that hill into Vermont, there's obviously going to be disturbed water courses in wetlands in New Hampshire that will have an impact on the water system in Vermont. So I would ask that that be done because in order for the application to be complete, the Applicant must show required application permits that they have obtained or at least started the process. At least my understanding. So I look forward to having this process continue, and I thank you very much for your attention.

1358-1

1358-2

Kevin McKinnon. I'm a representative of the Headwater Subcommittee of the Connecticut River Joint Commissions. We are charged with the preservation and protection of the resources of the Connecticut River Valley. Slicing out a 32-mile wide scar starting out at Hall Stream is a far cry from protecting and preserving our national resources. 31 towns have voted no to Northern Pass at their town meetings. Shouldn't this be enough? If, indeed, Northern Pass was serious about minimal impacts and utilizing existing corridors, they would have come south on US Route 3, cutting the mileage in half, minimizing the impacts both ecological and aesthetic. This would eliminate the horrific scarring of the countryside, alleviate many concerns in terms of the environment and aesthetics and bolster the State of New Hampshire's economy. As you are traveling north on US Route 3, you will climb a large hill prior to the town of Lancaster. At the top is a scenic pullover with a spectacular view of the gateway to the headwaters region we are in. This spectacular view will be despoiled by over 80 towers set in a broad swath of cleared land across the countryside. This image is completely at odds with the picture we set for our tourism industry. As our Chairman stated, the headquarters committee has consistently opposed Northern Pass project. Some reasons that have been cited at many of our meetings are the effect of scenic beauty, loss of work and forest land, impacts to wetlands, reduction of property values, negative effect on tourism, and the lack of any long-term benefits of the region. Member Tom Caron wrote, other regions of New Hampshire do not rely so heavily upon their natural resources and tourism in industry than do the Great North Woods and White Mountain regions of the state. While other regions to the south have large industrial and manufacturing sectors of their economies, the Great North Woods and White Mountain regions do not. All of our eggs are unfortunately in one basket, tourism. The fact that the transmission line as proposed is buried along its journey through the White Mountain regions for 52 miles and similarly buried for only an 8 mile segment along 145 in Clarksville in the Great North Woods region is curious. If it can be buried going through ecologically and tourism sensitive White Mountain National Forest, why not be buried in just as beautiful and sensitive a part of New Hampshire the Great North Woods? A better option is to bury the entire Northern Pass project. In the wetlands application under ENV-WT 302.04 #4, Northern Pass states, Work was not performed outside of the proposed right-of-way. The impacts are not known but are stated as the proposed transmission line will have little to no permanent direct impacts. This is a tremendously leap of assumptions. Number 17. Relocation of TS 1 and TS 5 to areas where it is outside wetlands would be much preferred. Burying the lines will eliminate these structures all together. Section 6, Table 3. Summary of wetlands, rivers, streams and vernal pool impacts. Half the impacted wetlands are in the North Country. This is not a good example of avoiding/minimizing wetland impacts. Table 4, Communities. Northern white cedar, balsam fir swamp. Purchasing wetlands and then proposing to develop the property is not responsible, environmentally sensitive aesthetically pleasing, and most importantly, does not take into consideration minimizing wetland impacts. 6.1.1.1. Route selection. Northern Pass states, identifying the shortest route feasible, end quote. The shortest route is traveling south in the US Route 3 corridor. Northern Pass has played connect the dots trying to develop an alternate route that they would own. This region is our home for us and our future generations to come. We refuse to have it maligned due to so-called progress, corporate greed or the supposed needs of southern neighbors. New Hampshire is and has been an exporter of electrical power. There is no demonstrated need for us to have this transmission line. We, the Headwaters Committee of the Connecticut River Joint Commission, stand opposed to this Northern Pass project as presented. Perhaps if a different approach had been used rather than trying to shove the project down people's throats, there may have been a different outcome. Thank you .

1365-1

Thank you for your comment. The EIS evaluates several alternatives that include burial of the Project and/or specific segments of the Project. Each of these alternatives is evaluated and compared within the Socioeconomic section of the EIS (see Section 4.1.2). The EIS additionally analyzes the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 addressed potential impacts to Visual Resources which may result.

1365-1

1365-2

Thank you for your comment. The commenter's concerns are related to the project proponent's application to the state Site Evaluation Committee (SEC). The SEC process is separate from, and beyond scope of, this NEPA EIS analysis.

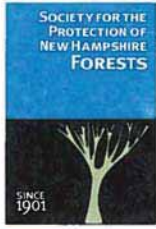
1365-2

1373-1

Thank you for your comment. The commenter's concerns are related to the project proponent's application to the New Hampshire Site Evaluation Committee (SEC). The SEC process is separate from, and beyond scope of, this analysis.

Thank you for holding these meeting this evening. I appreciate it. My name is Jane Difley, and I'm here this evening representing the Society for the Protection of New Hampshire Forests where I serve as the President/Forester. Last week at the hearing in Meredith, I summarized the Forest Society four concerns with the Northern Pass project as proposed. In Colebrook, Will Abbott reviewed concerns we have about the project's impacts on two of our largest forest reservations. Tonight I would like to address a basic concern before the SEC. That is, how you determine whether this project serves the public interest. The Forest Society protects land because of the public benefits such conservation provides. We hold conserved lands in the public trust. It is our duty to defend these conserved lands from interests that would adversely affect the conservation values inherent in these lands. Similarly, the state holds land in public trust and has similar stewardship obligations for state parks, state forests and state wildlife conservation areas. Eversource is a private company with a fiduciary obligation to its shareholders. There's nothing inherently wrong with this, but the interests they bring to this table are very different from the interests of those who steward the public trust. When Mr. Quinlan says that he believes that the Northern Pass project as proposed is balanced, he is using a scale where money is the primary counterweight. What Eversource has proposed is a project that its customer, Hydro-Quebec, says that it is willing to pay to build. The scale that the SEC must use to assess whether the project serves the public interest is very different. The counterweight on your scale is the public interest in protecting public lands, water resources, private lands conserved for public benefit and the scenic landscapes that New Hampshire advertises around the globe to visitors to support our tourism economy. In a nutshell, the resources held in this public trust should not and cannot be for sale, nor be made available for long-term lease. The State's wetland resources are a critical piece of water resources held in public trust. The State's wetland protection law, RSA 482-A, requires an Applicant for a wetland permit to demonstrate that it has studied alternatives that would avoid any adverse impacts to the maximum extent practicable. Only then can the Applicant look to minimize or mitigate impacts. The Northern Pass application asks the New Hampshire Department of Environmental Services to issue wetland permits for disturbance of an astounding 142 acres of wetland from Pittsburg to Deerfield. In the 27,000 pages of the application, we see no evidence that the Applicant has actually studied any alternative that would avoid any of the wetland impacts. Rather it appears to suggest that they simply need to write a large check to the state's wetland mitigation fund for the 142 acres of damage proposed without considering any alternative that would significantly avoid these impacts. Our preliminary analysis suggests that there are reasonable alternatives that would allow Northern Pass to be built in a way that substantially reduces the wetland impacts. The point is that Northern Pass should be required to present information documenting that they have actually considered alternatives that would avoid the wetland impacts in the current application. The statute requires it so the public interest requires it. As you begin your review of the Northern Pass application, we ask that you consider the public interest finding that you are charged to make in a manner that fully values the public trust and the resources that it is intended to protect. Thank you.

1373-1



54 Portsmouth Street  
Concord, NH 03301  
Tel. 603.224.9945  
Fax 603.228.0423  
info@forestsociety.org  
www.forestsociety.org

### Comments for SEC Hearing on Northern Pass, Concord March 10, 2016

My name is Jane Difley, and I am here this evening representing the Society for the Protection of NH Forests, where I serve as President/Forester.

Last week at the hearing in Meredith I summarized the Forest Society's core concerns with the Northern Pass project as proposed. In Colebrook Will Abbott reviewed concerns we have about the project's impacts on two of our larger forest reservations, both in Coos County, the Washburn Family Forest in Clarksville and the Kauffmann Forest in Stark. Tonight I would like to address a basic concern before the SEC: how you determine whether this project serves the public interest.

The Forest Society protects land because of the public benefits such conservation provides. We hold conserved lands in public trust. It is our duty to defend these conserved lands from interests that would adversely affect the conservation values inherent in these lands. Similarly, the State holds land in public trust, and has a similar stewardship obligation for state parks, state forests and state wildlife conservation areas. The State also holds all surface waters (ponds larger than 10 acres), ground water, wetlands and wildlife in public trust, and is responsible for stewarding these resources to serve the public interest.

Eversource is a private company with a fiduciary obligation to its shareholders. There is nothing inherently wrong with this, but the interests they bring to this table are very different from the interests of those who steward the public trust. When Mr. Quinlan says that he believes that the Northern Pass project as proposed is "balanced," he is using a scale where money is the primary counterweight. What Eversource has proposed is a project that its customer, Hydro-Quebec, says that it is willing to pay to build.

The scale that the SEC must use to assess whether the project serves the public interest is very different. The counterweight on your scale is the public interest in protecting the public trust, including public lands, public water resources, private lands conserved for public benefit, and the scenic landscapes that New Hampshire advertises around the globe to attract visitors to support our tourism economy. In a nutshell, the resources held in this public trust should not and cannot be for sale. Nor should they or can they be made available for long term lease.

We would argue that public roads and transportation rights of way are also held in the same public trust. There should be a high bar for the SEC to conclude that use of a publically owned transportation right of way by a private developer of any kind serves the public interest. It should go without saying that any such use cannot violate the private property rights of any landowner whose land is used for such a use without the expressed permission of the landowner.

The state's wetland resources are a critical piece of the water resources held in public trust. The state's wetland protection law (RSA 482-A) requires an applicant for a wetland permit to demonstrate that it has studied alternatives that would avoid any adverse impacts "to the maximum extent practicable." Only then can the applicant look to minimize or mitigate impacts.

The Northern Pass application asks the NH Department of Environmental Services to issue wetland permits for the disturbance of an astounding 142 acres of wetlands from Pittsburg to Deerfield. In the 27,000 pages of the NP application we see no evidence that the applicant has actually studied any alternative that would avoid any of the wetland impacts.

NP appears to suggest that they simply need to write a large check to the state's wetland mitigation fund for the 142 acres of damages proposed, without considering any alternative that would significantly avoid these impacts. Our preliminary analysis suggests there are reasonable alternatives that would allow NP to be built in a way that substantially reduces the wetland impacts of NP as proposed. One of the alternatives would be to completely bury the transmission line down Interstate 93. The point here is that NP should be required to present information documenting that they have actually considered alternatives that would avoid the 142 acres of wetland impacts in the current application. The statute requires it, so the public interest requires it.

One final point; The Forest Society was founded more than a century ago to help protect the White Mountains, a part of the state we should all be proud of. But I would note that our exceptional scenery is not confined to the Whites—it is in a backyard in Pembroke, it is at state parks in Allenstown and Northwood, and exceptional landscapes are found even in Franklin. More important, these scenic views are no less important to the people who call those places home, and it is in the public interest to protect them from unnecessary scars.

As you begin your review of the Northern Pass application, we ask that you consider the public interest finding you are charged to make in a manner that fully values the public trust and the resources it is intended to protect.

The seven of you are now the trustees of this public trust for the purposes of the Northern Pass application. For all of us, you are now the State of New Hampshire.

Thank you.

1374-1

1374-1

Thank you for your comment. The commenter's concerns are related to the project proponent's application to the New Hampshire Site Evaluation Committee (SEC). The SEC process is separate from, and beyond scope of, this analysis.

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 30, 2016

**ID:** 8993

**Date Entered:** Mar 30, 2016

**Source:** Website

**Topics:** Wildlife, Viewshed/Scenery, Water / Wetlands, Soils, Recreation

**Organization:** Appalachian Mountain Club

**Comment:** On March 29, 2016, I sent you (DOE) an email containing two proposed changes for burying added mileage of power transmission lines to the current plan for the northern pass.

One of these proposed changes was for burying an added segment the power transmission lines from a location near Northumberland east northeast to a location near the town of Dummer, where the planned route turns sharply 90 degrees to the north. In describing this portion to be buried, I noted that it traverses a corridor between two forests. To identify the forest to the north, I relied on the electronic maps provided on the Northern Pass website, which bore the name "Great Gains Memorial Forest". I subsequently checked the name of this forest on paper maps and then on the internet "New Hampshire State Forests" and found the name on the Northern Pass website to be incorrect. This forest is in fact the Nash Stream Forest and it is a New Hampshire State Forest. It lies within the NH political boundaries of Stratford (west portion), Odell (east portion), Stark (south portion) and Columbia (north portion).

For the record, the forest lying to the immediate south of the northern pass route in this location is The White Mountains National Forest.

Please add this email as an amendment to my email of March 29, 2016 to correct the record and to notify you of the map name error on the northern pass website.

Richard Kelly

1401-1

Thank you for your comment. The commenter's March 29, 2016 submission is also responded to in this document. The maps contained in Appendix A of the EIS are at a regional scale and do not display the level of detail referenced by the commenter, therefore we do not believe the commenter is referring to a map contained in the EIS.

1401-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Northern Pass hearings  
**Date:** Monday, November 16, 2015 7:02:19 AM

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comment

-----Original Message-----

From: Ken and Dianna Parkinson [[mailto:the\\_parkinsons@comcast.net](mailto:the_parkinsons@comcast.net)]  
Sent: Sunday, November 15, 2015 8:39 AM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: Northern Pass hearings

Dear Mr. Mills:

It is unreasonable and unfair to New Hampshire residents to schedule the hearings on the DEIS and Supplement for the Northern Pass project in mid-December. Please re-schedule these events so more residents can have our voices heard.

Ken & Dianna Parkinson  
108 Chase Road  
South Hampton, NH 03827  
[the\\_parkinsons@comcast.net](mailto:the_parkinsons@comcast.net)

1412-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1412-1



**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Northern Pass project public hearings on DEIS and Supplement  
**Date:** Monday, November 16, 2015 7:02:01 AM

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comment

-----Original Message-----

From: chuck.taylor@yahoo.com [<mailto:chuck.taylor@yahoo.com>]  
 Sent: Saturday, November 14, 2015 8:35 PM  
 To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
 Subject: Northern Pass project public hearings on DEIS and Supplement

Mr Mills,

I am a part time resident of Whitefield NH, and my family has been settled in Whitefield since the town was founded in the 1800's. Our family homestead is located on Parker Rd where I am to this day a resident.

Reason for my letter is that I am totally dismayed that the DOE has scheduled hearings on the DEIS and Supplement for the Northern Pass project for the week before Christmas. This seems to be a decision specifically designed to make it difficult for residents like myself to be able to have sufficient time to arrange to be present for the public hearings in December.

I urge you to reschedule these hearings for a more reasonable time in 2016. It is UNREASONABLE and UNFAIR to hold these hearings in mid/late December when many of us had plans in place for several months to be out of town with family for the holidays.

The Northern Pass project is an extremely important issue and I urge you to do the right thing here for the residents of New Hampshire who want to participate in the public hearings.

Sincerely,

Charles Taylor

1413-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1413-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Northern Pass  
**Date:** Monday, November 16, 2015 7:02:42 AM

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comment

-----Original Message-----

From: Tom Bigford [<mailto:Javaman@javaiscool.com>]  
Sent: Sunday, November 15, 2015 1:14 PM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: Northern Pass

Hello Brian: I would like to point out how un-American your handling of the Northern Pass hearings in NH are. The rules changed quietly and at Christmas. No, this is wrong! Lets try, at least, to be fair about this.

Tom Bigford  
Bradford, NH

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If we don't make a change in direction, we might wind up where we are headed...

1414-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1414-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Mar 21, 2016

**ID:** 8762

**Date Entered:** Mar 21, 2016

**Source:** Website

**Topics:** Viewshed/Scenery

**Name:** Joshua M Alper

**Organization:**

**Email:** jmalper@sherin.com

**Mailing Address:** 70 Clark Street

**City:** Belmont

**State:** MA

**Zip:** 02478

**Country:** US

**Comment:** I have hiked in the area around the proposed Northern Pass project for over four decades, and have great fondness for it. Assuming that this process concludes that this energy transmission project is necessary and approves the project route, the Applicant should be required to use best efforts to preserve affected areas and scenic through the use of most current methods to bury transmission lines.

1420-1

Thank you for your comment. The EIS analyzes several full-burial alternatives in detail (Alternatives 3, 4a, 4b, and 4c). The potential environmental impacts of all twelve alternatives, as well as technical constraints and costs, are discussed throughout the EIS.

1420-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Nov 14, 2015

**ID:** 8499

**Date Entered:** Nov 14, 2015

**Source:** Website

**Topics:** Purpose and Need, Alternatives, Health and Safety, Vegetation, Wildlife, Viewshed/Scenery, Recreation, Private Property/Land Use

**Name:** Nick Tulloh

**Organization:** Mr

**Title:** Mr

**Email:** nicktulloh@comcast.net

**Mailing Address:** 313 Newmarket Rd

**City:** Durham

**State:** NH

**Zip:** 03824

**Country:** US

**Comment:** As a 60 year old, 41 year NH resident I am strongly opposed to Northern Pass IN ANY FORM. We don't need it, there are alternatives if we did that are getting cheaper and more practical every day. In any guise it would ruin the pristine north country.

BUT - I AM PRIMARILY OPPOSED TO IT BECAUSE OF ITS' GENESIS IN CANADA. THOUSANDS OF DEFILED ACRES AND UPROOTED NATIVE AMERICANS DO NOT MAKE A "GREEN" PROJECT.

Lastly, I am writing to protest the timing of the hearings. The week before Christmas? Are you kidding? Do you people have ne shame?

1426-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1426-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: EIS Northern Pass  
**Date:** Monday, November 16, 2015 7:00:45 AM

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comment

-----Original Message-----

From: Peter and Pamela [<mailto:martinp003@gmail.com>]  
Sent: Saturday, November 14, 2015 11:34 AM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: EIS Northern Pass

Mr. Mills:

We just received notice that the next Northern Pass EIS meetings have been scheduled for mid-December. That is ridiculous. The DOE should represent the wants and needs of people not corporations, so these meetings should be rescheduled until after the holidays. Mid-December is just completely inappropriate for meetings of this importance. The DOE should stop representing Northern Pass and start representing the people.

Peter & Pamela Martin  
Plymouth, NH

1427-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1427-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Nov 16, 2015

**ID:** 8519

**Date Entered:** Nov 16, 2015

**Source:** Website

**Topics:**

**Name:** Brian Mills

**Organization:**

**Email:** ellenineson@gmail.com

**Comment:** I am writing to protest the fact that you are holding hearings on the Northern Pass during the week before Christmas. This whole thing is being steamrolled down our throats and this is just another fine example of the way things are being done. Sent from my iPad

1428-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

| 1428-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Northern Pass  
**Date:** Monday, November 16, 2015 6:59:56 AM

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comment

-----Original Message-----

From: shakerantiques@gmail.com [<mailto:shakerantiques@gmail.com>] On Behalf Of Doug  
Sent: Saturday, November 14, 2015 9:39 AM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: Northern Pass

Dear Mr. Brian Mills

I just received information that the hearing on the latest Northern Pass route changes is scheduled for mid December.

As a life long (66yr) resident of New Hampshire I do have concerns regarding the project. Holding hearing for the residents of New Hampshire during the height of the busy holiday season has appearance of tipping the table for advantage of Northern Pass and it's high priced attorneys.

Please reconsider the timing of the meeting to diffuse the concerns of the people most affected by the project.

Regards,

Douglas Hamel  
56 Staniels Rd  
Chichester, NH 03258

603-798-5912

1429-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1429-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Northern Pass  
**Date:** Monday, November 16, 2015 7:03:04 AM

---

comment

-----Original Message-----

From: Doug Mayer [<mailto:sherpamayer@icloud.com>]  
Sent: Sunday, November 15, 2015 3:04 PM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: Northern Pass

Hi Brian,

This is just a simple request to please consider adding more time for those of us directly impacted by the Northern Pass project. Can the hearings please be rescheduled to January or February? Not all of us are full-time on this effort (or even part-time for that matter!) and as concerned citizens, it's helpful to have more time, especially around the holidays, to consider the DEIS and the supplement.

All Best,

Doug Mayer  
79 Boothman Lane  
Randolph NH 03593

1430-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1430-1



**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Scheduling of the DEIS Hearings on NP  
**Date:** Monday, November 16, 2015 7:01:37 AM

---

comment

-----Original Message-----

From: Annie Schneider [<mailto:highlandannie@gmail.com>]  
Sent: Saturday, November 14, 2015 7:02 PM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: Scheduling of the DEIS Hearings on NP

Dear Mr Mills,

PLEASE! This is a most disrespectful design to hold the hearings right at the height of the Christmas Season in our lovely town and area.  
There are so many gatherings and celebrations long since scheduled for this exact date and surrounding dates.

We have validly developed a strong distrust for this process and the corporations pushing for this project.  
The choice of these dates only strengthens our feelings.

For the sake of trust, honor and fairness I/we urge you to reschedule this for a time when the vast majority of citizens can more easily attend and speak.

To schedule this at this time smells of ill will and Scrooge to boot!

Please amend this decision immediately.

Thank You,

Annie Schneider  
[highlandannie@gmail.com](mailto:highlandannie@gmail.com) <<mailto:highlandannie@gmail.com>>  
Plymouth, NH  
603-536-2507

1431-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1431-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: December NP meetings  
**Date:** Thursday, November 19, 2015 5:33:05 AM

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comment

-----Original Message-----

From: Marie Straiton [<mailto:m.straiton@comcast.net>]  
Sent: Wednesday, November 18, 2015 6:11 PM  
To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
Subject: December NP meetings

I am writing in to protest the timing of the NP town meetings during the month of December. I am in agreement with others that the meetings need to be moved to January 2016 so as not to interfere with the public holiday season.

Marie Straiton

Sent from my iPad

1432-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1432-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Hearings on the DEIS and Supplement for Northern Pass  
**Date:** Wednesday, November 25, 2015 7:04:37 AM

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comment

-----Original Message-----

From: Danni Downing [<mailto:danielle.downing075@gmail.com>]  
 Sent: Tuesday, November 24, 2015 9:25 PM  
 To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>  
 Subject: Hearings on the DEIS and Supplement for Northern Pass

Dear Mr. Mills,

I'm just dropping a quick line to ask about the logic of holding the public hearings about the Northern Pass DEIS and Supplement in New Hampshire a week before Christmas. While, yes, this is an incredibly important issue and people probably should somehow find the ability to attend, it is unlikely they will be able to do so. The timing of these meetings during a NH winter and only a week before Christmas seems either unintentionally short-sighted or intentionally planned to minimize attendance.

Either way, keeping the meetings on their currently scheduled dates does a disservice to the public and only benefits the interests of the Northern Pass Transmission, LLC.

Please consider re-scheduling, or explain why it is impossible to do so.

Sincerely,

Danielle Downing

--

Danni Downing Photography  
 Imagination Captured

[www.dannidowningphotography.com](http://www.dannidowningphotography.com)  
[dannidowning@gmail.com](mailto:dannidowning@gmail.com)

Do all the good you can, by all the means you can, in all the ways you can, in all the places you can, at all the times you can, to all the people you can, as long as ever you can. ~ John Wesley, Founder of the Methodist Movement

1433-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1433-1

**From:** Nancy Martland <nancy.martland@gmail.com>  
**Sent:** Friday, November 20, 2015 12:31 PM  
**To:** info@northernpasseis.us  
**Subject:** Re: DOE Northern Pass Transmission Line Project Draft EIS Notice of Public Hearing

To Whom It May Concern:

Please reschedule these meetings so that they are not taking place during the holiday season, as requested by our Governor, Maggie Hassan.

The planned schedule seems designed to minimize the public's ability to attend.

Nancy Martland

On Fri, Nov 20, 2015 at 2:00 PM, Northern Pass EIS <[info@northernpasseis.us](mailto:info@northernpasseis.us)> wrote:



**U.S. Department of Energy**  
**The Northern Pass Transmission Line Project**  
**Draft Environmental Impact Statement and Supplement**  
**Notice of Public Hearing**

The U.S. Department of Energy (DOE) announces public hearings to receive comments on the Draft EIS (DOE/EIS-0463) and the Supplement to the Draft EIS (DOE/EIS-0463-S1). The Draft EIS and the Supplement to the Draft EIS evaluate the potential environmental impacts of DOE's proposed Federal action of issuing a Presidential permit to Northern Pass LLC (the Applicant) to construct, operate, maintain, and connect a new electric transmission line across the U.S./Canada border in northern New Hampshire.

The public comment period on the Draft EIS started on July 31, 2015, with the publication in the Federal Register by the U.S. Environmental Protection Agency of its Notice of Availability of the Draft EIS, and the public comment period on the Supplement began on November 20, 2015 with publication in the Federal Register by the U.S. Environmental Protection Agency of its Notice of Availability of the Supplement to the Draft EIS. The public review period to receive comments on the Draft EIS and the Supplement to the Draft EIS closes on January 4, 2016.

DOE invites interested Members of Congress, state and local governments, other Federal agencies, American Indian tribal governments, organizations, and members of the public to provide comments on the Draft EIS and the Supplement to the Draft EIS. DOE will conduct public hearings to receive oral and written comments on the Draft EIS and the Supplement to the Draft EIS at the following locations commencing at the times identified:

Whitefield: Tuesday, December 15, 2015, 1:00 p.m. and 6:00 p.m.  
Mountain View Grand Resort and Spa  
Presidential Room  
101 Mountain View Road  
Whitefield, NH 03598

Concord: Wednesday, December 16, 2015, 6:00 p.m.

1434-1

1434-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

Grappone Conference Center  
 Granite Ballroom  
 70 Constitution Avenue  
 Concord, NH 03301

Plymouth: Thursday December 17, 2015, 6:00 p.m.  
 Plymouth State University  
 Ice Arena Welcome Center  
 129 NH Route 175A  
 Holderness, NH 03245

Please note that, in order to better accommodate the public interest in these hearings, two hearing sessions will be held in Whitefield on December 15, 2015. The format of all hearings, including the afternoon session in Whitefield, will be identical. A court reporter will be present to record comments for the record; interested individuals need only submit their oral comments once.

Requests to pre-register to provide oral comments at a public hearing should be addressed to the Northern Pass EIS Team at this email address: [info@northernpasseis.us](mailto:info@northernpasseis.us). When requesting to pre-register to provide oral comments at a public hearing, please include your full name and email address, and specify the location you request to speak at. For the Whitefield, NH meeting, please indicate which meeting time you wish to speak at. Please state in the subject line, "NP Draft EIS Public Hearing Speaker Request." Please submit your request by December 7, 2015; requests received by that date will be given priority in the speaking order. However, requests to speak may also be made at the hearing. The speaking order will be as follows: (1) Elected Officials; (2) Pre-registered speakers (order determined on a first-come, first-served basis); (3) Speakers registering at the meeting. Pre-registered speakers who have requested to speak at a specific time will be accommodated as possible. Note: if you requested to speak at the previously-scheduled public hearings in October 2015, please re-submit your request.

Each commenter will be allotted three (3) minutes. Individuals who have already spoken may have the opportunity to speak again when all other participants have made their first comments.

If assistance is needed to participate in any of the DOE hearings (e.g., qualified interpreter, computer-aided real-time transcription), please submit a request for auxiliary aids and services to DOE by December 4, 2015 by contacting Brian Mills as described below or e-mailing [info@northernpasseis.us](mailto:info@northernpasseis.us).

In addition to comments on the Draft EIS and Supplement to the Draft EIS, DOE is seeking public input with respect to the cultural and historic property information presented in this Draft EIS in accordance with its cultural and historic property review under Section 106 of the National Historic Preservation Act.

Comments on the Draft EIS, Supplement to the Draft EIS, and Section 106 can be submitted verbally during public hearings; on the project website (<http://www.northernpasseis.us/comment/>); in writing to Mr. Brian Mills at: Office of Electricity Delivery and Energy Reliability (OE-20), U.S. Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585; via e-mail to [draftEIScomments@northernpasseis.us](mailto:draftEIScomments@northernpasseis.us) or [Section106comments@northernpasseis.us](mailto:Section106comments@northernpasseis.us); or by facsimile to (202) 586-8008. Please mark envelopes and electronic mail subject lines as "NP Draft EIS Comments" or "NP Section 106 Comments." Written comments should be submitted by January 4, 2016. Written and oral comments will be given equal weight and all comments received or postmarked by that date will be considered by DOE in preparing the Final EIS. Comments submitted (e.g., postmarked) after that date will be considered to the extent practicable.

The documents are available online at <http://www.northernpasseis.us/>. Copies of the Draft EIS and the Supplement to the Draft EIS are also available at a number of public libraries and town halls (a list of locations is found here: [http://media.northernpasseis.us/media/DraftEIS\\_Hard\\_Copy\\_Locations.pdf](http://media.northernpasseis.us/media/DraftEIS_Hard_Copy_Locations.pdf)). Printed copies of the documents may be obtained by contacting Mr. Mills at the above address.

For further information contact Mr. Brian Mills at the addresses above, or at (202) 586-8267.

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Northern Pass Transmission Line Project  
P.O. Box 2729  
Frisco, CO 80443-9901

This email was sent to nancy.martland@gmail.com.  
*To continue receiving our emails, add us to your address book.*

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Dec 2, 2015

**ID:** 8552

**Date Entered:** Dec 2, 2015

**Source:** Website

**Topics:** Alternatives, Other

**Name:** Orzeck

**Organization:** Give us more time!

**Country:** US

**Comment:** I certainly hope these deadlines weren't chose to occur during the Holidays for a reason... Apparently the multi-millionaires behind this project value money over family. Goes to show you how much they care about New Hampshire and it's people.

Please re-schedule these meetings until January, when we can focus better on defending our way of life and not have to take time away from family to do so...

Should give the execs at NP more time to spend their Christmas bonus's anyway, how ironic.

1435-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1435-1

**From:** [Mills, Brian](#)  
**To:** [Travis Beck](#)  
**Subject:** FW: Hearings  
**Date:** Monday, November 16, 2015 7:00:59 AM

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comment

-----Original Message-----

From: Ellen Ineson [<mailto:ellenineson@gmail.com>]

Sent: Saturday, November 14, 2015 4:56 PM

To: Mills, Brian <[Brian.Mills@hq.doe.gov](mailto:Brian.Mills@hq.doe.gov)>

Subject: Hearings

I am writing to protest the fact that you are holding hearings on the Northern Pass during the week before Christmas. This whole thing is being steamrolled down our throats and this is just another fine example of the way things are being done.

Sent from my iPad

1436-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1436-1



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**From:** donnoyes@metrocast.net  
**Sent:** Thursday, December 03, 2015 11:31 AM  
**To:** info@northernpasseis.us  
**Subject:** meetings

Please schedule meetings at another time you know this is not the right way to do this a week before the holidays, or was that your plan??? Schedule when most people wont be able to attend???

1437-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

1437-1

**From:** \_\_\_\_\_  
**To:** \_\_\_\_\_  
**Subject:** FW: Hearings  
**Date:** Monday, November 30, 2015 8:42:51 AM

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-----Original Message-----

From: Ellen Ineson [<mailto:ellenineson@gmail.com>]  
Sent: Saturday, November 14, 2015 4:56 PM  
To:  
Subject: Hearings

I am writing to protest the fact that you are holding hearings on the Northern Pass during the week before Christmas. This whole thing is being steamrolled down our throats and this is just another fine example of the way things are being done.

Sent from my iPad

1438-1

Thank you for your comment. Following the receipt of the Further Amendment to Presidential Permit Application from Northern Pass on August 31, 2015, DOE prepared a supplement to the draft EIS analyzing the impacts of Alternative 7 - Proposed Action. A Notice of Availability of the supplement to the draft EIS was published by EPA in the Federal Register on November 20, 2015 (80 FR 72719). As a result of the production of the supplement to the draft EIS, the public hearings originally scheduled for October 2015 were rescheduled for December 2015, and were postponed again until March 2016. The comment period was extended until April 4, 2016. See Section 1.5 of the final EIS for a summary of public involvement in the NEPA process.

| 1438-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Aug 10, 2015

**ID:** 8266

**Date Entered:** Aug 10, 2015

**Source:** Website

**Topics:** Other

**Name:** Julie Moran

**Organization:**

**Email:** jmconnect777@gmail.com

**Mailing Address:** PO Box 447

**City:** Colebrook

**State:** NH

**Zip:** 03576

**Country:** US

**Comment:** Due Process: The lack of a Public Hearing in the North Country is unjust and unacceptable. The North Country stands to lose the most from overhead lines, a new Right of Way (which means that more lines will surely follow, widening the Right of Way that will be established if this is allowed to be built overhead). The people in the North Country do not have adequate access to the internet, and therefore cannot all get access to the hearings. In addition, the nearest hearing is 2 hours by car for Colebrook, and up to 3 hours driving for Pittsburg residents. Many of those who will be severely adversely affected by the Northern Pass in the North Country, do not have reliable transportation that can make the trip for 2-3 hours. This is completely unacceptable for a "public hearing".

Due process warrants a public hearing in Colebrook, Stewartstown, or Pittsburg, in addition to the other 3 hearings.

1440-1

Thank you for your comment. In response to these comments, DOE added a public hearing in Colebrook, NH to facilitate public involvement. Four public hearings were held on the draft EIS: Monday, March 7, 2016 in Colebrook, NH; Wednesday, March 9, 2016 in Waterville Valley, NH; Thursday, March 10, 2016 in Concord, NH; and Friday, March 11, 2016 in Whitefield, NH. While comments were accepted at these public hearings, comments submitted via mail, email, and website submission were also accepted. A variety of methods were employed to publicize project information and public meetings, including the Federal Register, local newspapers, postal mailing addresses, email addresses, and the project EIS website. Extensive information about the EIS process has been made available through the project EIS website (<http://www.northernpasseis.us/>). Project documents, including the draft EIS, supplement to the draft EIS, and Resource Technical Reports were available in several formats, including digitally via the project EIS website, and hard copy by request and at public libraries. Printed hard copies and CD copies of the draft EIS and supplement to the draft EIS were sent to those who requested to receive documents in those formats. Printed hard copies and CD copies were made available for public review at 30 public libraries ([http://media.northernpasseis.us/media/DraftEIS\\_Hard\\_Copy\\_Locations.pdf](http://media.northernpasseis.us/media/DraftEIS_Hard_Copy_Locations.pdf)).

1440-1

1441-1

Thank you for your comment. In response to these comments, DOE added a public hearing in Colebrook, NH to facilitate public involvement. Four public hearings were held on the draft EIS: Monday, March 7, 2016 in Colebrook, NH; Wednesday, March 9, 2016 in Waterville Valley, NH; Thursday, March 10, 2016 in Concord, NH; and Friday, March 11, 2016 in Whitefield, NH. While comments were accepted at these public hearings, comments submitted via mail, email, and website submission were also accepted. A variety of methods were employed to publicize project information and public meetings, including the Federal Register, local newspapers, postal mailing addresses, email addresses, and the project EIS website. Extensive information about the EIS process has been made available through the project EIS website (<http://www.northernpasseis.us/>). Project documents, including the draft EIS, supplement to the draft EIS, and Resource Technical Reports were available in several formats, including digitally via the project EIS website, and hard copy by request and at public libraries. Printed hard copies and CD copies of the draft EIS and supplement to the draft EIS were sent to those who requested to receive documents in those formats. Printed hard copies and CD copies were made available for public review at 30 public libraries ([http://media.northernpasseis.us/media/DraftEIS\\_Hard\\_Copy\\_Locations.pdf](http://media.northernpasseis.us/media/DraftEIS_Hard_Copy_Locations.pdf)).

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**From:** Larry | Laurence Rappaport [mailto:lmrapp@lmrapp.com]  
**Sent:** Thursday, August 06, 2015 11:01 AM  
**To:** Julie Moran <jmconnect777@gmail.com>; Mills, Brian <Brian.Mills@hq.doe.gov>; Blenda Rappaport <bsocci@lmr.com>  
**Cc:** Woodburn, Jeff <Jeff.Woodburn@leg.state.nh.us>; Greene, John <John.Greene@mail.house.gov>; Henderson, Chuck (Shaheen) <Chuck\_Henderson@shaheen.senate.gov>; jim <jim@dannis.net>; Bob Baker <abobbaker@aol.com>; Susan Schibanoff | Susan <susan.schibanoff@unh.edu>  
**Subject:** Re: DOE hearings for Northern Pass do not allow fair access for Northern constituents

Dear Mr. Mills,

I received the email below from one of my constituents and I completely agree with her. Whitefield is not an acceptable meeting place for Coos County residents. I request that you hold a public hearing in Colebrook or north in West Stewartstown or Pittsburg. There were NO usable rights-of-way belonging to Eversource Energy (formerly PSNH) and they were forced to buy land or easements in their top 40 miles. There is almost universal opposition to the project up here and I and others do not think residents should have to drive almost two hours (each way) to attend your hearing.

Please inform me of your decision. Thank you.

Larry Rappaport  
 NH State Representative  
 Coos District One

On Aug 6, 2015, at 10:41 AM, Julie Moran <jmconnect777@gmail.com> wrote:

Dear Senators and Representatives,

Having read several reports for the EIS of the Northern Pass I have several concerns for the lack of "Due Process" especially regarding access to public hearings in the state.

Why is there no public meeting from Colebrook to Pittsburg where we stand to lose the most if the overhead lines are done? This is a crucial issue where there are no existing powerlines or ROW's and there should not be any established. This is where the strongest opposition is. This is where many folks do not have access to computers or the internet and so they must travel to hearings in their beat up pick-up trucks. This is where the people MUST be heard, and must have fair access to the process.

Someone from Pittsburg must travel 2 hours to get to Whitefield. That is totally unacceptable and should not be considered fair access to a public hearing.

1441-1

Would you please raise that issue? We need a public hearing up here!

Thank you!

Julie Moran  
Colebrook, NH  
726-6992

# Northern Pass EIS Website Comment Receipt

1443-1

Thank you for your comment.

## Refers to Comment placed on Sep 22, 2015

**ID:** 8392**Date Entered:** Sep 22, 2015**Source:** Website**Topics:** Purpose and Need, Alternatives**Name:** Thomas Mullen**Organization:** Winterbrook Realty, Inc**Title:** President**Email:** tntmullen@gmail.com**Mailing Address:** 9 Deacon Willey Road**City:** Campton**State:** NH**Zip:** 03223**Country:** US**Comment:** Statement In Opposition To Northern Pass Routing Plan

I am the former owner of the Owl's Nest Resort & Golf Club in Campton, NH, a highly rated golf course and real estate development. From the date in October 2010 when the Northern Pass (NP) project was first announced, right through until January, 2015, when Owl's Nest was finally foreclosed upon by our lender, our firm was unable to sell one single property. The problem you see, was the announcement on 10/10/10 that the developer of the NP Project had decided to run approximately 11,000 lineal feet of its 1200 megawatt high tension transmission line overhead right down through the middle of the Owl's Nest residential development and golf course on an existing Public Service Company right of way. NP intended to run a new set of 100+/- foot tall steel towers down next to a set of 42+/- foot tall wooden poles already in the ROW.

Our firm objected to the NP plan and we spent over five years legally fighting NP's notion that it had a right to use the ROW on our property. We took PSNH at the time, now EverSource, to court, and for reasons my firm feels were largely political, we were never able to put our case in front of a jury of our peers. Time and money ran out and the auctioneer's gavel fell in December, 2014 turning over Owl's Nest to a group of investors for \$2.02 Million, which resulted in my partner and I leaving

1443-1

approximately \$10 Million on the table, essentially every penny I had gathered over a 45 year career in the real estate development industry. We are still continuing to pursue other options, however.

Then, adding great insult to profound emotional and financial damage, this past September, 2015, NP suddenly decided to abandon its plan to put the NP overhead through Owl's Nest and instead, it announced a new plan to bypass Owl's Nest entirely, and put the NP underground an additional 52 miles from Bethlehem, NH down to Bridgewater, NH. Now NP is trying to ram through this new routing for which it does not have any approvals. The new route has not been vetted through the DOE's EIS process. The public has not had time to address its concerns about the most recent revised routing plan. The NH Site Evaluation Committee is presently studying a siting plan, portions of which have no approvals and may never be able to be used for NP's purposes.

NP continues to ram its way through the heart of New Hampshire with no respect for the peoples' wishes. NP continues to play games with the NH SEC and the DOE's EIS process. NP seems to feel it has rights over certain peoples' properties it actually does not have. NP has no God given right to go where it isn't welcome and where, under state law, it has no legal rights to go. NP does not possess legal rights to use the route it has publicly announced it will use. NP put on a show in conjunction with the DOE's EIS process in five towns around New Hampshire earlier this month and everywhere it went, it was met with overwhelming objections to its planned routing.

When objecting to the option of using Interstate 93 (I-93), NP gave entirely false reasons why it chose not to go down the I-93 ROW. NP stated that the NH Department of Transportation had relegated NP's use of the ROW to the very extremities of the ROW in trees and rocky soils where under grounding would undoubtedly not be feasible as opposed to using already softened sections of the shoulders of the traveled surfaces. The people of New Hampshire don't buy this excuse when in fact, existing softened shoulders of highways all over the world, including here in the United States, have been successfully used extensively for the under grounding of power lines.

NP's use of the DOE's EIS process and the NH SEC's siting process has been a caricature of the way it should be conducted. Money has been thrown at people in an effort to buy their political support. Grants to a number of entities trusted to represent peoples' needs have been waived in those entities' faces in an effort to buy their support. A state that I moved to 45 years ago to get away from the political corruption prevalent in Massachusetts has become just as corrupt and it has changed the way business is now done here in the Granite State, and not for the better!

It would be one thing if the NP was a needed to keep the lights on project. It is not! It is an optional, "for profit"

project that is simply using NH for a giant conduit to get Canadian power down to Massachusetts and beyond. NP is a greed project designed to add millions per year to the EverSource bottom line. Those millions are designed to fatten up the already swollen paychecks going to the EverSource executives and to increase dividends to the firm's shareholders.

Making the people of New Hampshire literally and figuratively pay the price of pouring untold and unjustified millions into EverSource's coffers is obscene. How much is enough? At the end of 2014, it was announced that Tom May, the CEO of EverSource, was paid compensation of \$19 Million plus he was awarded \$5.28 Million in stock awards. Then, right at the beginning of 2015, rate payers around the EverSource system were hit with huge rate increases. New Hampshire rate payers have been taken undue advantage of by a company that used to call itself Public Service Company of New Hampshire? Last year I started calling it Public Disservice Company of New Hampshire because over

the years, as a result of disasters like the Seabrook Nuclear Plant, PSNH foreclosures and more recently, the losses incurred in mismanaging the scrubber problems at its coal plant here in New Hampshire, EverSource has shown a proclivity for not taking its rate payers needs into consideration when pricing its products and managing its resources so it can properly meet the power needs of our state's citizens and businesses in a reasonable fashion. It doesn't deserve further special considerations until it shows our state that it can be trusted to operate our power grid here in New Hampshire on a basis that will not give us the dubious distinction of having the highest rates for power in our nation.

Put it down below the Interstate, or no approval is your fate!

Sincerely,

Thomas N.T. Mullen, President  
Winterbrook Realty, Inc d/b/a  
Mountain Country Realty  
Mountain Country Construction  
438 NH Route 49, PO Box 1656  
Campton, NH 03223  
603-759-2510, tntmullen@gmail.com



# Northern Pass EIS Website Comment Receipt

1444-1

Thank you for your comment.

## Refers to Comment placed on Nov 13, 2015

**ID:** 8496

**Date Entered:** Nov 13, 2015

**Source:** Website

**Topics:** Other

### Organization:

**Comment:** There are many reasons why Northern Pass is wrong for NH. There is a big movement in this country to create alternative energy to get away from dependence on foreign oil. If this goes through we'll be dependent on Canada, who already owns too many of our dams on the Connecticut. We will have no control over the price of our own power. Northern Pass has already decreased property values in northern NH and it isn't even here yet. It will hurt the economy wherever it runs with its unsightly towers. If we must tolerate it, it should be ALL buried. It just doesn't make sense. We need to create our own alternative energy.

1444-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Dec 22, 2015

ID: 8627

Date Entered: Dec 22, 2015

Source: Website

Topics:

Organization: NH resident

**Comment:** The entire length of the northern pass transmission line must be constructed underground. An above ground transmission line will have dramatic, permanent and extremely negative impacts on tourism and therefore the state's economy; the ability of residents and businesses to sell their homes, business and land; the property values of homes, businesses and land, particularly those related to views, tourism and scenic values; wildlife and bird flight corridors; scenic views; and historic and cultural values. While project proponents have purchased some land thereby providing a benefit to some individuals, most, if not all, property owners within the viewsheds of the towers experience only negative financial and quality of life impacts and are provided with no compensation by project proponents. The real cost of adequately compensating those that will experience negative financial impacts must be taken into account in the cost-benefit equation. If that is done, the less expensive alternative for the proponent may become the underground construction of the entire line. As currently proposed, the project proponent alone will experience the benefit, while significant costs are externalized to those who live and own property along the corridor. NH is a highly tourism-dependent state in terms of its economy where visitors come to experience the state's scenic beauty, wildlife, historic and cultural resources for hiking, skiing, watersports, hunting and many more recreational activities. Visitor experience will be greatly diminished if the northern pass project progresses as proposed with overhead transmission lines and towers and those visitors will, as a consequence, make choices to visit other nearby states. This will negatively impact the local and state economy, which is heavily dependent on tourism. The project proponent must be required to underground the full length of the lines if the project is to be authorized.

1445-1

Thank you for your comment. The EIS evaluates several alternatives that include burial of the Project and/or specific segments of the Project. Each of these alternatives is evaluated and compared within the Socioeconomic section of the EIS (see Section 4.1.2). The EIS additionally analyzes the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable." Additionally, Section 4.1.1 addressed potential impacts to Visual Resources which may result.

1445-1

1445-2

1445-2

Thank you for your comment. Section 4.1.2 of the EIS addresses the anticipated impacts of the Project on adjacent properties, property values, and current/future tax assessments/payments. An exhaustive literature evaluation was undertaken to identify peer-reviewed studies which specifically assessed the potential impact of transmissions lines on adjacent real estate values. Due to the spatial extent of the EIS analysis, specific locations and properties were not individually analyzed. This information is presented in the Socioeconomic Technical Resource Report for the final EIS and in the EIS (Section 4.1.2). As a result of comments on the methodology and assumptions provided on the draft EIS, adjustments to the original analysis have now been updated in the final EIS. The commenter is referred to both the Socioeconomic Technical Resource Report for the final EIS, and Section 4.1.2 of the final EIS. Mitigation for lost property value is outside the scope of this analysis. The EIS analyzes several full-burial alternatives in detail (Alternatives 3, 4a, 4b, and 4c). The potential environmental impacts of all twelve alternatives, as well as technical constraints and costs, are discussed throughout the EIS.

1445-3

1445-3

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the

Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

# Northern Pass EIS Website Comment Receipt

1446-1

Thank you for your comment.

**Refers to Comment placed on Dec 29, 2015**

**ID:** 8637

**Date Entered:** Dec 29, 2015

**Source:** Website

**Topics:** Viewshed/Scenery

**Organization:**

**Comment:** We recommend that the Northern Pass bury its private transmission line entirely. Overhead lines will lower property values and ruin views. Underground lines are affordable and the best alternative.

1446-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Aug 10, 2015

**ID:** 8264

**Date Entered:** Aug 10, 2015

**Source:** Website

**Topics:** Tourism, Quality of Life

**Name:** Ken Mosedale

**Organization:**

**Email:** kenmosedale@roadrunner.com

**Mailing Address:** Box 186

**Mailing Address:** 298 meadow crest dr

**City:** Franconia

**State:** NH

**Zip:** 03580

**Country:** US

**Comment:** Disaster for many, Corporate Greed, No real reason for this NP project except Profits for a few shareholders...Northern Pass is owned by a company that is seeking to harm and hurt its own customers...these massive overhead towers will destroy property values, hurt tourism, and lead to lots of loss jobs....who will compensate all the property owners who loss value on their real estate?? NH does have a "view tax"....property values are partly based on views....in some cases this NP project will devalue property values below the mortgage value and then owners will have no reason to pay the mortgage.....what will the Banks do with the unsalable properties???

Northern Pass is unfair, unjustified, and unnecessary..... Northern Pass harms and hurts way too many people in NH....alternative 4a does make some sense and the State of NH would gain some very needed lease revenue, create many jobs encourage people to stay in NH...

1447-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1447-1

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**From:** Sandy Kingston <sndk307@hotmail.com>  
**Sent:** Tuesday, August 18, 2015 6:15 AM  
**To:** draftEIScomments@northernpasseis.us  
**Subject:** Bury the lines

Northern Pass will be built right next to our property. At this time, there is a nice buffer zone between our house and the power lines with many large trees. If the transmission lines are not buried, all the trees will be cut down and we will be looking directly at the massive towers.

Our property value will decrease and the beauty of the area that we now enjoy will be ruined.

We will only be supportive of this project if the lines are buried.

Bury the lines or do not proceed with this project,

Sandra Kingston  
307 owl Street  
Campton, NH

Sent from my iPad

1451-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1451-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Sep 20, 2015

**ID:** 8390

**Date Entered:** Sep 20, 2015

**Source:** Website

**Topics:** Forest Service Lands

**Name:** Paul Tate

**Organization:**

**Email:** pdtate@comcast.net

**Mailing Address:** 8 Edward Drive

**City:** Concord

**State:** NH

**Zip:** 03301

**Country:** US

**Comment:** In addition to the appearance of the proposed towers, which detracts from the natural beauty that is New Hampshire, property values will decrease, especially for those of us near them. Southern New England should find another way to acquire the power they need. We live in a gorgeous state, let's keep it that way!

1452-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1452-1

# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Oct 28, 2015

**ID:** 8456

**Date Entered:** Oct 28, 2015

**Source:** Website

**Topics:** Alternatives, Viewshed/Scenery, Economic, Tourism, Quality of Life

**Name:** Lynn Pettengill

**Organization:**

**Email:** turtlpond@comcast.net

**Mailing Address:** 99 Appleton St.

**City:** Concord

**State:** NH

**Zip:** 03301

**Country:** US

**Comment:**

I am concerned with the Northern Pass Power lines which are proposed for NH and the Concord area.

Whatever incentive Eversource is offering to mitigate the impact of the huge northern pass power lines through Concord and NH, it will never be enough to offset the impact on property values to those citizens within physical or visual distance of these towers. For many of us our homes are our greatest asset which we depend on to retain value for us through our retirement years.

NH and the Concord area are known for the natural beauty which generates tourist dollars, and which is why we enjoy living here. Neither citizens or visitors want to have their views destroyed by these massive towers. The technology exists to bury the lines and Eversource would continue to make a profit forever. The impact on property owners, Concord, and the state of NH would also be forever, as the value of homes and the beauty of our city and state plummet.

1454-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1454-2

Thank you for your comment. The EIS discusses the importance of tourism to New Hampshire, businesses, and the local and regional economy. The EIS (Section 3.1.2) and the Socioeconomic Technical Report describe the methods used to analyze potential impact to tourism for this EIS. As discussed in Section 4.1.2 of the EIS, no authoritative peer-reviewed studies were identified that address impacts to tourism as a result of the construction of transmission lines, and DOE did not attempt to develop such a study. No other resources were identified to allow for quantification of potential impacts. The EIS concludes that "while it is reasonable to conclude that the Project may have some level of impact on tourism within New Hampshire and on individual locations near the Project route, these are not quantifiable."

1454-1

1454-2



# Northern Pass EIS Website Comment Receipt

## Refers to Comment placed on Dec 11, 2015

**ID:** 8597

**Date Entered:** Dec 11, 2015

**Source:** Website

**Topics:** Purpose and Need, Alternatives, Health and Safety, Vegetation, Wildlife, Viewshed/Scenery, Water / Wetlands, Soils, Recreation, Private Property/Land Use, Taxes, Historic/Cultural

### Organization:

**Comment:** I purchased my property in 2001 for the purpose to own a piece of the Beautiful State of New Hampshire and to Retire to enjoy the Scenery and Recreation that The Great North Woods had to offer. I did not purchase to someday know the Landscape would turn into a using ground for the purpose of tearing up the landscape and scaring it forever to erect Towers to send electricity to the Southern States that do not care how much electricity that they waste to only use New Hampshire for a corridor for their wasteful electricity consumption and ruin what we have left for an economy. My property value will drop forcing our taxes to increase to subsidize an electricity project that is not needed for us here in the Northern part of the beautiful State of New Hampshire. We should not have to suffer for the unexcused waste of electricity that the masses in Massachusetts, Connecticut and other southern States that will not conserve this electricity , We only have Tourism left up here and the wildlife that surrounds us that will be impacted by this unwanted and unneeded project . Please insist that is this project is Granted that all of their Lines MUST be BURIED.

Thank you,  
Scott Roberge  
Colebrook, NH

1456-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions. Due to the spatial extent of the EIS analysis, specific locations and properties could not be individually analyzed.

1456-1



# The Northern Pass EIS

## PUBLIC COMMENT SHEET

If you would like to provide Comment on the Northern Pass Project to the Department of Energy (DOE), you can write your comment in the space below and return the sheet to a DOE representative at one of the sign-in tables at this meeting. You can also fill this Comment Sheet out at home and return it to Brian Mills, DOE, via mail or fax to the address posted below. Comments must be received before April 4, 2016 to be considered in the scoping process; comments received after this date will be considered to the extent practicable. Please print legibly.

Name: Sally Pratt  
 Address: 63 Water  
 City: Lancaster State: NH Zip: 03584  
 Email: \_\_\_\_\_  
 Comment: \_\_\_\_\_

*It is obvious that a "view" is considered valuable when it comes to taxation in N.H.*

*It is even more obvious when it comes to valuing a property for sale.*

*A person whose property is taken via eminent domain may receive some reimbursement but that doesn't cover abutting properties or others in the view that that will be affected.*

1459-1

Note: By Providing your name and address, it becomes public information and may be provided to individuals and organizations upon request under provisions of the Freedom of Information Act of 1974. Except for proprietary information, DOE will make all submissions from organizations or individuals available to the public in their entirety.

[www.northernpasseis.us](http://www.northernpasseis.us)

Brian Mills, Senior Planning Advisor  
 Office of Electricity Delivery and Energy Reliability (OE-20)  
 U.S. Department of Energy  
 1000 Independence Ave. SW  
 Washington, DC 20585  
 FAX: 202-586-8008

1459-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions. The methods for the property value analysis are described in Section 3.4 of the Socioeconomics Technical Report; the analysis considers properties within 500 feet of the centerline of the transmission corridor.

1460-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Due to the spatial extent of the EIS analysis, specific locations and properties could not be individually analyzed. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

SPEAKER: I'd like to thank you, both committees, for coming tonight and I'd like to read a statement I have. MR. HONIGBERG: Before you do, can you pronounce your last name and spell it for the record, please? MR. HONIGBERG: Yes. My name is Bruce Brekke. My wife and I are property owners in Whitefield. Our concern is the effects that the proposed overhead towers will have on property values and the tourist industry in the State of New Hampshire, the North Country, the town of Whitefield and specifically our property value in way of life. Recently, and new to us, the word viewshed has appeared in print and in much of the documentation referencing the Northern Pass. Interestingly, Wikipedia comments regarding the viewshed as, quote, in urban planning, for example, viewsheds tend to be areas of particular scenic or historic value that are deemed worthy of preservation against development or other change, end quote. My wife and I spend most of the days of the year at home and many hours of those days enjoying our backyard. Northeast facing view both inside and outside. We can see it when it's storming in Lancaster at Mt. Prospect or when it's sunny in Jefferson near Mt. Waumbek. Our viewshed has become our lifestyle. We praise it and we thank God for it every day. Our land abuts the existing right-of-way in Whitefield where three of the 40-foot wooden structures are visible only during winter months when the trees are bare. The view from the rear of our house is stunning. We have clear sight of the Mountainview Grand Hotel even though it's over four miles away. The panorama includes Mt Waumbek, Mt. Cabot, Mt. Prospect, Mt. Pleasant and Dalton Mountain, with the Pliny range and Kilkenny range and the Percy Peaks beyond, to the north. Now, and for the last four years our lifestyle has been threatened. Four of these steel towers as high as a hundred feet are planned to be placed along the 3000 foot of our property that abuts the existing right-of-way visible from our rear house windows and back yard. Another 19 towers would be very visible looking northeast into Whitefield. The proposed Northern Pass towers would dominate the view and if built as proposed according to the information provided by the DOE Northern Pass Section 106 documents, we would see 25 of them, and we would see the value of our property permanently diminished never to recover until the trees go to the heights that we will never see. Our ability to sell our property has been diminished by the current Northern Pass proposal. Approval of this proposal will certainly decrease our property value. Although we realize that there's a need for additional electric energy in Massachusetts, Rhode Island and Connecticut, installing the lines underground is a viable and sensible compromise which will address the interest of all parties and leave New Hampshire's views intact. After the initial impact of construction and underground lines, the scenery will revert back to its former beauty over time as nature takes hold and heals the scars. Unfortunately, even nature can't do anything about ugly overhead towers. When I look past my property at the mountains in the sky, I do not think of the value of my house and land. I take in the natural beauty what is there. That is why many people have stayed here in New Hampshire, settled here, and more importantly, visit here. We cannot ruin what we have. This magnificent country for any reason, especially a reason that is not necessary. The Northern Pass representatives say that they are listening to the people, but they are not. We want the entire project underground, not just part of it. Now, listening to the comments tonight, for the most part, it looks like Northern Pass, yes or no, is not the question. The issue is towers, and the issue is an issue because of Northern Pass's stubborn refusal to spend the money to completely bury the lines. Thank you.

1460-1

1462-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Due to the spatial extent of the EIS analysis, specific locations and properties could not be individually analyzed. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

Thank you. Barbara Meyer from Easton, New Hampshire. You've heard talk already tonight about the winners and losers in the Northern Pass project. Well, I guess I live among the winners where cables are proposed to be buried along Route 116 in Franconia and Easton, and I'd like to explain why my neighbors and I don't feel like winners at all. First, there's the fact that in our area our homes are sited fairly close to the road where these lines would go in. I estimate that about a third of our homes are probably within 50 feet of the road. Some are even on stone foundations. Some have wells in the front yard that are probably about 30 feet or so from the site of the excavation, and that excavation will include blasting and drilling. Eversource has even said they'll be taking videos of wells and foundations in anticipation of damage claims. So damage claims? I mean, where's the winning in that? We're also concerned that although Eversource has said that they'll try to bury the lines under the pavement, they will sometimes use adjacent land. That means that in some of our front yards, they will be removing vegetation permanently in order to keep the roots away from their lines. Again, there's no winning here. Next, consider what's happening to our property values. Many folks have an 80/20 split, mortgage financing to equity in their homes, but the banks don't share your pain when something affects your overall property value. So that if you have an overall loss of, say, 10 percent in the value of your home, that wipes out 50 percent of your equity. Half of your investment is gone overnight because just because you opened up a letter that says Eversource is going to put the Northern Pass at the end of your driveway. That feels like winning like Charlie Sheen is winning. Then you go into an info session to find out more and you learn that huge profit tax payments are being used to entice local governments to approve of the route. Millions of dollars are going here, going there to one group or another group that can push the project along. Yet you, the people who are actually affected, are completely ignored. You're ignored while you're the ones suffering the impact of the project. You bear the risk of excavation and the blasting, the dust and debris through the years of construction, and you'll forever bear the risk of accidental dig-ins. You know, people around here do use backhoes. And then you watch the value of your home equity eroded on top of that and nobody contemplates compensation to you. Somehow that feeling of being crushed by political expediency, I don't think that's what winning feels like. One way to turn things around and make us into winners is to use what we've been told by Eversource is the unthinkable, the infeasible, the impossible, the never-in-a-million-years, don't-even-speak-its-name alternative 4 A. We need to bury this whole line using the existing industrial corridor of 93. The 93 route is shorter, it has less environmental impact, fewer historical sites would need to be evaluated, a whole host of problems from the construction damage to dig-in risks would be reduced, and traffic flow there would even keep the lines safer from people that might want to intentionally disrupt the grid. And, most importantly, using 93 preserves local property values. There's no need to tear another industrial corridor through the North Country. Bury this down 93 instead. Thank you.

1462-1

SEC – Northern Pass

My concerns and statements for NH SEC regarding the Northern Pass Project thru Stark NH.

David McLaughlin

25 Montgomery Road

Stark, NH

[Davidmac55@aol.com](mailto:Davidmac55@aol.com)

#1, Right now the right of way has short poles with power lines and a buried gas pipe. Power poles are wooden and are lower than the trees and not visible. The proposed metal towers are much higher than the trees and would be visible, thus destroying the view of Nash Stream State Forest and the Upper Ammonoosuc River valley FOREVER! So I am totally against these tall metal towers, bury the wires like the gas pipe line had too.

#2, At the previous meetings the president said we would save 5% on our electric bill, he did not say if 5% of total bill or 5% off one of the other charges. Anyway 5% off my total bill would be about \$2.50 a month or \$30.00 per year. My house fair market value will devaluate far greater than \$30 a year with tall metal towers and wires visible. Another reason I am against these tall metal towers. I will assume if the fair market property value devaluates the my taxes to the town of Stark will go down just like all the other properties with views ruined by tall metal towers.

#3, At previous meeting the president said the NH makes more electricity than it uses, so NH does not need these tall metal towers destroying the natural views. Another reason I am against these tall metal towers.

#4, To be continued

1464-1

Thank you for your comment. The EIS and Visual Impact Assessment Technical Report analyze potential impacts to visual resources resulting from the Project. Visual impacts are summarized in Sections 2.5.1 and 4.1.1 of the EIS. Potential visual impacts in the Northern Section, where the Nash Stream State Forest and Upper Ammonoosuc River valley are located, are discussed in Section 4.2.1 of the EIS.

1464-2

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Due to the spatial extent of the EIS analysis, specific locations and properties could not be individually analyzed. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions. Potential impacts to taxes and tax revenue are discussed in Section 4.1.2 of the EIS.

1464-1

1464-2

My name is Bruce Brekke, my wife and I are property owners in Whitefield. Our concern is the effects that the proposed overhead towers will have on property values and the tourist industry in the state of New Hampshire, the North Country, the town of Whitefield and specifically our property value and way of life.

Recently, and new to us, the word "viewshed" has appeared in print, and in much of the documentation referencing the Northern Pass. Interestingly, Wikipedia comments regarding viewshed, "In urban planning, for example, viewsheds tend to be areas of particular scenic or historic value that are deemed worthy of preservation against development or other change."

We spend most days of the year at home, many hours of those days enjoying our backyard, northeast facing view, both in and outside. We can see when it is storming in Lancaster at Mt Prospect, or when it is sunny in Jefferson near Mt Waumbek. Our viewshed has become our lifestyle; we praise it and thank God for it daily.

Our land abuts the existing ROW in Whitefield where three of the 40 foot wooden structures are visible only during the winter months when the trees are bare. The view from the rear of our house is stunning. We have clear sight of the Mountain View Grand hotel even though it is over 4 miles away. The panorama includes Mt Waumbek, Mt Cabot, Mt Prospect, Mt Pleasant and Dalton Mountain, with the Pliny and Kilkenny Ranges, and Percy Peaks beyond, to the north. Now, and for the last 4 years, our lifestyle is being threatened. Four ugly steel towers, as high as 100 feet, are planned to be placed along 3000 feet of our property that abuts the existing ROW visible from our rear house windows and back yard. Another 19 would be very visible looking northeast into Whitefield. The proposed NPT towers would dominate the view, and if built as proposed, according to information provided by DOE Northern Pass EIS Section 106 Documents, we would see 25 of them, and we would see the value of our property permanently diminished, never to recover, until the trees grow to heights that we will never see.

Our ability to sell our property has been diminished by the current Northern Pass proposal. Approval of the proposal will certainly decrease our property value.

1465-1

Thank you for your comment. The EIS and Visual Impact Assessment Technical Report analyze potential impacts to visual resources resulting from the Project. Visual impacts are summarized in Sections 2.5.1 and 4.1.1 of the EIS. Potential visual impacts in the Northern Section, where the commenter's property is located, are discussed in Section 4.2.1 of the EIS.

1465-2

Thank you for your comment. Section 4.1.2 of the EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Due to the spatial extent of the EIS analysis, specific locations and properties could not be individually analyzed. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

1465-1

1465-2

During the last 4 years, the Northern Pass has promised to deliver jobs, lower electric rates, and money. Money for your land, money for the right to your land, money for your community project, more money than can be imagined. The truth is, the jobs, the lower rates and the money, as time passes, will not always be there. The towers, though, *will* always be there.

Although we realize that there is a need for additional electric energy in Massachusetts, Rhode Island and Connecticut, installing the lines underground is a viable and sensible compromise which will address the interests of all parties and leave New Hampshire's views intact. After the initial impact of construction of underground lines, the scenery will revert to its former beauty over time as nature takes hold and heals the scars. Unfortunately, even nature can't do anything about ugly overhead lines.

When I look past my property at the mountains and the sky, I do not think of the value of my house and land, I take in the natural beauty of what is there. That is why many people have stayed here, settled here, and, more importantly, visit here.

We cannot ruin what we have, this magnificent country, for any reason, especially a reason that is not necessary. The Northern Pass representatives say that they are listening to the people, but they are not. We want the entire project underground, not just part of it.

Bruce and Sondra Brekke  
99 Ramble On Road  
Whitefield, NH 03598

# Northern Pass EIS Website Comment Receipt

**Refers to Comment placed on Apr 4, 2016**

**ID:** 9212

**Date Entered:** Apr 4, 2016

**Source:** Website

**Topics:** Private Property/Land Use, Economic

**Organization:** Northern Pass Transmission LLC

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**Mailing Address:** 781 N. Commercial Street

**City:** Manchester

**State:** NH

**Zip:** 03101

**Country:** US

**Comment:**



**COMMENTS OF NORTHERN PASS TRANSMISSION LLC  
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PROPERTY VALUE IMPACT ANALYSIS**

Northern Pass Transmission LLC (“Northern Pass” or “the Project”) submits this comment on the issue of the impact of high voltage transmission lines (“HVTL”) on property values. This comment incorporates by reference and attaches hereto a report by Dr. James Chalmers entitled *High Voltage Transmission Lines and New Hampshire Real Estate Markets: A Research Report, June 30, 2015* (the “Chalmers Report”) that was commissioned by Northern Pass to support its application to the New Hampshire Site Evaluation Committee. The Chalmers Report provides a detailed analysis of the 11 different studies on the impacts of HVTL on property values that are the most relevant to the issues presented here.<sup>1</sup> The Chalmers Report also describes the results of three different studies that Chalmers undertook to evaluate the impact of HVTL on property values specifically in New Hampshire. It provides a strong basis for concluding that any impacts of the Project on property values in New Hampshire will be both rare and small.

**The DEIS Analysis**

Based on an averaging of four different studies, the DEIS suggests that Northern Pass will have small impacts on property values. The DEIS estimates that the construction of Northern Pass would reduce residential property values within 500 feet of the line by an average of approximately 3.5 percent, resulting in a reduction in property tax payments totaling approximately \$260,000 per year along the Project route. This would not be a large impact for such a large project. However, even this small assumed impact is overstated.

To arrive at its 3.5 percent impact on residential property values, the DEIS averages the results from two Canadian studies, one New Zealand study and one Illinois study, and it then applies them to properties within 500 feet of the Project. However, a key shared conclusion of the literature represented by those studies is that property value effects from a transmission line cannot be assumed. Effects have been found in some studies, but not in others, and other factors tend to determine whether HVTL will have an impact on property values. Moreover, nowhere in the literature that the DEIS relies upon – nor in the larger body of analytical on this topic – is it suggested that the results of one or more studies are sufficiently consistent or broadly applicable that they can be applied to unstudied areas. Thus, to average the results of four individual

<sup>1</sup> A copy of the Chalmers Report accompanies this comment. The back-up data for the report is available at <http://www.northernpass.us/assets/filings/Volume%20XXXV/Appendix%2046%20High%20Voltage%20Transmission%20Lines%20and%20Real%20Estate%20Markets%20in%20New%20Hampshire.pdf>.

1469-1

1469-1

Thank you for your comment. Section 4.1.2 of the EIS addresses the anticipated impacts of the Project on adjacent properties, property values, and current/future tax assessments/payments. An exhaustive literature evaluation was undertaken to identify peer-reviewed studies which specifically assessed the potential impact of transmissions lines on adjacent real estate values. This information is presented in the Socioeconomic Technical Resource Report for the final EIS and in the EIS (Section 4.1.2). As a result of comments on the methodology and assumptions provided on the draft EIS, adjustments to the original analysis have now been updated in the final EIS. DOE reviewed both the 2012 and 2015 versions of the Chalmers Report, and determined that the 2012 report was more appropriate to consider in the analysis. As these details are far too complex to be summarized within this response, the commenter is referred to both the Socioeconomic Technical Resource Report for the final EIS, and Section 4.1.2 of the final EIS.

1469-2

1469-2

Thank you for your comment. Section 4.1.2 of the final EIS addresses the potential for impact to property values as a function of proximity of the Project to private property. Adjustments to the original analysis presented in the draft EIS have been updated in the final EIS to reflect comments on the methodology and assumptions.

studies done in regions quite distinct from New Hampshire to conclude there is an “average effect” on property values is to misstate what the literature indicates.

The DEIS property value impact analysis also only addresses the impact of the Project in isolation. It does not ask the question that is most relevant in this case: What is the incremental impact of the Project on surrounding properties where there is already an existing ROW that contains one or more transmission lines? DOE acknowledges this flaw, but it does nothing to correct for it, except to note that the DEIS “likely overstates the adverse impact for segments of the Project that would parallel existing transmission lines.” More appropriately framed, because of this flaw, the DEIS certainly overstates the impact. Except for 32 miles of the northern-most 40 miles of the Project, where there are only few and widely dispersed residential properties, the entire overhead portion of the Project is in an existing ROW that already contains one or more 115 kV lines. The DEIS also does not take into account that property owners whose properties are subject to an easement for the existing ROW were compensated for that encumbrance and that subsequent purchasers presumably paid a price that reflected any impact associated with the encumbrance.

Both of these considerations undercut the conclusion contained in the DEIS that Northern Pass would have even a small effect on property values in the particular setting where the Project is to be built.

### **The Chalmers Report**

The Chalmers Report recognizes that the published literature can contribute valuable insights to the consideration of what impacts, if any, a project like Northern Pass will have on property values. He undertook an analysis of 11 prominent studies in the published professional literature, and he also undertook three New Hampshire-specific research initiatives, namely, Case Studies, Subdivision Studies and Market Activity research:

- The Case Studies analyze 58 individual sales of New Hampshire residential properties crossed or bordered by a HVTL.
- The Subdivision Studies examine the timing and pricing of lot sales in 13 New Hampshire subdivisions where some lots are crossed or bordered by a HVTL and others are not.
- The Market Activity Research compares sale price to list price ratios and days on market for residential sales in different New Hampshire locations relative to a HVTL corridor.

Before Dr. Chalmers discusses either the established body of professional literature or the New Hampshire-specific research initiatives, however, he addresses the important issue of the difference between what intuition or subjective judgment might say about the impacts and what the empirical data shows.

***Distinguishing Between Public Perception and Empirical Data***

At the outset of his Report, Dr. Chalmers emphasizes the importance of distinguishing between the empirical evidence and the public perception of real estate value effects. The empirical evidence described in the remainder of the Chalmers Report makes it clear that real estate value effects cannot be presumed and that, while there will be effects in some cases, these cases are infrequent and the effects are generally small. On the other hand, the public's perception of HVTL often seems to be that negative effects of HVTL on the value of real estate are a self-evident fact.

Dr. Chalmers explains that, part of the problem stems from the fact that, if you focus solely on HVTL, most people would expect the direction of the effect on market value to be negative. But it does not follow that there is a discernible effect on market value. The effect on market value, if any, depends on the weight given the HVTL effect relative to all the other positive and negative variables that shape a property purchase decision. All other things being equal, the property without the HVTL might be preferred, but all other things are never equal. The published research shows that, even though transmission line issues have been a concern in most of the communities studied, and even though the direction of effect on real estate value is generally negative, the presence of HVTL is apparently not given sufficient weight by buyers and sellers of real estate to have had any consistent measurable effect on market value. Ultimately, Dr. Chalmers notes, the existence of an effect has to be inferred from market data.<sup>2</sup>

In addition, as Dr. Chalmers points out, there are different perspectives on these issues. There is the "Market Value" perspective which investigates whether the price arrived at in a fair market sale is affected by an HVTL. This is an objective concept based on market data and is the perspective on which Dr. Chalmers' Report is based. A second perspective can be referred to as the "Owner" perspective. This is the subjective perspective of the owner of an affected property who has an opinion of the personal implications of the HVTL. This might include a scenario where the removal of a tree has great personal significance or where a portion of a

<sup>2</sup> A Comment submitted by Carl Martland purporting to find that HVTL have significant effects on property values may be seen as an example of Owner perspective Dr. Chalmers describes. He notes that the developer of the Owl Nest development in Campton asserts that Northern Pass caused him to lose \$9 million. Martland at 1. That may well be his perspective on the matter. However, a New Hampshire court evaluating that claim concluded that the developer had failed to show a connection between Northern Pass and decreased property sales and dismissed his lawsuit. <http://www.unionleader.com/apps/pbcs.dll/article?AID=/20141124/NEWS05/141129568>.

HVTL structure becoming visible causes harm in the subjective opinion of an individual property owner. In both of these scenarios, however, it is entirely possible that a prospective buyer, or, more generally, the market, would be oblivious to the change. A third perspective is that of a non-owner who enjoys an affected resource (while hiking or driving for example) and feels that their use or enjoyment is impaired by the HVTL. This perspective can be referred to as the “Public” perspective.

Dr. Chalmers does not dispute that both the Owner and the Public perspectives are genuine, but he notes that those perspectives are often confused with market value effects. Again, whether the market value of a property has been affected by proximity of HVTL is an empirical question that must be answered with market data. Based on the professional literature and the evidence, Dr. Chalmers finds that the subjective Public and Owner perspectives are frequently not reflective of what actually occurs in real estate markets.

### *The Published Literature*

The published literature is extensive and compares the sales of properties potentially affected by a HVTL to the sale of properties unaffected by such lines. These studies were carried out using different methods (statistical studies, subdivision studies, case studies). The 11 studies Chalmers includes in his literature review were the most widely referenced by researchers in the field, use the most widely accepted methodologies, are focused on the United States and Canada and carry publication dates of 1988 or later. Chalmers summarizes key conclusions of this literature review as follows:<sup>3</sup>

- For residential properties about half of the studies find some measure of a negative impact on the value of the property resulting from proximity to HVTL, while half find none.
- Where effects were found, they were usually in the range of a 1-6% reduction in value, and any effect declined rapidly as distance from the lines increased.
- Where effects were found, they were very small beyond 200 feet from the HVTL, and seldom extended beyond 500 feet.
- Once the effect of proximity has been accounted for, visibility generally has no additional, independent effect on market value.
- Encumbrances frequently have no effect on market value; where there is an effect, it is small relative to the size of the encumbrance.

<sup>3</sup> Chalmers Report at 8 – 15.

- HVTL generally have no effect on the value of commercial/industrial properties unless development of the site is constrained in a way that reduces the income producing potential of the property such as by reducing the size of the improvements that can be built on the site.
- The market value of vacant land is generally not affected by HVTL, although there may be some impact on value if the development of the land is constrained by the ROW, or if the HVTL are the principal differentiating feature of otherwise very similar parcels.
- Where there are effects, there is some evidence that they dissipate over time.

Dr. Chalmers concluded that the results in the published literature are sufficiently consistent across geographic areas and development patterns that there was no reason to expect a different result in New Hampshire. Nevertheless, Dr. Chalmers undertook three research initiatives to test whether that conclusion was confirmed by the data. He found that they were.

### *Case Studies*

The Case Studies represent a broad spectrum of properties crossed by, or adjacent to, a HVTL in New Hampshire including variations in property location, size and value and in the way in which the property is physically affected by the HVTL. While the results of any single Case Study are necessarily anecdotal, useful generalizations can be drawn when considering the results from the 58 Case Studies involving three different HVTL corridors and sales that occurred between 2010 and 2014. These include the following: sale price effects are infrequent, occurring in only 10 cases out of 58, or 17%. Despite significant encumbrances of many properties crossed by a HVTL ROW, highly visible structures and, in some cases, extreme proximity to the ROW, the effects on sale prices appear to be small and the effect is reduced substantially with distance of the residence from the line.

Even out of the 14 cases that combined close proximity of the house to the ROW and clear visibility of transmission structures, eight showed a sales price effect, while six did not. Only one of the 10 cases where there appeared to be an effect on sales price involved a residence located more than 100 feet from the edge of the ROW. In those instances in which an effect on sale price was noted, the properties were not only close to the ROW, but were forced to be close to the ROW because the developable portion of the lot was constrained by the location of the ROW on the property.

Of particular note, portions of what Chalmers designates as Corridor #2 are proposed to be the location of the southern 103 miles of overhead Northern Pass HVTL.<sup>4</sup> The Project began receiving publicity in 2010, the beginning of the period covered by the Case Studies, and thus the Case Studies for this corridor may include any effects on the real estate market of the Northern Pass. Yet, only 4 of 28 properties in this Corridor showed a sales price effect. All four had clear visibility of one or more transmission structures, and two of the four properties were more than 60% encumbered by the ROW. For eight other properties, real estate brokers suggested that the HVTL had a price effect, but the appraisal evidence did not support that conclusion.<sup>5</sup>

### *Subdivision Studies*

Chalmers studied 170 lot sales in 13 different subdivisions throughout New Hampshire where some lots were crossed or bordered by a HVTL ROW and others were not. The objective was to identify residential subdivisions that were representative of the diversity in land use and development patterns across the state. Since the lots were unimproved, if HVTL had effects on the marketability of the lots, those could be detected without distortion arising from differences in the value of improvements. Additionally, prior to improvement, close substitutes to those lots encumbered by or abutting HVTL were available. The response of the market to the two categories of lots, those crossed or bordered by HVTL and those that were not, was analyzed both for sale price and marketing time effects.

The lot sale history indicates a general absence of impact on marketability associated with lots encumbered by or abutting a HVTL ROW. Eight of the 13 subdivisions studied showed no differential sale price or marketing time effect associated with the HVTL. In those cases where there were price effects, the lots were heavily encumbered by the ROW, and frequently the area in which improvements could be sited on the lot was constrained. Thus, for example, a five-acre lot in Sugar Hill showed a significant price effect, but because it was so heavily encumbered by the ROW, there was only one acre that had access to the street and could be developed, while other lots that still had significant encumbrances showed no price effect.<sup>6</sup> Looking at all of the subdivision evidence, Chalmers concludes that the ROW encumbrance has to impinge on portions of the lot important to siting of a home for there to be an impact on value.<sup>7</sup>

<sup>4</sup> The Martland Comment criticizes the DEIS for basing its analysis on the literature and “not upon analysis of any properties that would be affected by the project.” Martland at 2. That criticism does not apply to Chalmers Report. However, Martland’s case study is of Sugar Hill, which will not be affected by the Project given that the proposed Northern Pass route is now designed to be entirely underground in public roads in the area of Sugar Hill.

<sup>5</sup> Chalmers Report at 25 – 28.

<sup>6</sup> Id. at 77 – 85.

<sup>7</sup> Id. at 85.

### *Market Activity Research*

Finally, for Corridor #2, Chalmers analyzed Multiple Listing Service sales data for 2013 and 2014 to compare the ratio of listing price to sales price and days on market of properties at different distances from HVTL. Data were collected for all sales occurring in towns for which some portion of the town fell within one mile of a HVTL. The sales were categorized by distance into three groups, encumbered or abutting, 1 foot to 500 feet, and 500 feet to one mile from the ROW. Multiple Listing Service data on sale price to list price ratios and days on market were then analyzed to see if there was market resistance to the properties in locations closest to the HVTL. All told, Chalmers analyzed 650 New Hampshire property sales. The analysis indicated no systematic market disadvantage of the encumbered or abutting properties relative to the more distant group with respect to either sale price or time on the market. Specifically, the data showed that sales of encumbered properties tended to have the same or higher sale price to listing price ratio than more distant properties, and in six out of the eight quarters studied, the average days on market of the abutting or encumbered properties was the same or lower than for the more distant properties.<sup>8</sup>

### Conclusion

Approaching the question from four distinct angles – the published literature and three New Hampshire-specific market studies – Dr. Chalmers makes a convincing case that there is no evidence that HVTL result in systematic or widespread effects on real estate markets, whether in New Hampshire or elsewhere. Effects typically occur only when the HVTL involves both close proximity and clear visibility. Impacts appear most likely when those factors combine with the existence of an encumbrance that significantly impairs the ability of an owner to develop a property. Because Northern Pass will be located in an existing ROW, the proximity of residential properties relative to the ROW will not change. Likewise, constraints on the development of property located near the ROW will be unaffected by NPT's use of existing ROWs. Chalmers therefore properly concludes that the Project will not have a discernible effect on property values or marketing times in local or regional real estate markets.

1469-3

Thank you for your comment. Section 4.1.2 of the EIS addresses the anticipated impacts of the Project on adjacent properties, property values, and current/future tax assessments/payments. An exhaustive literature evaluation was undertaken to identify peer-reviewed studies which specifically assessed the potential impact of transmissions lines on adjacent real estate values. This information is presented in the Socioeconomic Technical Resource Report for the final EIS and in the EIS (Section 4.1.2). As a result of comments on the methodology and assumptions provided on the draft EIS, adjustments to the original analysis have now been updated in the final EIS. As these details are far too complex to be summarized within this response, the commenter is referred to both the Socioeconomic Technical Resource Report for the final EIS, and Section 4.1.2 of the final EIS.

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<sup>8</sup> Id. at 86 – 88.