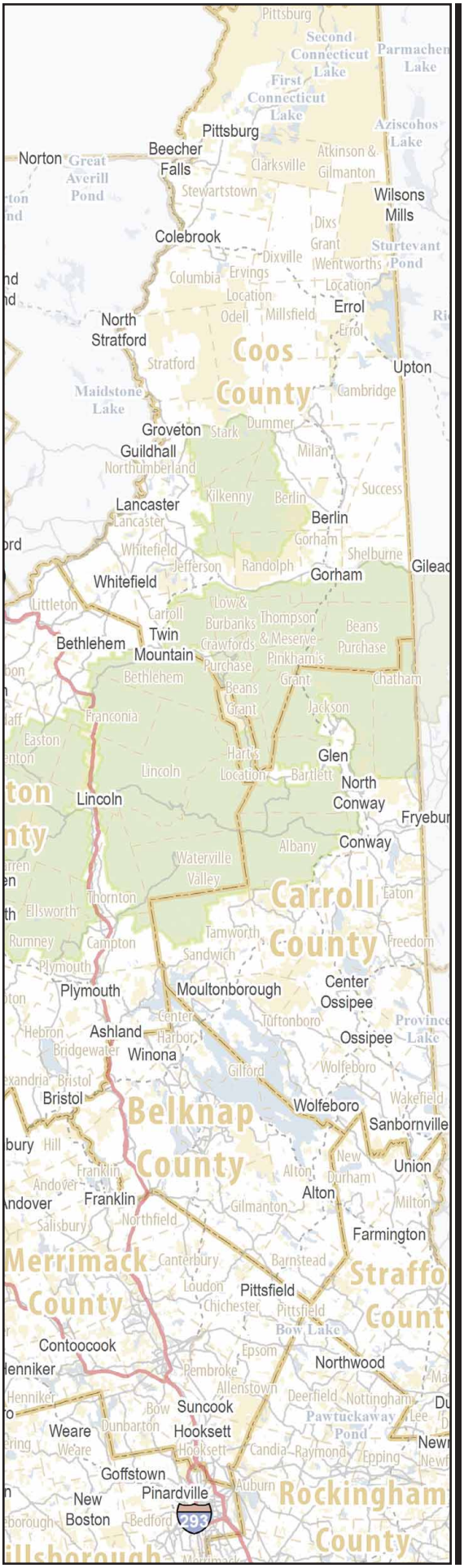


DOE/EIS-0463

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).

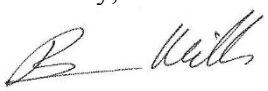
DOE has prepared this final EIS to evaluate the potential environmental impacts in the United States of the proposed action and the range of reasonable alternatives, including the No Action alternative. Under the No Action alternative, the Presidential permit would not be granted, and the proposed transmission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



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

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:

Mr. Brian Mills, National Environmental Policy Act (NEPA) Document Manager
Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585
Telephone: (202) 586-8267
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
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 ±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

Attachment C.
Response to All Comments on the Draft EIS

Document Metadata:DOE-HQ-2016-0008-DRAFT-0001

Document Details

Docket ID: DOE-HQ-2016-0008

Docket Title: Environmental Impact Statements; Availability, etc.: Draft Northern Pass Transmission LineProject; Public Hearings *

Document File:

Docket Phase: Notice

Phase Sequence: 1

Title: Comment on FR Doc # 2016-02111

Number of Attachments: 0

Document Type: PUBLIC SUBMISSIONS *

Document Subtype: Public Comment

Comment on Document ID: DOE-HQ-2016-0008-0001

Comment on Document Title: Environmental Impact Statements; Availability, etc.: Draft Northern Pass Transmission LineProject; Public Hearings

Status: Pending_Post

Received Date: 03/29/2016 *

Date Posted:

Posting Restriction: No restrictions

Submission Type: Web

Number of Submissions: 1 *

Document Optional Details

Status Set Date: 04/07/2016

Current Assignee: Bacon, Cuttie (DOE)

Status Set By: Adams, Andrea (DOE)

Comment Start Date:

Comment Due Date:

Legacy ID:

Tracking Number: 1k0-8orv-clmu

Submitter Info

Comment: As a citizen that lives in an area where a large scale

0800-1

0800-1
Thank you for your comment.

transmission line was recently built, I feel that this is beneficial for the surrounding areas. The benefits that come from the transmission line will not only make electricity cheaper, but also have a greater reach. The Nevada One transmission Line connected Las Vegas to northern Nevada, and it has been benefitting the Nevada rate payers tremendously. There was also an in depth Environmental Impact Statement to ensure that the project would not harm the environment or eco-system it would be living in. This is a project involves multiple countries and states, where The NV One Transmission line only involved the State of Nevada. That means there is going to be more red tape and regulations that need to be met. The State of New Hampshire and the rest of New England would be able to take advantage of cheap and clean Hydro energy. In my opinion this would benefit the New Hampshire and the New England Area *

0800-1
Continued

0800-1 cont'd

First Name:	Joseph *
Middle Name:	
Last Name:	Foley *
Mailing Address:	7800 foothill ash ave *
Mailing Address 2:	1301 Canosa Ave *
City:	Las Vegas *
Country:	United States
State or Province:	Nevada
ZIP/Postal Code:	89117 *
Email Address:	
Phone Number:	
Fax Number:	
Organization Name:	
Submitter's Representative:	
Government Agency Type:	
Government Agency:	
Cover Page:	

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Apr 4, 2016

ID: 9195

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Viewshed/Scenery, Historic/Cultural, NEPA Process

Name: Rebecca Harris

Organization: National Trust for Historic Preservation

Title: Senior Field Officer

Email: rharris@savingplaces.org

Mailing Address: 7 Faneuil Hall Marketplace

Mailing Address: 4th Floor

City: Boston

State: MA

Zip: 02109

Country: US

Comment: Please see attached letter.

National Trust for Historic Preservation
Save the past. Enrich the future.

April 4, 2016

Mr. 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 Line Project, Draft Environmental Impact Statement (July 2015) and Supplement (November 2015), DOE/EOS-0463 and DOE/EIS-0463-S1

Dear Mr. Mills:

The National Trust for Historic Preservation appreciates the opportunity to provide these comments on the Draft Environmental Impact Statement and Supplement for the Northern Pass Transmission Line Project (DEIS) under the National Environmental Policy Act of 1969, as amended (NEPA). As we stated in our November 5, 2013, comment letter on the EIS Scoping, given the scale and scope of this project—involving at least thirty-one towns, an estimated 192 miles, and potentially hundreds if not thousands of historically and culturally significant resources—it is critical that the Department of Energy (DOE) conduct the NEPA review process in a thoughtful and thorough manner. The National Trust and other interested parties are deeply concerned about the potential adverse effects of this project on New Hampshire's historic and cultural resources, the lack of completeness and accuracy of the cultural and historic resources information in the DEIS, and about how the NEPA process has been conducted thus far.

Goals of the National Environmental Policy Act

Congress established the National Environmental Policy Act to ensure that federal agencies consider the impacts of proposed federal actions on the nation's environmental and cultural resources when making decisions. Agencies are directed to "use all practicable means" to ensure that federal actions "preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and a variety of individual choice."[1] To satisfy this obligation in the permitting review for the proposed Northern Pass transmission line, the DOE must carefully consider the potential impacts of the project on historic

[1] 42 U.S.C. § 4331(b).

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P 202.588.6000 **F** 202.588.6038 **E** info@nthp.org www.PreservationNation.org

resources that are listed in or eligible for listing in the National Register. This requires the DOE to consider potential direct, indirect, and cumulative impacts of the project on historic resources in its NEPA review documents.[2] As described below, the DEIS has information gaps and flaws in methodology that fail to satisfy the DOE's obligations under NEPA.

The DOE's Purpose and Need Statement Fails to Identify the Need for the Project.

The DEIS states that the "purpose of, and need for, the DOE's action is to decide whether or not to grant the requested Presidential permit for the Project at the international border crossing proposed in the amended Presidential permit application."[3] A purpose and need statement in a NEPA document is intended to describe what goal the proposed *project* is attempting to achieve, and an explanation for why achieving that goal is necessary. Instead of addressing the need for the Northern Pass project, the DOE's statement of purpose and need erroneously focuses on the bureaucratic task of making a decision on an application, without even addressing whether or not the permit for the project *should* be issued, and what the purpose of the project is in the first place. This is inappropriate, and as a result, the DEIS fails to adequately explore whether there is an actual need for the project.

The DEIS Fails to Consider an Adequate Range of Alternatives.

The DEIS only evaluates alternatives that were presented by the project applicant.[4] There is no assessment of alternative methods to supply the proposed amount of energy (*e.g.* wind, solar, distributed generation, other transmission line routes, *etc.*). By limiting analysis solely to the alternatives proposed by the project applicant, the DOE has not satisfied its obligations under NEPA. Moreover, this focus on a limited range of alternatives has limited the DOE's ability to decide whether this proposed project is consistent with the public interest, as is required by Executive Order 12038.

Before a Presidential permit may be issued, the action must be found to be consistent with the public interest. The two criteria used by the DOE to determine if a proposed project is consistent with the public interest are a consideration of the project's environmental impacts and the project's impact on electric reliability. The NEPA review process is the method that the DOE uses to consider the project's environmental

[2] 40 C.F.R. § 1508.8.
[3] DEIS, page S-4 of the Summary.
[4] See Table 1, page 2-3, in the Supplement: No Action, Alternatives 2, 3, 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, and 7.

0808-1

0808-1
Thank you for your comment. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE's purpose and need reflects this limited authority. While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a connected action. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground/overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives, including two alternative border crossings, were considered but eliminated from further detailed analysis.

0808-2

0808-2
Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public

interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a "connected action" under NEPA. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

impacts and evaluate the public interest. Because the DEIS does not consider an adequate range of project alternatives, a reasoned determination regarding whether the project is consistent with the public interest cannot be made. To ensure that this proposed project is consistent with the public interest, and to ensure full compliance with NEPA, the DEIS should consider other alternatives to meet the project need beyond simply those alternatives that were supplied by the project applicant.

There are Fundamental Flaws in the Methodology Used to Identify and Evaluate Historic and Cultural Resources.

In our letter dated November 5, 2013, we urged the DOE to coordinate its review under NEPA and Section 106 of the National Historic Preservation Act. Guidance for this coordination has been developed by the Advisory Council on Historic Preservation (ACHP) and the Council on Environmental Quality (CEQ).[5] This guidance advises lead agencies to ensure that they "Develop comprehensive communication plans that meet agency outreach and consultation requirements to maximize opportunities for public and consulting party involvement and minimize duplication of effort by agency staff." Agencies are also directed to "Use NEPA documents to facilitate Section 106 consultation, and use Section 106 to inform the development and selection of alternatives in NEPA documents."

This approach has not been embraced by the DOE in the development of this DEIS. At this point in the review process, at least three different consulting companies are being used to prepare materials for review under NEPA, Section 106, and the state's Site Evaluation Committee (SEC), resulting in an enormous duplication of effort and a lack of standardized approaches to identifying historic resources and reviewing potential impacts. This also creates a huge burden on the public, consulting parties under Section 106, and the participants in the state review process, as they must comb through multiple data sets, not all of which are available to the public yet, to ensure that places of concern are identified and analyzed. This is not a process that is designed to ensure robust public participation, as required by NEPA; in fact it makes participation unduly burdensome. Similarly, members of the public have been specifically excluded from participating in the Section 106 process and much of the information produced under Section 106 has been withheld from the public. This is directly contrary to the public participation requirements in the NHPA's regulations, 36 C.F.R. §§ 800.2(d), 800.3(e).

[5] *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106* (see http://www.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf).

0808-2 cont'd

0808-2 Continued

0808-3

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.

0808-3 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. In implementing these federal processes, it is the federal agency's responsibility to balance the sensitivity of certain information, e.g., individual's personal information or the specific locations of resources that could be damaged by looting, with providing public access to information. Additional information has been added to Section 3.1.8 of the EIS regarding the sensitivity of information about historic and cultural resources. 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 amendment to their 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. Additional information has been added to the Section 3.1.8.3 of the EIS to clarify the methodology for identifying historic properties. The methodology used in the preparation of the draft EIS was correctly described in Section 2.4.1.3 of the Cultural Resources Technical Report, which indicates that additional investigations were recommended to determine National Register of Historic Places eligibility and that these investigations will be conducted in accordance with the Section 106 programmatic agreement developed for the proposed Northern Pass project. Cultural landscape studies are being conducted through the Section 106 process in accordance with guidance from NH DHR regarding how cultural landscape studies should be identified and documented. For more information on cultural landscapes see Sections 3.1.8 of the EIS and 1.4.7 of the Technical Report. 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.

0808-3 cont'd

0808-3
Continued

While we understand that the DOE ultimately declined to use an integrated NEPA and NHPA review process, the DEIS and associated Cultural Resources Technical Report (July 20, 2015) still refer to and purport to rely on the cultural resources information prepared for the Section 106 consultation. For example, the DEIS states that, "The information gathered during the Section 106 process is being used to inform the draft EIS…"[6] However, as a consulting party participating in the Section 106 review, we know that, at the time the materials were prepared for the DEIS, the draft Project Area Forms (PAFs) prepared for historic resource identification under Section 106 were in the early stages of revision based on extensive comments from the New Hampshire Division of Historical Resources and were far from complete. As of today's date, they are still not finalized. The draft PAFS are also based on Alternative 2 in the July 2015 DEIS, and not the new preferred route described as Alternative 7 in the November Supplement. Additionally, the individual survey forms have not even been initiated yet. Much of the historic resource information included in the DEIS and the Supplement, and the conclusions that are drawn, are based on the consultant's evaluation of the information in the draft PAFs. Therefore, it is simply impossible for the analysis related to historic properties included in the DEIS and Supplement to be considered adequate or complete.

Furthermore, the methodology that the DOE used to determine how many historic resources might be affected by the project is wrong. For example, on page 85 of the *Cultural Resources Technical Report*, three historic properties are removed from consideration because "they have not yet been evaluated for NRHP eligibility." That approach is incorrect. Just because a property has not been evaluated for historic significance does not mean that it is not significant or eligible for inclusion on the National Register of Historic Places. It means that the property must be evaluated under the National Register's criteria 36 C.F.R. § 800.4(c). Then, if the property is determined to be National Register-eligible, the potential effects of the project on the property must be considered in the Section 106 consultation process and the NEPA review. This same faulty logic is used elsewhere in the DEIS, and it serves to dramatically underestimate the number of historic properties that would actually be affected by the project. This systematic attempt to limit the scope of the review of cultural resources is contrary to the requirements of NEPA *and* Section 106.

Moreover, the DOE failed to evaluate large, landscape-level resources. There is virtually no mention of potential rural historic districts, cultural landscapes, historic landscapes, traditional cultural properties or historic trails or byways. Given the expansive scope of

[6] DEIS, page 3-31, Section 3.1.8.

the project, the DEIS should have had an equally expansive identification and evaluation of historic and cultural resources beyond archaeological resources and historic structures listed on or already determined eligible for listing on the National Register of Historic Places.

The vistas from historic properties, state and federal scenic byways, waterways, and recreational hiking trails (many of which are likely eligible for the National Register), should also have been evaluated. The historic resources throughout this region include the specific environmental context of rural historic landscapes and the cohesive character of the natural and built environment that shapes them. These landscape characteristics are key to understanding and interpreting the centuries of human use of the land in this region, such as agricultural and recreational development patterns.[7] Also, unaltered natural landscapes can hold deep cultural significance to Native American tribes and other communities. While tribal resources are mentioned in passing in some places (*e.g.* page 3-31), there is no substantive discussion of identifying or evaluating the impacts to places that might be of importance to Native communities or other cultural groups.[8] All of these resources, regardless of whether an area has already been listed on or determined eligible for listing on the National Register, should have been explicitly included. It is difficult to believe that a project that would bisect 192 miles of New Hampshire would impact only 75 potential architectural resources in the direct APE and 264 in the indirect APE for the preferred alternative, and even harder to believe that the project would have no adverse effects on any historic districts or significant landscapes (*e.g.* see Table 13 on page 14 of the Supplement; Tables S-11 and S-12 on page S-27 of the Summary, Table S-13 on page S-28 of the Summary; page 4-130 of the DEIS). The methodology that has been used to identify historic resources is clearly flawed.

Secrecy is Undermining the Public Process and Impeding Meaningful Consultation.

One of the factors that has been a source of confusion and frustration for many parties has been the DOE's focus on secrecy. Examples of this unnecessary focus on secrecy include the fact that attendees at the Section 106 consultation meetings in the summer of 2014 were informed that the content of the meetings was secret and not allowed to be shared with anyone other than "official" consulting parties. The draft APE document

[7] See NPS Bulletin 30: *Guidelines for Evaluating and Documenting Rural Historic Landscapes*.
[8] See NPS Bulletin 38: *Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

0808-3 cont'd

0808-3 Continued

0808-4

DOE is committed to conducting a thorough and open review of Northern Pass's Presidential permit application under Section 106. Participants in the Section 106 process include DOE and other federal agencies, the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties, and the public. DOE considers the views of the public to be essential for informed decision-making by DOE about identification of historic properties for the proposed undertaking and consideration of the effects of the proposed undertaking on historic properties. Comments from the public regarding historic and cultural resources have been accepted throughout the process, including in conjunction with NEPA comment periods. In implementing the NEPA review and Section 106 process, it is the federal agency's responsibility to balance the sensitivity of certain information, e.g., individual's personal information or the specific locations of resources that could be damaged by looting, with providing public access to information. Additional information has been added to Section 3.1.8 of the EIS regarding the sensitivity of information about historic and cultural resources.

0808-4

0808-4 cont'd

discussed at the meetings included a heading in red letters at the top of every page, which reiterated:

". . . NOT FOR PUBLIC DISCLOSURE**
FOR SECTION 106 CONSULTING PARTY REVIEW ONLY"

This veil of secrecy also persists in the monthly email updates, which, until the December 30, 2015 message, specifically stated:

> "*REMINDER: Throughout the Section 106 process, the information shared with consulting parties regarding historic and cultural resources is not to be shared with non-consulting parties or made publicly available, including through public comment submissions (e.g., during the NEPA review).*" (emphasis in original).

While the December 30, 2015 email and subsequent emails used less strident language, this focus on unnecessary secrecy has not only been intimidating to the consulting parties, but it fundamentally violates the whole spirit of the Section 106 regulations. There is simply no support for this secretive approach under applicable federal law. Instead, "*The views of the public are essential to informed Federal decision making in the section 106 process.*" 36 C.F.R. § 800.2(d)(1)-(2) (emphasis added). It is impossible to solicit public opinions effectively using the secretive process that has been pursued by DOE to date.

The imposed secrecy related to the Section 106 consultation is mentioned here because the DOE's constant secrecy warnings also have the effect of intimidating and inhibiting public input under the National Environmental Policy Act (NEPA). The DOE's explicit directive is that information "regarding historic and cultural resources" may not be "made publicly available," "*including through public comment submissions (e.g., during the NEPA review).*" (emphasis in original). In other words, the Section 106 parties are repeatedly being warned ***not*** to discuss issues regarding historic and cultural resources in their ***NEPA*** comments. This warning is simply bizarre given that NEPA regulations require that impacts to historic properties be taken into account during NEPA review.[9] Energy's approach to integrating NEPA and NHPA is fundamentally flawed.

The Department of Energy's instruction to consulting parties to refrain from discussing historic and cultural resources in their NEPA comments is contrary to federal law

0808-4
Continued

[9] Council on Environmental Quality and ACHP, NEPA AND NHPA: A MANUAL FOR INTEGRATING NEPA AND SECTION 106, p.12 (March 2013).

requirements. Interested parties who are not also consulting parties are at a distinct disadvantage by not having access to the cultural resources information provided to consulting parties.

Additional Specific Concerns

- By evaluating tourism, recreation, land use, scenic resources, visual impacts, and historic resources as separate sections, the DOE fails to understand the inherent integration of these elements and how they relate to and impact one another.

- The Indirect APE used in the "Description of Direct and Indirect Areas of Potential Effects for the Proposed Action (Alternative 2) and Its Alternatives (Alternatives 3 through 6b)" on Table 2, beginning on page 16 of the *Cultural Resources Technical Report,* does not accurately reflect what was agreed upon by the Division of Historical Resources (DHR) and the Department of Energy. In the letter from DHR to DOE, it specifically states that the Indirect APE can be wider than the one mile on either side of the center line where the particular topography would cause the project to be visible for a larger area (see http://media.northernpasseis.us/media/nhdhr_concur_ape_3-28-13.pdf). The narrowness used in this Table limits a full assessment of the potential effects.

- The list of "Applicant-Proposed Impact Avoidance and Minimization Measures" in Appendix B of the *Cultural Resources Technical Report* and Appendix H of the DEIS should be expanded in consultation with Consulting Parties and members of the public.

- The overall format of dividing the identification and assessment of cultural resources into four sections, and each section into each of the 11 Alternatives, is cumbersome. The intent may have been to mirror the geographic sections of the Project Area Forms, but the use of this format means that reviewers must sort through hundreds of pages and cross-reference information contained in separate sections, appendixes, the separate Cultural Resources Technical Report, and the Supplement. Furthermore, having all of the cultural resources information collected in one section would help the reader to assess the route as a whole.

Thank you again for the continued opportunity to comment on the draft NEPA documents. The National Trusts looks forward to continuing to participate as the review process moves forward and we appreciate your consideration of these comments.

0808-4 cont'd

0808-4 Continued

0808-5

0808-6

0808-7

0808-8

0808-5
Thank you for your comment. The EIS analyzes 12 alternatives, 14 different resources, and four geographic regions. These variables present a large number of potential combinations of discussions in which the information could be presented. The organization of the EIS follows a traditional structure based on geography and resource subject areas to facilitate a clear review process for the public and agency officials. In forming their decisions, the responsible officials for the DOE and USFS will consider all impacts, including their inter-relations.

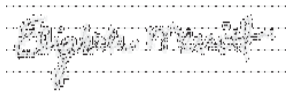
0808-6
Thank you for your comment. Section 3.1.8.2 of the EIS has been revised with additional information regarding the definition of the APE. Table 2 in the Cultural Resources Technical Report has been revised to reflect the agreement between DOE and the New Hampshire Division of Historical Resources (DHR). Additionally, Appendix B in the Technical Report has been revised to summarize the stipulations of the Section 106 programmatic agreement that address amendments to the area of potential effects (APE).

0808-7
Thank you for your comment. Appendix H of the EIS includes a list of Applicant-Proposed Impact Avoidance and Minimization Measures (APMs) considered in the EIS process. APMs are submitted by an applicant through the NEPA process. DOE considers APMs to be part of "the project" for purposes of determining the environmental impact under NEPA and any adverse effect under Section 106. APMs do not represent agreed upon measures to avoid, minimize, or mitigate adverse effects related to Section 106, but may help inform discussion during the Section 106 process about resolution of adverse effects. Additional mitigation measures related to cultural and historic resources may be developed through the ongoing Section 106 consultation process with the State Historic Preservation Office and Consulting Parties.

0808-8
Thank you for your comment. The comment regarding the organization and format about the EIS is noted. Many options exist to present this large amount of information, each with benefits and drawbacks. The geographic division was intended to provide more localized information to residence and interests

along the Project corridor. Analysis of alternatives is required under the EIS process and, therefore, is a critical tool in the eventual selection of an alternative should the Project be approved.

Respectfully submitted,



Elizabeth S. Merritt
Deputy General Counsel

Rebecca A. Harris
Senior Field Officer

cc: Jennifer Goodman and Maggie Stier, New Hampshire Preservation Alliance
Charlene Vaughn, Brian Lusher, and Reid Nelson, Advisory Council on Historic Preservation
Elizabeth Muzzey and Richard Boisvert, New Hampshire Division of Historical Resources
Tiffany Benna and Tom Wagner, U.S. Forest Service, White Mountain National Forest
Martin Honigberg, Public Utilities Commission
Pamela G. Monroe, New Hampshire Site Evaluation Committee

Good evening. My name is Alex Richie, and I am here on behalf of Cate Street Capital. Cate Street Capital is the developer of a 75 megawatt biomass facility in Berlin, known as Burgess Biopower. We oversaw its development, construction and now we manage its operations. We have seen firsthand the positive impact that a large scale project can have on a region. Having been a part of the North Country and throughout our efforts at Burgess BioPower for over 8 years now we feel we have an obligation and responsibility to the region, its livelihood and its success. As a result, Cate Street Capital is an intervenor in the Northern Pass docket, and I am here to testify that we do support the approval of Northern Pass's application by the New Hampshire SEC. Given the many measures the developer has taken in order to minimize the significant adverse impact, we believe that this project and the region can both succeed in harmony. More so, we are here to support the approval of the Northern Pass Project as we believe it is critically important to the region's overall energy forecast. Almost 50 percent of New England's generation is currently being produced from natural gas, as Mr. Quinlan spoke to earlier this evening. Additionally, approximately 8,000 megawatts of capacity is scheduled to be retired from now to 2020. We are in imminent need of significant diversification of New England's overall energy supply, and we believe that the Northern Pass project is needed to help bridge both of these fronts. Further, Northern Pass will bring a large and much needed investment to the North Country's tax base. This investment will help lessen the burden on existing taxpayers and provide new revenues for local and county services. Having developed the Burgess BioPower project facility, we have seen the meaningful impact that an anchor tenant, if you will, can have on a community. The property tax agreement that Burgess BioPower and the city of Berlin was able to negotiate has allowed the city to strategically plan for its future as a community over the long-term, knowing that this tax base will be available. As part of the Northern Pass's proposal the project has proposed an upgrade to a portion of the Coos County loop which Burgess BioPower uses to transmit its power to the grid. This portion of electric infrastructure is critical to those of us that operate energy generators in the region, and, unfortunately, this transmission line is currently limited and the ability to transmit power is restricted on many days, sometimes significantly. Very often, Burgess BioPower and other New Hampshire electric generators face significant curtailment because of these ongoing issues, which has had and will continue to have a significant economic impact on anyone affected. We do believe that the proposal put forth by Northern Pass to upgrade a significant portion of the loop is meaningful and is a much needed near-term solution to this problem. In closing, let's be honest. There's no perfect project. I saw that firsthand 7 years ago. There is no pleasing everyone 100 percent of the time, but I have to compliment Eversource and their Northern Pass team on the painstaking effort they put into the development of this project. They listened, they engaged with surrounding communities, they explored alternatives. They worked with neighbors to not only try and find a way to bring this critically important product to New Hampshire, but to do so in a responsible and collaborative way. So I thank you for your consideration of our comments and I encourage the Committee's support for the Northern Pass. Thank you.

0814-1

Thank you for your comment. As discussed in Section 1.4 of the EIS, Northern Pass set forth a range of project objectives and benefits in its permit application. DOE and the cooperating agencies reviewed this documentation and determined that the project objectives include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity.

0814-2

Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS, including impacts on property taxes, by geographic section.

0814-3

Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Nov 19, 2015

ID: 8530

Date Entered: Nov 19, 2015

Source: Website

Topics: Purpose and Need, Health and Safety, Quality of Life, Other

Name: Michele Robertson

Organization:

Email: jakay78@aol.com

Mailing Address: 384 Perley Ave

City: Pembroke

State: NH

Zip: 03275

Country: US

Comment: As a registered nurse for over twenty years, I can tell you that the need for reliable electricity in New Hampshire is higher than ever. With the closure of Vermont Yankee and the pending closure of Plymouth Pilgrim, our electricity grid and its capacity will not be enough to meet the demands that our businesses, medical facilities and residencies need each day for electricity. By supporting Northern Pass' Forward NH Plan, we're bringing cleaner electricity to New Hampshire communities. We're also providing reassurance to our local hospitals, who are some of the larger facilities in the state that have high demands for electricity, that black outs like the one that happened in 2003 in New York, won't reoccur.

It is no surprise that our state's hospitals and medical facilities rely heavily on consistent electricity to perform life-saving procedures and to treat ailments of all kinds. Generators can only go so far. As a supporter of the Forward NH Plan, I look forward to bringing more electricity to our state while lowering the rates for not only our most vital facilities, but for our residential neighborhoods.

Michele Robertson, RN

0816-1

0816-1
Thank you for your comment. As discussed in Section 1.4 of the EIS, Northern Pass set forth a range of project objectives and benefits in its permit application. DOE and the cooperating agencies reviewed this documentation and determined that the project objectives include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity.

- My name is Alex Richie and I am here on behalf of Cate Street Capital, Inc.
- Cate Street was the developer of a 75 MW biomass facility in Berlin NH known as Burgess BioPower. We oversaw its development, construction and now manage its operations. We have seen first-hand the positive impact that a large-scale project can have on a region. Burgess Biopower represented hundreds of jobs over its two and a half year construction period, and currently employs approximately 30 individuals on-site; while also representing an additional 250-350 local jobs in the woods associated with the supply of biomass to the plant.
- Having been a part of the North Country through our efforts at Burgess BioPower for more than 8 years, we feel an obligation and responsibility to the region, its livelihood and its success.
- As a result, Cate Street is an intervenor in the Northern Pass docket, and I am here to testify that we do support the approval of Northern Pass' application by the NH SEC. Given the many measures that the developer has committed to in order to minimize significant adverse impacts, we believe that this project and the region can both succeed in harmony.
- Having the first-hand knowledge and experience of developing a project in the North County, Cate Street understands the importance of bringing economic development to the region. We support the economic benefits that we believe the Northern Pass will bring to the State of New Hampshire and specifically Coos County. While there will be direct employment opportunities relating to the construction of NPT, the indirect impact will be felt throughout the region, through hospitality outfits and restaurants, vendors, and a variety of other local services.
- More so, we are here to support the approval of NPT as we believe it is critically important to the region's overall energy supply. Almost 50% of New England's generation is currently being produced from natural gas – additionally approximately 8,000MWs of capacity is slated to be retired by 2020. We are in need of significant diversification in New England's overall energy supply. The NPT project is needed to help bridge both of these fronts.
- Further, Northern Pass will bring a large, and much needed, investment to the North Country's tax base. This investment will help lessen the burden on existing taxpayers and provide new revenues for local and county services. Having developed the Burgess BioPower facility, we have seen the meaningful impact that an anchor tenant, if you will, can have on a community. The property tax agreement Burgess and the City of Berlin negotiated has allowed the City to strategically plan for its future, as a community, over the long-term, knowing that this tax base will be available.
- As part of Northern Pass' proposal, the project has proposed an upgrade to a portion of the Coos Loop which Burgess BioPower uses to transmit its power to the grid. This portion of electric infrastructure is critical to those of us that operate energy generators in the region, and, unfortunately, this transmission line is currently limited and the ability to transmit power is restricted on many days. Very often, Burgess and other NH electric generators face significant curtailment because of these on-going issues; which has had, and will continue to have a severe economic impact on anyone affected.
- We do believe that the proposal put forth by Northern Pass to upgrade a significant portion of the Loop is a meaningful and a needed near-term solution to this problem.
- In closing – let's be honest – there is no perfect project. There is no pleasing everyone 100% of the time. But I have to compliment Eversource and their NPT team on the painstaking efforts put into the development of this project. They listened; they engaged with surrounding communities; they explored

0819-1

0819-2

0819-3

0819-4

0819-5

0819-1
Thank you for your comment. The commenter's opinion is noted.

0819-2
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.

0819-3
Thank you for your comment. As discussed in Section 1.4 of the EIS, Northern Pass set forth a range of project objectives and benefits in its permit application. DOE and the cooperating agencies reviewed this documentation and determined that the project objectives include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity.

0819-4
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.

0819-5
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur.

alternatives; they worked with neighbors to not only try and find a way to being this critically important project to New Hampshire, but to do so in a responsible and collaborative way.

- So, I thank you for your consideration of our comments and I encourage the Committee's support for the Northern Pass application.

William Clewes from Littleton. I started out by saying I wasn't going to speak, but there's so much more going on than just Northern Pass. If we look at our overall energy situation in the United States, we've becoming foreign owned. We look at the hydro stations that are on the Connecticut River. They were at one time a domestic asset. They are now a foreign owned asset. The profit goes offshore. We look at the windmills that we bought. We paid them a very preferential rate to encourage the industry. The profit goes offshore. We have a electric utility and gas company in the State of New Hampshire that is a Canadian company. Liberty Energy. They're owned by Canadians. It's a good company but the profit goes offshore. National Grid which is a large utility in the New England area is owned by the Brits in the UK. The profit goes offshore. Just think how much better our international balance as payments would be if we could keep some of that money within the country, encourage building something here. Now, I know if we went down to Fitchburg, Mass., where I think there's a terminal for Northern Pass, someone built a nuclear plant to take the place of it, I'd have another fight, but we have become a "no" nation. No, you can't do this and no, you can't do that and no, you can't do something else, and in life we have choices. They're not all that we're always going to like. Now, I'm not in favor of Northern Pass, but I'm not adamantly opposed to it either. All of these plants are going off line, Brighton Point which is 5000 megawatts. That's five Northern Passes. And that plant is running, and the power coming out of that thing is being sold and consumed. When it shuts down, something has got to take its place. Vermont Yankee and Pilgrim are both of about 600 megawatts, one Northern Pass. Vermont Yankee is down, Pilgrim is going down in the next couple years. That's a Northern Pass right there. That energy was put out into the grid and sold and consumed. So something has got to take its place. There's another site, I think Fitzpatrick over in New York. 800 megawatts. Eighty percent of another Northern Pass. And I don't like the idea of Northern Pass, but right now, I don't see something to take its place. You walk into the room and you flip the light switch on and you expect the lights to come on. If they don't, call up the power company and say how come I don't have no lights. You know. To do this thing I hear people telling me that New Hampshire is a net exporter of power, and that is true some of the time, but let a large unit such as Seabrook go down, New Hampshire now is a consumer of power and it has to borrow from the grid. The grid operates like one of these mutual aid fire packs. You've got a fire that's bigger than you can handle, I'll come and help you. That's what the grid does. I don't like the idea of all these towers up here in New Hampshire, but I also, if you take a ride over to Vermont, in the Essex Junction area, head south toward Bristol, there's a gas pipeline going in over there and you'll see a lot of orange tapes alongside of the road where they have mapped out the route of it. It's not all that good to look at, and there are some people who own property there who are probably going to have to sacrifice some of their property that they can't, you know, they can't build a house on it or they can't drill a well there or whatever, they lose some of the use of their property. It's unfortunate, but sometimes that's necessary for the larger good. So I would hope that we would start trying to get our arms around the entire energy situation and keep some of the money within the United States and help with our balance of payments. That's what I have to say. Thank you.

0821-1

0821-1
Thank you for your comment. The analysis of electricity system infrastructure in the EIS and Socioeconomic Technical Report considers the most up-to-date information about energy supply in the ISO-NE region, including scheduled retirements (see Section 4.1.2 of the EIS). The project objectives are outlined in Section 1.4 of the EIS, and include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity.

Testimony before the NH Site Evaluation Committee
In Docket 2015-06 (Northern Pass)

Concord, NH, March 10, 2016
State Rep. Howard Moffett
Merrimack District 9 (Canterbury and Loudon)

First, thank you for the time and attention you are giving to this docket.

Shortly before 4 pm on Monday, I passed through Franconia Notch on my way to the Colebrook Elementary School. As I went by Profile Lake, I looked up to my left (as I always do) to the spot where the "Old Man" used to be. The cloud cover was low, but not too low: I could clearly make out where that 40-foot rock face once kept proud watch over the Pemigewassett River Valley.

And it reminded me of something Daniel Webster once said:

> "Men hang out their signs indicative of their respective trades; shoe makers hang out a gigantic shoe; jewelers, a monster watch, and the dentist hangs out a gold tooth; but up in the Mountains of New Hampshire, God Almighty has hung out a sign to show that *there* He makes *men*."

We lost the Old Man in 2003, but he still serves as the symbol of the Granite State, and I'd like to think he still watches, though now from high above the cloud cover.

So what would he think of Northern Pass, which now proposes to hang out its own signs—two chains of steel towers 100 feet high, strung with wires from Pittsburg to Bethlehem and from Bristol to Deerfield—to show that there, ~~across~~ high above some of New Hampshire's most storied landscapes, Northern Pass wants to transmit high voltage electric power (made somewhere else), for the benefit of consumers in Massachusetts and Connecticut, and for the profit of Eversource shareholders? I believe I know what he would think.

Need: The first thing to be said about Northern Pass is that it's not a "reliability" project. It isn't needed to keep the lights on. Rather, it's an "economic" project, proposed primarily for economic benefit rather than need. So I ask you to scrutinize carefully the alleged benefits to the public, and weigh them carefully against the costs—because I believe if you do that, you will conclude that the benefits to the public are modest compared with other alternatives, while the costs to the public would be incalculable, unless the line is buried.

Benefits: Mr. Quinlan has told you that Northern Pass hydropower would displace higher-cost generation in the ISO-NE "bid stack," resulting in $800 million in annual savings for New England, and that New Hampshire's share of those

0822-1

0822-1
Thank you for your comment. As stated in Section 1.4 of the EIS, the purpose of the Project is to build and operate a participant-funded electric transmission line. Section 4.1.2.2 of the EIS further states: "Future system reliability and impact studies would be conducted according to ISO-NE parameters in order to determine the effect of interconnecting the Project into the ISO-NE grid. The Project has not been identified as a reliability project, although the Applicant addressed reliability issues in their Amended Application (Northern Pass 2013a)." In deciding whether the issuance of a Presidential permit would be consistent with the public interest, DOE assesses the environmental impacts of the proposed project and reasonable alternatives, the impact of the proposed action on electric reliability, and any other factors that DOE may also consider relevant to the public interest. The EIS analyzes potential environmental impacts to the electricity system in the socioeconomics section (see Section 4.1.2 of the EIS). The reliability study, completed in cooperation with ISO-NE, provides a separate analysis of impacts of the proposed federal action on the electricity system. Potential impacts to electricity prices resulting from the Project are described in Section 4.1.2 of the EIS.

savings would be 10%--or $80 million, based on our 9% share of New England's electric load. He calls this the "market suppression effect."

What he didn't tell you is that Hydro-Quebec expects to sell Northern Pass power at "prevailing market rates," meaning it will charge as much as the market will bear. So yes, Northern Pass could in theory displace the most expensive 1000 MW of the 20,000 MW needed to serve New England on an average day, but that doesn't mean electric rates paid by New Hampshire ratepayers would be cut by 5%. The effect of Northern Pass on the average ratepayer's monthly electric bill will be measured in cents, not dollars—and that's if you credit Eversource analysts' guesses about what the bid stack will look like if and when Northern Pass comes on line several years from now.

Mr. Quinlan also mentioned a "beneficially priced" Power Purchase Agreement with Hydro-Quebec for 10% of Northern Pass's power. But Eversource has been talking about that for several years, and we have yet to see the contract.

If you are really curious about how much Northern Pass might reduce retail electric rates in New Hampshire and New England, you might want to compare it with the Tennessee Gas interstate pipeline project, Northeast Energy Direct (SEC Docket No. 2015-08). Coming out of an investigative docket last year (IR 15-124), the PUC staff concluded that NED would reduce prices for electricity in New England by seven (7) to eleven (11) percent—not 7 to 11 cents, but 7 to 11 percent. Northern Pass would not come close to that. Oh, and by the way, the NED pipeline project would be installed underground, and would not cut a new swath-scar through 60 miles of the most beautiful landscapes in New Hampshire.

Costs: Northern Pass would have you believe that it costs too much to bury the project, but it has been mired for five years in route battles, litigation over rights to use privately owned conservation land and public roads, and overwhelming public opposition to overhead lines—while buried projects in neighboring states have sailed through their permitting processes in less than two years, and are set to start construction later this year. Why is this lesson so hard to understand?

Eversource and Hydro-Quebec stand to make billions of dollars in profit over the life of this project. They can put the whole thing underground. And if they tell you they can't do that because the project would then be "uneconomic," well, then, "Just Say No."

But it is the costs to the public that make this project unacceptable, if it is to be built largely above ground. You can't quantify these costs, because if Northern Pass is hung from 100-foot-high steel towers, the damage to the state's most treasured natural landscapes would be incalculable. New Hampshire's sense of itself would be irretrievably compromised. And for the state's symbol and welcome sign, we would have traded the Old Man for a mess of pottage—130 miles of overhead high voltage transmission lines.

0822-1 cont'd

0822-1 Continued

0822-2

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.

0822-2

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 25, 2015

ID: 8345

Date Entered: Aug 25, 2015

Source: Website

Topics: Purpose and Need, Alternatives, Wildlife, Viewshed/Scenery, Recreation, Economic, Tourism, Quality of Life

Name: Richard Desmarais

Organization:

Email: rdesmaraisnh@yahoo.com

Mailing Address: 17 Longwood Ave.

City: Londonderry

State: NH

Zip: 03053

Country: US

Comment: I'm a hiker and enjoy the White Mountains and North Country with frequent hikes, typically weekly. Me and others like me enjoy the solitude and opportunity to 'reset' after a week of work and family stresses. That aside, I'm also an engineer, and I see this as old technology that's driven more by a profit motive than genuine need. Quoting from the EIS, the line is projected to bring 1.2GW to the region. However, ISO New England is projecting that by 2021 the Northeastern states will be generating 2GW, mostly from solar power (http://www.acore.org/images/documents/Northeastern_Region_Report.pdf). From an older Northern Pass presentation, assuming the contruction takes three years starting mid-2016, by the time this project is complete it will likely be unnecessary. Cost recovery over a 40-year period seems unrealistic; if solar moves half as quickly as projected then in 20 years Eversource may be left with a transmission line and dwindling demand. It's understandable that the companies working on this agreement are wholly owned LLCs and not the corporations themselves, but this seems like two wary partners deciding to marry on the condition of being completely lawyered up with prenups.

0823-1

0823-1
Thank you for your comment. The purpose of, and need for, DOE's action is to determine whether or not to grant the requested Presidential permit for the Project, which is a proposed transmission line crossing the international border. As discussed in Section 1.4 of the EIS, Northern Pass set forth a range of project objectives and benefits in its permit application. DOE and the cooperating agencies reviewed this documentation and determined that the project objectives include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity. Section 2.4 of the EIS discusses alternatives considered but eliminated from further analysis. DOE determined that other transmission projects, power generation alternatives, and energy conservation do not meet the purpose and need for DOE's action. The EIS analyzes in detail the potential environmental impacts of a No Action Alternative and eleven action alternatives. Under the No Action Alternative, it is assumed that existing energy sources, including distributed generation and alternative energy generation, would continue to supply the ISO-NE region and that energy efficiency measures would continue. Section 3.1.2.5 of the EIS discusses the existing condition of Electricity System Infrastructure which would be anticipated to persist under the No Action Alternative.

APPALACHIAN MOUNTAIN CLUB
YOUR CONNECTION TO THE OUTDOORS

Susan Arnold, Appalachian Mountain Club
Northern Pass Comments to the NH SEC and US Department of Energy
March 10, 2016 – Concord, NH

My name is Susan Arnold and I am Vice President for Conservation at the Appalachian Mountain Club. The AMC is the oldest conservation and recreation organization in the country, with more than 100,000 members and supporters from Maine to Washington, DC, including more than 12,000 here in New Hampshire. In our 140 year history, AMC has helped to protect this region's open spaces, including from poorly sited energy projects such as Northern Pass, which is requesting to use high impact, old technologies to maximize profits at the expense of NH's iconic landscape. Yes, parts of this proposal use an existing ROW where current tower structures are less than tree height. This project will congest that ROW with over 1,100 new towers that are more than 2-3 times tree height, and cut a new swath for 40 miles through northern NH. It is that unnecessary impact that has brought out so many people in opposition to this project as proposed. And the choice is not Northern Pass or nothing, or Northern Pass versus expensive energy.

I will reference but not repeat here AMC's comments provided earlier by Dr. Kimball in Meredith and Colebrook, and Chris Thayer in Waterville. The following points are germane to both the SEC and DEIS processes:

1. The choice before the SEC and DOE is far from Northern Pass, or nothing. It is whether you will allow the use of yesterday's technologies with their high environmental impacts at the expense of NH's landscape. You know that other competing projects are completely buried using 21st technology and that different energy alternatives exist. Both the SEC Application and the DEIS fail to acknowledge or appropriately examine competing and other reasonable alternatives to meet regional energy needs. The need for Northern Pass and its impacts must be reviewed within a broader framework.

2. Along with Northern Pass, other competitive projects have bid into the recent New England Clean Energy RFP – for the MA, CT and RI market. Grid scale storage is not entirely futuristic as suggested in Northern Pass's introduction. Over 40 MW of grid scale battery storage were just bid into the New England Clean Energy RFP. The U.S. energy storage market surged 243% in 2015 and is estimated to hit the 1 gigawatt threshold by 2019. And ironically one of these RFP projects - the Vermont Green Power Line-- even has Hydro-Quebec power as part of its bid, and it is a totally buried transmission proposal. **Much of the future energy need Mr. Quinlan presented in his opening presentation will be met with or without Northern Pass, but New Hampshire's landscape will be permanently scarred if Northern Pass is approved as proposed.**

Main Headquarters: 5 Joy Street • Boston, MA 02108-1490 • 617-523-0636 • outdoors.org
Regional Headquarters: Pinkham Notch Visitor Center • 361 Route 16 • Gorham, NH 03581-0298 • 603 466-2721
Additional Offices: Bretton Woods, NH • Greenville, ME • Portland, ME • New York, NY • Bethlehem, PA

0824-1

0824-2

0824-1
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.

0824-2
Thank you for your comment. The purpose of, and need for, DOE's action is to determine whether or not to grant the requested Presidential permit for the Project, which is a proposed transmission line crossing the international border. As discussed in Section 1.4 of the EIS, Northern Pass set forth a range of project objectives and benefits in its permit application. DOE and the cooperating agencies reviewed this documentation and determined that the project objectives include addressing three primary needs concerning New England's electricity supply: diverse, low-carbon, non-intermittent electricity. Section 2.4 of the EIS discusses alternatives considered but eliminated from further analysis. DOE determined that other transmission projects, power generation alternatives, and energy conservation are not reasonable alternatives. Section 2.4 has been updated to include additional information about these alternatives. The EIS analyzes in detail the potential environmental impacts of a No Action Alternative and eleven action alternatives. Under the No Action Alternative, it is assumed that existing energy sources, including distributed generation and alternative energy generation, would continue to supply the ISO-NE region and that energy efficiency measures would continue. Section 3.1.2.5 of the EIS discusses the existing condition of Electricity System Infrastructure which would be anticipated to persist under the No Action Alternative.

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3. Mentioned but downplayed in Mr. Quinlan presentation are distributed energy and energy efficiency. These alternatives are clearly ways to help meet future energy need without the negative environmental impacts and increased foreign trade deficit of Northern Pass. And the fact is they would create more NH jobs than NPT. Energy efficiency and distributed generation are emphasized in New Hampshire's updated 10-Year Energy Strategy from the Office of Energy and Planning in 2014, the most recent official NH State energy document, but it is not even cited in the DEIS or SEC Application. Why not? It needs to be.

4. These paradigm shifts for meeting energy needs are happening at an accelerating rate. On Tuesday night the Town of Lancaster voted to give the select board permission for solar arrays to reduce the Town's total energy cost by 25%. Ironically Franklin's plan to build a much larger 8.5-megawatt solar project can't proceed until more people are allowed to net meter, though it would help halve that city's electric bill. The NH Electric Coop released a study they commissioned showing that net metered solar was not unfairly raising customer rates since it comes on line when demand and electric rates are highest. Big utilities like Eversource are championing continued regulatory barriers to growing net metering; Eversource and its ilk are themselves the primary barrier to getting more distributed generation on line faster. Imagine what the playing field would look like if there were a cap on imported Hydro Quebec power such as exists with net metering in New Hampshire.

5. Northern Pass's presentation discusses the NE region's Forward Capacity market and argues that prices will be going up in the short term because of a "scarcity situation." But Moody's most recent analysis last month states that this market is expected to be further depressed (i.e. prices lowered) because (i) 371 megawatts of demand-side resources (promises by large energy users to reduce usage when called upon by the power grid operator), (ii) 6.8 MW from the first US offshore (34-MW) wind farm under construction off Block Island, RI, (iii) incorporation of the first long-term forecast for solar growth, with small-scale New England solar facilities expected to reduce demand in 2019-2020 by 390 MW –which is 57% of the power going off line because of the Pilgrim Nuclear Power Station retirement that Mr. Quinlan noted in his presentation, and (iv) two large fuel cell facilities, providing 2.5 MW each. The DEIS's analysis of these alternatives is absent or much out of date, and needs to be included and updated in the FEIS. And these are factors the SEC should consider when it determines the overall public good, or lack thereof, of Northern Pass as proposed.

Thank you for your time and consideration.

Main Headquarters: 5 Joy Street • Boston, MA 02108-1490 • 617-523-0636 • outdoors.org
Regional Headquarters: Pinkham Notch Visitor Center • 361 Route 16 • Gorham, NH 03581-0298 • 603 466-2721
Additional Offices: Bretton Woods, NH • Greenville, ME • Portland, ME • New York, NY • Bethlehem, PA

0824-3

0824-3
Thank you for your comment. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative, in part because energy efficiency and conservation cannot alone meet the growing demand for electricity in ISO-NE. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

0824-4

0824-4
Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS and include an assessment of impacts on electricity rates and the anticipated mix of current and future generation types. The analysis conducted did not find evidence that the Project would reduce or alter the construction of new, or reliance upon existing, renewable power sources in the U.S., other than by potentially affecting total expenditures for electricity within the market.

0824-5

0824-5
Thank you for your comment. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use in the New England region since the draft EIS was published in 2015. An updated discussion of existing electricity system infrastructure has been added to Section 3.1.2.5 of the final EIS. The analysis of socioeconomic impacts in the EIS and Socioeconomics Technical Report has also been updated to account for the changing baseline condition of the New England electricity market.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Jul 21, 2015

ID: 8194

Date Entered: Jul 21, 2015

Source: Website

Topics: Economic

Name: Susan Young

Organization:

Email: young1_43566@yahoo.com

Mailing Address: PO Box 83

Mailing Address: 10 Old Fairfield Road

City: Woodstock

State: NH

Zip: 03293

Country: US

Comment: There has not been one valid example of how the Northern Pass will benefit the United States. It certainly will not benefit New Hampshire in its current form, wreaking havoc on the economy of Northern New Hampshire.
In an area almost totally dependent on outdoor tourism this will create an ugly scar and pose environmental and health risks to the flora, fauna, and humans in the area. Burying it, as is being done in Vermont is a viable alternative.

Data show that we have little need for this type of electrical energy. Consumption is down significantly because of more efficient appliances and equipment. Numerous other successful means of generating electricity, such as wind and solar are being adopted by other countries and in other parts of this country.

No one benefits fro this but the HQ, Northeat Ufilities, and their other cohorts. The consumer certainly does not benefit as rates continue
to go up as demand lessens.

Thirty two Northern NH communities have voted agains this. We do not need it. We do not want it. It

0828-1

0828-1
Thank you for your comment. The purpose of, and need for, the DOE's action is to determine whether or not to grant the requested Presidential permit for the Project at the international border crossing proposed in the amended Presidential permit application (August 2015). Section 2.4 of the EIS discusses alternatives considered but eliminated from further analysis. DOE determined that other transmission projects, power generation alternatives, and energy conservation do not meet the purpose and need for DOE's action. The EIS analyzes in detail the potential environmental impacts of a No Action Alternative and eleven action alternatives. Under the No Action Alternative, it is assumed that existing energy sources, including distributed generation and alternative energy generation, would continue to supply the ISO-NE region and that energy efficiency measures would continue.

is not green energy.

If burying the lines is feasible in Vermont and drowning them in NY, why do not the same rules and methods apply to NH?

I have already contacted Brian Mills.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 14, 2015

ID: 8295

Date Entered: Aug 14, 2015

Source: Website

Topics: Alternatives

Name: Timothy Duggan

Organization:

City: Concord

State: MA

Country: US

Comment: Any alternative is better than overhead transmission lines. The Draft EIS makes this fact crystal clear. While the Draft EIS lists some 10 distinct alternatives, there are only 2 that have no overhead lines whatsoever:

1. Do Not Build. As I mentioned in my previous comment (“Need”), this alternative is actually in place and working now. Electricity consumption in New England is trending lower according to ISO NE and therefore there is literally no need to add Canadian Hydropower. Additionally, the lack of a foreign power source in the New England energy market will encourage local power generation – specifically decentralized renewable power sources. Development of local renewable sources prevents our dependency on foreign supplies that leave Americans helpless in the face of price hikes and supply restrictions. See OPEC, Arab Oil Embargos, etc…

2. Complete Burial. This alternative – in contrast to the proposed overhead transmission lines – benefits more than just the shareholders of Eversource and HydroQuebec. Burial along roadways will shift the right-of-way revenue from Eversource to State and local governments. HydroQuebec leases the route in NH and the resulting funds go to the citizens of NH. That’s just plain fair.

Burial also generates up to 2x the number of jobs for citizens of NH. Eversource is more than happy to embellish the pitiful number of jobs created by their cheapest alternative but what’s (intentionally) missing from their propaganda is the point that even more jobs would be created by an underground solution. Those additional jobs mean that more funds are shifted from Eversource shareholders to the citizens of NH. Again, that’s just plain fair.

Burial also eliminates the negative impact on property values. Again, the Eversource propaganda machine would have you believe that 100 foot tall steel lattice towers have no impact on property

0829-1

0829-2

0829-1
Thank you for your comment. The purpose of, and need for, DOE's action is to determine whether or not to grant the requested Presidential permit for the Project at the international border crossing proposed in the amended Presidential permit application (August 2015). Similarly, the purpose of, and need for, the USFS's action is to decide whether to grant a special use permit for the Project to cross the WMNF. The project objectives are outlined in Section 1.4 of the EIS, and include a need for diverse, low-carbon, non-intermittent electricity supply in New England. Section 2.4 of the EIS discusses alternatives considered but eliminated from further analysis. DOE determined that other transmission projects, power generation alternatives, and energy conservation are not reasonable alternatives. Section 2.4 has been updated to include additional information about these alternatives. The EIS analyzes in detail the potential environmental impacts of a No Action Alternative and eleven action alternatives. Under the No Action Alternative, it is assumed that existing energy sources, including distributed generation and alternative energy generation, would continue to supply the ISO-NE region and that energy efficiency measures would continue.

0829-2
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. Additionally, Section 4.1.2 of the EIS addresses the anticipated impacts of the Project on adjacent properties, property values, current/future tax assessments/payments, and both short-term and long-term employment.

values. The Draft EIS refutes this and clearly indicates that property values along the overhead route will suffer. In this case funds are shifted from Eversource shareholders to prevent home equity losses for the citizens of NH. Fair again.

Burial also eliminates the negative impact on tourism and according to the Draft EIS it has the least overall negative environmental impact. So why, after all of these benefits have been clearly stated in the Draft EIS, is Eversource continuing to plow ahead with their one and only proposal for building overhead lines? Profit. That's it, nothing more. Corporate greed in its most pure and simple form: Damn everyone and everything else, they want absolutely as much money as they can possibly squeeze out of this project.

Partial burial alternatives are not "compromise" – they are capitulation. Partial burial pits community against community, it creates "haves" and "have nots"… in this case, the "haves" are the people who "have" to live with 100 foot towers looming over them for the rest of their lives while the "have nots" are the people who "have not" even thought about the power line because it is literally out of sight and out of mind.

Who is to say that the impact in one town is severe enough to warrant burial while it is not severe enough - and therefore can be built overhead - in another town? The towers are the same, the power line is the same, the blight is the same… yet somehow it's supposedly worse for some than for others.

Partial burial is a ploy – it allows the company to project an image of cooperation while maximizing profits. It allows the DOE, SEC, and elected officials to claim they've taken a hard line with the company while barely slapping their wrist.

All partial burial alternatives should be rejected without any further consideration.

If the benefits of burial are provided to one community, then they should be provided to all communities.

That's just plain fair.

0829-2
Continued 0829-2 cont'd

SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS
SINCE 1901

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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.

0832-1

0832-1
Thank you for your comment. The commenter refers to the review process of the New Hampshire Site Evaluation Committee (SEC). Section 1.7.3.1 of the EIS notes that the SEC "is a non-federal process in which the DOE has no role."

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 you 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.

0832-2

0832-2
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.

0832-3

0832-3
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.

From: Wallace S. Stuart <wallystuart@comcast.net>
Sent: Saturday, March 19, 2016 7:39 PM
To: draftEIScomments@northernpasseis.us
Subject: Northern Pass Draft EIS Comments.

Ladies and Gentlemen:

Topic: Environmental Justice

I urge the DOE to choose the No Action Alternative regarding the grant of a Presidential permit for bringing electrical power into New Hampshire by Northern Pass LLC.

At Eversource's Northern Pass web site, the company states:

> "Hydroelectricity is one of the cleanest forms of power used today. By harnessing the energy generated by the flow of water, hydroelectricity can reduce our need to burn fossil fuels for electricity."

From Nicolas Boisclair and Alexis de Gheldere in their film SEEKING THE CURRENT, we learn how damaging the damming of Québec's Romaine River by Hydro-Québec would be. They examine how the flow of water from the dammed river would generate electricity to flow down The Northern Pass line, but would not be clean power coming into the US. http://www.seekingthecurrent.com/ Hydro-Québec's source of power does not fit the definition of low carbon energy supply that New Hampshire and New England seeks to import.

Given the evidence given by the Canadian filmmakers regarding uncleanliness of hydroelectricity from Hydro-Québec, I urge the DOE choose the No Action Alternative for The Northern Pass project and to urge Eversource to actively pursue other low carbon energy supplies, like wind, solar, tidal, geothermal, and selected biomass.

Sincerely yours,

Wallace Stuart

Wallace S Stuart
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0837-1

0837-1
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.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 5, 2015

ID: 8243

Date Entered: Aug 5, 2015

Source: Website

Topics: Purpose and Need, Alternatives, Health and Safety, Vegetation, Wildlife, Viewshed/Scenery, Water / Wetlands, Recreation, Private Property/Land Use, Taxes, Historic/Cultural, National Security, Tourism

Name: Gail Beaulieu

Organization:

Mailing Address: 280 Reservoir Road

City: Plymouth

State: NH

Country: US

Comment: Draft EIS Table 2-1 Underground Alternatives 4a, 4b and 4c operational capacity needs to be corrected showing 1200 MW. HVDC light cable now has the capacity to deliver 1800 MW http://new.abb.com/systems/hvdc/hvdc-light- Burial along the entire route is the only way! The positives out way the negatives.

0840-1

0840-1
Thank you for your comment. Chapter 2 of the final EIS has been updated to specify that alternatives with substantial underground sections (including Alternatives 3, 4a, 4b, 4c, 5a, 5c, 6a, 6b, and 7) would have a potential transfer capability of up to 1,090 MW. The Applicant proposes to use voltage source converter technology and cross-linked polyethylene cable, which results in this change to the Project size. For alternatives without large sections of underground cable (Alternatives 2 and 5b) the capacity would still be 1,200 MW.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 21, 2016

ID: 8752

Date Entered: Mar 21, 2016

Source: email

Topics: Alternatives

Name: Kris Pastoriza

Organization:

Email: krispastoriza@gmail.com

Comment: The Draft EIS did not include the route from Deerfield to Schobie Pond, in the towns of Candia, Chester, Raymond, Londonderry and Derry.

0843-1

0843-1
Thank you for your comment. The projects mentioned in this comment are described in Section 2.3 of the EIS as "AC System Support Projects." Impacts potentially resulting from these projects were analyzed in Section 4.4 of the EIS.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 28, 2016

ID: 8857

Date Entered: Mar 28, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Vegetation, Wildlife, Viewshed/Scenery, Recreation, Historic/Cultural, Tourism, Quality of Life, Design Criteria / Mitigation Measures

Organization:

Comment: Alternatives should be sought besides the Northern Pass - it is not clear that this is the only viable energy solution and the impact of the project would be huge. If built, the Northern Pass needs to be fully buried as in alternative 4a.
The effect on the landscape and wildlife of an above ground or partially above ground line would be devastating. Also tourism in the North Country would suffer greatly with visible lines- hence the alleged economic benefits of the line would come at a great cost.

Also, Northern Pass's claim that full burial in the I-93 corridor (Alternative 4a), is not doable is misleading and unsubstantiated- they should have to independently verify this claim.
The DOE should examine full burial as outlined in Alternative 4a, but site the DC to AC converter station in Bow NH, where Merrimack Station is located. Merrimack Station is NH's largest coal-fired power plant, and one of New England's top sources of toxic and greenhouse gas pollution. It is also one of the most expensive sources of power for the New England grid. Full burial of Northern Pass to Bow, linked with the decommissioning of this power plant (now for sale by one of the Northern Pass partners, Eversource NH) is a reasonable alternative to consider as it meets the "purpose and need" of this project, even as defined by Northern Pass itself.

0847-1

0847-2

0847-3

0847-1
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.

0847-2
Thank you for your comment. Because an EIS is intended to inform decisionmakers and the public about potential impacts of a major federal action, DOE analyzes in detail several alternatives that involve underground cable in the I-93 corridor, including Alternatives 4a, 4b, 4c, 5a, 6a, and 6b. The regulatory framework governing utilities in roadway corridors, including through Franconia Notch (Section 4.3.6.4 of the EIS), is discussed in the Land Use Technical Report and the EIS, see Section 3.1.6.4. DOE has considered this comment and no change to the EIS was made.

0847-3
Thank you for your comment. Alternative 4a is analyzed in detail in the EIS. Alternative project terminus and converter station locations (including Bow, NH; Buxton, ME; Vernon, VT; and Londonderry, NH) were considered but eliminated from detailed analysis in the EIS because they are not reasonable alternatives. Section 2.4.14 of the final EIS has been updated to include additional information about this alternative. Further, 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 EIS.)

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Apr 3, 2016

ID: 9179

Date Entered: Apr 3, 2016

Source: Website

Topics: Alternatives, Viewshed/Scenery

Organization:

Comment: I am writing in relation to the Draft EIS for the Presidential Permit requested by Northern Pass. I am both a lifetime user of the White Mountains and other New Hampshire wilderness areas, and as a second home owner and power consumer in Southern New Hampshire.

I strongly support full burial of the Northern Pass project, and examination of all burial alternatives in the Final Environmental Impact Statement (FEIS). I particularly support burial supports along existing interstate corridors (e.g., I-93) and believe that Northern Pass should be required to independently verify its claim that full burial along the I-93 corridor is not feasible. I also support full examination of alternative burial routes, such as the I-91 corridor in Vermont.

I also challenge the DEIS's visual analysis, in particular, the use of US census data to quantify the impact of the project on the North Country of New Hampshire. It defies common sense to evaluate the visual impact on the beautiful, undeveloped spaces in our country based on population density. Rather than US Census data, the FEIS should assess the visual expectations for the undeveloped landscape qualities of the North Country held by residents, visitors and second home owners.

Finally, I urge that the FEIS examine distributed generation like solar, grid scale battery storage, and energy efficiency as reasonable alternatives to Northern Pass as proposed.

0855-1
Thank you for your comment. Because an EIS is intended to inform decisionmakers and the public about potential impacts of a major federal action, DOE analyzes in detail several alternatives that involve underground cable in the I-93 corridor, including Alternatives 4a, 4b, 4c, 5a, 6a, and 6b. The regulatory framework governing utilities in roadway corridors, including through Franconia Notch (Section 4.3.6.4 of the EIS), is discussed in the Land Use Technical Report and the EIS, see Section 3.1.6.4. DOE has considered this comment and no change to the EIS was made.

0855-2
Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a "connected action" under NEPA. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and

underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. Among these alternatives, DOE considered two alternate border crossings. One was an alternative that would utilize the existing National Grid Phase I/II route, including its border crossing in Vermont. Based on its review of the National Grid alternative DOE determined that this alternative is not reasonable. Section 2.4.3 of the final EIS has been updated with additional information related to the National Grid alternative. Separately, in response to comments received on the draft EIS, DOE considered a second alternative border crossing in Vermont, specifically identified as a border crossing at Derby Line, VT that would utilize I-91. DOE determined that this alternative is not reasonable. Section 2.4.17 of the final EIS has been added to reflect consideration of this alternative and DOE's determination.

0855-3
Thank you for your comment. The value of scenic sensitivity used in the analysis is the greater of scenic concern or viewer exposure, not the average. Therefore, low viewer exposure in the Northern Section and the WMNF, for example, does not lower the scenic sensitivity of these areas. The rationale for the viewer exposure ratings is explained in Section 2.4.2.5 of the Visual Impact Assessment Technical Report. As discussed, use data are generally not available for scenic or recreation resources in New Hampshire and estimates of transient and tourist populations would be excessively speculative. Therefore, census data were used as an indicator of how many potential viewers exist in an area. The scenic value of the undeveloped nature of the area is captured through the other elements of the landscape assessment, including intrinsic visual quality. The viewer exposure metric was included in this analysis to represent the sensitivity of areas with many viewers but less intrinsic scenic quality.

0855-4
Thank you for your comment. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative

was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

0855-5
Thank you for your comment. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Sep 11, 2015

ID: 8378

Date Entered: Sep 11, 2015

Source: email

Topics: Alternatives

Name: Gene R.

Organization:

Email: techpic@roadrunner.com

Comment: As I have indicated in previous emails,I do not have any problem with the NP being situated in the normal energy ROW's that Eversource has. Towers and wires are not a problem. Only to a few visually sensitive advocates. Yes, they are the squeaky wheel, but not the whole vehicle !!!
The problem is now, that Eversource has relented to the public pressure to bury more of the line, it appears to be following Rt. 3, right thru the center of Plymouth, at its Main St.
I was the Water and Sewer Superintendent for 11 years (86 - 97) and have much knowledge of the infrastructure under Main St. It will be a slow difficult process to evade the numerous pipes and wires currently already placed under that road.
I can understand the need to avoid the overhead system thru the National Forest area, if its not allowed. But, that area ceases well before Plymouth. So go back into the existing ROW before entering Plymouth.
Thus, I would endorse using the existing ROW in Holderness that the current Eversource lines follow, and forget about intrusion into Plymouth.

0861-1

0861-1
Thank you for your comment. The land use analysis in the EIS discusses potential conflicts with existing infrastructure resulting from underground cables in roadways (see Section 4.1.6.1). The EIS analyzes several alternatives that include overhead transmission lines in Plymouth (Alternatives 2, 5a, 5b, and 5c).

Mullen, first name Thomas. I want to, first thing I want to do is apologize to the people from Coos County. I'm an interloper from down south, down around Campton, where there was an announced not so long ago that the Northern Pass was going to go underground. Now, I have a very clear picture of why Northern Pass decided to go underground down through southern Grafton County. One of them is the gentleman sitting at the table over there, Tom Wagner, who has the White Mountain National Forest, and I don't know what went on there, but I have a pretty good idea that Tom Wagner wasn't about to let the Northern Pass go overhead through the White Mountain National Forest. Secondly, there are a lot of people who own property in and around the area where I live. North Woodstock, Campton, Thornton, Plymouth, Ashland. They had deeds that go way back, and in those deeds, it's quite specific what they were deeding those right-of-ways for, and in many, many cases those right-of-ways were deeded in order to electrify the North Country for the people that lived up here, not to enrich the pockets of Public Service Company of New Hampshire. So if you think for a moment that going underground through my neck of the woods was done out of the goodness of Eversource's hearts, forget it. That's not what happened. And Mr. Muntz knows this is true, and Mr. Quinlan knows this is true and they will not argue this because they know of what I speak. Couple of other things. The Northern Pass project is absolutely in terms of how it's designed is defying the Federal Energy Regulatory Commission in terms of putting lines too close together and rights-of-way that are too narrow. FERC has weighed in on these types of lines and has said that they are the wrong thing to do, and the problems that come from storms and related events cause huge blackouts in areas where these towers are so tall that when they fall, they fall on other towers and knock out the whole grid, number one. I happen to think that it would be in all of our interests to support the Northern Pass project. I don't think at this stage that there's any reason why if they go underground we should not support them. It's a solution to our nightmare. It stands to end the difficulties that we're all going through with our businesses and with our property values. So I challenge the SEC and the Department of Energy to require this project to go underground and will tell you that the cost of undergrounding this project works out to about 1/1000th of the income stream that flows in to Eversource on an annualized basis. 1/1000th of the income stream represents what their costs would be of going overhead, and I'll bet that that's probably not anybody in this room that wouldn't pay some sort of a surcharge on their electric bill to see this thing go underground. I would, and I know many businesses that would. And it's time that as a community we step up and have this dialogue, have it with the Northern Pass people and let's get this thing out of the public clamor that's been going on. It's a terrible process that we've been going through, and it damages everybody's values. Thank you very much.

0862-1

0862-1
Thank you for your comment. To be approved, the Project must comply with all federal, state, and local requirements (see Section 1.7 of the EIS). 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. A separate reliability study will be completed by DOE in cooperation with ISO-NE, and will provide a separate analysis of impacts of the proposed federal action on the electricity system.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Oct 20, 2015

ID: 8442

Date Entered: Oct 20, 2015

Source: Website

Topics:

Name: Peter Martin

Organization: Mr.

Title: Mr.

Email: martinp003@gmail.com

Mailing Address: 280 Old Hebron Rd.

City: Plymouth

State: NH

Zip: 03264

Country: US

Comment: Neither cost or engineering issues should preclude burial of the entire Northern Pass line.
From FERC technical Conference, Oct 13, 2004 in Hartford, Connecticut. Jeffery Donahue CEO of TransEnergie US reports:
• Several studies confirm reliability of underground transmission
• No Electric Fields or AC EMF issues
– HVDC and HVAC underground cables have no electric fields
– Advanced underground HVDC cables - DC magnetic fields directly over cable are within natural variations of the earth's DC magnetic field
• O&M cost of advanced underground HVDC less than overhead HVAC
• Advanced underground HVDC cost comparable to underground HVAC
• Advanced underground HVDC costs are declining, overhead HVAC costs are increasing
More resilient, fails three times less often than overhead lines. Storms and solar flares are not an issue like they are for overhead lines.
Fails are found instantly with time domain reflectometry. Same method used for overhead lines.
In a letter to Energy and Climate Secretary Chris Huhne leaked to the press, "Dr. Fox cites research suggesting the lifetime cost of pylons could be double that of underground cables

0863-1

0863-1
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.

over 40 years," the UK'S Daily Mail reports. Dr. Fox is Britain's Defense Secretary.
Iroquois pipeline trenching at $1 million per mile in present dollars. Overhead towers and installation at $900,000 per mile. For 39 miles Leeds to Pleasant Valley, extra cost $4 million. Savings per year due to lower line lose $8 million, over 30 years buried saves $240 million. Net saving over 30 years for buried $236 million. Buried is cheaper.

0863-1 Continued

0863-1 cont'd

Good evening. I want to thank your for the opportunity to be here. I'd like to give this young lady my correct spelling. It will be easier. Bruce Beaurivage. I'd like to from a contractor's point of view. Specifically, an electric contractor's point of view, which I am. Seventeen years I spent with Public Service. I helped wire and build, construct Deerfield's substation where this electric is ultimately going to enter the New England grid in the late '70s. That's from the point of view, from electrician's point of view and jobs, this is a very unique type of electrical work. It's limited to linemen and it does provide jobs, but I don't want anybody to be misled here about the apprenticeship program and how it work in the State of New Hampshire for a licensed electrician. The utilities have their own training facilities and their own requirements for hours worked and for education. It is not recognized totally by the New Hampshire State Fire Marshal's office in licensing of electricians in the State of New Hampshire. The State of New Hampshire requires an apprentice to do 2000 hours of work a year for four years, 8,000 hours, and 600 hours in school. It's up to the Licensing Board of the State of New Hampshire electricians to decide how much credit will be given to an apprentice in the program for the utility to build the power line, and he would still have to attend 600 hours of school before he can even take the test to become a journeyman electrician in the State of New Hampshire. So building a power line does not allow the 10,000 current electricians licensed in the State of New Hampshire to do residential, commercial or industrial work in the State of New Hampshire. I'll make it quick because I know we don't have much left here. Basically, as far as reliability point of view, with my background in electricity for the years that I've been involved and among other things, this is very simple. That bury it is a lot more reliability as we all watched back in the ice storm of 1997 when the towers toddled in Canada and they had to milk the cows by hand because they had no power for a month in some of the provinces of Quebec. So from reliability point of view, I realize it's more money, but it makes a lot more sense to go underground. Thank you very much.

0864-1

0864-1
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.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Apr 2, 2016

ID: 9163

Date Entered: Apr 2, 2016

Source: Website

Topics: Alternatives

Organization:

Comment: I am in favor of forcing more of the proposed route, ideally its entirety, to be buried. In between the initial proposal, in which almost none would be buried, until the current proposal, Northern Pass managed to find a way to bury 40+ miles of the route. That did not seem to make the project infeasible. Anytime someone raises the objection that the whole route should be buried, the uniform response from Northern Pass is that is is simply too expensive. But just how expensive? That is a number that has never been provided, to my knowledge. Having that number would allow the public - and public officials - to better gauge whether the project truly would be "too expensive." Without this information, we are left to merely take Northern Pass at their word that burying the whole line is uneconomic. I believe that, prior to any approval, a budgetary breakdown of the costs of burying the whole line should be required. Indeed, in order to prevent Northern Pass from whitewashing it with an inflated estimate, the DOE should contract its own study to determine what the expected cost would be.

0868-1

Secondly, the proposed route follows route 3 and Interstate 93 for long distances. If the cost of burying the line in the existing rights of way is truly too expensive, then perhaps burying it alongside the highway, which has already been worked over, would be less expensive. In addition to providing easier installation and easy access for maintenance, this proposal would provide useful revenue to the state and leave the existing right-of-way intact. Burying the line alongside the highway is an alternative that I feel has not been fully vetted, but is definitely one that should be investigated before committing to the proposed route, tower structure, and budget.

0868-2

0868-1
Thank you for your comment. Section 4.1.2 of the EIS presents cost estimates for the Project under all alternatives. These costs were developed by DOE based on preliminary inputs from the Applicant (see Socioeconomics Technical Report for more information).

0868-2
Thank you for your comment. Because an EIS is intended to inform decisionmakers and the public about potential impacts of a major federal action, DOE analyzes in detail several alternatives that involve underground cable in the I-93 corridor, including Alternatives 4a, 4b, 4c, 5a, 6a, and 6b. The regulatory framework governing utilities in roadway corridors is discussed in the Land Use Technical Report and the EIS, see Section 3.1.6.4. DOE has considered this comment and no change to the EIS was made.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

OFFICE OF THE
REGIONAL ADMINISTRATOR

April 4, 2016

Mr. Brian Mills, National Environmental Policy Act (NEPA) Document Manager
Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

RE: EPA Comments on the Northern Pass Transmission Line Project Draft Environmental Impact Statement and Supplement, CEQ#20150327

Dear Mr. Mills:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, we have reviewed the Department of Energy (DOE) Draft Environmental Impact Statement (DEIS) and Supplement for the proposed Northern Pass Transmission Line Project in Coos, Grafton, Belknap, Merrimack, and Rockingham counties in New Hampshire.

According to those documents, the purpose of the Northern Pass project "is 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)." Northern Pass LLC (Northern Pass) intends to construct the transmission line to deliver up to 1,200 megawatts (MW) of Canadian electric energy (primarily hydropower) from Quebec to southern New Hampshire to supply the New England Region. The applicant's preferred project alignment would be constructed with 132 miles of overhead and 60 miles of buried transmission line. Northern Pass applied for a special use permit from the United States Forest Service (USFS) for permission to construct, operate, and maintain an electric power transmission line crossing portions of the White Mountain National Forest. The USFS intends to use the DOE NEPA process to guide their decision-making with regard to the special permit.

The DEIS and Supplement consider seven transmission line build alternatives along differing alignments featuring overhead and underground installation. The potential impacts for each alignment varies as some of the alignments follow existing transmission rights of way (ROW), parallel existing roadways, or create entirely new transmission corridors. Some of the alternatives are hybrids of all three. EPA's experience with other transmission projects in New England helped shape our active participation in the Department of Energy (DOE) scoping and interagency coordination process for this project. As a cooperating agency during the DOE's work to prepare the DEIS and Supplement, we offered two sets of detailed scoping comments on the project, comments on the interagency review draft of DOE's Administrative Draft

Environmental Impact Statement (ADEIS), and participated in numerous interagency meetings to discuss the EIS analysis.

The Northern Pass project has been the subject of intense public interest in New Hampshire, with significant concern focused on whether the transmission lines can be routed and buried to reduce or eliminate anticipated impacts. We note DOE's efforts to engage with the public through two rounds of project scoping and provisions for a number of public meetings to accept comments. We encourage the DOE to continue this type of outreach to help address comments and concerns raised during the balance of the NEPA process.

The DEIS and Supplement describe a number of potential direct, secondary and cumulative impacts. Our attached comments focus on concerns we have related to: impacts to wetlands, drinking water and air quality, as well as the consideration of alternatives. We look forward to a response to these issues in the FEIS. We have rated the DEIS "EC-2" (Environmental Concerns-Insufficient Information) in accordance with EPA's national rating system, a description of which is enclosed. EPA is ready to continue to participate on the interagency review team to provide additional input, as necessary, to help DOE develop the FEIS. We encourage DOE to continue with a robust public outreach program as project impacts come into focus.

Please feel free to contact Timothy Timmermann of the Office of Environmental Review at 617/918-1025 if you wish to discuss these comments further.

Sincerely,

H. Curtis Spalding
Regional Administrator

enclosure

Summary of Rating Definitions and Follow-up Action

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Detailed Comments on the Northern Pass DEIS and Supplement

Drinking Water

Summary

The DEIS provides insufficient discussion of potential impacts to surface or ground drinking water resources and measures that can be taken to mitigate those impacts. To prevent impacts on public water supplies that utilize groundwater, the transmission line must not pass through the state defined Sanitary Protective Areas for any public water supply.

Assessing Potential Areas of Impact to Drinking Water

The DEIS does not adequately identify areas where the Project has the potential to impact drinking water. Although it lists areas of disturbance overlying aquifers for each alternative, the accounting is incomplete as it does not include bedrock aquifers, which supply the majority of New Hampshire's groundwater wells (see the Draft Water Resources Technical Report, page 22). Moreover, it does not identify those areas which supply drinking water for Public Water Systems.

EPA recommends the FEIS identify and map areas where the Project will cross state defined Source Water Protection Areas (for both surface water and groundwater). Information on Source Water Protection Areas is available from the New Hampshire Department of Environmental Services (NHDES). Please contact the NHDES Source Water Protection Program (contact noted below) to obtain this information and determine appropriate protective distances between proposed transmission lines (including construction areas) and private and public drinking water sources.

New Hampshire Department of Environmental Services--Drinking Water & Groundwater Bureau
Pierce Rigrod, Supervisor
Drinking Water Source Protection Program
Phone: (603) 271-0688
Email: Pierce.Laskey-Rigrod@des.nh.gov
http://des.nh.gov/organization/divisions/water/dwgb/dwspp/index.htm

We also recommend that the FEIS include requirements that the project applicant communicate and coordinate with NHDES as well as local Public Water Systems and private well owners about proposed construction and operation activities within Source Water Protection Areas. NHDES and/or EPA can provide contact information for local Public Water Systems.

Blasting and HDD

Two construction activities that may pose significant hazards to groundwater resources are blasting and horizontal directional drilling (HDD). In multiple sections, the DEIS states that "potential blasting during construction could result in groundwater being more susceptible to infiltration by on-site materials from spills or leaks, and could also temporarily affect turbidity in groundwater wells near the blast zone." This statement does not adequately capture the risk to groundwater from blasting, which can be far greater and long-lasting. Blasting near bedrock

0869-1

0869-2

0869-1
Thank you for your comment. Sections 3.1.13 and 4.1.13 of the EIS and Sections 2 and 3 of the Water Resources Technical Report have been updated to include an inventory of drinking water resources in the Project corridor (including aquifers, wells, and Source Water Protection Areas) and an analysis of potential impacts. Appendix H also includes Applicant Proposed Measures related to avoidance and minimization measures on water resources as well as requirements for consulting with NH DES and local agencies.

0869-2
Thank you for your comment. General impacts to water resources, including groundwater, from blasting and HDD are noted in the EIS and Water Resources Technical Report. As analyzed in the EIS, potential impacts from blasting to water resources include increased bedrock fracturing resulting in increased turbidity in groundwater wells and increased susceptibility of groundwater to infiltration from on-site materials from spills or leaks (see Section 4.1.13). Potential impacts from HDD on water resources include impacts to water quality resulting from leaks of HDD drilling fluid. Specific impacts (short- and long-term) from blasting or HDD would be addressed during subsequent siting processes. Applicant-Proposed Impact Avoidance and Minimization Measures (APMs) included in the EIS ensure that potential impacts are avoided/minimized where possible. As analyzed in the EIS, HDD would be utilized where appropriate and necessary to avoid or minimize impacts to resources (see Section 2.3.2.5). The specific locations of blasting and HDD are not known at this time, as project design continues to evolve through the New Hampshire Site Evaluation Committee review. Through this State siting process, Northern Pass would be required to coordinate with the New Hampshire Department of Environmental Services to establish appropriate impact avoidance and mitigation measures, including potentially, the use of HDD in particular areas. Additionally, monitoring protocols and public outreach requirements would be developed through coordination with the State and USFS, as the agencies with siting authority. These procedures could include EPA's recommendations. Appendix H of the EIS includes a number of APMs designed to minimize impacts to water resources. In particular: The Applicant will avoid or minimize impacts to waterways and floodplains, to the extent practicable, in route selection, siting, and design; and, Applicable BMPs and specific measures to minimize and avoid impacts on waterbodies will be established during the permit application process in consultation

with state and federal agencies. The Project will be constructed, operated, and maintained in accordance with federal and state permits. The Applicant will also adhere to stipulations in the Certificate of Site and Facility, which is administered by the Site Evaluation Committee.

wells poses a significant risk to the water quality and capacity of these wells. EPA recommends that alternatives to blasting be fully explored, and that blasting within close proximity to bedrock wells be prohibited.

EPA recommends the FEIS identify specific areas where blasting and HDD may occur. In these areas, we recommend specific steps are outlined for contacting well owners (both private and public) in proximity to the construction areas in advance of blasting. We recommend water quality monitoring of public and private wells near blasting and HDD construction activities be conducted to determine if construction activities cause impacts. We recommend monitoring for impacts to well yield also be conducted. In the event that construction is determined to have impacted well yield or water quality, we recommend the applicant be held responsible for corrective actions, and that it is specified in the FEIS. We recommend this include, at a minimum, assisting well owners with finding additional sources of drinking water, compensating owners for any damages to drinking water supplies or taking any other measures to put the well owner in the position he was in before the damage occurred.

With respect to HDD, the DEIS only states that this technique "…could be employed at most major stream crossings…" (Draft Water Resources Technical Report, page 96). We recommend specific areas where HDD may be used be listed and mapped. In any areas where HDD activities may occur in Source Water Protection Areas, we recommend the FEIS include plans for contacting the local Public Water Supply operator in advance of construction activities. We recommend specific details about the use of HDD in Source Water Protection areas be provided to the Public Water Supply, NHDES, and other relevant stakeholders. HDD construction details should include engineering specifications for the planned construction activities. We recommend map cross-sections of HDD construction areas include, among other things, aquifer materials and bedrock features (e.g. fractures) which may be intersected by drilling.

Hazardous Materials

Although existing hazardous waste sites and generators are presented in the DEIS, we recommend that the FEIS identify types of fuels or other hazardous materials that will be stored along the transmission route and at converter stations. We recommend storage locations for chemicals, fuels or other hazardous materials are identified for each of the transmission route alternatives as part of the effort to better characterize risks to drinking water resources. No storage or use of chemicals within Sanitary Protective Areas around wells may occur either indoors or outdoors. In addition to a stormwater pollution prevention plan (SWPPP) and Spill Prevention Countermeasure and Control Plan (SPCC), we recommend the FEIS describe the safeguards that will be necessary for fuels and/or hazardous materials located in Source Water Protection Areas.

Biocides and Chemical Threats to Drinking *Water*

We recommend maintenance practices for each of the transmission line alternatives is addressed in the FEIS, including the type of biocides/herbicides to be used and their application frequencies. If portions of the alignments are located in drinking water source areas and/or in close proximity to public/private wells, we recommend alternatives to biocides are fully explored and a communication plan with local communities and water suppliers is included in the FEIS. Any proposed application of biocides or herbicides near public drinking water wells is required

0869-2 cont'd

0869-2 Continued

0869-3

Thank you for your comment. The specific types of fuels/hazardous materials and their storage locations are not known at this time, as project design details continue to evolve through the New Hampshire Site Evaluation Committee review. Through this State siting process, Northern Pass would be required to coordinate with the New Hampshire Department of Environmental Services to establish appropriate impact avoidance and mitigation measures, including potentially a more detailed plan for hazardous materials management (which may include limits on storage or use of chemicals in Sanitary Protective Areas around wells) as well as the prohibition mentioned in the comment. Appendix H of the EIS includes a number of APMs designed to minimize impacts to water resources from hazardous material spills. In particular: "The Applicant will include in its SPCC plan protective measures to minimize contamination of waterways due to accidental spilling of fuels or other hazardous substances. Refueling will occur at sites away from wetlands and surface waters;" and, "To minimize contamination of wetlands due to accidental spilling of fuels or other hazardous substances, the Applicant will develop and implement an SPCC plan or its equivalent. Environmental Monitors will ensure that construction is conducted in a manner that is consistent with the SPCC."

0869-3

0869-4

Thank you for your comment. As noted in Appendix H of the EIS, the Applicant "does not plan to use herbicides as part of its vegetation management program. As indicated in the ... [project permit], all vegetation management and maintenance will be carried out in accordance with the NHDFL [New Hampshire Division of Forests and Lands] BMPs for utility maintenance" (see Appendix H). In addition, the use of herbicides "was dismissed from further detailed analysis because herbicides are not included, or utilized, in PSNH's [Public Service of New Hampshire, now Eversource] vegetation management program. Mechanical means would be employed for vegetation management, and the potential impacts of these activities are analyzed in this draft EIS" (see Appendix B, Section B.2.4).

0869-4

to be approved by the NH Department of Agriculture after consultation with the NH Department of Environmental Services.

Wetlands and Aquatic Impacts

Development of the action alternatives will result in a range of direct, indirect and cumulative impacts to wetlands and other water resources within the project area. According to the DEIS, the estimated direct wetland impacts will range from two to twenty-five acres depending on the alternative selected, temporary impacts from eight to seventy eight acres.

A permit under Section (§) 404 of the Clean Water Act will be necessary for all of the action alternatives. EPA's § 404(b)(1) guidelines (40 CFR Part 230) set forth the environmental standards that must be satisfied in order for a § 404 permit to issue. Four of the key guidelines' provisions are as follows:

Section 230.10(a) prohibits the discharge of dredged or fill material if there exists a practicable alternative which causes less harm to the aquatic ecosystem. A discharge of dredged or fill material is prohibited if there "is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem so long as the alternative does not have other significant adverse environmental consequences." This fundamental requirement of the Section 404 program is often expressed as the regulatory standard that a permit may only be issued for the "least environmentally damaging practicable alternative" or LEDPA. Furthermore, where (as here) the project is not water dependent and involves fill in wetlands and other special aquatic sites, practicable and less environmentally damaging alternatives are presumed to exist unless clearly demonstrated otherwise by the applicant. An alternative can be rejected if it does not meet the project purpose or it is not practicable. The information presented in the DEIS suggests a conclusion that all of the build alternatives in the DEIS meet the project purpose and general practicability tests. Based on the information in the DEIS, alternatives 4 and 6 bury most or all of the transmission cable underground next to previously disturbed areas and subsequently result in far less impact to the aquatic environment than the Northern Pass preferred alternative (Alternative 7).

Section 230.10(b) prohibits discharges that would cause or contribute to violations of state water quality standards; violate toxic effluent standards under § 307 of the Clean Water Act; jeopardize the continued existence of an endangered or threatened species, or result in the likelihood of the destruction or adverse modification of such species' critical habitat; or violate requirements of marine sanctuary designations.

Section 230.10(c) prohibits discharges that would cause or contribute to significant degradation of waters of the U.S. Significant degradation may include individual or cumulative impacts to human health and welfare; fish and wildlife; ecosystem diversity, productivity and stability; and recreational, aesthetic or economic values.

Section 230.10(d) prohibits discharges unless all appropriate and practicable steps have been taken to minimize potential adverse impacts of the discharge on the aquatic ecosystem.

0869-4 cont'd

0869-4 Continued

0869-5

0869-5 Thank you for your comment. The analysis of direct, temporary, and indirect impacts to wetlands has been clarified in the final EIS to address EPA's concern, and additional detail is provided in the Water Resources Technical Report. It is important to note, however, that this EIS will not be used for compliance with Section 404 of the Clean Water Act and related permitting, and the U.S. Army Corps of Engineers will produce separate NEPA compliance that will inform discussions about potential compensatory mitigation. Appendix H of the EIS includes a number of APMs designed to avoid and minimize impacts to wetlands, but the formal discussion of mitigation is under the jurisdiction of the U.S. Army Corps of Engineers, not DOE.

Compensatory mitigation for unavoidable impacts to the aquatic ecosystem must satisfy the requirements of 40 CFR §§ 230.91-230.98.

We recommend that the FEIS better characterize the nature and extent of all direct, temporary, indirect and cumulative impacts to wetlands for all alternatives. The assessment of indirect impacts should include full consideration of the secondary effects of project alternatives on the aquatic ecosystem, as required under 40 CFR Part 230. Ultimately, all direct, indirect and cumulative impacts on the aquatic ecosystem associated with the project must be avoided, or, where unavoidable, minimized per the Clean Water Act § 404(b)(1) guidelines. All unavoidable direct, indirect and cumulative impacts must be mitigated per the 2008 federal aquatic resource compensatory mitigation regulations at 40 CFR Part 230.

Impact Characterization

The Northern Pass DEIS describes the likely wetland impacts from the project including impact summary tables that provide information that allows for alternative comparisons. Our previous comments on the wetlands analysis for the project requested a summary of all direct, temporary and secondary impacts following this outline:

- Direct Impacts (the placement of fill in all wetlands, streams, or vernal pools (VP))
- Temporary Impacts (alteration to wetlands, that will grow back to existing form; for example, cutting trees and the use of swamp mats for the construction process) to forested, shrub and emergent wetland areas.
- Secondary Impacts (including permanent conversion of forested wetlands to scrub-shrub wetlands; permanent conversion of forested wetlands to emergent wetlands; removal of forested cover (upland or wetland) within 100' of any vernal pool; removal of forested cover (upland and wetland) within 100' of any stream.

While the summary tables present impact information under broad categories, we recommend the FEIS contain a breakdown of the impact totals. For example, under temporary impacts, the total impact could be subdivided into different types of impacts. That information would help to inform future discussions regarding mitigation for those impacts and will support permitting efforts following the close of the NEPA process. Moreover, the DEIS presents vernal pool impacts in acres. It would be more informative if the FEIS includes a tally of the number of pools that will be subject to direct and secondary impacts under each alternative. We also recommend that the FEIS provide maps for each alternative showing areas where the alignment of the project will use a new right of way (ROW) and where it will be constructed on an existing ROW. This information is difficult to see on the maps provided in the DEIS. Ideally, these maps will clearly show whether additional tree clearing within the ROWs is necessary and those areas where the current level of clearing is adequate. This information will be especially useful in those areas where overhead transmission lines are proposed.

EPA participated in meetings with the DOE in support of the DEIS preparation and meetings conducted by the State of New Hampshire/Corps of Engineers in support of state/federal permitting for the project. The wetland and stream impact totals provided in the DEIS vary considerably from the totals provided in state and federal permit applications prepared by the applicant. To eliminate confusion, it would be helpful if the FEIS highlights the root cause of

0869-5 cont'd

0869-5 Continued

0869-6

Thank you for your comment. The summary tables presented in the EIS are meant to provide an overview of wetland impacts. Additional detail, including a breakdown of impact types, is provided in the Water Resources Technical Report. While this information is available, it is again important to note that this EIS will not be used for wetlands permitting by the U.S. Army Corps of Engineers.

0869-7

Thank you for your comment. The number of vernal pools identified in each geographic section is noted in the Water Resources Technical Report and the EIS in Sections 4.2.13, 4.3.13, and 4.4.13.

0869-8

Thank you for your comment. The existing maps in Appendix A of the EIS indicate the location of the Project in existing versus new transmission corridor. The level of detail needed to identify specific locations of additional tree clearing in maps is more appropriate for the applicant's state filing than for this EIS document.

0869-9

0869-6

Thank you for your comment. The final EIS has been updated to include revised calculations of potential impacts to water resources, including wetlands, streams, and vernal pools (see Section 4.1.13, 4.2.13, 4.3.13, 4.4.13, and 4.5.13). Additional information is provided in the Water Resources Technical Report. The revised numbers are much more consistent with the totals provided by the applicant.

0869-7

0869-8

0869-9

these discrepancies and whether they can be reconciled so that the information in the EIS can be used to support future permitting. The following table shows the wetland impact totals presented in the DEIS and the applicant's own filings for Alternative 7.

	DEIS Alternative 7	Northern Pass Alternative 7
Direct Wetland Fill (acres)	23	2.48
Temp. Wetland Loss (acres)	65	181
Direct Vernal Pool Impacts	None	4 pools
Vernal Pools Secondary Impacts (acres)	0.1	0.3

Beyond the table, the Northern Pass application states that the project will directly impact four vernal pools and have secondary impacts on forty-two other pools within 100' of the project. We recommend these types of variations are more fully explained in the FEIS.

Alternatives Considered

When the DEIS was published in July 2015, Alternative 2 was the applicant's preferred alternative. Alternative 2 includes 8 miles of underground transmission and 179 miles of overhead transmission. Wetland impacts include twenty-six acres of direct impact, eighty-two acres of temporary impact, and eight acres of secondary impact. However, in August 2015, shortly after publication of the DOE DEIS, Northern Pass made changes to the project by proposing to bury another fifty-two miles of transmission cable (Alternative 7). This new alternative was subsequently addressed in DOE's November 2015 Supplement. Alternative 7 would have less wetland impact than Alternative 2 with twenty-three acres of direct impact, sixty-five acres of temporary impact and seven acres of secondary impact. Cable installation underground, next to existing highways, causes less potential damage to wetlands and upland habitat. This is especially true for sections of the corridor that are on new alignment and require a major disruption to the forest matrix. It appears that for Northern Pass's preferred alternative, forty miles of overhead transmission lines will be constructed on a totally new alignment in the northern part of the route. The majority of the impacts to wetlands occurs in this section. Alternative 7 will also fragment several natural communities including several Northern Hardwood Seepage Forest and Northern White Cedar–Balsam Fir Swamps.

We request that the DOE consider another alternative in the FEIS which buries all transmission line segments located on the new segments of the Alternative 7 alignment. It appears that 40 miles of ROW in the northern part of the proposed project would be built through forest on new alignment. If buried, the balance of the overhead transmission lines would be located on (mostly) existing ROW, and we presume this would reduce impacts and would result in approximately 100 miles of underground cable and ninety-two miles of overhead transmission lines. Additionally, we recommend the FEIS also explain how the border crossing location was selected and whether a shift in the crossing location would help to eliminate potential impacts.

Impact avoidance

Whether overhead or below ground, EPA generally agrees that the best general approach to avoid a wide range of impacts is to construct and operate the transmission line along existing

0869-9 cont'd

0869-9 Continued

0869-10

Thank you for your comment. As explained in Appendix B, Section B.2.1 of the EIS, DOE's responsibilities under the Presidential permit regulations (10 CFR Sections 250.320-205.329) are limited to responding to an application for an international border crossing for a transmission project. The scope of DOE's decision is whether or not to grant the requested Presidential permit for the Project at the international border crossing proposed in the amended Presidential permit application (August 2015). 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 WMNF. Therefore, the selection of a particular alternative alignment within the state of New Hampshire is beyond the scope of DOE's decision. The USFS will specify the selected alignment within the WMNF in a Record of Decision. While DOE's authority is limited to the approval or denial of the Presidential permit application as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a connected action. In keeping with this policy, DOE analyzed the impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other similar alignments and configurations between the proposed border crossing and connection with the existing U.S. electricity system utilizing primarily roadway corridors. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. These alternatives include a variety of alignments and overhead and underground configurations. Additionally, seventeen alternatives were considered but eliminated from further detailed analysis. Alternative 7 does include approximately 40 miles of overhead transmission in a new transmission route requiring a corridor of vegetation removal approximately 120 feet wide. The EIS analyzes, in full detail, a number of alternatives that do not include the creation of a new transmission route. Alternatives 4a, 4b, 4c, 6a, and 6b are all buried along roadway corridors in the Northern Section and therefore avoid impacts associated with a new transmission route. If Alternative 7 was buried in the Northern Section in the alignment of a roadway alternative, temporary and permanent impacts would be decreased. A

0869-10

0869-11

summary of impacts associated with EPA's suggested alternative are presented in Appendix J of the final EIS.

0869-11
Thank you for your comment. For each resource topic, the EIS notes the impacts from splice vaults, as well as potential helicopter landing pads, laydown areas, and access and maintenance roads (see Section 2.3). The EIS also describes which alternatives would require temporary work and staging areas, and includes potential impacts arising from those areas in the total impacts of each alternative. In addition, Appendix H of the EIS includes a number of measures by which to avoid and minimize potential impacts, such as limiting disturbance to as small an area necessary to accomplish the task, avoiding sensitive habitats, placing work areas in previously disturbed locations, and restoring disturbed areas to preconstruction conditions where possible. Appendix H of the EIS includes the following impact avoidance and minimization measures related to temporary construction impacts: "Construction staging and storage areas will be located and arranged in a manner to preserve trees and vegetation to the maximum extent practicable. They will be located outside the WMNF to the maximum extent practicable. Also, to the extent practicable, staging areas will be restored to preconstruction conditions;" "Construction activities will be limited to the transmission route, substation locations, or areas where the Project has negotiated rights for access roads, staging areas, and/or storage yards. Access roads have been designed, wherever practicable, to be located on already disturbed areas;" and, "The Applicant will avoid major disturbance of individual wetlands and drainage systems during construction to the extent practicable. Structures and temporary access paths, pulling stations, laydown and staging areas, and crane pads will be sited to avoid and minimize wetland and stream impacts." Potential impacts from blasting and HDD are also analyzed in the EIS. Additional site-specific detail on the locations of blasting and HDD along with appropriate impact minimization measures will be developed through the New Hampshire Site Evaluation Committee process in coordination with the New Hampshire Department of Environmental Services.

ROWs and transportation corridors to the degree practicable. The range of transmission line alternatives considered in the DEIS and Supplement does this for the most part and illustrates a wide range of potential impacts. It would be helpful if the discussion incorporates an articulation of impacts associated with temporary work or staging areas for each alternative and whether options exist to further minimize or avoid them.

The DEIS considers burial alternatives that will utilize horizontal directional drilling (HDD) as a means to avoid impacts at ground level such as habitat fragmentation, wetland impacts and changes to the visual landscape. While HDD has been used with great success in a number of energy transmission projects, use of this technology, and any potential transmission line burial through other means involving trenching or blasting needs to follow thoughtful investigation of subsurface conditions to avoid unintended consequences and potential drilling failure. As noted above in our drinking water comments, we strongly recommend that potential impacts to drinking water supplies from blasting and trenching activity and the establishment of preferential pathways for movement of pollutants in groundwater table be considered in the analysis. Avoiding impacts to wetlands, streams and other water resources, as well as to drinking water supplies, should be a high priority of the project design and construction.

Minimization and Compensatory Mitigation
The DEIS describes efforts to minimize adverse impacts to aquatic resources including:

- Spanning streams and many wetlands with overhead transmission lines;
- Avoiding impacts to streams by using trenchless, horizontal directional drills;
- Maximizing the use of existing ROW;
- Extensive vernal pool mapping and avoidance.

This DEIS, however, does not contain a mitigation plan. We recommend the FEIS advance the discussion of compensatory mitigation to address unavoidable project impacts.

Air Quality

Appendix H: Applicant-Proposed Impact Avoidance and Minimization Measures
The fourth commitment listed in Table H-1 on page H-2 under air quality measures notes, "Vehicular emissions will be limited by requiring contractors to properly maintain construction equipment and vehicles, and by minimizing diesel construction idling times in accordance with New Hampshire air quality regulations." This statement partially addresses our scoping comments requesting emission controls during construction. We continue to encourage the DOE to require the applicant to employ retrofit technology on older equipment to further reduce diesel emissions during construction of the project.

Lists of these diesel exhaust control technologies can be accessed at http://epa.gov/cleandiesel/verification/verif-list.htm. In addition, the Northeast Diesel Collaborative has prepared model construction specifications to assist in developing contract specifications that would require construction equipment to be retrofitted with control devices in order to reduce diesel emissions. The model construction specifications can be found on the

0869-11 cont'd

0869-11 Continued

0869-12
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, including several related to aquatic resources. The analysis of potential impacts in this EIS assumes that these measures would be applied during implementation of the Project, if approved. DOE notes that compensatory mitigation agreements between the Applicant and other agencies, as referenced in a comment letter from Northern Pass submitted on the draft EIS on April 14, 2016, are on-going. 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.).

0869-12

0869-13
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. The measure noted in the comment was identified and proposed by the Applicant and no changes have been made to Appendix H in response to this comment. 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.).

0869-13

Northeast Diesel Collaborative web site at URL address http://northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf.

To support the listed efforts to minimize construction idling, we suggest the list of approved idle reduction technologies found at on the agency SmartWay site at: http://www3.epa.gov/smartway/forpartners/technology.htm. Additionally, we encourage operator training to reduce unnecessary idling of equipment.

Miscellaneous

- Section 3.1.10 – The report refers to a dated ISO NE emissions report. We recommend that the analysis be updated to reflect the most recent emission report. In addition, we recommend the discussion of Regional Greenhouse Gas Initiative (RGGI) assess the impact that this project will have on the ability of states – NH in particular – to continue to meet their RGGI CO2 caps in future years.
- Sec 4.1.10 – Please use SO2 instead of Sox. SO2 is the pollutant EPA regulates and power plants measure. Also see comment above about using the most recent ISO emission data for analysis.

Alternatives

According to the DEIS, Alternative 2 is not consistent with the Forest Plan for the White Mountain National Forest. This finding combined with the applicants filing of an amended project (Alternative 7) signals that it is appropriate for the DOE to cease further analysis of alternative 2 for purposes of the FEIS. We also continue to note that the analysis of non-transmission alternatives consistent with the diverse, low-carbon, non-intermittent electricity supply purpose of the project would improve the EIS.

0869-13 cont'd

0869-13 Continued

0869-14

0869-15

0869-16

0869-14
Thank you for your comment. Section 3.1.10 and other sections of the EIS as well as several sections of the Air Quality and Greenhouse Gas Technical Report were revised to include the most recent ISO-NE emissions report. Analysis was conducted, and updated (January 2017) with GE Energy Modeling to consider future projected scenarios of fossil fuel use and generation in ISO-NE. This analysis includes implications on the ability of states to meet Regional Greenhouse Gas Initiative (RGGI) goals. Since power can be generated anywhere in the ISO-NE region, it is not possible to accurately specify how this project will directly affect specific state RGGI CO2 caps for New Hampshire beyond already planned retirement of other electric generation facilities. However, the proposed project involves the transmission of electricity generated from hydroelectric facilities into ISO-NE. Therefore, it will, in general, improve the ability of states in the ISO-NE region to continue to meet their RGGI CO2 caps in future years (see Section 1.4.2 of the final EIS).

0869-15
Thank you for your comment. Section 4.1.10, and other sections of the final EIS, as well as various sections of the Air Quality Technical Report have been revised to refer to sulfur dioxide emissions as SO2 rather than SOx. Analysis was conducted with GE Energy Modeling to consider future projected scenarios of fossil fuel use and generation in ISO-NE based on the most recent ISO-NE emissions data (ISO-NE 2015 Regional System Plan, November 2015).

0869-16
Thank you for your comment. As stated in the EIS, Alternative 2 would be inconsistent with the WMNF Forest Plan (see Section 4.5.6.2, Appendix C, and Appendix F of the EIS). In August 2015 Northern Pass submitted a further amendment to their Presidential permit application with DOE, however, Northern Pass has not submitted an amended application for special use permit with the USFS. Thus the final EIS contains an analysis of Alternative 2, as this is the project currently proposed to the USFS. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from

Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a connected action. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

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April 4, 2016

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To the Department of Energy:

We are students of administrative law submitting this comment as citizens concerned about the threat Northern Pass poses to our important national resource, the state of New Hampshire. One of us is a former resident, employee of the Appalachian Mountain Club, and thru-hiker of the Appalachian Trail, and both of us are frequent visitors of the state who use its trails, admire its scenery and wildlife, and think about becoming permanent residents there one day. We urge the Department of Energy ("DOE") to protect New Hampshire from the irreversible damage Northern Pass's Proposed Action would inflict on the State's North Country residents, landscape, and wildlife.

The DOE's Draft Environmental Impact Statement ("DEIS") sensibly outlines full burial alternatives for the transmission line that would enable the project to bring low-carbon energy to the New England grid without scarring NH's land. In its Final Environmental Impact Statement ("FEIS") DOE must reject Northern Pass's unsubstantiated claim that full burial is not feasible and should examine alternative burial routes, specifically Alternative 4b. If DOE insists this project be imposed on New Hampshire and issues a Presidential permit, it must require full burial of the line; if the line is not buried, the DOE must take no action under Alternative 1. This is because the DEIS overestimates the benefits of Northern Pass and does not include in its draft anything about the sustained community opposition to the project.

0873-1

0873-1
Thank you for your comment. Because an EIS is intended to inform decisionmakers and the public about potential impacts of a major federal action, DOE 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. A summary comparison of impacts between all alternatives is presented in Sections S.9 and 2.5 of the EIS.

0873-1 cont'd

0873-1
Continued

Full Burial of the Line

The DEIS shows that full burial under Alternative 4b would significantly reduce the extensive negative impacts associated with the Proposed Action, such as harm to viewsheds, reductions in property values, closures of recreational resources[1], risks to public safety, destruction of wildlife habitats and vegetation, negative effects to wetlands and vernal pools, and disturbances in areas above aquifers. Full burial would also bring positive impacts to landowners by increasing statewide property taxes.[2]

Viewsheds and Property Values

Instead of the recognized scenic impacts of the Proposed Action, Alternative 4b has no long-term scenic impact.[3] It entirely removes from consideration how 130' steel towers looming high above the canopy of mature trees would negatively affect the expectations of tourists, who come to NH to find uninterrupted land, and residents, who stay because of it. Compared to the $9,600,000 that would hit New Hampshire's property values if the line is not buried, Alternative 4b results in no decrease to property values.[4] This is significant partly because NH's economy relies on tax revenues generated by the second-home market, whose homeowners might be reluctant to keep a second property if the reason they have it--the scenic view--is no longer there.[5]

Recreational Resources and the Economy

Construction under the Proposed Action would affect almost 17 times as many miles of New Hampshire's hiking trails as Alternative 4b,[6] which would have no long-term visual impacts on those trails.[7] The decline of NH's paper and grain mills have left Coos County with tourism as *the* industry supporting its economy. The imposition of Northern Pass is a direct assault on Northern New Hampshire's most reliable source of income. Additionally, if DOE approves full burial under Alternative 4b, it will gives another boost to New Hampshire's economy, as this option will create over 70% more jobs than the Proposed Action.[8]

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[1] Closures of recreational resources will primarily occur during construction, but they will also occur during maintenance and repairs, which could be needed at any point along the transmission line, at any time. The harsh environmental conditions the region is known for suggest that transmission lines may require frequent repairs, leading to further trail closures.

[2] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-19, Table S-4.

[3] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-18, Table S-2.

[4] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-19, Table S-3.

[5] "Vacation Homes in New Hampshire: The Who, The What, The Where," National Public Radio, August 26, 2011: https://stateimpact.npr.org/new-hampshire/maps/new-hampshire's-vacation-homes-who-owns-them-where-are-they-and-how-many-are-there/

[6] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-20, Table S-5.

[7] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-21, Table S-6.

[8] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-19, Table S-4.

0873-1 cont'd

Vegetation and Wildlife

The report indicates that the Proposed Action will result in the loss of carbon dioxide uptake due to vegetation removal amounting to 932 metric tons per year.[9] The loss of CO2 uptake due to vegetation removal is nearly 85% less for Alternative 4b.[10] Additionally, while the report says that compared to the burning of fossil fuels the project will reduce emissions of greenhouse gases, it does not compare the project to any non-fossil fuel based energy generation methods.[11]

The Wildlife Technical Report ("WTR") for the DEIS surveys a number of species threatened by the Proposed Action. The American marten, for example, will experience "direct, long-term adverse impacts through the loss of interior forest habitat and the associated habitat fragmentation created by the construction of the Project in the Northern Section."[12] WTR recognizes that the impacts on the American marten will be more pronounced than on other species due to its low population, restricted range, and susceptibility to forest fragmentation.[13] On the same page the DEIS acknowledges that removing 300 acres of forestland would have "a long term adverse effect" on the marten, it goes on to say that because there is other forestland nearby this species would suffer "no long-term adverse effects." How this is possible when the species is already threatened and the Proposed Action would open it up to further attack by predators who would either eat it or outcompete it is not explained by the report. The WTR also seems to say that the burial alternatives would have equal negative effects on the marten during construction and maintenance, but provides no justification for this assertion.[14]

The DEIS Overestimates the Benefits of the Proposed Action

If full burial of the line is not an option, the DOE should require Northern Pass take no action under Alternative 1. This is because DEIS's assumption that the electricity provided by Northern Pass will only displace fossil fuel-based electricity generation is false and misleading.

The DEIS improperly assumes that all of the electricity use displaced by Hydro-Québec's hydropower will be carbon-based. Additionally, the DEIS does not analyze other uses for the electricity generated by Hydro-Québec and whether increased use by the New England grid would decrease use of hydropower elsewhere. Would Hydro-Québec increase its electricity production or merely shift its supply to a higher-revenue market? If Hydro-Québec shifts its electricity supply then the regions it currently supplies may come to rely more heavily on fossil

0873-1 Continued

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0873-3

0873-2

Thank you for your comment. DOE has reviewed the language in the EIS and Wildlife Technical Report to ensure that all statements regarding potential impacts to federal and state listed species, including American marten, are consistent and adequately defined.

0873-3

Thank you for your comment. The EIS does not address impacts outside ISO-NE. The GE Model used in the analysis assumes that power plants in the U.S. are dispatched based on marginal cost, and therefore existing renewable sources are unlikely to be affected by the Project. The analysis conducted did not find evidence that the Project would reduce the construction of new renewable power plants in the U.S., other than by potentially affecting total expenditures for electricity within the market.

[9] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-29, Table S-14.
[10] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, p. S-29, Table S-14.
[11] Draft Northern Pass Transmission Line Project Environmental Impact Statement Summary, pp. S-29-30.
[12] Wildlife Technical Report for the Draft Environmental Impact Statement, p. 116 (discussing effects of construction); See also, ibid., p. 150 (discussing effects of maintenance activities).
[13] Wildlife Technical Report for the Draft Environmental Impact Statement, p. 130
[14] See, Wildlife Technical Report for the Draft Environmental Impact Statement, p. 261

fuel-based electricity generation methods. And if this occurs, the supposed benefits of getting New England off fossil-fuel based electricity generation disappear.

The DEIS does not consider alternative non-fossil fuel based electricity sources that do not impose the negative impacts the Proposed Action has on New Hampshire's unique natural resources. Alternatives such as distributed generation, solar power, grid scale battery storage, and improvements in energy efficiency have environmental benefits and would keep energy local, benefitting the very people the Proposed Action currently harms.

The DEIS Fails to Consider Public Opposition to Northern Pass

The DEIS does not consider how NH's historic conservation efforts relate to the current project. When Taft signed the Weeks Act in 1911, dissenters like the legislator who had declared "not one cent for scenery," lost to conservationists, who had the prescience to provide national protection to NH's land when loggers had depleted mountainsides of trees to provide the country with a commodity in high demand[15]. Time over the spirited response of NH residents who have opposed large interstate projects has prevailed over objections by fiscal conservatives who say it would cost too much to care. Due to community opposition of I-93's construction in Franconia Notch, it took three decades and a special statutory amendment for the project to finally pass.[16] The superhighway that might have been is now a narrow, speed-controlled eight mile stretch of Parkway. Congress amended the statute "for the protection of the environment and for the preservation of the park-like and historic character of Franconia Notch."[17]

Nor does the DEIS say anything about how strong community opposition to this project has been from the start. Thirty one of the thirty-four impacted towns have voted "no" to Northern Pass and the recent public hearings by the New Hampshire Site Evaluation Committee have had so many concerned attendees not everyone can fit in the same room.[18] In its first iteration of public commenting on the project the DOE received 7500 comments, mostly negative.[19] Compare that to the mere 12 comments DOE received regarding Vermont's Clean Power Link, a fully buried line using existing rights of way.[20]

[15] http://www.foresthistory.org/ASPNET/Policy/WeeksAct/PassingAct.aspx
[16] "The Battle for Franconia Notch," *AMC Outdoors*, November/December 2001: http://www.outdoors.org/publications/outdoors/2011/flashback/the-battle-for-franconia-notch.cfm
[17] Federal-Aid Highway Act of 1973, Pub. L. No. 93-87, § 158, 87 Stat. 250, 278.
[18] "The SEC Meets the Opposition: Northern Pass Update," *Society for the Protection of New Hampshire Forests*, March 2016: https://www.forestsociety.org/blog-post/northern-pass-update-march-2016
[19] "Vermont's Northern Pass Alternative," *New Hampshire Business Review*, July 24, 2015: http://www.nhbr.com/July-24-2015/Vermonts-Northern-Pass-alternative/
[20] *Ibid.*

0873-3 cont'd

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0873-4

0873-4

Thank you for your comment. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. An Energy conservation alternative was considered but was eliminated from detailed analysis in the EIS because DOE determined it is not a reasonable alternative, in part because energy efficiency and conservation cannot alone meet the growing demand for electricity in ISO-NE. Section 2.4.9 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

0873-5

0873-5

Thank you for your comment. Section 1.5 of the EIS describes public participation in this NEPA process. Public participation is an important part of the process. For example, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of Project alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. This final EIS includes responses to all comments received on the draft EIS and supplement. Executive Order 10485, as amended by Executive Order 12038, authorizes DOE to issue a Presidential permit if, inter alia, the issuance of the permit is found to be consistent with the public interest. In deciding whether issuance of a Presidential permit is consistent with the public interest, DOE determines the proposed project's impact on electric reliability as well as its potential environmental impacts, including potential impacts to historic properties and cultural resources.

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0873-5
Continued

Under his statutory authority, the Secretary of Energy should only issue a permit "upon finding [issuance] to be consistent with the public interest."[21] The Secretary is encouraged to consider "any factor relevant to the public interest" in making the permit determination.[22] The public outcry against this project is highly relevant to its negative environmental impacts because it is NH's people who have kept NH's environment intact for centuries. To ignore the majority's view, expressed by a resident in Whitefield recently, who said "the scar the towers represent [is] emblematic of a willingness to give privilege to profit over preservation," would hurt this state indefinitely and cause people to lose faith in the public-commenting process. Either require that Northern Pass bury the line or stop this project by denying a permit.

Sincerely,

/s/ Whitney McCann
/s/ Greg Tolbert

J.D. Candidates, Graduation Expected 2017
CUNY School of Law

[21] E.O. 10485, as amended by E.O. 12038.
[22] *Ibid.*

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 28, 2016

ID: 8864

Date Entered: Mar 28, 2016

Source: Website

Topics: Alternatives, Wildlife, Viewshed/Scenery, Recreation, Design Criteria / Mitigation Measures

Organization: Mr.

Comment: Northern Pass, if not buried, will have a significant impact on recreation and tourism which is a large part of the economy of northern NH. The EIS should evaluate fully burying the power line along existing transportation corridors, to prevent further forest fragmentation.

Likewise, I'd like to see the EIS do a real evaluation of distributed generation using wind, solar, and hydro, with grid scale storage using batteries, pumped storage or even kinetic storage (flywheels.)

0877-1

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.

0877-2

Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as

requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a "connected action" under NEPA. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 28, 2016

ID: 8907

Date Entered: Mar 28, 2016

Source: Website

Topics: Purpose and Need, Alternatives

Name: Edward Craddock

Organization:

Email: edward-craddock@hotmail.com

Mailing Address: 523 Crafts St

City: Newton

State: MA

Zip: 02465

Country: US

Comment: HI,
I am NOT in favor of importing out of region electricity until we have locally exhausted all out renewable alternatives,including solar, wind and conservation. I currently have no electric bill in Massachusetts by reducing consumption, add Solar PV systems and reducing fossil fuel use to under 100 therms of natural gas a year. I also drive all Massachusetts miles (~11,000) on the electricity I generate. I see no need for transmission lines from over 200 miles away to support the needs that can be fulfilled locally. The cost of the transmission line is then born by the rate payers and if it is needed or not. There is more than adequate supply of wind to offset the requirement for the transmission lines.

Sincerely

Edward Craddock

net zero carbon household

0882-1

0882-1
Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a "connected action" under NEPA. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information

on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Jul 24, 2015

ID: 8213

Date Entered: Jul 24, 2015

Source: Website

Topics: Purpose and Need, Alternatives, Health and Safety, Vegetation, Wildlife, Viewshed/Scenery, Water / Wetlands, Recreation, Tourism

Name: Gary Robertson

Organization:

Title: Mr.

Email: bicycle81@yahoo.com

Mailing Address: 226 Belknap Mt. Rd.

City: Gilford

State: NH

Zip: 03249

Country: US

Comment: I abhor the Northern Pass. NH does not need energy. The power generated comes from poorly considered massive water polluting dams that usurp indigenous peoples right. The power lines will be kept tree free with herbicides that will pollute water and harm wildlife. Vermont was a better route. These towers are not only ugly but are not up to ice storm damage, hundreds of miles of these were destroyed in the late '90s. The towers and right of way are unsightly blemishes on a region visited for its beauty and tranquility. The length of the transmission line guarantees a high percentage of ohmic losses. Point of use generation is much more efficient. Increasing the complexity of the grid only makes it more susceptible to solar geomagnetic storms and human caused interruption. The tide has turned and large scale power grid is looking more like telephone land lines, the high cost of maintaining the infrastructure inflicted upon a shrinking user base. Fifty years ago this might have been a better idea, but not now, the right idea at the wrong time IS the WRONG IDEA.

0887-1

0887-2

0887-1
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. With respect to herbicides, the Applicant has agreed in their Applicant Proposed Impact Avoidance and Minimization Measures found in Appendix H to not use herbicides.

0887-2
Thank you for your comment. Section 2.4 of the EIS discusses alternatives considered but eliminated from further analysis. DOE determined that power generation and energy conservation alternatives are not reasonable alternatives. Section 2.4 has been updated with additional information about these alternatives. The purpose of, and need for, DOE's action is to determine whether or not to grant the requested Presidential permit for the Project, which is a proposed transmission line crossing the international border. Potential impacts related to weather extremes and human-caused interruption are discussed in Section 4.1.4.2 of the EIS. Ohmic losses are not analyzed in the EIS.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 9, 2015

ID: 8249

Date Entered: Aug 9, 2015

Source: Website

Topics: Other

Name: Laurence Rappaport

Organization: State of New Hampshire

Title: NH State Representative

Email: rapp@lmr.com

Mailing Address: PO Box 158

City: Colebrook

State: NH

Zip: 03576

Country: US

Comment: Your information is incorrect. At least one corporation produces a coaxial cable capable of carrying more than 1000 megawatts which can be buried. ABB has a cable capable of carrying 2200 megawatts. The announcement occurred while you were writing your draft EIS report.

0891-1

0891-1
Thank you for your comment. Technical design details for Alternative 2 and Alternative 7 - Proposed Action were provided by the Applicant. In their further amended Presidential permit application (August 2015) NPT proposed a change in the project design to voltage source converter technology with a capacity of 1,090 MW. This change in technology was described and analyzed in the supplement to the draft EIS, and has been incorporated into the final EIS (see Chapter 2). Design details for the other action alternatives (Alternatives 3, 4a, 4b, 4c, 5a, 5b, 5c) were developed by DOE through consultation with an independent transmission engineer. Detailed project engineering is outside the scope of this EIS.

Thank you, Mr. Chairman, and the Committee for this opportunity. I do know my statement is closer to four minutes so I'll just say that from the outset. MR. HONIGBERG: We won't cut the mike off. SPEAKER: Thank you. Appreciate that. I'm Susan Arnold, the Vice President for Conservation for the Appalachian Mountain Club. The AMC is the oldest conservation and recreation organization in the country with more than 100,000 members and supporters from Maine to Washington, DC, including more than 12,000 here in New Hampshire. In our 140-year history, AMC has helped to protect this region's open spaces, including from poorly sited energy projects such as Northern Pass which is requesting to use high impact old technologies to maximize profits at the expense of New Hampshire's iconic landscape. Yes, parts of this proposed project use an existing right-of-way where current tower structures are less than tree height. This project will congest that right-of-way with over 1100 new towers that are more than 2 to 3 times tree height and cut a new swath for 40 miles through northern New Hampshire. This is not state of the art, and this is the unnecessary impact that has brought out so many people in opposition to this project as proposed. I will reference but not repeat here AMC's comments provided earlier in other meetings by Dr. Kimball in Meredith in Chris Thayer in Waterville. The first point is that the choice before the SEC and the DOE is far from Northern Pass or nothing. It is whether you will allow the use of yesterday's technologies with their high environmental impacts at the expense of New Hampshire's landscape. You know that other competing projects are completely buried, using 21st century technology and that different energy alternatives exist. Both the SEC application and the DEIS fail to acknowledge or appropriately examine competing or other reasonable alternatives to meet regional energy needs. The need for Northern Pass and its impacts must be reviewed within a broader framework. Along with Northern Pass, other competitive projects have been bid into the newest New England Clean Energy RFP. These projects include solar, battery storage, offshore wind and more, and, ironically, one of these RFP projects, the Vermont Green Power Line, even has Hydro-Quebec power as part of its bid and it is a totally buried transmission proposal. Much of the future energy need Mr. Quinlan discussed in his opening presentation will be met with or without Northern Pass, but New Hampshire's landscape will be permanently scarred if Northern Pass is approved as proposed. Mentioned but downplayed in Mr. Quinlan's presentation and distributed energy and energy efficiency. These alternatives are clearly ways to help meet future energy need without the negative environmental impacts and increased foreign trade deficit of Northern Pass, and in fact, they would create more New Hampshire jobs than Northern Pass. Energy efficiency and distributed generation are emphasized in New Hampshire's 2014 update of our ten-year energy strategy, but it's not even sited in the DEIS or the SEC application. Why not. It should be. Paradigm shifts for meeting energy needs are happening at an accelerating rate. On Tuesday night, the town of Lancaster voted for solar arrays to reduce the town's total energy cost by 25 percent. Ironically, Franklin's plan to build a much larger solar project can't proceed until more people are allowed to net meter though it would halve that city's electric bill. Big utilities like Eversource are blocking efforts to increase net metering. Eversource and its ilk are themselves the primary barrier to getting more distributed generation online faster. Northern Pass's presentation discussed the New England region's Forward Capacity market and argues that prices will be going up in the short-term because of the scarcity situation, but Moody's most recent analysis this last month states this market is expected to be further depressed, i.e., prices lowered, because of the amount and variety of resources that will be available. From demand side commitments from big energy users to the nation's first offshore wind farm off Block Island to two large fuel cell facilities, and, finally, the first long-term forecast for solar growth that shows small scale New England solar reducing demand by 390 megawatts in 2020. That's 50 percent of the tower going off line because of the Pilgrim

0894-1

0894-1
Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an international border crossing associated with an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a connected action. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because DOE determined thta is was not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. An energy conservation alternative was considered but was

eliminated from detailed analysis in the EIS, in part because energy efficiency and conservation cannot alone meet the growing demand for electricity in ISO-NE. Section 2.4.9 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use since the draft EIS was published in 2015. Additionally, an updated discussion of existing electricity system infrastructure has been added to Section 3.1.2.5 of the final EIS. For additional information on the electricity system infrastructure, see Sections 1.4 and 4.1.2.

nuclear power retirement. The DEIS's analysis of these alternatives is absent or much out of date and needs to be included and updated in the FEIS, and these are factors the SEC should consider when it determines the overall public benefit or lack thereof of Northern Pass as proposed. Thank you for your time and your consideration.

0894-1
Continued

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 21, 2015

ID: 8329

Date Entered: Aug 21, 2015

Source: Website

Topics: Vegetation

Name: Timothy Duggan

Organization:

City: Concord

State: MA

Country: US

Comment: Clear-Cutting Forest Land for a new ROW in Coos County is not the only “vegetation” impact of the Northern Pass project. Eversource also often points out that the additional overhead lines will run within existing Rights of Way. What this means from a legal perspective is that the new lines will be contained within the boundaries of the easements that grant Eversource their Rights of Way. What is not obvious is that those boundaries are usually well beyond the currently cleared portion of the existing ROW. The existing ROW width on paper is typically 225 feet to 265 feet. On the ground, however, it appears much narrower because the ROW is often only cleared to the width required by the existing lines.

When the new lines are shoe-horned into the ROW alongside of the existing lines – or after the existing lines have been moved onto new towers closer to the edge of the ROW – the full width of the ROW will likely be cleared edge to edge. This additional clearing will be no different from the clear-cut slated for Coos County – thousands of trees will be felled and the visible profile of the existing ROW will grow accordingly.

There are likely hundreds of homeowners along the existing ROW who are currently screened from the existing power lines by trees and vegetation growing within the boundaries of the ROW. The addition of the new lines into the ROW will almost certainly require the removal of all vegetation in the ROW exposing these families not only to the massive new 100 foot towers for Northern Pass, but also to the existing (or replacement) poles and/or towers that had previously been screened by vegetation in the ROW.

0900-1

0900-1
Thank you for your comment. The difference between the existing cleared area and the ROW easement is understood. The visibility analysis incorporates the clearing analyzed by Northern Pass for each alternative, which includes clearing required for a new transmission corridor in the Northern Section as well as widening within the existing transmission corridor. The width of corridor needed to accommodate the proposed transmission line is detailed under each alternative in each geographic area, as are the resulting visual impacts and vegetation losses (i.e., EIS Sections 4.1.12, 4.2.12, 4.3.12, 4.4.12, 4.5.12, and 4.6.12). The width of the new transmission corridor in the Northern Section would be 120 feet for overhead transmission lines and 40 feet for underground cables (see Section 2.3.2.5 of the final EIA). Additional information is provided in Chapter 3 of the Vegetation Resources Technical Report. This clearing is one source of the additional visibility, along with the proposed new and relocated structures for overhead alternatives.

Statements by Eversource that downplay this impact by saying that the new lines “will be placed in existing rights of way” are just plain disingenuous. An honest landowner outreach campaign would provide those impacted with the full plan for use of the ROW and the vegetation within it. I personally suspect that most residents in the affected communities have no idea how wide the ROW in their town actually is.

And they likely won’t realize that it’s much wider than it currently looks until they wake up to the sound of chainsaws one morning.

0900-1
Continued 0900-1 cont'd

(Linda Upham-Bornstein) Thank you for giving me an opportunity to speak to you again. I moved to New Hampshire 30 years ago from Boston. Eight years ago, my husband and I purchased a house in Lancaster, New Hampshire, which I might add we never would have purchased had we known that the Northern Pass was going through our backyard, but we purchased a house that was once owned by Sinclair Weeks and is part of the Weeks family estate. We chose this home not only because of its history but because of the beautiful 180 degree view of the Pliny White Mountain ranges out our windows. My phone is full of photographs from this view trying to capture the sun breaking through the clouds or the fall landscape or the snow coming down or the sun rising in the morning, and yet photographs don't even begin to capture the beauty that I see every morning. I am disappointed with the Northern Pass project as it's proposed. I like so many others have chose to live in this place with terrible internet service, limited cell phone service, no cable television and very few shopping centers because and only because we have beautiful landscapes. Remarkable mountains. It's something that I have to say that I don't think the folks in the Northern Pass fully seem to grasp and appreciate the passion that we feel for this community and this region and for this landscape. The Northern Pass frequently proclaims that they have listened to the people, but I don't feel that they have. They have spent a lot of money and a lot of effort to convince the citizens of New Hampshire they will bring great jobs, provide economic opportunity, to lower our electrical rates and a host of other unfounded promises. The Supplemental EIS confirms that Alternative 7 that they recently proposed is not in the public interest, and full burial of any transmission line pursuant to Alternative 4 A or 1 or corridor 91 as we've learned tonight will create many more public benefits and cause much less harm anyhow. For example, Alternative 4 A will generate far greater economic benefits than Alternative 7. 4 A will create 46 percent more annual construction jobs, 50 percent more permanent jobs, 50 percent more annual economic impacts and nearly 50 percent more economic impacts from construction will have 54 percent more statewide annual property tax revenues than the proposed transmission projects in Alternative 7. Also the environmental damage of alternative 4 A will be of much less, the carbon dioxide uptake from vegetation removal and the resulting adverse impacts on air quality will be six times greater; the adverse impacts to wildlife and vegetated habitats will be four times greater with Alternative 7. The negative impacts to forest lands will be almost 7 times greater and the disturbance to prime and important farmland will be twice as much. I confess I'm tired of being tromped on by big business. To see all that so many in the north country have fought to preserve including the Weeks family in 1911 be scarred in the interest of business profit over cultural landscapes and heritage. Moreover, we have yet to actually have the actual figures from Northern Pass. For example, what is the expected annual return on assets and the expected annual return on equity of the Northern Pass project as currently proposed, and if the entire transmission line is buried. I wish that they would answer these questions directly and specifically. 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 full disclosure of their financial and other information that forms the basis of its contention so that they can be evaluated reliably. It is my hope that you will listen to the voice of the people and take our passion for this region in the mountains into full consideration. Thank you again for your time.

0904-1

0904-2

0904-1

Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a connected action. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground/overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis.

0904-2

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.

November 12, 2015

Town of Pittsburg-1526 Main Street Pittsburg NH 03592
Town of Clarksville-408 Route 145 Clarksville NH 03592
Town of Stewartstown-PO Box 119 West Stewartstown NH 03597

Pamela G. Monroe
Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: NH SEC Docket No. 2015-06
Application of Northern Pass Transmission LLC and Public Service Company of New Hampshire d/b/a Eversource Energy for a Certificate of Site and Facility for the Construction of a new High Voltage Electric Transmission Line in New Hampshire

Dear Ms. Monroe:

We the undersigned are Selectmen of Pittsburg, Clarksville and Stewartstown. Our three towns are jointly filing the following comments with the Site Evaluation Committee ("SEC") for its consideration in Docket No. 2015-06.

We represent the residents of the northernmost towns in New Hampshire. It is in our towns that the Northern Pass applicants propose to construct an entryway into the United States for a transmission line that would import electric power into this country from Canada. We hereby notify the SEC that our towns strongly object to construction of this transmission line. We further notify the SEC and the applicants, that as elected Selectmen in our three towns, we are unwilling to lend the applicants any assistance in their attempts to construct this transmission line as long as it contains any portion or segment that is constructed on above ground structures. Unless the Northern Pass project is proposed as a wholly underground project, our combined and coordinated opposition will be maintained.

Over the past five years, the voters in each of our towns have overwhelmingly made it known to us in person and in voting on town warrant articles, that they oppose the Northern Pass project because of the adverse impact that it would have on our scenic and cultural assets, property values and tourism businesses. At the March 13, 2012 Clarksville annual town meeting, the citizens of Clarksville, by petition adopted an ordinance which reads, "Other than high voltage electrical transmission lines in existence as of the effective date of this ordinance, there shall be no further overhead development of alternating current or direct current high voltage transmission lines within the borders of the Town of Clarksville. All such future electrical transmission lines must be placed underground within power line rights of way or within yet to be

established power line corridors and installed in a manner approved by the State of New Hampshire's Public Utility Commission and/or Department of Transportation. Distribution lines carrying electrical power and other utility lines such as telephone and cable television for local residential or commercial use may continue to be installed above ground, but undergrounding of such lines is strongly recommended and encouraged." In accordance with our civic duties as Selectmen, we will not act against the interests of those who elected us.

This project is designed to be a revenue maker for the applicants and their partner in Canada, Hydro Quebec—a provincially owned crown corporation. There is nothing wrong with making a profit. There is, however, something terribly wrong with a foreign government and out of state corporations making profits at the expense of our environment and our town resources in direct opposition to the will of our residents.

This project is classified as an elective project because it is not necessary for reliability of the electric grid in New Hampshire or New England. It is one of many such projects recently proposed to bring hydropower into the Northeastern United States, but it is the only one that is designed to be built substantially above ground on large structures that would be visible high above the tree lines in our communities, farms, forests and recreational areas. All other transmission projects currently proposed to carry Canadian generated power through New York, Vermont and Maine are designed to be constructed underground in existing disturbed road or rail beds or underwater without significant damage to the environment.

The total underground construction of this project is a viable and less environmentally damaging option according to the Department of Energy in its initial environmental impact statement. Yet, the Northern Pass Applicants continue to propose a primarily above ground project that will do considerable damage to the environment, visual resources and cultural heritage of many New Hampshire communities including our three towns. Over 2300 new transmission towers are planned to be erected in New Hampshire by Northern Pass in order to accommodate this elective project. For a relatively small further investment, it could be placed entirely underground.

The Northern Pass project appears to be proposed to serve the self-imposed "clean energy" wants and desires of our neighbors to the south who wish to purchase this power from a foreign country while sparing their citizens the need and consequence of hosting large renewable power generation facilities and transmission lines in their own communities or offshore from their urban areas. New Hampshire is already the host of many renewable power generation plants and is a net exporter of that power to the rest of New England. Quebec, of course, is anxious to capitalize on the opportunity to sell its provincially owned power at a higher profit than it could realize selling to its own citizens. So it wants to build a new transmission line through New Hampshire to reach

0907-1

0907-1
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.

its intended market. Burial of the project would cost marginally little more in order to save New Hampshire's landscapes and environment. The solution is therefore really quite simple. If the proponents of the project outside our borders want it that badly, then they should be required to pay for complete burial. If that is too much to pay for this particular project, then the project should not be built at all.

The applicants proposed transmission corridor through our three towns would run a distance of approximately 16 miles on an entirely new energy corridor that they propose to build—a corridor that will be controlled and solely used by Hydro Quebec. Essentially, they want to take our environmental resources, property and local roadbeds for the benefit of a foreign government that may or may not transmit power over the transmission line depending on market conditions, political considerations, and a pricing policy that will not be constrained by limitation of its monopoly power or by public interest concerns for those who might consume it in the United States. As stewards of our Town resources, we object to this proposed taking of our property for private use of a foreign government.

Half of the 16 mile distance proposed to be traversed in our towns would be constructed using three separate above ground segments. These above ground segments would involve construction of new access roads and clear cutting of corridors up to 150 feet wide through our forests, farms and scenic areas. Moreover, excavation and pouring of concrete for massive foundations would be required for the erection of four transition stations and 72 above ground transmission towers up to 120 feet high. A great deal of our wetlands would also be directly impacted and damaged.

The proposed transmission line would enter Pittsburg from Canada above ground on towers crossing the wetlands of Halls Stream and Halls Stream Road and then move upland high above the Connecticut River just north of the Vermont border and then down to a transition station that is proposed to be constructed near the banks of the Connecticut River just west of Route 3, a federally designated Scenic Byway. Highly important, scenic, cultural and historic areas of Pittsburg and of Canaan (in Vermont) would forever be adversely changed by the existence and dominance of this commercial intrusion into the pastoral landscapes surrounding the historically important Pittsburg area known as the Indian Stream Republic. The Indian Stream Republic was a sovereign nation located in Pittsburg from 1832-1840 with it's own constitution and congress. This land has been untouched for 175 years and we must keep it that way. This is sacred territory to our citizens. The Route 3 Connecticut River Byway entry to Pittsburg would also forever be diminished and the views of the Connecticut River Valley from Stewartstown and Clarksville and Canaan, Vermont along the Connecticut River would forever be changed if this first segment of the project is built above ground.

0907-2

Thank you for your comment. The commenter's concerns regarding potential project impacts in the Northern Section are noted. Section 4.2.13 in the EIS describes potential impacts to wetlands and other water resources from the Project in the Northern Section. The Water Resources Technical Report provides more detail. Appendix H of the EIS describes Applicant-Proposed Impact Avoidance and Minimization Measures that would avoid and minimize potential impacts.

0907-3

Thank you for your comment. The comment about potential adverse effects from the proposed Northern Pass Project in the areas around Pittsburg, NH and Canaan, VT is noted. Although NPT has not proposed any construction within the state of Vermont, the proposed U.S. international border crossing in Pittsburg, NH that is being currently being considered by DOE is in close proximity to the New Hampshire-Vermont border in the vicinity of Beecher Falls, NH. As a result, a portion of the indirect area of potential effects ("APE") [36 C.F.R. Section 800.16(d)] for the proposed Northern Pass Project that has been defined for the project (see EIS Section 3.1.8.2) extends into the Town of Canaan in Essex County, VT. The portion of the indirect APE for potential visual effects to historic resources in Vermont is approximately 1.25 square miles. 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. Section 3.1.8.2 of the EIS has been updated to reflect the portion of the indirect APE that extends into VT. 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 Cultural Resources Technical Report.

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When it reaches the banks of the Connecticut River, the Northern pass proposal takes the project underground for the first time in proposed trenching and a boring through and under Old Canaan Road, NH State Route 3 and the Connecticut River into Clarksville where another transition station is proposed to be built on the east side of the Connecticut River. From there another 23 transmission towers up to 105 feet high, would be erected running for 2.3 miles in a generally easterly line running to Route 145 on Ben Young Hill. This above ground segment in Clarksville would forever alter the views from important abutting conservation areas, including the Washburn Family Forest owned by the Society for the Protection of New Hampshire Forests. It would also destroy the scenic vistas looking into the Connecticut River valley and Vermont to the west of Ben Young Hill along Route 145 which itself is a New Hampshire Cultural and Scenic Highway known as the Moose Path Trail.

0907-4

The project then proposes to dive underground at another transition station to be erected on the west side of Route 145 where it would be buried under Route 145 and down Old County Road for 1.4 miles into Stewartstown. The proposal then has the project continuing in a generally easterly direction to a fourth transition station on Bear Rock Road where it would pop out of the ground and be built on 29 transmission towers up to 120 feet high for another 3.5 miles continuing east until it reaches the top of a high ridge on the Stewartstown/Dixville line. In this third above ground segment, the proposed transmission corridor and 29 towers would be starkly visible from some of the most valuable residential and tourism development properties in Stewartstown and Colebrook along Bear Rock Road, Harvey Swell Road, Noyes Road and Diamond Pond Road. In addition, this segment of the transmission line would ruin views from and entryways to Coleman State Park. The towers and transmission line would run directly along much of the southern boundary of Coleman State Park and it would cross high above Diamond Pond Road which is the only entryway to the Park.

0907-5

Thus, the path of project construction in our three towns, if permitted, would not run south towards its proposed destination. Instead, the project would needlessly run from west to east leaving our communities at a point that would be no closer to its destination than when it entered from Canada. This alone is an absurd outcome and wasteful destruction of resources.

Where they have been blocked by landowners, the applicants claim they have the right to use roads without compensation by trenching and boring under them in a linear fashion. On most of those highways, roads and passageways, neither the state nor the towns hold fee title interests. Private abutting property owners have legal property rights that must be considered and, thus far, have not been adequately dealt with by the applicants. The applicants simply have no legal right or permission to take those private property interests for an elective transmission project. Given the overwhelming sentiment of the voters in our towns, we cannot and will not assist the applicants in

0907-6

0907-4
Thank you for your comment. Visual impacts in these areas are analyzed in the landscape assessment described in the Visual Impact Assessment Technical Report, and Section 4.2.1 of the EIS. Potential impacts to the Moose Path Trail are considered in the roads-based analysis in Section 4.2.1 of the EIS. One key observation point (CL-1) is taken from the Connecticut River National Scenic Byway (NH Route 145 in Clarksville, NH) looking west.

0907-5
Thank you for your comment. Visual impacts in this area are analyzed in the EIS (Section 4.2.1) and the Visual Impact Assessment Technical Report (Section 4.1). Coleman State Park is identified as a sensitive scenic area in the analysis. A Key Observation Point (KOP) simulation was added to the final EIS and Visual Impact Assessment Technical Report at Little Diamond Pond in the Coleman State Park, Stewartstown (KOP SE-3). Potential impacts on residential property value are considered in the Socioeconomics analysis in the EIS (Sections 4.1.2 and 4.2.2).

0907-6
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.

resolving these types of municipal road and private property rights conflicts unless the Northern Pass proposal is modified to be built entirely underground. Indeed, Stewartstown voters at the annual Town meeting in 2011 passed a directive requiring all future transmission lines in Stewartstown to be built underground. The existence and content of that directive were set forth in a Town of Stewartstown comment previously filed with the SEC on September 30, 2015.

We conclude by raising an issue of social justice and economic discrimination. The applicants insist on using older above ground transmission line technology in our communities to construct an entirely new energy transmission corridor. At the same time, the applicants have recently modified their project to propose using modern underground construction technology for 50 miles in the more affluent and politically influential White Mountain Region to our south even though there is an existing above ground transmission line corridor that could have been used—resulting in making the existing transmission line scar look twice as ugly. The applicants say they made this change in the White Mountain Region because they recognize the value of preserving New Hampshire's scenic resources and landscapes. We therefore ask why the applicants don't apply the same logic and value to our untouched landscapes and resources that have no existing transmission line scars. Our scenic resources and landscapes are the essence of who we are. They define our communities and our sense of place. They drive the economy of the area through tourism and the building, maintenance and repair of second homes and vacation properties. We therefore demand that the applicants employ the same standards and modern technologies in our communities as those that they have now applied in their proposal for the White Mountain Region. Nothing less will be permitted by our communities and we would hope that the Site Evaluation Committee will see to it that our local community interests and concerns are respected in full without further discrimination and social injustice.

Sincerely yours,

Town of Pittsburg

By _____
Selectman

_____
Selectman

_____
Selectman

Town of Clarksville

By _____
Selectman

0907-6 cont'd

0907-6 Continued

0907-7

Thank you for your comment. Socioeconomic impacts are addressed in the EIS within Section 4.1.2 and including an analysis of potential disproportionate impacts on minority and low-income residents of New Hampshire (see Section 4.1.9 of the EIS). The EIS does provide full evaluation of several alternatives which assess burial of the Project in its entirety. Other elements of this comment are specific to the NH State evaluation committee process and do not pertain to, or necessitate a revision to, the EIS.

Selectman

Selectman

Town of Stewartstown

By

Selectman

Selectman

Selectman

cc:

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Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 28, 2016

ID: 8889

Date Entered: Mar 28, 2016

Source: Website

Topics: Quality of Life

Organization: Carlisle Conservation Foundation

Comment: Please respect requests to bury much of the transmission lines as requested by multiple parties to mitigate the visual effect of an unbroken line of overhead cables and associated towers/stanchions. The quality of life will be significantly compromised for both residents and visitors if the project develops as originally planned. The most sensitive area is obviously within the White Mountain National Forest, but it is important to provide a completely natural buffer for significant distances beyond the official boundaries of the park. It is worth the effort and expense now to insulate future generations from the impact of the visual effects of this huge project.

0909-1

0909-1
Thank you for your comment. The EIS analyzes a variety of alternatives across a range of alignments and including both overhead and underground transmission lines. Visual impacts of all alternatives are summarized in Section 2.5.1 of the EIS, and are further detailed under each alternative and geographic section.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 29, 2016

ID: 8957

Date Entered: Mar 29, 2016

Source: Website

Topics: Viewshed/Scenery

Organization:

Comment: Burying lines to preserve the viewshed is critical. If the costs will become part of the rate base then we have the right to demand the proposal meet the aesthetic and environmental concerns of the rate payer. We went through a similar line upgrade in CT.

0910-1

0910-1
Thank you for your comment. The EIS analyzes a variety of alternatives across a range of alignments and including both overhead and underground transmission lines. Visual impacts of all alternatives are summarized in Section 2.5.1 of the EIS, and are further detailed under each alternative and geographic section.

Mary Lee. Thank you for the opportunity to speak to this committee and to the USDOE. I've been here before since 2011. Here I am again. I am still convinced that the best action for me, for my property in Northfield and for the State of New Hampshire is no build. As currently proposed, the Northern Pass plans to keep the originally proposed steel H-frame towers and the steel monopoles. 2. The aesthetics of my conservation land and other properties along the 192 miles would be permanently blighted by the proposed aboveground structures that are to be taller than the surrounding treetops and built of steel rather than the wooden poles. Once the steel structures are put up, there is irreparable damage to our landscape. The placement would be wrong, the dimensions would be disproportionate to our rural beauty. 3. I and my neighbors live near the right-of-way easement that Northern Pass will alter. I and we are used to the small scale and the camouflaged wood poles that are currently in place. In my neighborhood we can walk out or we can stay indoors and see the wood poles. Especially in the winter. Right now. There would be no camouflage for steel structures that are taller and built as a tower. My neighbor is further away from my property and sees in a long perspective view from her windows more of the stretch of transmission poles and lines than I do. The discussion regarding the 100 foot or 100 feet distance to the proposal in order to be considered as an intervenor during the review of Northern Pass should consider the eyesore to those whose viewshed is greater distance than just outside my yard. So, in other words my neighbors see more of the line out of their windows than I do when I look directly out my dining room table, picture window or over my sink. So they have a right to be here as intervenors even if they're within what is called the list of nonabutters. Number 4, since 2011 I have attended hearings before the New Hampshire legislature and the US Department of Energy. Thousands of New Hampshire citizens have voiced concern about the suitability of Northern Pass. Visitors to New Hampshire have come here to enjoy our natural beauty and have remarked that our state is, quote, still beautiful. I hope you will decide to protect and cherish the environment, and I want to make an addendum to this remark because Mr. Quinlan is here and you mentioned outreach by the Northern Pass to landowners. And I'm hoping you didn't say out of reach, you. Said outreach by Northern Pass to those of us who are landowners and I have made the outreach to Northern Pass mainly because I didn't believe that it should be built and I don't believe it should be built today so I still have many opportunities to outreach to you all to find out what exactly going is to be coming up the pick if it's approved. Just to correct the record. Thank you.

0911-1

0911-1
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 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).

CC →
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Subject: SEC Docket No. 2015-06 Northern Pass

RE: Comment for Hearing on March 10, 2016- by Mary A. Lee, Northfield

To Site Evaluation Committee & US Dept. of Energy, Grappone Center, Concord

Dear Ms. Monroe,

Please distribute this comment to the Site Evaluation Committee & to the US Dept. of Energy, as well as to all current members on the Distribution List of the Site Evaluation Committee

1. I am still convinced that the best action for me, my property in Northfield, & for the state of NH is "NO BUILD." As currently proposed the Northern Pass plans to keep the originally proposed steel H-frame towers & steel monopoles.

2. The aesthetics of my conservation land & other properties along the 192 miles would be permanently blighted by the proposed above-ground structures that are to be taller than the surrounding treetops & built of steel rather than the wooden poles. Once the steel structures are put up, there is irreparable damage to our landscape; the placement would be wrong & the dimensions would be disproportionate to our rural beauty.

3. I & my neighbors live near the right-of-way easements that Northern Pass will alter. We are used to the small scale & camouflaged wood poles that are currently in place. In my neighborhood, we can walk out or stay indoors & see the wood poles, especially in Winter. There would be no camouflage for steel structures that are taller & built as a tower. My neighbor is further away from my property & sees, in a long perspective (from her windows), more of the stretch of transmission poles & lines than I do. The discussion regarding the 100 ft. distance to the proposal, in order to be considered as an Intervenor during the review of Northern Pass, should consider the eyesore to those whose viewshed is a greater distance than just outside my yard.

4. Since 2011, I have attended hearings before the NH legislature & the US Dept of Energy. Thousands of NH citizens have voiced concern about the suitability of Northern Pass. Visitors to NH have come here to enjoy our natural beauty & have remarked that our state is "still beautiful." I hope you will decide to protect a cherished environment.

Thank you for your consideration of my concerns.

Sincerely,

Mary A. Lee

cc: SEC distribution list as of March 10, 2016 for Docket No. 2015-06. Copies to be distributed by Ms. Pamela Monroe, Site Evaluation Committee; US Dept of Energy

0912-1

0912-1
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 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).

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 13, 2015

ID: 8286

Date Entered: Aug 13, 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

Name: Kris Pastoriza

Organization: Ms.

Title: Ms.

Email: krispastoriza@gmail.com

Mailing Address: 294 Gibson Road

City: Easton

State: NH

Zip: 03580

Country: US

Comment:
Agents Orange & White
in WMNF
Pentachlorophenol too.

Agent Orange in WMNF: Comments on Draft EIS, Volume 1, Section 3.5, White Mountain National Forest

Kris Pastoriza, Easton, NH

3.5.1 Visual Resources states that "Neither the existing PSNH transmission route; within which alternative 2 and 3 would be located, nor the Project corridor for any other alternative crosses through designated Wilderness areas or IRA's. The area crossed by the PSNH powerline cannot be designated Wilderness because of the powerline. The applicant is essentially stating they will not damage Wilderness because the presence of the existing line has already degraded the land to below Wilderness standards. Now that burial is technically feasible, the existing line, which was permitted because of lack of alternatives, can be buried outside the Forest.

3.5.1.1 Landscape assessment needs an explanation of the methodology. Is it consistent with any others, such as that used by the Forest Service? Why wasn't the USFS Visual Impact Assessment used in WMNF? The EIS method grossly underestimates the visual effect of the existing lines and the proposed lines. There is no such thing as "overall visual magnitude." Large effects cannot be "diluted" by other areas with small effects, any more than a concussion could be averaged into a gentle nudge if one was stroked lightly many times within the next hour and average intensity of pressure was calculated.

3.5.1.3 This analysis of views fails to take into account the relationship of the viewer to the terrain. Residents of Easton, for example, will likely have a more negative view of the exiting line than people from away. The analysis also fails to take into account the fact that Eversource is widely despised and every town on the proposed route has voted against it. Therefore, the view of the existing line is highly influenced by the fact that it stands as a symbol of Eversource's intentions and amoral behavior.

3.5.1.4. "Portions of the project corridors are under easements that may affect whether the Scenic Integrity Objectives apply to activities needed for the transmission of electricity." No evidence is supplied to support this. Standards may call for co-location, but with the alternative of burial along existing transportation corridors, which would have no scenic impact, this alternative is trumped.

3.5.4.2 states "No known locations that currently or historically could have had soil or groundwater contamination are within 250 feet of any of the disturbance areas for Alternatives 2,3, and 4a." Given the history of pesticide application to the line between this statement needs to be supported by extensive soil samples taken along the existing line, by a contractor hired by someone other than Eversource or the DOE.

Pesticide spraying in WMNF, on PSNH X-178 line, under special use permit:

6/15/58-9/1/58: "The chemical will be 24D and 245T four pound acid per gallon in a solution 2 gallons chemical, 88 gallons water, 10 gallons #2 fuel oil. This will be applied from the ground by mechanical spray equipment and the area sprayed as covered by the right-of-way permits."

0913-1

0913-2

0913-3

0913-4

0913-5

0913-6

0913-1
Thank you for your comment. The commenter's opinion regarding the burial of the project within and/or adjacent to the WMNF is noted. Impacts to Inventoried Roadless Areas (IRAs) are analyzed in Section 4.5.6 of the EIS.

0913-2
Thank you for your comment. Landscape assessment methods are explained briefly in Section 3.1.1.2 of the EIS, and more thoroughly in Section 2.4.2 of the Visual Impact Assessment Technical Report (VIA). The USFS does not have a visual impact assessment procedure, but uses a Scenery Management System (SMS) that results in Scenic Integrity Objectives (SIOs). The VIA was designed to be compatible with SMS, and substitutes the WMNF SIO for scenic sensitivity in the analysis of scenic impact. The methods used in the analysis were formulated through coordination with the WMNF.

0913-3
Thank you for your comment. All GIS-based models were re-run to address the commenter's concern. A new calculation, the "aggregate scenic impact," was added to the final EIS and additional aggregate indices were added to the Visual Impact Assessment Technical Report to account for an increase in the size of the affected area. However, the area and average indices used in the Visual Impact Assessment Technical Report are useful to make relative comparisons among alternatives (see Section 5 of the Visual Impact Assessment Technical Report).

0913-4
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). Potential impacts in Easton are discussed in Section 4.3.1 of the EIS. Section 1.5 of the EIS describes public participation in the NEPA process. Public comments on DOE's NEPA process have been accepted during several review periods.

0913-5
Thank you for your comment. The commenter has correctly cited Section 3.5.1.4 of the EIS. USFS management requirements, including SIOs, do not apply to easements. Additional discussion is provided in the Land Use section in the EIS (e.g., Section 4.1.6), and in Appendix F in the Visual Impact Assessment

Technical Report. The visual impacts of all alternatives are analyzed in the EIS (Section 4.1.1, 4.2.1, 4.3.1, 4.4.1, 4.5.1).

0913-6
Thank you for your comment. Previously contaminated soils would be avoided to the extent practicable. Applicable federal, state, and local requirements related to soil and groundwater contamination are discussed in Section 1.5 of the Public Health and Safety Technical Report. The Project would avoid siting structures in known locations that currently or historically could have had soil or groundwater contamination. See the discussion in Section 3.1.4.2 in the EIS; specific locations in each geographic section are discussed under Health and Safety. Appendix H of the EIS describes Applicant-Proposed Impact Avoidance and Minimization Measures that would be used.

0913-6
Continued

5/10/62: Pole treatment: "It is our understanding that the treatment consists of the application of a 6 percent solution of pentachlorophenol in number 2 fuel oil to the entire pole and cross arms and that the fire hazard created by this application continues for 24-36 hours...The area of high hazard is in the immediate vicinity of the pole where the oil drips into the ground."

6/20/66: "1. Wiggins airways has the sub-contract and possibly Pete Goldsmith who has done all our Wiggins contracted aerial spraying, would do the flying. Hydraulic spraying may be done in immediately accessible locations.

2. They will use 4 gallons of 2# acid equivalent (total 8#) American Chemical Cor. 2,4,5-T (Weedone) Invert with 12 gallons of water for a total of 16 gallons of spray mix per acre.
3. Weather permitting, and with a start of spraying on June 27 in Newport, N.H., they expect to spray the Woodstock-Easton line July 5-10 and the Beebe River line July 10 onward...

The Woodstock-Easton line was hydraulically sprayed by another contractor in the readily accessible areas in 1963 and copter sprayed on the difficult terrain. Don Footer supervised the aerial spraying on the Pemi. And we experienced no difficulty...

About 2 ¾ miles of this line passes through our land in the Gordon Brook Pond drainage which is a part of the North Woodstock watershed. Mr. Collier indicated that he knew this and I got the impression that they would "hand cut" this portion of the line. This would leave only 0.8 miles between U.S. 3 and N/.H. 118 on the Pemi. And 1.75 miles on the Ammonoosuc in the Reel brook drainage to be copter or hand sprayed.

I phoned Norman Fadden, North Woodstock selectmen, etc., and this was the first he had heard about it. He quite specifically wants no chemical use in the watershed. He did not appear to know about the 1963 project."

FS letter to PSNH: "2. The Town of North Woodstock has requested that no chemical be used within the confines of the municipal watershed. We must require that their request be honored—you will have to resort to a mechanical means of treating that portion of your power line.

3. Drifting spray from brush control operations can kill vegetation on adjoining areas. It will be necessary to hold the Public Service Company responsible for any damage to the National Forest resulting from spraying done under your contract with Bartlett Tree Company."

5/28/69: "The chemical that will be applied on this transmission line will be Tordon 101, mixed at the rate of one gallon of chemical to ninety-nine gallons of water and applied as a foliage application.

The portions of this right-of-way to be chemically treated will be from the North Woodstock substation located in North Woodstock to the switches in Easton on Route 116.

0913-6
Continued

On all rights-of-way crossing all primary and secondary State highways, Public service Company of New Hampshire maintains a buffer strip of one hundred feet wide which is not chemically treated."

3/30/71: "The following was agreed upon concerning the clearing for this project on Forest Servie administered lands:

1. You will submit a request to us for use of stump herbicides...

4. Stumps will not be treated between the wind-rows and the edge of the clearing on either side of R.O.W. Stumps will be treated in the area between wind-rows and under the powerline."

1978: Sprayed, herbicide unknown.

1/19/82: "This is to advise you the Public Service Co. of N.H. Is anticipating to chemically treat approximately 48.89 acres of vegetation within the White Mountain National Forest.

The town and forest district where these acres are located are as follows:

Transmission line	Town	District	Acres
X-178&67	Woodstock	Pemigewasset	7.61
B-112	Sandwich	Conway	41.28

The chemical that will be applied on these acres will be Tordon 101, Garlon 3A and water, mixed at the rate of 1 gallon Tordon 101 and ½ gallon of Garlon 3A to 98.5 gallons of water and applied as a selective foliage application.

On all rights-of-way crossing all primary, secondary State Highway, trails and streams, Public service company of New Hampshire maintains a buffer strip 25 to 100 feet wide which is not chemically treated."

WMNF: "Is there a particular reason why you want to use the herbicides you named and, if necessary, would you be willing to use some other product such as Krenite?"

PSNH: "I selected the herbicide "Tordon 101" and "Garlon 3A" based on my previous experience with these materials. I have found they are superior in controlling resistant species, are cost effective and both materials provide a longer period of control between treatments.

Although my choices are obvious, I will agree to Krenite if necessary."

1985: Last spraying. "X-178—Beebe River S/S to Woodstock S/S 195.42 acres
X-178—Woodstock S/S to Easton Switch 201.71 acres

X-178—Easton Switch to U-199 Tap	175.49 acres
U-199 Tap to Littleton S/S	148.11 acres

The following chemicals were used and all were applied based on label specifications.

Dow Chemical : Tordon 101. Tordon 101R, Garlon 4
Dupont Chemical: Krenite (used on any portion of the ROW that crossed National Forest land.) Surfactant wk.

Asplundh Grands: Clean Cut plus pine., Clean Way (same as low drift.)

Velsicol Chemical: Banvel CST"

In addition, the portion of the line from North Woodstock through Lincoln, Easton and Sugar Hill was upgraded in 1985, and in White Mountain National Forest 215 pentachlorophenol and creosote soaked poles were dumped along the right-of-way, including in wetlands and streams. Many of the poles stubs, which were similarly treated are still sitting in standing water.

Action by a local conservation commission has forced Eversource to hire a subcontractor to remove these poles, which are in violation of the Clean Water Act.

Existing poles are treated every five years with MITC-Fume or Cu-Bor, chemicals toxic to fish and waterways. Pentachlorophenol, though banned in 22 countries, is still legal in the US as a pole treatment. The site of the corporation that treated the dumped poles is now a toxic waste site.
That the Draft EIS missed this information calls into question any conclusions the report makes on the absence of toxins.

Alternative 3 is, by Eversource's own admission in its amended Special Use Permit application, impossible:

"Finally, there is an important legal impediment to underground construction along the Proposed Route. Northern Pass has the ability 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 explicitly provide rights to construct underground facilities. More than 600 easements could require modification 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, it is extremely unlikely that underground rights for the existing ROW areas could be secured along the entire Proposed Route." (p. 18)

http://northernpass.us/assets/permits-and-approvals/SUP_Application_Amendment_9-4-1.pdf

Why was this alternative even considered?

3.5.4.3. lists no explanation of how the USFS's two Type 6 fire engines with 300 gallon water storage capability, and two Type 7 fire engines with 100 gallon water storage capability would

0913-6 cont'd

0913-6 Continued

0913-7

0913-8

0913-6 cont'd

0913-6
Continued

0913-7
Thank you for your comment. The Land Use analysis in the EIS and Land Use Technical Report acknowledges that the existing PSNH easements along the Project corridor do not, in many cases, permit underground transmission cables (see Sections 4.2.6.3, 4.3.6.3, 4.4.6.3, and 4.5.6.3 of the EIS). The EIS further acknowledges that in order for Alternative 3 to be implemented, the majority of these 644 easements would need to be amended through agreement with each individual land owner. However, Alternative 3 was retained for detailed analysis in the EIS because it ensures that the potential environmental impacts from any combination of above and below ground placement of the Project within the Alternative 2 route is bounded by the analysis.

0913-8
Thank you for your comment. Type 6 and Type 7 fire engines are generally smaller vehicles that are better able to traverse rough or steep terrain compared to larger, more commonly used fire engines. Section 3.5.4.3 in the EIS indicates that hand crews and air support are available in addition to the Type 6 and Type 7 fire engines. (Hand crews vary from 4 to 20 people.) In locations in the WMNF where fire equipment could not reach a fire from existing roads or trails, air support could be used.

0913-7

0913-8

make it up the Reel Brook Trail or the Bog Pond Snowmobile Trail or the existing ROW to fight fires on the 11 mile stretch of powerline corridor in White Mountain National Forest.

3.5.6.2 states “No conservation lands other than NFS lands are located within this section.” There are 19 acres of ROW on a 361 acre parcel of private conserved land (SPNHF) in Easton. This land is surrounded on three sides by WMNF and the ROW is bounded on either “end” by ROW in WMNF. Another pending easement (SPNHF) on 145 acres in Easton has a view of the ROW and includes part of Reel Brook Road which leads to the Reel Brook Trail. Easton also has the Cooley-Jericho Community Forest, (ACT) nearly 800 acres along the Cooley- Cole Ridge which overlooks the preferred route and borders WMNF. Another easement of 100 acres (USDA) in Easton is on property with views of the project and borders WMNF.

3.5.6.3 The entire Ham Branch Watershed in Easton was determined eligible for listing to the NH Rivers Management and Protection Program. The application is complete and was approved by the RMAC.

3.5.6.4. states: “Existing construction access routes for the existing PSNH transmission line on the WMNF are not considered “roads” per USFS criteria.” They should not be, as they do not exist at all in most sections. How does Eversource propose to construct its line without roads? Does it expect private landowners to consider the game trails on their ROWS “construction access routes” and grant Northern Pass/Eversource access?

3.5.7 Noise. dBA is not an accurate measure of noise. A distant scream or loud motorcycle could have the same decibel level as a nearby stream or happy child. This measure completely excludes and ignores the fact that the character and meaning of sounds affects us as much as their loudness. It also ignores whether the sound is consensual or non-consensual, and how that affects the experience of the sound. This section also fails to mention wildlife, which is affected by noise, possibly more than people.

3.5.8 Cultural Resources fails to mention the hiking and tourism history of the White Mountains, as well as the connection of the White Mountain painters and poets to this history. Even Wikipedia has an entry on this.

3.5.8.1 Archaeological Resources: The definition of archaeologically sensitive areas is not defined. The list of affected architectural and archaeological resources for burial alternatives makes no mention of which side of the road, or highways, the line would buried on. This presumably would make a difference.

3.5.8.2 What is the indirect Area of Potential Effect for a buried line?

3.5.11 (3.1.11) Wildlife, makes no mention of the effects of electromagnetic radiation on wildlife. Nor is there discussion of the failure of PSNH to leave un-mowed scrubland wildlife crossings on the existing ROW, or suggestion that this would be BMP for ROW corridors.

3.5.11.1 Why were no bat acoustic sampling locations within the WMNF section?

0913-8 cont'd

0913-8 Continued

0913-9

0913-9 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 the identified conservation lands and the conservation values they contain. Conservation lands that are not included in the Complex Systems Research Center dataset were not considered because those data were not available at the time of analysis. The Cooley-Jericho Community Forest does not appear to be included in the Complex Systems Research Center dataset and as a result was not included in the quantitative analysis. Any potential impacts to this resource would be similar to those discussed for conservation areas in the Central Section (see Section 4.3.6 of the EIS and Section 3.3 of the Land Use Technical Report). No updates have been made to the final EIS or Land Use Technical Report in response to this comment. There is not enough data provided in the comment to ascertain whether the other two easements mentioned are included in the Complex Systems Research Center dataset or not. There are a number of SPNHF properties and conservation easements identified in this area that were analyzed. The identified conservation lands are available for review in tables and in maps in the Land Use Technical Report.

0913-10

0913-10 Thank you for your comment. As noted in the Land Use Technical Report, data from the Nationwide Rivers Inventory, the WMNF Forest Plan, and the New Hampshire Department of Environmental Services, federally designated and eligible Wild and Scenic Rivers as well as RSA 483 state designated rivers were identified through Geographic Information Systems (GIS) software. These datasets represent the best available statewide data regarding protected rivers in New Hampshire. Overlapping areas between the rivers and the Project were quantified and

potentially impacted rivers were discussed. These data were then interpreted and analyzed to determine potential effects to the rivers by construction and on-going operation of the alternatives. Sections 4.1.6, 4.2.6, 4.3.6, 4.4.6, and 4.5.6 of the EIS discuss potential construction and operational impacts to protected rivers. Rivers that were not included in the datasets were not considered because the data were not available at the time of analysis. The Ham Branch Watershed was not listed as a protected river at the time of analysis. Any potential impacts to this resource would be similar to those discussed for protected rivers in the Land Use Technical Report and the EIS.

0913-11
Thank you for your comment. Section 2.3 of the final EIS has been updated to include additional information on construction and maintenance access roads associated with the Project. Construction access and maintenance roads would be required within the WMNF.

0913-12
Thank you for your comment. The A-weighted sound level measurement (dBA) has been adopted by regulatory bodies worldwide. This approach measures sound similar to how a person perceives sound and thus achieves good correlation with acceptable and unacceptable sound levels. No completely satisfactory way exists to measure the subjective effects of noise or to measure the corresponding reactions of annoyance and dissatisfaction, primarily due to the wide variation in individual thresholds of annoyance and habituation to noise. Thus, an important way of determining a person’s subjective reaction to a new noise is to compare it to the existing or "ambient" environment to which that person has adapted. In general, the more the level or the tonal (frequency) variations of a noise exceed the previously existing ambient noise level or tonal quality, the less acceptable the new noise would be, as judged by the exposed individual. Details regarding the methods used for measuring noise impacts are described in the Noise Technical Report.

0913-13
Thank you for your comment. Potential impacts to wildlife from noise are discussed in Section 4.1.11.1 in the EIS.

0913-14
Thank you for your comment. Section 3.5.8 notes the hiking and tourism history of the White Mountains. Section 3.5.8 has also

been revised to note that the wilderness of the White Mountains has been the subject of art and literature.

0913-15
Thank you for your comment. Section 3.1.8 of the EIS addresses archaeologically sensitive areas. As defined in Section 1.4 of the Cultural Resources Technical Report, for the purposes of the Phase IA review as part of Section 106, archaeologically sensitive areas were defined as those areas that have the potential to contain archaeological resources, although no archaeological resources have been previously identified within these areas or were observed during the pedestrian survey. The draft EIS analyzed burial options on both sides of the road corridors as well as down the center. Since publication of the draft EIS additional design detail has been developed and incorporated into the analysis in the final EIS, including information about where in the roadway corridor the Project would be buried (primarily in the road shoulder).

0913-16
Thank you for your comment. EIS Section 3.1.8.2 describes the study area for the EIS analysis. As described in Section 1.4.1 of the Cultural Resources Technical Report, for the various alternatives that include buried components of the Project within or adjacent to existing roads (i.e., Alternatives 2, 3, 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, and 7), the indirect APEs consist of a 200-foot-wide area on each side of the existing roads and architectural resources within the indirect APEs that are visible from the existing roads.

0913-17
Thank you for your comment. 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.

0913-18
Thank you for your comment. As stated in section 2.3, vegetation would have to be cleared where there is no preexisting transmission route for both overhead and underground alternatives. The effect of vegetation clearing on habitat connectivity related to wildlife movement across the landscape is discussed in Sections 3.2.11.3, 3.3.11.3, 3.4.11.3 and 3.4.11.3

and the Wildlife Technical Report (see: http://www.northernpasseis.us/library/draft-eis/technical-reports/). Mowing policies and procedures applicable to all alternatives for project operation and maintenance are discussed in section 2.3.12.5.

The EIS states: “The winter tracking survey did not document any Canada Lynx or American marten in the study area of the WMNF Section”, but fails to note that the Forest Service has documented Lynx near the project area.

0913-19

0913-19
Thank you for your comment. The discussion of lynx presence within the project area is consistent with data utilized by the USFWS and NHFG.

My name is Virginia Jeffries. I live in Franconia. I work in Colebrook. I'm going to submit more detailed tailed with other information that's more specific to the sections of the EIS which I haven't had to chance to kind of pull together yet. I think overall what I wanted to say here tonight is that I think the landscape assessments on the currently proposed routes are underestimated in the draft EIS. I understand from the information session with the SEC that was held here, Northern Pass showed a movie and it included your statement about the scenic impact being very low to low, and I understand, and your EIS goes on to qualify that due to being sparsely populated up north, and I understand that there's some sort of, must be some sort of legal definition that is why you have to crunch it by how many people live here or see it compared to down south, but to those of us who live up here and experience the beauty and live here in part because of the solitude and the viewsheds and the way we can just sit and feel at peace up here, the impact is not low to very low. The impact is high and excruciatingly high for those people that actually live on that route or along that route. I happen to be an abutter right in Franconia. It's going to be buried past my house. I won't to have to actually look at a tower, but I will, of course, see them as I drive north, and when I drive to Berlin where I work one day a week I'll be seeing when I pass Pondicherry Wildlife Refuge, the towers will be everywhere. There will be no way to avoid them, and to those of us who actually live here, that's huge. I hear the people come up who talk about all the economic benefit for jobs, you know, the electrical workers and the people who are going to be cutting the routes and all that, but that's short-term. So they make some really good money for a couple of years while they're constructing, and then after that it's gone, but the rest of you will see this day in and day out. So I'm not sure what you can do by the definition and the rules behind how you have to assess scenic impact and crush in the population, but I think it's, I think it's truly been underestimated. I also think that if any of your data has come from groups paid for by Northern Pass, such as Normandeau Associates and the environmental impact, I think that is sort of scurrilous. I'm a physician and they train us in residency you don't let a drug rep in the door and you don't read the research that they publish because it's slanted. At least, that was the residency I went to got trained like that. So it's sort of the same way. If Normandeau Associates has been paid for and you happen to be using any of their data, I read through some of them. I'm on the Conservation Commission in Laconia, and I read through that and I thought what? Where have they been. One interesting example that came up, I don't know if anybody's mentioned this, at the Easton Conservation Commission they had a meeting with Northern Pass officials that they had asked for several years ago but they finally showed up in February, and it was brought up by the Easton Conservation Commission that despite that Normandeau surveyed the old route that went through the National Forest and so on, Normandeau never either noticed or if they noticed they certainly didn't tell Easton that hundreds of power poles that had been put in many years before on that thing over Real Brook had been dumped in a pristine brook, and it was only the -- anyway. That's about all I want to say except for the data is -- MR. KERVITSKY: You can finish your idea. SPEAKER: Okay. Is that I really don't think you should be taking data that's been paid for by the corporation. Part of that has to do also with the land, their viewsheds and their landscape, I think it's just very little truth and huge amount of minimization going there. And, lastly, I also think you have not looked at Pondicherry Wildlife Refuge strongly enough. It was said at one of these meetings that oh, well, it only just cuts across a small corner. Well, I hike and walk in the Pondicherry Wildlife Refuge a lot. Yeah, there's an existing corridor, and yeah, the power lines are maybe 45 feet or something like that, maybe 40. It’s very different than 100-foot power lines. It's very different, and it will make a huge impact on everybody. Okay. Thank you.

0916-1

0916-2

0916-1
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 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).

0916-2
Thank you for your comment. The Pondicherry Wildlife Refuge is considered a scenic resource in the landscape assessment model. Potential impacts at this location are analyzed in the EIS (see discussion of impacts in the Northern Section, 4.2.1). The Project under Alternatives 2, 5a, 5b, 5c, and 7 would be located aboveground in this area, resulting in visual impacts from proposed structures.

COMMENTS
ON THE *DRAFT* ENVIRONMENTAL IMPACT STATEMENT PREPARED BY THE US DEPT. OF ENERGY ON THE NORTHERN PASS TRANSMISSION LLC

Rebecca Weeks Sherrill More, Ph.D., Weeks Lancaster Trust, Lancaster NH
March 11, 2016

To: Brian Mills, PhD
Office of Electricity Delivery and Energy Reliability (OE-20)
U.S. Department of Energy, 1000 Independence Avenue, SW.
Washington, DC 20585

Mr. Mills and Colleagues, I am Rebecca W. S. More, speaking on behalf of the Weeks Lancaster Trust. I speak regarding to the Draft EIS prepared on the proposal of the Northern Pass Transmission LLC to lay TWO new Above-Ground Power lines through over 150 miles of New Hampshire's historic and beautiful Landscape.

We know this is a protracted process, at both the Federal and State level. I would like to thank your team for its Review work on the Project to date.

Many of us here in NH remember the significance of the Weeks Act of 1911. We remember that the state was degraded by the actions of profit-making Timber Companies. The New England Homestead, the most widely read magazine in New England referred to them as "The Boa Constrictor of the Mountains", crushing the well-being of the state's for the profits of a few. We remember the painstaking, incremental process which led to the reclamation of forest lands and habitats from the Canadian Border to the shores of the Lakes Region. People from around the world come to enjoy what our ancestors worked so hard to conserve and in some measure restore. This was a collaborative, grass-roots efforts, supported by many people - just as today. For many here tonight, there is a new serpent in our Eden - this time bearing the face of the Northern Pass.

The Draft EIS lays out clearly that Alternative Route 4A is the only one which would represent a genuine Investment by Northern Pass in the long-term well being of the state's assets: its environment, habitats, human activities and historic and cultural landscapes from pre-history to the present.

Sadly, Weeks State Park, given to the State in 1941 by my grandfather Sinclair Weeks and his sister, overlooks this proposed transmission line. The property was given to the State for recreation and enjoyment by all, but also as a reminder of the purpose and benefits of the Weeks Act. Thousands of visitors from around the globe come to enjoy its extraordinary panoramic views from Monadnock near Colebrook to Moosilauke near Benton. From Mt. Washington, itself, Weeks State Park and Israels's River are easily visible.

I will submit to you detailed Comments on the Draft EIS in writing. However, I wish to point out tonight that all of the documents submitted regarding the Impact of this proposal on the viewshed from Weeks Sate Park are inaccurate, inconsistent and misleading. Just one example will suffice: the submitted materials claim that 8 towers will be visible from the Park, when in fact the number is approximately 219. I trust that your team will subject these materials to meticulous analysis and review. If these Weeks State Park materials are inaccurate, inconsistent and misleading, then undoubtedly others are as well. We are counting on your team to hold the Applicant accountable and to the highest possible standards.

Thank you.

0922-1

0922-1
Thank you for your comment. This comment concerns visual impact information submitted by the Applicant to the New Hampshire Site Evaluation Committee, not this EIS. The review by the New Hampshire Site Evaluation Committee is a separate process in which DOE has no role. Visual impacts at Weeks State Park are analyzed in the EIS (Section 4.2.1). Key Observation Point (KOP) LA-2 is from the Weeks State Park overlook. From this viewpoint 15 existing structures that are visible. Under Alternative 2, 5a, 5b, and 5c there would be a total of 34 visible structures, and under Alternative 7 there would be 37 visible structures (relocated structures and proposed new structures; see Table A-8 in the Visual Impact Assessment Technical Report). There are locations within Weeks State Park from which more than 200 structures are potentially visible under Alternative 2, 5a, 5b, 5c, and 7 but the structures would not be visible from most of Weeks State Park due to topography and forest cover.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Apr 4, 2016

ID: 9188

Date Entered: Apr 4, 2016

Source: Website

Topics: Alternatives, Viewshed/Scenery, Cumulative Effects, Noise

Name: Carlos Baia

Organization: City of Concord, NH

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Comment:

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Carlos P. Baia
Deputy City Manager
Development

April 4, 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

Re: City of Concord's Public Comment Regarding Clarification on the Draft EIS (DOE/EIS–0463) and the Supplement to the Draft EIS (DOE/EIS–0463-S1); OE Docket No. PP-371

Dear Mr. Mills:

In accordance with its September 13, 2013 Petition to Intervene, the City of Concord New Hampshire is an intervener in this matter. In reviewing the Draft EIS and the Supplement, the City of Concord seeks clarification on the following two issues.

I. Key Observation Point CO-1

The City of Concord seeks clarification regarding Key Observation Point ("KOP") CO-1, which is on Loudon Road (NH Route 9). The Viewpoint Assessment for this area contained in the Draft Environmental Impact Statement dated July 2015 states that "[u]nder Alternative 2, the contrast-dominance rating would be 'severe' (36), which indicates that the visual change would be very large, and in sensitive settings is likely considered unreasonably adverse by a casual observer." Draft Northern Pass EIS, page 4-286. A review of the site plans shows that the proposed structure for this vicinity is a monopole. The City of Concord seeks clarification

0941-1

0941-1
Thank you for your comment. The Key Observation Point (KOP) CO-1c visual simulation in the draft EIS represents Alternative 2, 5a, 5b, and 5c. The lattice structure shown in CO-1c represents the proposed new HVAC structure and the relocated 115kV structure would be replaced with a monopole. The design of Alternative 2 has not been changed since the draft EIS was published in July 2015 and this simulation accurately represents the Project based on the design information available to DOE. Alternative 7, the current Proposed Action, was developed after the draft EIS was released. New simulations have been prepared for Alternative 7 representing the most current project design details which include a proposed monopole structure at this location. Site specific decisions, such as conformance with zoning regulations, are beyond the scope of this analysis.

because the photo simulation contained in Appendix E (CO-1c) demonstrating the simulated condition of Alternative 2 shows a lattice structure.

The City of Concord believes that even using a monopole, the height of the proposed structures in this area will have a "severe" visual impact. The City of Concord is concerned about the visual impact of this area because two of the proposed structures and the accompanying wires will be 125 feet. This area is Concord's Gateway Performance District that provides an entrance into the easterly portion of Concord, and the proposed overhead structures conflicts with the goals of Concord's Zoning Ordinance. The Gateway Performance District was established to provide for well designed, large scale commercial developments that "are expected to adhere to high standards for appearance in order to ensure that the gateways to the City are attractive and functional. Buffering and screening for adjacent neighborhoods are of concern for development at the edges of this District." The Gateway Performance District is a growth corridor that is actively developed, and has some of Concord's highest valued properties due to its desirable location.

This is an important issue for the City of Concord, and, therefore, we are seeking clarification to avoid any confusion resulting from the photo simulation which incorrectly shows a lattice structure.

II. Noise During Operations

The analysis in the Draft EIS does not identify the amount the audible corona noise level during operations will increase from the current conditions. The analysis of noise is contained in the Draft EIS at S-26 (Table S-10, Noise Summary Impact Table). It states that the audible noise during operations will be 44 dBA below the conductors under the 345 kV AC Transmission Line, and 36 dBA at 150 feet from the centerline of the 345 kV AC Transmission Line.

Although the audible noise does not exceed the EPA guidance level of 55 dBA for outdoor areas beyond the transmission line, the City of Concord seeks clarification regarding the

0941-1
Continued

0941-1 cont'd

0941-2

0941-2
Thank you for your comment. Potential visual impacts in Concord, NH are discussed in Section 4.4.2 of the EIS. The Key Observation Point (KOP) CO-1 visual simulation in the draft EIS represents Alternative 2. New simulations have been prepared for Alternative 7 representing the most current project design details. Site specific decisions, such as conformance with zoning regulations, are beyond the scope of this analysis.

0941-3
Thank you for your comment. Additional discussion regarding current ambient noise levels and potential increase in noise levels from the Project has been added to Section 4.1.7 of the final EIS, and to Section 3.2.2.5 of the Noise Technical Report.

0941-3

0941-3
Continued 0941-3 cont'd

amount that the audible corona noise levels will increase from the current conditions that exist. *See, e.g.*, Noise Technical Report for the Draft Environmental Impact Statement dated July 16, 2015, prepared by Ecology and Environment, Inc. at Table 16 (Sensitive Noise Receptors, Southern Section, Map 5 of 8). This information is important to Concord because a number of residences are located within close proximity of the proposed line, and, therefore, the City of Concord requests this additional information to be contained in the final EIS.

In closing, the City of Concord has significant concerns about the impact that the project will have on the City's character and property values as a result of the overhead lines and supporting structures. Concord is the capital of New Hampshire, and has a population of 42,695, which equates to 36% of the entire population along the proposed route.[1] There are 8.1 miles of overhead lines proposed for Concord, which is approximately 6% of the proposed 132 miles of overhead route. The proposed facility is projected to run through significant portions of Concord, and unlike much of the rest of the proposed Northern Pass route in the state, in Concord it will abut dense residential neighborhoods. The City of Concord is concerned about the impacts of transmission lines and large structures, and in order to reduce the project's impacts, it is requested that the applicants be required to bury the line within the City of Concord.

Sincerely,

for Carlos P. Baia
Deputy City Manager

[1] The population data is based on the 2010 census. According to the census, there are 31 municipalities along the proposed route, and those municipalities have a combined population of 117,518.

As presented, 3/7/16 CDM

Statement to Joint Hearing by US DOE and NH SEC on Proposed Northern Pass Project
Carl D. Martland, Chair, North Country Scenic Byways Council

My name is Carl D. Martland, and I live in Sugar Hill, NH. I have more than 40 years' experience in research and analysis related to infrastructure projects, and I am the author of "Toward More Sustainable Infrastructure: Project Evaluation for Planners and Engineers," a textbook that is based upon a course that I developed and taught at MIT for more than ten years. I have previously submitted comments showing how 1950s PSNH transmission lines affected the development of ...
I am the Chair of the North Country Scenic Byways Council, and I will be summarizing comments previously submitted by the Council concerning the impact of the proposed Northern Pass project on North Country's scenic byways, which are the basis for my comments today.

Three of the region's major scenic byways would be adversely affected by the proposed Northern Pass Project. These byways cover all of the major state roads and non-interstate US highways serving the North Country. The local roads that are accessed from the scenic byways are in many cases even more rural, more scenic, and less touched by 20th century industrialization than the designated scenic byways themselves. If the project is constructed as proposed, then visitors to the North Country would suffer adverse visual impacts resulting repeated views of massive industrial structures in what they expected to be a rural or wild region little touched by 20th century industrial development.

The visual analysis presented in the draft EIS documents the dramatic negative effect that the proposed project will have on the region. The draft EIS includes photo simulations of what the proposed towers would look like from 15 "key observation points" (KOPs) along roads, trails, and recreational sites. Experts in visual aesthetics rated the impact of Northern Pass on a scale that ranges from 0 to 45, depending upon the apparent size of the structures and the extent to which the structures contrasted with the surrounding environment. The rating is higher for taller, more massive, closer structures that are located in a less developed, more pristine location. Based upon this rating, they describe the visual impacts on a casual observer as negligible, weak, moderate, strong, or severe, ~~or severe~~. A moderate impact is "clearly noticeable to a casual observer, and is likely to be considered adverse." A strong impact is "likely to be considered adverse … and may be considered unreasonable." A ~~strong~~ severe impact is "likely to be considered unreasonably adverse." (SKIP)

~~The~~ The photo simulations in the EIS cover three situations of special interest to users of the scenic byways:

> Views of towers at road-crossings: the visual impact will be severe, i.e. "unreasonably adverse", at more than 40 locations where the proposed transmission lines would cross scenic byways and local access roads ~~(see KOP BT-1 in the attached table for a simulation of towers at a crossing of a scenic byway).~~
>
> Views of a row of towers from a byway: in some locations, such as driving along Route 3 ~~from~~ between Whitefield ~~toward~~ and Pittsburg, visitors will have repeated views of a row of towers running along a nearby hillside. Based upon the KOP analysis ~~(see KOP WD-3)~~, the aesthetic impact will be strong, i.e. "adverse and possibly ~~likely~~ unreasonable."
>
> Views of towers from a scenic vantage point: the proposed lines and towers of the Northern Pass Project would be seen again and again as visitors traveled along local roads to visit nearby attractions, including historic town centers, hiking trails, farm stands, lakes, rivers and streams.

The draft EIS analyzed aesthetic impacts at 15 locations. ~~Today, the visual impact is strong or severe from only four of these KOPs. However,~~ if the towers are built, then the impact would be strong or severe for all but three of them. A close look at ~~the attached table~~ analysis (not mine) supports the following conclusions: DO!

- Visual impacts would be ~~severe~~ (unreasonably adverse) for all locations within 750 feet of the nearest tower.
- Visual impacts would be ~~strong~~ (adverse and possibly unreasonable) for all locations within 750 to ~~850~~ 1,800 feet of the nearest tower.
- Visual impacts could be moderate or strong for distance up to two miles from the nearest tower. Even moderate impacts are "likely to be considered adverse" by a casual observer.
- In short, the KOP analysis shows that the visual impact of the proposed towers would be "adverse" or "unreasonably adverse" at many locations for people using the scenic byways to explore the North Country of New Hampshire.

Unfortunately the KOP analysis is basically ignored and contradicted by the conclusion of the draft EIS that the visual impact of the project would be minor. This conclusion is based upon a different visual analysis, which considers the average impact over the entire viewshed of the project. The conclusion is based upon a result showing that there would only be a 10% increase

0946-1 (comment bracket beside paragraphs 3 through the bullet list)

0946-2 (comment bracket beside final paragraph)

0946-1
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 Section 2.5.1 of the final 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 final EIS). Impacts to scenic byways in the Northern Section are analyzed in Section 4.2.1 of the EIS, and Section 4.1 of the Visual Impact Assessment Technical Report. The method for the contrast-dominance ratings of simulations is described in Section 2.4.6 and Appendix E of the Visual Impact Assessment Technical Report.

0946-2
Thank you for your comment. All GIS-based models were re-run to address the commenter's concern. A new calculation, the "aggregate scenic impact," was added to the final EIS and additional aggregate indices were added to the Visual Impact Assessment Technical Report to account for an increase in the size of the affected area. However, the area and average indices used in the Visual Impact Assessment Technical Report are useful to make relative comparisons among alternatives (see Section 5 of the Visual Impact Assessment Technical Report).

0946-2 cont'd

in the average scenic impact, ignoring the fact there would be an increase of 165% in the size of the viewshed in the North Country. This is like saying that the flood waters have only risen 10% when more than twice as much land is flooded.

In our earlier, more detailed comments, the North Country Scenic Byways Council has recommended ways to improve the presentation of the visual analyses within the Final EIS. Today we are happy to also have the opportunity to document the adverse aesthetic impacts of the proposed Northern Pass route on the scenic byways and the magnificent scenic, cultural and recreational resources that can only be accessed by traveling along the scenic byways of the North Country. The Site Evaluation Committee must conclude that these adverse impacts can only be averted by requiring the line to be buried throughout the North Country.

0946-2
Continued

Table 1 Aesthetic Impact of Proposed Northern Pass Project on Key Observation Points, (Source: Draft EIS for the Northern Pass Project)

Location	View	Number of Structures Visible	Distance to Nearest Structure (feet)	Visual Impact	
Franconia (FR-2)	View from summit of Mt. Lafayette	16	35,412	11 Weak	
Lincoln (LI-2)	Driving north along Interstate 93 where it enters Franconia Notch State Park	8	10,155	17 Weak	
Lancaster (LA-2)	View from ledge at Weeks State Park down toward lines crossing generally open area below	34	5,981	23 Moderate	
Lincoln (LI-5)	View from Appalachian Trail near summit of S. Kinsman toward Bog Pond	38	9,411	27 Strong	
Dummer (DU-1)	View across Little Dummer Pond toward ROW on side of ridge	6	1,756	29 Strong	
CL-1	View of new transition station at transition between towers and burial, across fields toward forest and distant hills	5	1,450	29 Strong	
Woodstock (WD-3)	Driving north along Interstate 93 just north of Exit 31 where towers climb across a ridge almost directly in front of viewer	11	1,391	32 Strong	
Concord (CO-4)	View from boat ramp across Turtletown Pond toward lines extending along shore	13	1,058	33 Strong	
Concord (CO-1)	View of three rows of lines next to a shopping center	7	749	36 Severe	
Campton (CA-1)	View to north at Exit 28, where existing ROW climbs Sunset Hill	12	649	37 Severe	
Bethlehem (BT-1)	View across small pond where existing ROW crosses Route 302	3	509	40 Severe	
Deerfield (DE-1)	Lines crossing field and then over a small ridge from Nottingham Road	24	325	42 Severe	
Woodstock (WD-4)	View along ROW where it crosses the Gordon Pond Trail	10	502	41 Severe	
Easton (EA-3)	View from where ROW crosses Route 116 looking east toward Kinsman Ridge	25	126	43 Severe	
Lincoln (LI-4)	Where the ROW crosses the Appalachian Trail at its intersection with the Reel Brook Trail, looking at the nearest tower	1	117	44 Severe	

My name is Scott Rineer. I'm a resident of Errol, New Hampshire. I've been a resident of Northern New Hampshire for over 25 years living in towns close to the proposed Northern Pass project. I also work in the timber industry, an industry that is vital to this region and one of the leading industries in our state for many years. I support the Northern Pass project and for many good reasons. Northern Pass doesn't just promise to spend money in this area. They have already begun to do so. This project will support local businesses, it will provide jobs, and it will provide a much needed upgrade to the Coos loop. In recent months the timber industry has been hard hit, losing markets for low-grade wood that are vital to keeping our loggers and sawmills in business. The current limitations to the Coos loop are the reason for the new biomass plant in Berlin to be running at half throttle. An upgrade would allow for up to 100 megawatts of additional power to enter the New England grid. This is not new development. Rather existing power facilities such as biomass, the biomass plant in Berlin and the wind farms at Dixville, Millsfield and Berlin to operate to full capacity. The timber industry as well as local renewable industry producers need this upgrade badly, and Northern Pass agreed to do it. The Northern Pass project will provide the economic stimulus our state and this region is so desperately seeking. They will do this by supporting local businesses and helping our traditional industries such as timber and tourism prosper in the future. Thank you. And I also have ten additional letters written by business owners here in Coos County to submit for the record as well as my letter.

0951-1

0951-1
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur.

From: Mark Koprowski <hearthstone_03@yahoo.com>
Sent: Saturday, August 01, 2015 8:18 AM
To: draftEIScomments@northernpasseis.us
Subject: Northern Pass Draft Environmental Impact Comments

I support hydroelectric projects as a means to balance other renewable energy sources that are intermittent.

I support Northern Pass as a fully underground-along public road corridors utility.

The public and environmental benefits of a fully buried-along public corridor utility are clear when one steps back and looks at the long term. Easy access, no right of way maintenance, no wind, ice and electromagnetic expenses, publicly visible to deter vandalism. All of us long term residents remember all to well when Southern Quebec and Northern NH suffered from a devastating ice storm that shut down parts of Quebec for almost a month. The cost of one storm could pay for the cost of burying.

0954-1

My guess is that when the life cycle costs are considered, including loss of economic activity during ice storms, the fully buried route along public corridors becomes the cheapest alternative.

One alternative not discussed is a publicly owned underground utility corridor that would allow not just one but several energy suppliers to access.

0954-2

Mark Koprowski
PO Box 217
Bethlehem, NH 03574
Sent from my iPad

0954-1
Thank you for your comment. Section 4.1.2 of the EIS evaluates numerous alternatives that include burial of the Project and/or specific segments of the Project. The anticipated capital cost to develop each of these alternatives is evaluated and compared within the Socioeconomic section of the EIS. The analysis of economic activity considers typical weather conditions.

0954-2
Thank you for your comment. All action alternatives analyzed in detail in the EIS include at least one section of underground cable in roadway corridors.

March 7, 2016

Office of Electricity & Energy Reliability (OE-20)

U.S. Department of Energy

1000 Independence Ave., SW

Washington, D.C., 20585

Mr. Brian Mills:

My name is Butch Lane and my son Jon and I own JML Trucking & Excavating, LLC in Errol, NH. I am here to support the Northern Pass project. This project will provide the much needed upgrade to the Coos Loop. Right now and in the near future there is a surplus of biomass available. This is a great chance for the biomass plant in Berlin, NH to run at full strength and provide much needed jobs for the woods industry. This will only be possible when Northern Pass comes through and makes these upgrades.

This construction project will be one of the largest in New England. With the poor winter season we have just experienced, we now know we cannot just survive on tourism and recreation alone. This type of project will put a lot of quick money into the local economy in motels, rentals, restaurants, parts stores, gravel pits and to small contractors such as myself. This will also help the many local men who have gone and trained at lineman school and are simply waiting for a chance to work close to their homes.

I sincerely hope that we can come to some agreement on the Northern Pass project.

Sincerely,

Clifford Lane

Clifford "Butch" Lane

P.O. Box 175

Errol, NH 03579

0955-1

0955-1
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation or operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur. Because this upgrade is not part of the Project, potential employment impacts related to it are not considered in the EIS.

March 7, 2016

Office of Electricity Delivery & Energy Reliability (OE-20)

U.S. Dept. of Energy

1000 Independence Ave., SW

Washington, D.C. 20585

Mr. Brian Mills:

My name is Scott Rineer and I am a resident of Errol, NH. I have been a resident of northern New Hampshire for over 25 years, living in communities in close proximity to the proposed Northern Pass project. I also work in the timber industry. An industry that is vital to this region and one of the leading industries in our state for many years.

I support the Northern Pass project and for many good reasons. Northern Pass doesn't just promise to spend money in this area, it is something they have already begun to do. This project will support local businesses, it will provide jobs during the construction phase and it will provide a much needed upgrade to the Coos Loop grid system. 0956-1

In recent months, the timber industry in this region has been hard hit, losing markets for low grade wood that are vital to keeping our loggers and sawmills in business. The current limitations to the Coos Loop are the reason for the new Burgess Biopower plant in Berlin, NH to be running at half throttle. An upgrade would allow for up to 100 MW of additional power to enter the New England grid. This is not new development, rather existing power facilities such as the biomass plant in Berlin and the wind farms in Dixville, Millsfield and Berlin to operate to full capacity. The timber industry, as well as local renewable energy producers, need this upgrade to happen, and Northern Pass has stepped up to the plate and has agreed to do it.

The Northern Pass project will provide the economic stimulus our state and this region is so desperately seeking. They will do this by supporting local businesses and helping our traditional industries such as timber and tourism prosper into the future.

Sincerely,

Scott D. Rineer

35 Stump Road, Errol, NH 03579

0956-1
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur. Because this upgrade is not part of the Project, potential employment impacts related to it are not considered in the EIS.

My name is Mark Armstrong and I'm the forester with Wagner Forest Management in Errol, New Hampshire. Perform logging operations in Coos County. This is my personal opinion. We might all agree that these are not the best economic times, but our concept of hard times is nothing compared to our grandparents endured during the Great Depression. We might ask how the people in that era dealt with that economic crisis. It was Franklin Delano Roosevelt's great public works projects providing the springboard for the nation's recovery. The CCC employed thousands of young men building woods through the wilderness, roads that are still in use today. The TVA and the Bureau of Reclamation built big hydroelectric projects that continue to provide cheap electricity to southeastern and west states. Here's what the iconic American folk singer Woody Guthrie had to say about these enormous hydroelectrical projects. Quote, and on up the river is Grand Coulee Dam, the mightiest thing ever built by a man to run these great factories and water land. Roll on, Columbia, roll on. Woody Guthrie was a starving Oakie, right out of the dust bowl. Now, this iconic American folk singer wrote a couple dozen songs about these big hydro projects, and it's interesting to know if that you did a word search on this entire body of lyrical work, graces like snail darter, endangered species or viewshed don't come up. And the hundreds of thousands of hungry refugees from the poverty of the dustbowl didn't pass up these temporary construction jobs. Maybe they and President Roosevelt realized that sometimes you need a brief but intense spark to ignite something bigger and longer lasting. When you go camping and carefully build your fire lay with the tinder and the kindling and the tiny twigs with some bigger sticks on top and you get ready to strike the match, nobody ever says oh, don't bother with that temporary thing. That's only going to last about five seconds. The Northern Pass construction may well be what we need to rekindle the economy. One enormous benefit of this project will be the upgrade of the Coos loop. This really is very significant for all of Northern New England because it will allow the biomass boiler to run at full capacity. With the slowdown of the pulpwood sector, we desperately need this market for low-grade wood. We need to build this project for the good of New Hampshire, for the good of New England, for the new generation of Americans who will need this low cost electrical energy to build a flourishing economy for the future. Thank you.

0957-1

0957-1
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur.

My name is Clifford Lane, Jr. My name is Butch Lane. Everybody knows me, my son John and I own JML Trucking & Excavating in Errol. I am here to support the Northern Pass project. The project will provide much needed upgrades to the Coos loop. Right now and in the near future there is a surplus of biomass available. Mills in Maine are closing down, ton of biomass at a very cheap price. This is a great chance for the biomass plant in Berlin to run at full strength. I've worked around there for the last month or so, and I've seen nothing but trucks. Three months ago they couldn't get enough, wondering, and now they're turning trucks away. What a great place. They will keep people in the woods going. Keep everybody going. We need jobs for the woods industry, believe me. The woods industry is failing fast, and the government's moving in from both sides. That will only be possible when Northern Pass comes through with these upgrades because we need this Coos loop open. We have one windmill farm that can't even operate. We have another one that our tax dollars have built, $130 million up there, and that's running at half capacity. We've got to start getting some of these places going. The construction project will probably be one of the largest that New England's ever had. With this poor winter season we have just experienced, we cannot just survive on tourism, and I think a lot of the motels and restaurant owners and people around here with rentals are seeing that. This type of project will put a lot of quick money into the local economy. Motels and restaurants, parts stores, gravel pits, small contractors and such and myself. These people, contractors, I was in it for 30 years, make big and they spend fast. Puts quick money into the area. This will also help many local young men who have gone for training at linemen school hoping to get a chance on the lines. As I look around this room, there's not a lot of young people. Young people are leaving the North Country fast. We've got to put them back to work. So in closing, I sincerely hope this agreement, the agreement can be done with Northern Pass and we can put people back to work. Thank you.

0959-1

0959-1
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur. Because this upgrade is not part of the Project, potential employment impacts related to it are not considered in the EIS.

My is Allen Bouthillier. I was born and brought up here in Colebrook. I'm the owner of AB Excavating in Lancaster, New Hampshire. I employ approximately 30 employees. We do excavating and logging, and we provide other types of construction services. We've also been involved in developing the wind energy projects in this region. I'd like to say that I was initially opposed to this project. Like many other examples of misinformation that swirl around this project, I was told that this project would hurt the local logging industry. However, I took the time to research this project and the benefits involved, and I changed my mind. I am now in full support of the project. This is exactly what the county needs, major investment that will support local jobs and the economy and bring critical support for our tax base. A critical piece of the past project is its proposed upgrade to portions of the Coos loop. Rebuilding the Coos loop will bring long-term help to landowners and logging alike. With the closing of the paper mills, biomass becomes more important to setting the price of wood for loggers and landowners alike. The proposed upgrade for the Coos loop will mean that existing renewable energy plants will be able to run more often and produce more wood industry based jobs and produce more local energy. By increasing the amount of electricity that can be exported out of the county to the New England grid, the current biomass plants can run at full capacity, increasing demand for chips. Finally, I think it is important for this committee to understand how critical the route agreements are that Northern Pass has developed with large timberland owners. These large industrial timberlands are the backbone of our economy and revenues from projects like Northern Pass help to ensure they were remain viable and in private ownership. Keeping these properties viable for private ownership ensures they stay open to access by ATVs, snowmobiling and other recreational uses. In Coos, much of the industrial timber land that we have had historical free access to recreate on has been bought by federal and state agencies and environmental groups. Once land comes under the control of some of these groups, access is usually limited. It is hard to hunt a 40,000-acre piece of land which no longer has access to wheeled vehicles or camp on over night. There is a push right now in Coos County to expand the Conti Refuge which if that happens you'll see restrictions put on that property and those acres will no longer be available for historical use and access. Northern Pass will not harm our economy. In fact, this project will be a huge benefit to our economy in many ways. Local construction jobs, massive new tax revenues for towns and the county, and critical support for our existing economy include forestry, recreation and tourism. It is important that this committee look beyond the vocal minority and do what is best for the majority of people in Coos County and the State of New Hampshire. Please support the project. Thank you.

0960-1

0960-2

0960-1
Thank you for your comment. Potential socioeconomic impacts, including employment and taxes, are discussed in Section 4.1.2 of the EIS. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur.

0960-2
Thank you for your comment. The commenter's observations are noted regarding potential impacts on recreation access on private lands on or near the Project corridors. Impacts to recreation (including motorized and non-motorized uses) are analyzed in Sections 4.1.3, 4.2.3, 4.3.3, 4.4.3, and 4.5.3 of the EIS, and in the Recreation Technical Report.

Allen Bouthillier

- My name is Allen Bouthillier, I was born in West Stewartstown and brought up in Colebrook NH graduated from Colebrook academy.
- I am the owner of AB Excavating in Lancaster. I have approximately 30 employees and we do excavating, logging and provide other types of construction. We have also been involved in the development of wind energy projects in the region.
- Let me say that I was initially opposed to this project. Like many other examples of misinformation that swirl around this project, I was told that this project would hurt the local logging industry. However, I took the time to research this project and the benefits involved and I changed my mind. I am now in full support of the Northern Pass.
- This is exactly what Coos County needs. A major investment that will support local jobs and the economy, and bring critical support to our tax base.
- A critical piece of the Northern Pass project is its' proposed upgrade to portions of the Coos Loop. The rebuilding of the Coos loop will bring long term help to land owners and loggers alike. With the closing of the paper mills, biomass becomes more important to setting the price of wood for loggers and landowners.
- The proposed upgrade to the Coos Loop will mean that existing renewable energy plants will be able to run more often and produce more wood industry based jobs and produce more local energy.
- By increasing the amount of electricity that can be exported out of Coos to the New England grid, the current Biomass plants can run at full capacity increasing demand for chips.
- Finally, I think it is important for this committee to understand how critical the route agreements are that Northern Pass has developed with large timberland owners. These large industrial timberlands are the backbone of our economy, and revenue from projects like Northern Pass help to ensure they remain viable and in private ownership.
- Keeping these properties viable for private ownership ensures they stay open to access by ATVs, snowmobiling and other recreational uses.
- In Coos much of the industrial timber land that we have had historical free access to recreate on has been bought by Federal and State Agencies and Environmental groups. Once land comes under the control of any of

0961-1

0961-2

0961-3

0961-1
Thank you for your comment. To accommodate the Project, portions of the existing 115 kV transmission line presently within the Project corridor would be relocated. As an incidental benefit of the Project, Northern Pass plans to upgrade the capacity of a portion of this 115 kV line in the North Country (also known as the "Coos Loop") by up to 100 MW. While this capacity upgrade is not necessary for the implementation/operation of the Project, Northern Pass has determined that upgrading the line would be an incidental benefit to surrounding regional generators. Under the No Action Alternative, this upgrade would not specifically occur.

0961-2
Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS.

0961-3
Thank you for your comment. The commenter's observations are noted regarding potential project impacts on motorized uses in private lands on or near the Alternative alignments. Impacts to motorized uses is analyzed in the Recreation Technical Report.

these groups access is usually limited. It is really hard to hunt a 40,000 acre piece of land that you no longer can access with wheeled vehicles or camp on over night. There is a push right now in coos county to expand the conti refuge which if that happens you will see restrictions put on that property and those acres will no longer be available for historical use and access.

- Northern Pass will not harm our economy, in fact, this project will be a huge benefit to our economy in many, many ways.
- Local construction jobs, massive new tax revenues for towns and the county, and critical support for our existing economy including forestry, recreation and tourism.
- It is important that this committee look beyond the vocal minority, and do what is best for the majority of the people of Coos County and the state of New Hampshire.
- Please support the Northern Pass.

0961-3 cont'd

0961-3 Continued

0961-4

0961-4
Thank you for your comment. Socioeconomic impacts are addressed in Section 4.1.2 of the EIS, including impacts on employment, tax revenue, and income in New Hampshire.

Good evening and thank you. I'm State Senator Andrew Hosmer. I represent District 7 which is 8 towns and two cities. One of those cities being the city of Franklin which is where the converter station is proposed to be built. Franklin is a city that's struggled over the past few decades with the closure of mills and the depreciation of its tax base. It's also a place that's quite beautiful. Its citizens are proud and hard working, and I know that the ones that I speak with are hopeful that the future will hold economic opportunity for them as well as for future generations. The Northern Pass project will be transformational for the city of Franklin. The project will provide a $400 million investment in the city's tax base, approximately $6 million a year in new tax revenues and more than 500 jobs coming to that city during the construction phase. The benefits to the city will both be short-term and long-term, and the residents of the city are eager to see this project move forward. I have followed this project for many years. No one will dispute the fact that Northern Pass got off to a bad start and was poorly designed and presented. However, the project has continued to reach out to communities, has listened to concerns from residents and has made changes that address many of the concerns raised. Because of this, the project deserves your support. I recognize that these types of projects have impacts, and many residents have very legitimate concerns. The Site Evaluation Committee can play a positive role in helping address those concerns and encouraging Northern Pass and abutting landowners to continue to discuss opportunities to reduce the impact of the project. In conclusion, New Hampshire must pursue long-term energy strategies that balance the interest of its citizens, lowers the cost of energy and helps create a vibrant economy. This project allows the citizens of Franklin to look into the future and know that the city they love has a future filled with opportunity. Thank you very much. I appreciate the opportunity to speak.

0963-1

0963-1
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.

Hi, my name is Lance Clute. I'm the Vice President of Operations for PAR Electrical Contractors, and we were recently selected as the general contractor for the Northern Pass project. MR. HONIGBERG: Can you spell your last name for the record, please? MR. CLUTE: C L U T E. First and foremost, I want to thank the Site Evaluation Committee and the DOE for allowing me the opportunity to speak in support of the project. I personally been involved with our operations here in New Hampshire and throughout New England for the past six years. Over that time frame we have constructed and maintained a large portion of the transmission lines that bring power to really everyone here in the room. We also have played a major role in restoring power during recent storm events. An example, we provided thousands of workers for Hurricanes Irene, Sandy and the October snowstorm. We have an office located in Bow, and we currently employ approximately 200 people in New Hampshire. These employees live, work and raise families here in the State of New Hampshire, and you can be sure that all of them are looking forward to working on the Northern Pass project staying here in New Hampshire. Some of these current employees are part of a program that Eversource and us started last year. The goal is to find New Hampshire residents that want to join the apprenticeship program. We hire these candidates, put them into the program, and approximately three and a half years later they become fully qualified line workers. We plan on continuing this program throughout Northern Pass and into the future. What that does is allows these men and women to be able to stay and work in New Hampshire even long after the Northern Pass project is finished and completed. Based on my experience on past projects, Northern Pass will add thousands of jobs to the New Hampshire economy, and only a small portion of those jobs will be those line workers. The larger portion and the greatest portion will be from local road builders, excavation companies, lumber mills, loggers, landscapers, waste management companies, aggregate hauling, equipment maintenance, trucking and I could go on and on. I also wanted to give you an order of magnitude of some of the legal spend that we occur from the project. With our experience in the past projects, I put together an estimate of these spends for the local now. We expect to spend $7 million on gravel. Upwards of $10 million on concrete. $27 million on conduit and other items for the construction of the duct banks and substations. Our lodging and means from all of the people working in this project we would expect to be $20,000,000 and above. Fuel costs alone for our equipment, not including the folks that drive to and from work, will add up around $10 million. And believe it or not we will spend over a million dollars on ice, water and Porta-Potties. Keep in mind these are just a few of the direct spends that we will bring to the project. There are far nor indirect, some of the trickle down spends that will have a large impact on the economy. In closing, I would like to urge the committee to approve the application. The State's workforce, economy and well-being is best served by building Northern Pass. Thank you.

0964-1

0964-2

0964-1
Thank you for your comment. Economic impacts are addressed in Section 4.1.2 of the EIS and include an evaluation of potential impacts on employment and income in New Hampshire.

0964-2
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.

From: _____
To: _____
Subject: FW: Support of The Northern Pass Project/Draft Environmental Impact
Date: Tuesday, November 3, 2015 7:20:24 AM
Attachments: DOE Northern Pass - Hadley Support 11-2-15.pdf

-----Original Message-----
From: jhadley@metrocast.net [mailto:jhadley@metrocast.net]
Sent: Monday, November 02, 2015 8:03 PM
To: Mills, Brian <Brian.Mills@hq.doe.gov>
Subject: Support of The Northern Pass Project/Draft Environmental Impact

Brian,

Attached are my 1-page comments in support of The Northern Pass Project/Draft Environmental Impact as well as a 2-page newspaper article from 1981.

Thank you.

Jim Hadley

Jim Hadley
Mailing Address: PO Box 104, West Nottingham, NH 03291

November 2, 2015

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

RE: Comments in Support of The Northern Pass Project/Draft Environmental Impact Statement

Dear U.S. Department of Energy:

I am submitting this testimony as a former Northwood selectman; a 28 year resident of Northwood; and as a former Business Manager to the late Democratic Governor Hugh Gallen at the Governor's Council on Energy more than 35 years ago. Ironically in June 1981 following talks between Gov. Gallen and the director general of Quebec's Ministry of Energy Resources, Dennis L'Homme, an agreement was signed in New Castle to bring hydroelectric power from Canada into New England within four years (by 1985).

The agreement called for New Hampshire to build a high-voltage power line from a dam on the Connecticut River at Monroe, west of Littleton, to the Quebec border at Pittsburg by 1985. Initial reaction in New Hampshire was favorable. Michael Love, Chairman of the state-PUC said the lines in New Hampshire would try to follow existing rights of way wherever possible. Michael Cornelius, state energy director said preliminary talks with North Country officials showed a positive response. Paul Bofinger, the former long-time visionary head of the Society for the Protection of NH Forests said his organization was not necessarily against the plan, but that it would require an environmental impact statement.

The line would be among the largest in the country at that time with a planned capacity of 2,000 megawatts, one-tenth of New England's power capability. "This agreement is a major achievement for New Hampshire in our pursuit of hydro power from Quebec", Gov. Gallen said. He said that it would assure residents a source of inexpensive power while helping Hydro Quebec, the provincial utility, sell off its excess electricity. Unfortunately Gov. Gallen lost his re-election bid for a third term in November 1982 and New Hampshire's state's energy policy has been labelled as dysfunctional ever since.

I am requesting that the U.S. Department of Energy support this project for the following reasons:

1. This is a public energy policy opportunity to bring in low-cost hydro power at no cost to NH residents. We missed out 35 years ago (as described above). Let's not make this same mistake.
2. Within this past week, NH Governor Maggie Hassan signed the Under 2 MOU where signatories agree to reduce their greenhouse gas emissions 80-90 percent below 1990 levels by 2050.
3. Within this past week, Gov. Hassan also highlighted her support (along with U.S. Sen. Shaheen) for the Clean Power Plan, administered by the EPA which establishes the first-ever national standards to limit carbon pollution from power plants.
4. The burying of the poles in the White Mountain National Forest is a major concession.

If you have any questions, please contact me at jhadley@metrocast.net.

Sincerely,

Jim Hadley

Jim Hadley, MPA, MBA, MS in Community Economic Development
Attachment

Residence: 125 Old Mountain Road, Northwood, NH 03261

0965-1

0965-1
Thank you for your comment.

The New York Times

June 14, 1981

NEW HAMPSHIRE AND QUEBEC SIGN PACT MAJOR POWER SUPPLY LINE

AP

CONCORD, N.H., June 13— Hydroelectric power from Canada could begin flowing into New England within four years under an agreement that has been reached between New Hampshire and Quebec.

The agreement, which was signed this week, calls for New Hampshire to build a high-voltage power line from a dam on the Connecticut River at Monroe, west of Littleton, to the Quebec border at Pittsburg by 1985. The Canadian portion of the power line should be in place in the mid-1980's, officials said in a statement.

Initial reaction in New Hampshire was favorable, in contrast to opposition to a similar $300 million plan for a corridor on the Vermont side of the river, which became an issue in that state's gubernatorial campaign.

The line would be among the largest in the country, with a planned capacity of 2,000 megawatts, one-tenth of New England's power capability. Signing of Accord

The agreement was signed by Mr. Gallen and Dennis L'Homme, director general of Quebec's Ministry of Energy Resources, after a day of talks in New Castle.

"This agreement is a major achievement for New Hampshire in our pursuit of hydro power from Quebec," Mr. Gallen said. He said that it would assure state residents a source of inexpensive power while helping Hydro Quebec, the provincial utility, sell off its excess electricity.

Michael Love, chairman of the state Public Utilities Commission, said that the New Hampshire route would be a 200-foot swath with 84-foot towers, running 71 miles. He said that the lines in New Hampshire "would try to follow existing rights of way wherever possible."

He said that the power from Canada would not be enough to make the Seabrook nuclear power plant unnecessary. "We will still need Seabrook to solve the major energy problems," he said of the twin reactors, which are scheduled to be completed in 1984 and 1986.

Michael Cornelius, New Hampshire's director of energy, said that most of the landowners affected by the agreement were paper companies rather than individual owners.

He said that even if Vermont had approved a power line there, New Hampshire would have gone ahead with its own plans, which called for completion in almost half the time.

"We're interested in having the line in place at the earliest possible date," he said. Methods of Financing Project

Mr. Cornelius said that the cost of a New Hampshire line could be borne in several ways: by members of the New England Power Pool, an association of New England utilities, if it was made part of the agreement; by New Hampshire utilities, if only the state was involved, or by New Hampshire Energy Authority bonds, if such an agency was established.

Mr. Love said that the proposal sought to quicken completion of a New Englandwide interconnection with Canada by 1988. Before then, the line would carry Quebec surplus power.

Talks between Quebec and the state began when Mr. Gallen and state energy officials traveled to the province and Newfoundland in April. Paul Ambrosino, special assistant to the New Hampshire Governor's Council on Energy, said, "Quebec was sensitive to the public opposition in Vermont."

Vermont has a stiff review process for construction of power lines. David Merrill, an executive vice president of Public Service Company of New Hampshire, said that Quebec officials were impressed that New Hampshire's review process was simpler and faster than Vermont's.

"New Hampshire officials expressed the opinion the line could be built entirely in New Hampshire without any problem," he said.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 28, 2016

ID: 8908

Date Entered: Mar 28, 2016

Source: Website

Topics: Air Quality

Name: James Feldman

Organization: member AMC

Title: Professor (retired), Northeastern University

Email: jim@feldman.com

Mailing Address: 14 Linda Lane

City: Newton

State: MA

Zip: 02461

Country: US

Comment: As the retired head of the Power Systems Program at Northeastern University, I am strongly in favor of bringing more Canadian hydro power into the US and New England in particular. The positive impact on clean air, system reliability, energy diversity and total cost including environmental impact is undeniable. So I see no argument against doing this overall project. The question is: How to do it?

I can see no reason for insisting on the Northern Pass route. Economically, towers an overhead lines are more economical ONLY if you ignore ice storms (think back to the one that took out VT and NH within the last decade.) If an ice storm can take out a lot of your base power, you have to have under-utilized alternative power sources sitting down here burning some less attractive fuel. There is also the licensing cost when you consider the intense opposition to your proposed route. Many a nuclear project has been cancelled after too much licensing cost (e.g., Seabrook 2.) I have seen no compelling reason for picking Northern Pass when such obvious and generally acceptable alternatives as the I93-I95 route are available.

I strongly recommend that DOE reject the current Northern Pass proposal but encourage the proponents to come back with a more acceptable route.

0967-1

0967-1
Thank you for your comment. Licensing costs are outside the scope of this EIS analysis.

Thank you. My name is Jonathan Mitchell. I'm the Training Director for Local 490 IBEW. I've been to all these meetings in the past couple years, and tonight happens to be one of them where they're talking about jobs. I'm one of the guys who for the past almost 37 years has been working one of these temporary construction jobs. That's my career. This particular job will go roughly three years, give or take. Well, when you're in construction with a 30-year career, that's ten percent of your career, and anybody in construction will say, you know what? That's a big job. They don't look at it like this is a temporary job. They look at it like this is my career. This is how I make my living. This is how I pay my mortgage, and we're proud to do that. So when people come up and say it's just a temporary job for these temporary workers, I do take offense. I do take offense. It would be like telling a realtor, well, one of your temporary jobs is still on that condo down the street because as soon as that's done you're done. Then you move on to the next one. I hope you see it my way. My thought on the whole project, overview, is, you know, as times change and they are, and we're looking at diversifying how we get our electricity. We're going to have to go, we're going through some growing pains. And more than likely it's going to come in in the transmission of said power. And this is the case. So there are some growing pains going on here. I for one believe Eversource has bent over backwards in trying to listen to the people of New Hampshire and hear their needs and adjust accordingly. We do have power plants that are going out, have gone out or slated to go out, and luckily we have people, companies, and yes, they're going to make a buck, but they have the foresight to be ahead of that curve so we're not in the dark a few years down the road. Thank you very much. MR. KERVITSKY: Jonathan, have you ever spoken before? MR. MITCHELL: I spoke once in Concord at a meeting. A year and a half ago. SPEAKER: Why don't you fill this out just so we definitely have your information. MR. MITCHELL: Sure.

0978-1

0978-1
Thank you for your comment. Potential socioeconomic impacts are addressed in the EIS within Section 4.1.2, including an evaluation of construction related, and long-term operations, changes to employment and income in New Hampshire.

1. Hi, My name is Lance Clute and I am the Vice President of Operations for PAR Electrical Contractors. We were recently selected as the general Contractor for the Northern Pass Project.

2. I want to thank the Site Evaluation Committee for allowing me the opportunity to speak in support of the Northern Pass Project.

3. I have personally been involved with our operations in New Hampshire and throughout New England for the past 6 years. Over that timeframe we have constructed and maintained a large portion of the lines that deliver power to everyone. We also play a major role in restoring your power after major storm events. In Example, we provided thousands of workers during Hurricanes Irene & Sandy and the October snowstorm.

4. We have an office located in Bow, New Hampshire and we currently employ approximately 200 people in New Hampshire. These employees live, work and raise their families in New Hampshire. And you can be sure that all of them are looking forward to working on the NP project.

5. Some of these current employees are part of a program we started last year with Eversource. The goal is to find and train New Hampshire residents. We hire these candidates and put them into an apprentiship program. After approximately 3.5 years they become a fully qualified line worker. We plan on continuing this program throughout the NP project. These men and women will learn a trade and be able to stay and work in New Hampshire after the NP project is completed.

6. Based on my experience on past projects, Northern Pass will add thousands of jobs to the New Hampshire economy. Only a small portion of these jobs will be for the line workers who build the actual lines. The greatest portion of jobs will be in the form of local road builders, excavation companies, lumber mills, loggers, landscapers, waste management, aggregate hauling, equipment maintenance, trucking….And I could go on and on…..

7. I also wanted to give you some order of magnitude **Local** spends that will occur during the NP project. The following represent estimates I formulated based on previous project experience:

    a. Gravel – 7M
    b. Concrete- 8M
    c. Conduit-27M
    d. Lodging-10M
    e. Fuel-9M
    f. Meals-10M
    g. Ice, Water, and Porta Potties – 1M

8. Keep in mind that these are just a few of the direct spends. There are far more indirect (trickle down spends) that will have a large impact on the economy.

9. In closing I would like to **urge** the committee to approve this application. The states workforce, economy and well-being is best served by building Northern Pass.

0980-1

0980-1
Thank you for your comment. Economic impacts are addressed in Section 4.1.2 of the EIS and include an evaluation of potential impacts on employment and income in New Hampshire.

Rick Samson, Coos County Commissioner. I'd like to thank the people that are still here this evening and have stayed throughout this process. Several comments that I would like to make is that my grandmother is a Quebec Indian and an original settler of Pittsburg, New Hampshire, and my backyard starts in Pittsburg, New Hampshire, and it ends down in Nashua, Exeter, Salem, Portsmouth and Conway. This state is everyone's backyard that lives here. Every dam on the Connecticut River from Littleton, New Hampshire, to Pittsburg, New Hampshire, with the exception of the Gilman site and the Canaan Hydro in Canaan, Vermont, is owned by TransCanada. Every dam on the Androscoggin River from Shelburne, New Hampshire, to Errol, New Hampshire, with the exception of Smith Hydro in Berlin is owned by Brookfield Power. Seventy-five percent of the Coos Wind Park is owned by Brookfield Power. The other 25 percent is owned by Tom Colgan who is the land manager for Wagner Land. Wagner Land manages Bayroot LLC Land Holdings. Bayroot LLC Land Holdings are the Yale University's endowment fund, and this is all about big money. As you have heard here tonight, we do not want Northern Pass above ground. There is no way that Northern Pass should be approved above ground. I speak from experience as a former Public Service Company of New Hampshire lineman, and one issue that has not been addressed here tonight is that there is only two men from Groveton, New Hampshire, to the Canadian border that are qualified to work on the type of structures that Northern Pass is proposing. So they will not be hiring local employees to build these towers. I will conclude by saying that if the right, honest and common sense thing is done, Northern Pass will not be built above ground. Thank you.

0981-1

0981-1
Thank you for your comment. Potential socioeconomic impacts are addressed in Section 4.1.2 of the EIS, including impacts on short-term (construction related) and long-term (operations related) employment and income in New Hampshire. The analysis does not attempt to speculate from where the estimated additional employment would be sourced.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Apr 4, 2016

ID: 9216

Date Entered: Apr 4, 2016

Source: Website

Topics: Historic/Cultural

Name: Erica Druke

Organization: NH resident

Email: ericajdruke@yahoo.com

Mailing Address: 8 Fellows St

City: Concord

State: NH

Zip: 03301

Country: US

Comment: Constructing gigantic towers will destroy NH's scenery as we know it. Northern Pass has stated over and over again that Northern Pass will not have any impact on NH's tourism or economy. This is just not true.

0982-1

Take a look at Central Park in NYC. Central Park is valuable because of its natural beauty and the respite it provides to locals and visitors alike. If it wasn't so valuable, the land would be developed by now and it would be full of skyscrapers. The people of NYC are protecting this space for themselves, visitors, and future generations. Even the NYC buildings around Central Park are more valuable simply because of the view and peace it provides occupants. Central Park is a popular tourist destination in NYC that residents are proud of and like to show off. NH is also proud of its own scenic beauty. We want to protect it for ourselves, visitors and future generations. Massive high voltage towers are in total contrast and a contradiction to our way of life here in NH.

0982-2

Northern Pass continues to bring up the benefits of 1000 jobs without ever saying these jobs will go to NH residents. They also keep saying Northern Pass will create an economic stimulus for the local hotels and businesses. This doesn't seem true if you are hiring local people from NH for a temporary, mobile project. The people from the International Brotherhood of Electricians have been showing up supporting Northern Pass because they want jobs. Many of them are from Massachusetts. If they are truly in favor of Northern Pass then they should move to NH and buy a house next to a tower and call

0982-1
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.

0982-2
Thank you for your comment. Potential socioeconomic impacts are addressed in Section 4.1.2 of the EIS, including impacts on short-term (construction related) and long-term (operations related) employment and income in New Hampshire. The analysis does not attempt to speculate from where the estimated additional employment would be sourced.

it home. They can admire the towers instead of trees like they do in Massachusetts. Who's to say Canadians won't be hired using work visas?

All private enterprises that impact the public sector, especially in the energy field, bear an ethical responsibility for being caretakers of the earth. We should not damage the environment or risk human health and well being simply to save money for investors. Today, towers and overhead, high voltage, transmission lines are antiquated methods for delivering electric power to the grid. The modern world demands underground burial and so does NH.

Northern Pass provides a Gateway for Canada to access the US power grid system and its markets. Canada is sending DC power all the way to Franklin, NH where it is being converted to AC power and then sent to a substation in Deerfield, NH for processing. Northern Pass is destined for the higher demand states of Southern New England, the Eastern Seaboard, and beyond. NH is a low population, low industry, low demand (electric) state but has some of the highest electric rates in the country. It doesn't need this power. NH can compete and develop its own independent, clean, and renewable sources of power which will provide jobs to NH residents.

Northern Pass and Eversource are not providing the people of NH with the information or data that they have been asking for on various topics. This is enabling the ignorance level of the people of NH and preventing them from doing the due diligence necessary to understand fully the impact of Northern Pass on their local communities, the state, the region, the United States and globally. All information must be timely, accurate and relevant. The people of NH have a right to informed dissent or consent, as the case may be, with conditions. The SEC has a responsibility to the people of NH to keep us informed of the status and issues regarding Northern Pass and its true impact on NH. Northern Pass and Eversource can not get away with lies, deceiving NH residents or acting against the public interest.

0982-2
Continued 0982-2 cont'd

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Apr 4, 2016

ID: 9220

Date Entered: Apr 4, 2016

Source: Website

Topics: Purpose and Need, Health and Safety, Wildlife, Viewshed/Scenery, Water / Wetlands, Historic/Cultural, Economic, Tourism, Quality of Life, Cumulative Effects, Noise

Name: suzanne steele

Organization:

Email: steele1@metrocast.net

Mailing Address: 8 harvey rd.

City: deerfield

State: NH

Zip: 03037

Country: US

Comment: There are many reasons why I am not in favor of the Northern Pass project. New Hampshire is known for its beautiful countryside, lakes and mountains and this beauty is imperative for hundreds of thousands of dollars flowing into our economy through tourism. This tourism creates jobs for thousands of people in our state as well. This project, if it goes through, would forever scar our great state. Hundreds of miles would change with many vistas that are currently free from 100+ foot towers. There are many towers that are estimated to be 130 or taller. That height is well above treeline - and would not only impact the views of our scenic vistas but would also damage the rural character through all of the towns that would potentially host this 192 mile line.

0983-1

I am also a Wellness Consultant and am very concerned about the health impacts of Northern Pass. Although I am not an abutter, I am extremely troubled that continuous exposure to higher frequencies would negatively impact these families health. Dr. Robert O. Becker, an Orthopedic Surgeon was the pioneer in EMF and negative health effects. The following is from an article from the NY Sun ..."It was at Environmental Protection Agency hearings in 1975 over a New York State Power Authority plan to run a 765,000-volt line from Utica to Massena, N.Y., on the Canadian border, that Becker announced his opposition on health grounds. Becker and one of his students, Andrew Marino, said that they had found various irregularities in rats exposed to high-voltage electromagnetic fields (EMFs). Their findings meant that no one should be within 100 yards of high-power lines, they testified. Becker later

0983-2

0983-1
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.

0983-2
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.

appeared on "60 Minutes" to raise more concerns, but his visibility on the issue ended his other scientific studies because he questioned the objectivity of the National Academy of Sciences, according to Mr. Marino. Becker's grants were canceled. " The NY project was not stopped and I feel just because the applicant(Eversource) & HQ has unlimited funds for marketing (TV ads & social media campaigns), retaining numerous lawyers and experts it does not mean that this is in the best interest of our wildlife, our people, our state or even our country.

I moved to Deerfield in 1993 because of the beauty of this area as well as the history of our town. We are currently celebrating our 250th Anniversary in 2016; a community steeped in history. We have a number important "centers" in our town -- several very near the new proposed expanded lines. During the SEC visit on 3/16/16 at our Town Hall stop it was shared that there would be additional 40 feet of trees that would need to be cleared to expand the ROW along the area behind the Deerfield Community Church. That was the first time that specific a number (in feet) had ever been mentioned. That raised a red flag for me, because I don't believe there is more than 40 feet of a buffer currently. If that is true, then the new towers would be totally in view from any place in the Historic Center and that simulated picture that was shared was not a true representation of the project. This would truly threaten our Historic Places.
During the open forum with Eversource it was asked a number of times how much larger the Deerfield terminal would be and how much more Electromagnetic power would be surging from this building. Neither Bill Quinlan nor any other spokesman answered any of these questions. As a Deerfield resident, that raised another red flag for me. The general spirit of not being truthful has been obvious throughout this process...starting even 4 years ago when they hosted an "open house" at the American Legion in town. There were no real answers, only glossy marketing material and "experts" who weren't even from our state.

Another issue with this project is that the jobs would be temporary and it was again not clear at the open forum where the workers would come from. It was said in later sessions they would use NH workers and that would bring them home (which IS a good thing). In the same sentence they said this would bring lots of money into restaurants and hotels...I'm confused…if the workers where coming HOME, they would not need hotels or restaurants... would they???!

Another point that was shared with at the fall 2015 forum was the potential savings for us as users of electricity. Mr. Quinlan said, when asked directly that the savings MIGHT be 3-5%, but he also said IT WAS UNDETERMINED WHETHER THERE WOULD BE ANY SAVINGS AT ALL. This is definitely not a big enough benefit for me to support the downsides of this project!
The NH Forward plan "sounds like a good idea" at first glance…but if you lift up the covers, it is just a way to "BUY" people off and hand out "rose-colored" glasses. One of the first people that has been bought off is Les Otten. He is a man of vision; he certainly had great intentions when growing the American Ski Company back in the 1990's. I was impressed with his forward thinking when I met him and worked as a ski instructor for that company. Unfortunately, though his vision for reviving the Balsams has been clouded by easy money donated by Eversource's overflowing coffers.

Burying the lines seems to be a better option; however, according to Eversource not feasible due to the cost. I do have concerns from a health standpoint on burial since I don't know if there is enough long-term knowledge of the impacts to the land and its surroundings to this amount of power being buried for years/decades...

One of the biggest reasons why I don't support Northern Pass is that this electricity is NOT going to be used by our residents. It is going to be used by southern New England (just like the EXISTING

0983-2 Continued

0983-2 cont'd

0983-3

0983-4

0983-5

0983-3
Thank you for your comment. Commentor's concerns about the Deerfield Community Church and the Deerfield Historic Center are noted. DOE is addressing potential adverse effects on resources such as Deerfield Community Church and the Deerfield Historic Center, in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations. This includes the Deerfield Community Church and the Deerfield Historic Center, 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 such as the Deerfield Community Church and the Deerfield Historic Center were identified within the APE: Sections 1.4.1, 1.4.3, 1.4.4, 1.4.6, and 1.4.7 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 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.

0983-4
Thank you for your comment. The Deerfield Substation would be expanded by approximately nine acres to accommodate the new 345 kV line (see Section 2.3.2.5 of the EIS). This would require the installation of additional terminal structures, 345 kV switches, breakers, bus work, instrument transformers, and associated protection and control devices inside the existing substation. Section 4.1.4.2 of the EIS addresses potential adverse impacts related to electric and magnetic fields but it does not cover the specific question of surging from the Deerfield substation.

0983-5
Thank you for your comment. Potential socioeconomic impacts are addressed in Section 4.1.2 of the EIS, including impacts on short-term (construction related) and long-term (operations related) employment and income in New Hampshire. The analysis does not attempt to speculate from where the estimated additional employment would be sourced.

Northeast Utilities Transmission Line that runs through NH). We are just being used by Hydro-Quebec and Eversource to help them earn more money by scarring our beautiful state. There are current concerns from Massachusetts about creating a "monopoly" -- here is an excerpt from an article by Dan Doyle ".. Efforts on Beacon Hill to put a large portion of this state's energy future in the hands of Canadian hydropower could place local energy jobs, affordable electric rates and power reliability at risk.
Gov. Charlie Baker's proposal to get more than 30 percent of the commonwealth's electricity from Canadian utilities, such as Hydro-Quebec, will undermine serious efforts on Cape Cod and across the state to create the next generation of electricity supplies right here." (https://shar.es/1YfSOK)

Our State Motto is the "Granite State" -- I fear if this project is allowed to proceed our new state motto in a few years could be the "Tower State" -- I certainly don't think that will help drive tourism, new economic growth, expansion of future families and youth to stay in this once beautiful gem.... "Live free or Die".... not "Live free and Fry" !

Thank you for your time and careful consideration of this extremely important project that WILL impact generations to come in a negative way if it is approved.

p.s. - enclosed is a more realistic view of 130 tower - the 130' flagpole is the one on rt. 4 in Chichester. As explained at the Town Hall in Deerfield there would be 135 and 140 towers in that area. The inset picture gives a good comparison of a normal telephone pole height.

Frederick L. Von Karls, Ph.D.

P.O. Box 803

Franconia, NH 03580-0803

443 -223-5454 or 603-823-5948

Dear Mr. Roth:

After meeting you at the Loon Mountain Northern Pass meeting, I had an idea that may prove crucial to a final and accurate rendition of the outcome data concerning the estimated verses the ultimate true tax benefit value to communities in New Hampshire regarding the immediate, ongoing and long term effects of Northern Pass Project.

I propose that you consider hiring an independent consultant who would gather the following data.

1. Validate the current EverSource estimates regarding the proposed total tax dollar benefit of their proposal.
2. Research the dollar impact of view and construction degradation to affected properties adjacent to the proposed construction per owner and town.
3. Assess tax revenue losses in each town along the route due to assessments that may need to be lowered on properties, as well as, the probable losses of income due to tourist avoidance of visiting impacted areas or deciding not to visit the affected or adjacent areas.

I believe that the residents of the state of New Hampshire deserve a fair and accurate cost benefit analysis that compares the EverSource estimates of tax revenue benefits

0988-1

0988-2

0988-3

0988-1
Thank you for your comment. The evaluation of economic impacts presented in Section 4.1.2 of the EIS is reliant upon data and analysis which was independently assessed by DOE and its consultants. No portion of the analysis incorporates, or is reliant upon, studies or conclusions provided by Northern Pass.

0988-2
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.

0988-3
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." Section 4.1.2 of the EIS additionally includes analysis of the impact on future assessments due to potential adverse impacts on property values.

against all possible tax and tourist revenue losses that could be incurred because of real estate devaluation and lessened tourist trade visits because of the likely degradation to scenic areas and towns both during construction and as a result of this project. This type of analysis would represent a more comprehensive and thorough assessment of critical elements of the proposed project. Furthermore, it would provide the public with a more accurate estimate of how much these contingencies would realistically impact the residents of New Hampshire on a personal, local and state level. I will be available for a further discussion of this matter, if you so desire. Please do not hesitate to reach out to me.

Thank you for your consideration in this matter.

Yours sincerely,

Frederick L. Von Karls, Ph.D.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 17, 2015

ID: 8320

Date Entered: Aug 17, 2015

Source: Website

Topics: Alternatives, Health and Safety, Recreation, Private Property/Land Use, Taxes, Tourism, Quality of Life

Name: Michelle Vaughn

Organization:

City: Thornton

State: NH

Zip: 03285

Country: US

Comment: If anyone were to simply look at the EIS study's simulated tower photos, not even knowing too much of the project, they would concede that this technology is out-dated, ridiculous and a threat on several fronts. Just by looking at these large scale above ground transmission towers one could easily conclude they would detrimentally effect private property/land abutting the ROW, tourism in the area (which is a prominent feature to the communities on the proposed route), thereby negatively affecting the tax base due to losses in property values and loss of tourists.

Why in this day and age, when newer technology is becoming smaller in size and health conscious, would we continue to use enormous, out-dated and damaging technology? Burial is not a novel new idea - it is regularly used, in some countries the default choice. Hydro-Quebec itself recommends the use of burial and proudly extolls the use of burial in their projects on the corporate website. The ability is available to bury in the state of NH, the DOE has made quite a list of alternatives proving this.

If this project is so necessary to the New England power grid then NPT, Eversourse and Hydro-Quebec can certainly bury this project. I request that the DOE finalize the EIS with the choice of either No Build or 100% burial.

0990-1

0990-2

0990-1
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." Section 4.1.2 of the EIS additionally includes analysis of the impact on future assessments due to potential adverse impacts on property values.

0990-2
Thank you for your comment. Northern Pass has applied to the Department of Energy for a Presidential permit for an HVDC transmission line that would run from Quebec, Canada to Deerfield, NH. Executive Order (EO) 10485, as amended by EO 12038, "requires that executive permission be obtained for the construction and maintenance at the borders of the United States of facilities for the exportation or importation of electric energy." DOE is authorized to "receive applications for the construction, operation, maintenance, or connection, at the borders of the United States, of facilities for the transmission of electric energy between the United States and a foreign country[,]" and "[u]pon finding the issuance of the permit to be consistent with the public interest, and, after obtaining the favorable recommendations of the Secretary of State and the Secretary of Defense thereon, to issue to the applicant, as appropriate, a permit for [the] construction, operation, maintenance, or connection." (EO 10485). DOE, however, 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.) While DOE's authority is limited to the approval or denial of the amended Presidential permit application (August 2015) as requested by the Applicant, DOE's policy is to analyze not only the proposed border crossing, but also the alignment of new infrastructure required between the proposed border crossing and connection to the existing U.S. electricity system as a

connected action. In keeping with this policy, DOE analyzed the potential environmental impacts of the alignment proposed by the Applicant. In addition, in response to input from Cooperating Agencies, other agencies, and extensive public comment, DOE analyzed a range of other alignments and underground and overhead configurations between the proposed border crossing and connection with the existing U.S. electricity system. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. 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. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis.

Hello everybody. My name is Frederick Von Karls, and I'm a resident of Sugar Hill, New Hampshire. I also work as a business consultant. I do a great deal of work for sustainability companies that are nationally known and involved in really protecting the environment as well as are involved directly in energy conservation. At the last Northern Pass meeting in Loon Mountain, I met a Mr. Peter Roth who is a attorney who is charged with representing the residents of New Hampshire in regard to issues that pertain directly to the Northern Pass project, and at that meeting, I was impressed with his openness about hiring consultants that would represent directly the residents of New Hampshire around any issues that he thought could be raised to the level of significance that would either affect directly in a positive or negative way the residents of New Hampshire. So after that meeting I wrote him this letter and I'd like to introduce it into the record here. Dear Mr. Roth, after meeting you at the Loon Mountain Northern Pass meeting, I had an idea that may prove critical to a final and accurate rendition of the outcome data concerning the estimate versus the ultimate tax benefit value to communities in northern New Hampshire regarding the immediate ongoing and long-term effects of Northern Pass projects. I propose that you consider hiring an independent consultant who would gather the following data. Number one, validate the current Eversource estimates regarding the proposed total tax dollar benefit of their project. Number 2, research the dollar impact of view and construction degradation to affected properties adjacent to the proposed construction per owner and town. 3, Assess tax revenue losses in each town along the route due to assessments that may need to be lowered on properties as well as the probable losses of income due to tourist avoidance of visiting impacted areas or deciding not to visit the impacted areas or adjacent areas. I believe that the residents of the State of New Hampshire deserve a fair and accurate cost/benefit analysis that compares the Eversource estimates of tax revenue benefits against all possible tax and tourist revenue losses that could be incurred because of the real estate devaluation and lessened tourist trade visits because of the likely degradation to scenic areas, towns, both during construction and as a continuing result of this project. This type of analysis would represent a more comprehensive and thorough assessment of the critical elements of the proposed project. Furthermore, it would provide the public with a more accurate estimate on how these contingencies would realistically impact the residents of New Hampshire on a personal, local and state level. And, essentially, that's the end of my letter. And thank you for the opportunity to speak here.

0991-1

0991-2

0991-1
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.

0991-2
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." Section 4.1.2 of the EIS additionally includes analysis of the impact on future assessments due to potential adverse impacts on property values.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 25, 2016

ID: 8814

Date Entered: Mar 25, 2016

Source: Website

Topics: Purpose and Need, Alternatives, Health and Safety, Vegetation, Wildlife, Viewshed/Scenery, Water / Wetlands, Soils

Name: David Chappell

Organization: Clarksville Freedom Trails

Title: President

Email: ldsdac@yahoo.com

Mailing Address: 32 Bressette Road

City: Clarksville

State: NH

Zip: 03592

Country: US

Comment: I had given comments at Colebrook meeting but one comment I missed that I wanted to bring up is if towers are next to someones property or if they have to look at them they are going to ask for an abatement on their taxes and if many people do this someone has to pick up the slack and will be taxed the extra. I am on a fixed income and will not be able to pay the taxes. Northern pass says they will pay the taxes on the towers but how long will it be before they ask for a reduction or exemption altogether. Most other big companies do. Thats what happened in dixville with the wind.mills. If it is a must bury it all the way in the State rite of way. Please dont torture the people that would have to look at towers for the rest of their likes say nothing about the health issues the lines can cause. Before you make a decision please stop and think would you want to look at these towers for the rest of your life after having the beauty that we have to savor and enjoy. I am one thet would have to look at them from my house. Towers disturb 110 to 150 feet of foresland as opposed to30 feet to burg it. BURRY It. Thanks for your consideration in this matter.

0993-1

0993-1
Thank you for your comment. The EIS addresses potential impacts on property taxes anticipated as a result of the Project (see Section 4.1.2 of the EIS). Future tax abatement, or related proceedings, are beyond the scope of this analysis.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Oct 4, 2015

ID: 8426

Date Entered: Oct 4, 2015

Source: Website

Topics: Taxes

Name: Brian Cloutier

Organization:

Email: clouchdude@yahoo.com

Mailing Address: 38 Grove St

City: Franklin

State: NH

Country: US

Comment: I own a home in Franklin NH and we NEED northern pass to become a reality. Because of the tax cap we have limited revenue available for schools, infrastructure, and municpal services. It is estimated that Northern Pass will generate 7-7.6 million dollars in taves for the city of Franklin. Not to mention job creation, economic growth, and decreased energy costs as a result. It is imperatibe that Northern Pass become a reality. Not only for the city of Franklin, but all of our neighboring communties, and quite frankly the entire sate of NH. Political agendas can not be allowed to intefere with this once in a generation oppotlrtunity. In closing, as beautiful.as outlr state is (and I believe it is the most scenic state in the union) we must no let a few miles of "staging in nature" become an obstacle to deny this opportunity.

0994-1

0994-1
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.

Good evening. My name is Robert Martin. M A R T I N. I'm an elected official. In addition to that, I'm the emergency coordinator for Coos County. I spoke at the meeting at the DOE EIS meeting last time and I submitted a paper which was in their database. I suggest very strongly that you take a look at that because I raised some points relative to what I consider to be potential serious issues and emissions from the towers that would affect radio communications here. On that point I'm not in agreement with the gentleman from the Northern Pass. Nor was the FCC when they fined the power transmission line in California for repeated interference with communications. Similar events took place in Texas. So it's a potential serious issue. A lot of the people here have spoken on some of the points that I wanted to raise so let me make very brief comments about a few point here. I feel Mr. Quinlan is a bit disingenuous when says he has spoken to folks up here. I know he hasn't spoken to my town, Pittsburg, and Stewartstown and he hasn't spoken to any of the towns down below, and that's unfortunate because we have a few points to make for sure. With regard to the comments about the real estate, you can't look at the real estate and do a comparative on it. It's like doing a comparative on an island in the middle of the ocean. There's nothing to compare it with. We don't have sales up here. How can you do comparisons on it. I know of at least ten pieces of property that have been on the market for years because of Northern Pass. Signs are up and nobody will buy them. They could probably dump it and lose a lot of money, but to do a comparative on property that doesn't even enter into the lists that the gentleman is using as a comparative is ridiculous. We have a serious problem with evaluation of the property to the point that you cannot sell property anywhere around this area here. People just won't buy it. So you can't say that there's no impact when you don't have a sale because people can't sell them, and that I think is an important point. I'm a little bit concerned about Northern Pass with another issue. That is a bidirectional line. Power doesn't only go down from Canada. It can go back to Canada. Somebody commented about a thousand towers in Canada. The actual number from the Canadian reports was 3101 towers. 526 or 36 structures were damaged in that ice storm. Canada was in very serious problems. They were not exporting, and to think that they don't have any serious needs of power down from Canada we could have serious impact in terms of getting it, and we may in fact be sending power back up to Canada and that would be unfortunate. The other comment is about the cheap electricity. During that storm and in other periods of time when there have been shortages in the wintertime Canada has been charging us 50, 60, 70 cents a kilowatt hour. No cheapness there. That's 3 or 4 times what we're paying, five times what we're paying here. That's not a good thing. So some of those arguments are a little bit flaky as far as I'm concerned. The other issue I'm very concerned about is this whole thing about taxes. How much money we're going to be getting from taxes. And we've got to be careful. Power companies and the gas companies with the power lines and everything else come in with the all these things about tax savings. First thing their accounting department is going to do is to apply accelerated depreciation on those assets, and they're going to drop the value significantly. This is a 40-year project. Five or ten years out in the project, we're going to have that stuff devalued to a point where it's not going to have any significant tax advantage at all, and I want to be very careful about that. I don't like the canons about how much money we're going to be saving on our taxes and all that. I think that's not reasonable to expect. MR. HONIGBERG: Mr. Martin, how much more do you have? MR. MARTIN: Well, I think if you could probably close it up if you give me a chance. I know it's getting late. I'm sorry. Thank you for listening to me and I appreciate your efforts. That's it.

0995-1

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0995-3

0995-4

0995-1
Thank you for your comment. General discussion of electromagnetic frequencies is located in Section 3.1.4.1 of the EIS, and Section 4.1.4.2 discusses EMF-related consequences arising from the proposed Project. Interference of EMF with communication infrastructure is discussed in the Public Health and Safety Technical Report. As noted in the Public Health and Safety Technical Report, "Northern Pass would develop mitigation measures during the detailed design of the HVDC system to prevent and minimize any potential interference with other utilities, such as pipelines, telephone lines, radio, TV, etc." (Section 3.2.2.2 of the Public Health and Safety Technical Report). Also, see Appendix B, "EMF Technical Report," in the Public Health and Safety Technical Report.

0995-2
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. 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.

0995-3
Thank you for your comment. Section 4.1.2 of the EIS addresses impacts of the Project on electricity expenditures within New Hampshire and across the ISO-NE region.

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 EIS has been updated in response to this comment

0995-4
Thank you for your comment. The EIS does not attempt to speculate how Northern Pass would, or would not, structure the financial and taxation obligations of the project. As is normal for an EIS analysis, property tax calculations included in Section 4.1.2 of the EIS are based on the estimated capital cost of the project (equipment, materials, labor) and are not depreciated over time due to the level of speculation which would be required.

Town of Sugar Hill
1411 ROUTE 117 • P.O. BOX 574 • SUGAR HILL, NEW HAMPSHIRE 03586
603-823-8468

Comments on Northern Pass EIS draft
Sugar Hill Conservation Committee
September 2015

We find that the EIS draft fails to address many of the concerns we raised and submitted as formal comments in the EIS Scoping process. It appears that instead of considering our comments the EIS was prepared using an industry oriented template.

Safety.

We expressed concern that a failure of above ground transmission lines under alternative 2 could cut our town in half, preventing emergency services to half the town. Such concerns are dismissed in the EIS (Appendix H) relying on industry standards and the applicant's assurances that they will ensure safety. This despite the recent history of catastrophic failures of Hydro Quebec projects in the North Country and the acknowledgement of such possible failures in 2.5.4

Property values

The average reduction of property values of 5% cited for properties viewing the transmission line in alternative 2 is not accurate for our area where view is a major factor in property value. As revealed in assessed property values, view plays a much larger role here than in the state as a whole. Thus the EIS values for economic loss due to visual degradation property are too low. In chart 4.1 Reduction of property values, a house on the edge of the right of way would suffer much more than a 5% drop in property value unless it was already on an existing power line. Cited studies probably reflect a more suburban high density housing.

Conservation Land

The Town of Sugar Hill, Conservation Organizations, and private landowners have made major investments in conservation lands in the Town. Alternative 2 would directly impact many of the conserved areas such as the Town Forest and the Cooley Jericho Community Forest. These protected lands form a significant portion of the Towns land area and contribute in a major way to the rural character and attractiveness of the Town. Above ground transmission lines especially those with towers above the tree canopy would greatly degrade the value of these lands, clearing the right of way beyond existing limits would reduce the conserved land area and affect adjacent conserved lands.

Recreation

The Draft EIS fails to account for the degradation of recreational hiking trails in the Town of Sugar Hill. Several trails would be within the viewshed of Alternative 2. The Sugar Hill Historical Society also has published a set of auto tour guides featuring the historical and scenic attractions of the many 19th century roads still accessible in the town. These would be crossed by Alternative 2 in 9 places and would be reduced in

0997-1

0997-2

0997-3

0997-4

0997-1
Thank you for your comment. Emergency response is discussed in Section 3.1.4.4 of the EIS.

0997-2
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. 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.

0997-3
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 the identified conservation lands and the conservation values they contain. Conservation lands that are not included in the Complex Systems Research Center dataset were not considered because those data were not available at the time of analysis. The Cooley-Jericho Community Forest does not appear to be included in the Complex Systems Research Center dataset and as a result was not included in the quantitative analysis. Any potential impacts to this resource would be similar to those discussed for conservation areas in the Central Section (see Section 4.3.6 of the EIS and Section 3.3 of the Land Use Technical Report). The Sugar Hill Town Forest was included in this dataset and the property is specifically identified, mapped and considered as potentially impacted conservation lands in the

Land Use Technical Report. In addition, the Sugar Hill Town Forest is mentioned in the following sections of the EIS: 3.3.1, 3.3.3, 4.4.3.2, 4.3.3.8, 4.3.3.9, 4.3.3.12. No updates have been made to the final EIS or Land Use Technical Report in response to this comment.

0997-4
Thank you for your comment. An inventory of recreation resources in the Central Section considered in this EIS is included in Section 3.2 and Appendix A of the Recreation Technical Report, and Section 3.3.3 of the EIS. Sources of trails data included in the analysis are presented in Section 2.4 of the Recreation Technical Report. Impacts to trails in the Central Section, which includes Sugar Hill, are analyzed in Section 4.3.3 of the EIS. Visual impacts in Sugar Hill are analyzed in Section 4.3.1 of the EIS. No changes have been made to the EIS in response to this comment.

value to the Town. The draft EIS does not evaluate such losses.

Tourism

Our town economy is dependent on attracting visitors and the many comments we have received from hotel owners and residents uniformly support the assertion that alternative 2 would change the basic environment of Sugar Hill from an attractive rural setting to a less attractive more industrial setting. The EIS economic impact assessment fails to adequately reflect this effect on Sugar Hill.

Wildlife viewing is a significant attraction in our area from moose watching to birding. There is no analysis of the impact on migrants or of resident species in section 3.1.11.1. Thus there is no evaluation of the economic impact of wildlife viewing on tourism.

Page 4.14. We do not consider the loss of the rock formation "Old Man of the Mountains" a relevant indicator of the importance of natural attractions to our area. It's loss, although historically important, did not reduce the basic scenic and wildlife attractions to the Sugar Hill Area as alternative 2 would do.

Effect of Magnetic fields.

The Draft EIS does not adequately address the effect of DC magnetic fields on wildlife. In section 4.1.4.2 electric and magnetic fields are calculated. The earth's magnetic field ranges from .25 to .65 mgauss. Calculated Northern Pass alternative 2 DC magnetic fields are 1000 to 100 times as strong as natural fields within the right of way and still 10 times as strong 300 feet away. So disruption of the natural magnetic field would affect a large area around the power line. Buried line calculations show much reduced fields. The EIS only considers the effect on workplace humans where people have relatively brief exposures and fails to adequately address AC vs DC effects.

Much evidence shows a wide range of animals are effected by magnetic fields. The effect of magnetic fields on wildlife is dismissed in B.2.4 without any citations except two which show that birds do use magnetic fields for orientation. We continue to assert as in our scoping comments the the EIS should consider the abundant published evidence that disruption of magnetic fields has wide ranging effects on wildlife from bacteria to birds. In our area it is likely that DC fields could disrupt many amphibians such as frogs in their movement to and from breeding areas. The Draft EIS offers no response to our well documented scoping comments.

Wildlife

The EIS only considers endangered or threatened species but resident and migrant species are also important to residents and visitors of Sugar Hill. This despite our documented scoping comments that Sugar Hill and the Franconia mountain range is an area of intense bird migration with 12 million birds moving in the area in a single night.

In section 3.3.11.3 There is a brief mention of migratory birds through our area but no mention of migratory bats although all bats in area are migratory to hibernacula. There is no consideration of the impact on migratory birds, despite the importance of magnetic cues in bird orientation and the known importance of Franconia Notch as a

0997-4 cont'd

0997-4 Continued

0997-5

0997-5

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."

0997-6

0997-6

Thank you for your comment. 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.

0997-7

Thank you for your comment. The FEIS discusses Important Bird Areas (IBAs) that have been identified and monitored by the National Audubon Society in conjunction with BirdLife International. The High Elevation Spruce-Fir IBA (also known as the White Mountains High Elevation IBA), located within the WMNF, near the Sugar Hill area and Franconia Notch State Park, and within Franconia Mountain Range, is discussed in sections 3.1.11, 3.3.11, and 3.5.11. Applicant-Proposed Impact Avoidance and Minimization Measures in Appendix H of the EIS include 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. Impacts to migratory birds and bats, including effects from magnetic fields, are also addressed throughout the Wildlife Technical Report as well as Appendix B of the Public Health and Safety Report (EMF appendix).

0997-7

migratory crossroads.

Perhaps nowhere is the bias toward the applicant more evident than in section 4.5.1.2. Above ground towers and lines would not meet the WMNF guidelines for visual impacts and the WMNF would have to rewrite their rules if the project were done. For example on page F-21 where after stating that the Forest Service guidelines ".....active raptor nest areas must be protected." is revised to "Project corridor would be surveyed by helicopter before construction .... and...raptor nests in or near the transmission route [removed]. Thus when the Northern Pass proposal conflicts with local values the local values must change.

Relevance to revised Northern Pass 2015 proposal.

The revised Northern Pass Proposal would not include above ground transmission lines in the Town of Sugar Hill. However, the above ground sections of the transmission line proposed in the areas just north of us and in Coos County would affect the Town by reducing the attraction of the entire area to visitors, businesses, and second home buyers. At present the area of northern New Hampshire is a connected landscape in which each natural area enhances the value of its neighbors and the whole. The above ground, off transportation corridor sections of the proposed Northern Pass project would reduce this important resource. Burial of the entire line along transportation corridors would be a significant improvement over any of the routes yet proposed by the applicant.

Sugar Hill Conservation Commission

Kathie Galligan

Chair

0997-7 cont'd

0997-7 Continued

0997-8

0997-8

Thank you for your comment. Appendix H (Applicant-Proposed Impact Avoidance and Minimization Measures) of the EIS states, "The project corridor will be resurveyed by helicopter for raptor nests prior to construction to identify any new raptor nests in or near the transmission corridor, so that these may be removed or replaced (under permits) prior to the nesting season, or avoided as necessary." As further stated in Section 1.5.1.3, Bald and Golden Eagle Protection Act (BGEPA), of the Wildlife Technical Report, Northern Pass would obtain "take" permits as required under BGEPA before removing or replacing said nests and would need to consult with the Us Forest Service and White Mountain National Forest to be consistent with their standards and guidelines.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Nov 5, 2015

ID: 8469

Date Entered: Nov 5, 2015

Source: Website

Topics: Economic

Name: Orzeck

Organization: The Balsams

Country: US

Comment: According to the SEC rules: “The project will not unduly interfere with the orderly development of the region”.

Considering the North Country is doing their best to transform The Balsams into a “world-class” resort, Northern Pass’s preferred route will cross RT26 on either side of the resort. This will be the “gateway” that guests will see as they enter this scenic and historical area.

IF Northern Pass is approved, please make Proposal 4a (with the recent WMNF changes) a requirement for certification and avoid hamstringing the northern NH economy boost that the Balsams can provide.

Mark Orzeck
Westport, MA and Stark, NH

0998-1

0998-1
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. Section 4.1.2 of the EIS includes an analysis of potential socioeconomic impacts resulting from the Project.

Lamprey Rivers
Advisory Committee
c/o 203 Wadleigh Falls Road
Lee, NH 03861
www.lampreyriver.org

Protecting the rivers that connect our fourteen communities

Barrington, Brentwood, Candia, Deerfield, Durham, Epping, Exeter, Fremont, Lee, Newfields, Newmarket, Northwood, Nottingham, Raymond

Mr. Martin Honigberg, Chairman
New Hampshire Site Evaluation Committee
29 Hazen Drive
Concord, NH 03301
February 8, 2016

RE: NORTHERN PASS PROJECT, PITTSBURG, NH TO LONDONDERRY, NH

Dear Mr. Honigberg:

The Lamprey River Advisory Committee, one of the 21 Local River Management Advisory Committees established under RSA 483, recently completed reviews of State of NH permit applications associated with the Northern Pass, a proposed new energy transmission line designated to bring hydroelectric power from Canada to southern New England. Our technical comments were significant. They were submitted to the appropriate bureaus within the Department of Environmental Services in November 2015; however, we wish to forward some additional comments about the overall impacts of this proposed transmission line for consideration by your Site Evaluation Committee.

The new transmission line would enter the Lamprey River watershed in an existing right-of-way corridor located across the central part of Deerfield, beginning at the Allenstown town line and terminating at the Deerfield Substation on Cate Road. From there, power would be sent by way of an existing transmission line, south through Deerfield and Candia before connecting beyond our watershed at the Scobie Pond substation in Londonderry. Modifications to a number of towers on that line are anticipated to accommodate the increased use of the power lines. These transmission corridors were constructed in the mid-twentieth century when New Hampshire was a much different place from what it is today. Most of New Hampshire's population was centered in urban areas such as Manchester and Portsmouth. The towns of Deerfield and Candia were very rural, with populations of fewer than 1000 persons each. The principal land uses were logging and farming. With those conditions, there was little objection to the above ground transmission lines that were built at that time.

Today, the same towns have populations of around 4000 each and the population of the area is growing annually. While logging and farming are still practiced, a greater local economy has developed around commuter and retirement residential lifestyles. There is also a tourism and recreational sector of the economy that provides considerable income to some, particularly in the summer. **The local economy is dependent on the quality of the environment that we enjoy here. We cannot allow any land uses that detract from that environment.**

At Pawtuckaway State Park, there are a number of good hiking trails, some of which are within view of the transmission corridors being planned for the Northern Pass. Three access roads to the park, Nottingham Road, Mountain Road and Tower Road, are crossed by this transmission corridor. The Lamprey and North Branch rivers, both Designated Rivers under RSA 483, are used regularly for canoeing/kayaking and fishing. The Northern Pass corridor crosses or directly abuts these rivers at four locations. The town center of Deerfield bears visible witness to its historic past. It is narrowly missed by the transmission corridor. The Upper Lamprey River Scenic and Cultural Byway, recently designated by NHDOT, passes through the corridor at the edge of the town center. **The visibility of the existing or proposed power lines from these public locations severely detracts from our local economy.**

It is remarkable to compare the proposed construction quality of the Northern Pass with other large impact projects built in New Hampshire in recent times. Highway projects, such as the reconstruction of the Spaulding Turnpike in Newington/Dover and the widening of Interstate 93 include provisions to minimize their impacts on abutters. Common mitigation strategies include, but are not limited to, landscaping and construction of sound walls. The transformation of Pease Air Force Base from a military installation to a business park included access point landscaping as well as the establishment of the very significant Great Bay National Wildlife Refuge. The construction of the Manchester Airport involved landscaping of all public areas and the relocation of over eighty households to neighborhoods not adversely affected by noise. The Mall at Rockingham Park in Salem, NH was heavily landscaped and millions of dollars were invested to mitigate traffic impacts on local roads and streets. All this; yet we allow the power companies to apply the out-dated, least-cost approach to construction of new facilities without the slightest effort to mitigate their adverse impacts. **We support the SPNHF position that the entire Northern Pass should be buried for the economic good of our region.**

If there is any reason that portions of the project within our watershed cannot be buried, we request you require the following mitigation actions by the power company:

1. Perform an independent engineering review of the proposed height of towers and require that the approved height be no taller than necessary for the current proposal.
2. Reject the proposed use of lattice-type, galvanized steel towers. Require that all new towers be monopole construction and that they be painted a visually neutral color, similar to the towers over I-95 in Portsmouth.

1000-1

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."

1000-2

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. An independent engineering review of tower heights is more appropriately addressed as part of the New Hampshire Site Evaluation Committee process. The Project has been analyzed in the EIS according to the design specifications of the Applicant, including structure types. Several measures described in Appendix H of the EIS relate to revegetation of disturbed areas. These measures include various requirements to revegetate disturbed areas promptly with seed mixes from sources as close as possible to the Project corridor and subject to federal or state agency approval. Appendix H of the EIS references general practices for reducing visual impacts, which could include plantings at road crossings. Limiting access to the corridor would be the choice of the underlying property owner and is outside the authority of DOE and USFS. These measures could change or be amended if the New Hampshire SEC requests or directs that additional or different measures be adopted. In particular, this analysis assumes that the Applicant will adhere to all stipulations defined in all permits issued by the State of New Hampshire, including those defined by the New Hampshire Department of Environmental Services in their March 2017 approval recommendation to the SEC (NHDES 2017a). Finally, when the detailed design phase of the Project is completed, the Applicant may conclude that additional or different (but no less protective) measures are appropriate. 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.).

1000-2
Continued

3. Require that all areas disturbed within the transmission corridors, whether by construction or by prior unauthorized entry, be restored with appropriate vegetation at the close of construction.
4. Require that vegetative view screens be constructed at all public road crossings, river intercepts, and adjacent to residential land uses.
5. Require that locked gates be installed at all public road crossings to prevent future secondary impacts to the environment within the corridor.

We thank you for consideration of our proposals and encourage you to act in the best interests of the residents and visitors of the Lamprey River watershed.

Very truly yours,

representatives of the Lamprey Rivers Advisory Committee

Pat deBeer, Fremont
Joseph Foley, Epping
Cynthia Kelsey, Deerfield
Anne Lightbody, Durham
Richard Lord, Durham
Carolyn Matthews, Raymond
Deborah McNelly, Raymond
Sharon Meeker, Lee
Todd Piskovitz, Exeter
Preston Samuel, Lee
Emily Schmalzer, Brentwood

CC: Mr. Brian Mills, Senior Planning Advisor, U.S. Department of Energy
Ms. Jane Difley, President, SPNHF
Ms. Tracie Sales, NHDES Watershed Planner
Ms. Kate Hartnett, Acting Chair, Deerfield Conservation Commission

Karen J J Spencer

161 Sullivan Road, Stark, NH 03582-6451
603-449-2337
kkspencerbwi161@gmail.com

3/17/2016

President Obama
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear President Obama:

This letter is in response to the Northern Pass Proposed Route. I have written letters and emails to the NHSC, the DOE, the DEIS, the NHPR and Burns Involvement Specialist, of Burns & McDonnell, regarding the impact of the Northern Pass Project and its' negative effect on us.

Stark, New Hampshire is our home base. We also own 26 acres of land that has the electric lines easement running along the northern property lines, along with 72 acres which is across the road, which borders along the Upper Ammonoosuc River. Route 110 travels through the landscape of Stark. These electric lines today are low enough to not be seen while driving on Route 110, for the lines are below the tree landscape. With the Northern Pass Project, these lines will be seen all through the Town of Stark's landscape. Both of these parcels of land are being developed into recreational areas, for Lodging, RV's, Snowmobiling and Tenting. This Northern Pass Project, if allowed to start will not only effect the View Shed and Scenery, of this private property and land use, it will also have an impact on recreation, historic, cultural issues, and most important tourism. Now, both these parcels have the views of Percy Peaks and Long Mountain, this beautiful landscape will be scared with the new height of these transmission towers. If this Northern Pass Project is allowed to start.

On February 19, 2016, a hiring was held with the PUC (Public Utilities Commission) in Concord, NH. This hiring was the start of the fight, for PSNH (Public Utilities of New Hampshire), (now known as Eversource Energy), which was given the above mentioned easement, to the present owner of the 25 acres in May of 1946, is going to LEASE this easement to the Norther Pass Transmission, LLC. Our legal argument is that PSNH (Eversource) does not own this land easement, we the property owners own this land, which the easement crosses. PSNH (Evesource) has filed papers requesting the Commission to dismiss our motion and order such further relief as may be just and equitable.

On March 11, 2016, a Public Information Session was attended in Whitefield, NH. This was just one of many being held in the State of New Hampshire. These public sessions are to open up discussions from residents, land owners, business owners, State Representatives to the Project representatives, on the updates on the latest developments with the Northern Pass Project. Over and over again, during these sessions, you see and hear of the negative impact this NPP (Northern Pass Project) will have on the whole State of New Hampshire. The power line that will be replacing the existing power lines, will then be over the tree line, and not just one tower but another steel tower, this steel tower will be seen along the whole Coos County landscape.

1001-1

1001-2

1001-1
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."

1001-2
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-ways and 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. If the Project route were to change due to inability of the Applicant to obtain property rights/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.

You are probably wondering why I have reached out to you, Mr. President, but I have followed your decisions to stop the KeyStone LX Pipeline Project, that was to go down the middle of our great country. This is another project that is coming from our Northern neighbors in Canada. Hydro Quebec along with PSNH (Eversource) is behind this power take over. I understand that before this project can even cross the boarders of Canada and United States, that a Presidential Permit must be granted from the DOE (Department of Energy) in Washington, DC.

Is there anyone that can shine a light on our rights to stop, legally, this Northern Pass Project?

Yours truly,

Karen J J Spencer

CC: Society for the Protection of New Hampshire Forests
Office of Electricity Delivery and Energy, Washington, DC
Public Utilities Commission
New Hampshire Site Evaluation Committee
Attorney Arthur B Cunningham

From: widhu@myfairpoint.net
Sent: Thursday, December 10, 2015 3:00 PM
To: draftEIScomments@northernpasseis.us
Subject: opposition to the proposed route

I moved to New Hampshire because of its large tracts of forests, ponds, streams and mountains giving me many opportunities for outdoor recreation in areas which remain in an undeveloped natural state. I am an avid hiker, especially on properties managed by the Society for the Protection of NH Forests, some of which would be adversely affected by overhead transmission lines in the currently proposed Northern Pass Proposed Route (NPPR).

I am strongly opposed to the NPPR in northern Hew Hampshire, which area is uniquely valuable for its scenic beauty and relative freedom from commercial development.

As I look at the map of the NPPR I see that an existing 2000 MW HVDC transmission line goes through part of Vermont and then closely parallels the NPPR in New Hampshire. Why can't this route be used?

Richard Widhu
Nashua NH

1009-1

1009-1
Thank you for your comment. Impacts to the recreation experience are analyzed in Sections 4.1.3, 4.2.3, 4.3.3, 4.4.3, and 4.5.3 of the EIS. A range of alternatives including different alignments and configurations of overhead and underground transmission are analyzed in the EIS, with a range of potential impacts to recreation.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Mar 12, 2016

ID: 8736

Date Entered: Mar 12, 2016

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, Economic, Tourism, Quality of Life, Cumulative Effects, Noise, Forest Service Lands, Design Criteria / Mitigation Measures, Environmental Justice

Organization: NA

Comment: As a thirty year resident of NH, I am against this proposal on so many levels. In order of your topics above:
1. The state of NH does not need this power, therefore there it is criminal to mar the beauty we have for something that is of no use to us.
2. Investment in alternative energy will suffer if people think this will provide the answer to their power needs.
3. Research has shown that electrical fields under these power lines are not healthy.
4. Putting the power lines through unbuilt upon land harms vegetation, wetlands, wildlife, soils and views. I have driven from Michigan to Niagra Falls through Canada, and from NH to Ottawa. The huge power lines that cover Canada's landscapes are ugly and sprawling.
5. I hike a lot in the White Mtns. and throughout NH. Many other people use the states outdoors for recreation and these power lines would spoil that.
6. Erecting these towers will put many people's private property worth in serious jeopardy. We don't live in the woods and remote areas because we can't live in cities, we live in woods and remote areas because we choose to. Those towers would make property worthless.
7. Any taxes EverSource and HydroQuebec would pay wouldn't even be close to being enough. There is no amount that would pay for the spoilage of our beautiful state.
8. We are a rural state of great beauty that has historically built its culture on the outdoors - we sugar, ski, hunt, snowmobile, farm, hike, etc. Many towns carefully maintain their hundreds year old architecture and character. Those towers and wires go strictly counter to all of that.
9. Why should we have this ugliness forced down our throat so that yet another corporation can get rich at our expense?
10. If those towers are built we will be saying, what tourism?
11. Our very quality of life is at stake. Our sense of peace, serenity, beauty will all be gone.
12. If this project is allowed, we are allowing big corporations to make a profit at a huge expense to all of us who live here and love it here. We may as well put out the welcome mat to all to come scar the rest of the state.
13. Walking under power lines is creepy - they hum.
14. If the project must be done, BURY THE ENTIRE LINE under existing highways (Rtes 3 and 93). HydroQuebec has done or is doing this in NY, VT and ME (I believe). Why should we not require the

1010-1

1010-2

1010-3

1010-4

1010-5

1010-1
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.

1010-2
Thank you for your comment. The EIS analyzes the potential impacts of the Project to vegetation (Section 4.1.12), water resources (Section 4.1.13), wildlife (Section 4.1.11), soils (Section 4.1.14), and visual resources (Section 4.1.1).

1010-3
Thank you for your comment. Impacts to the recreation experience are analyzed in Sections 4.1.3, 4.2.3, 4.3.3, 4.4.3, and 4.5.3 of the EIS. A range of alternatives including different alignments and configurations of overhead and underground transmission are analyzed in the EIS, with a range of potential impacts to recreation.

1010-4
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.

1010-5
Thank you for your comment. The EIS analyzes several full-burial alternatives in detail (Alternatives 3, 4a, 4b, and 4c). All action alternatives analyzed in the EIS include at least one section of burial in roadway corridors. The regulatory framework governing utilities in roadway corridors is discussed in the Land Use Technical Report and the EIS, see Section 3.1.6.4. The potential environmental impacts of all twelve alternatives, as well as technical constraints and costs, are discussed throughout the EIS.

same?
14. This project, as proposed, is environmentally unjust. Overhead power lines is yesterday's technology and we should not allow them here. Other more environmentally friendly energy sources should be pursued and developed in our state (solar, wind).

1010-6

1010-6
Thank you for your comment. The EIS analyzes in detail the No Action Alternative and eleven action alternatives. Additionally, seventeen alternatives were considered but eliminated from detailed analysis. Section 2.4 of the final EIS has been updated with additional information on alternatives considered but eliminated from detailed analysis. A power generation alternative was considered but was eliminated from detailed analysis in the EIS because it is not a reasonable alternative. Section 2.4.8 of the final EIS has been updated with additional information about this alternative. Section 1.4 of the final EIS has been updated to include new information on market trends and energy use, including demand-side management and energy efficiency, since the draft EIS was published in 2015.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 10, 2015

ID: 8269

Date Entered: Aug 10, 2015

Source: Website

Topics: Alternatives

Name: Julie Moran

Organization:

Email: jmconnect777@gmail.com

Mailing Address: PO Box 447

City: Colebrook

State: NH

Zip: 03576

Country: US

Comment: The first and foremost alternative for this merchant powerline is the NO BUILD option. This option is the best for NH because it will stop all the current and future fighting, legal wrangling, extremely costly expense for towns, residents, and even for the utilities who are ramrodding it down NH residents throat. To allow this project to cross into NH will be a huge mistake and the legacy of all those who contribute to approval of any other alternatives. In fact, all those who refuse to allow this travesty into NH will be regarded as heroes by future generations who will enjoy the awesome landscape and its benefits.

However, if there is any alternative worth looking at, the only one that is acceptable is the complete burial of the line, crossing the US border at a highway, and follow NH and US highways or other Rights of Way that are not being used for recreational uses, (such as the train trail in Colebrook and Stewartstown). Allowing this completely buried line to be along highways will certainly inconvenience all the residents who use these roads, especially during construction or repair, but this will be the safest and least disruptive of the alternatives (beside NO BUILD).

Something that should be considered when siting the line along ROW's is the possibility that the line might melt snow if not buried deep enough. On the one hand, that might be a nice thing, but if it doesn't fully melt the snow, it could turn it to ice, which would be very dangerous, and a major liability for the utility and the town where it is located. It would also be bad to site it on a snowmobile trail like

1014-1

1014-1
Thank you for your comment. Buried transmission lines do not emit thermal energy sufficient to reach the ground surface and are not anticipate to melt snow or promote ice formation on the ground surface. Such potential impacts are not discussed in the EIS.

the railtrail in Colebrook.

Any alternative route that goes through the White Mountain National Forest should be completely rejected unless it is along the highway in a median strip. The White Mountain trails, especially those in Franconia Notch, are PACKED with hikers EVERY weekend... Please drive there any Saturday around noon-5 pm, and you will see the vast overflow parking of all the hikers that are seeking the peaks - and are looking for an experience devoid of powerlines, gaslines, pipelines, and any other lines. Again, the best alternative for NH's economy, long term viability, and value, is NO BUILD.

1014-2

1014-2
Thank you for your comment. Impacts to the recreation experience in the WMNF are analyzed in Section 4.5.3 of the EIS. Visual impacts within the WMNF are analyzed in Section 4.5.1 of the EIS. The EIS analyzes several alternatives in detail that include underground cable within the WMNF (Alternatives 3, 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b and 7).

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 28, 2015

ID: 8357

Date Entered: Aug 28, 2015

Source: Website

Topics:

Name: Richard Findsen

Organization:

Email: rfindsen@gmail.com

Mailing Address: 79 Cloutier Drive

City: Stark

State: NH

Country: US

Comment: For the record, I am not against the building of Northern Pass. If built correctly, it would be good for New Hampshire and for its residents. When I say, "Built Correctly", I mean if the ENTIRE project is placed underground, it will be beneficial, but ONLY if it is COMPLETELY built underground. If not, it will scare the beautiful landscape of New Hampshire for EVER and will be absolutely devastating to TOURISM and RECREATION, for who wants to hike, mountain bike, walk, ride ATV's, ride Snow Machines or ski anywhere near 85 to 110 foot towers runnng for over 135 miles or more that will ruin the beautiful scenic views and landscape of this beautiful state. The cost of completely burying this project will undoubtedly be quite a bit more, but New Hampshire is TOTALLY WORTH IT! Again, I am not against this project, but I am against trying to do it the cheapest way. Please, please, I beg the DOE to mandate to the builders of this project, that even though it is a very good project that it be built RIGHT the first time. Other states have done similar projects and those lines were completely placed underground. Thank you for taking my comments and I hope the end result will be to allow the project be built CORRECTLY UNDERGROUND!

1017-1

1017-1
Thank you for your comment. Impacts to the recreation experience are analyzed in Sections 4.1.3, 4.2.3, 4.3.3, 4.4.3, and 4.5.3 of the EIS. A range of alternatives including different alignments and configurations of overhead and underground transmission are analyzed in the EIS, with a range of potential impacts to recreation.

My name again is Bruce Brekke. I'm from Whitefield. Just a brief comment. There is an entity called the Coos Trail that is relatively new that is a hiking trail that runs from Crawford Notch, it's about 160 miles, that goes from Crawford Notch north through Coos County to the border of Canada. This is still relatively new, like I said, and it's somewhat under development. We're still building shelters and relocating the trails to better properties that as we get permission, and it's expected to attract and it's geared for anyone, especially tourists, who seek remote adventures to try to alleviate folks who hike a lot and are looking for an alternative to the White Mountains and trails in this area. The Northern Pass Transmission will crisscross the trail from Nash Stream area, Christine Lake, Percy Peaks, Dixville Notch, and seriously impact the attractiveness to Coos County and any tourism that this trail would attract. Anyone who hikes through wilderness will certainly not want to hike through wilderness with power lines. Thank you.

1020-1

1020-1
Thank you for your comment. The final EIS, Recreation Technical Report, and Visual Impact Assessment Technical Report have been updated to include analysis of the Cohos Trail. Short-term impacts could result from Alternatives 2, 3, 5a, 5b, 5c, and 7 north of Lovering Mountain where the Project would be underground along the trail for 1.8 miles. Additionally, under Alternatives 2, 5a, 5b, 5c, and 7 the Project would cross the Cohos Trail three times as an overhead line, and the trail could be impacted indirectly by visibility of the Project. A Key Observation Point (KOP) has been added to the final EIS and Visual Impact Assessment Technical Report in Stark at the location where the Project would cross the Cohos Trail (KOP ST-4). See Section 4.2.1 and Appendix E of the final EIS. See Section 4.2.3 of the final EIS for a brief discussion of recreation impacts to this resource; additional information has been added to the Recreation Technical Report.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Jul 24, 2015

ID: 8210

Date Entered: Jul 24, 2015

Source: Website

Topics: Purpose and Need, Wildlife, Viewshed/Scenery, Recreation, Economic, Tourism, Quality of Life, Cumulative Effects, Forest Service Lands

Organization:

Comment: Please consider this another in the long line of "No" to the Northern Pass project. My main objections are as follows:
1. Scenery. Tourism in the Northern part of the state is based heavily on the natural beauty of the forests. With so many other options for power, I will not accept the "path of least resistance".
2. ATV and Hunting use. As an avid ATV enthusiast and hunter, I know the facts regarding both recreational activities around power lines - and both are "No Trespassing". Essentially what we are doing here is taking away hundreds of acres otherwise available for both activities.
3. Wildlife - Speaking of wildlife. The argument "for" Northern Pass regarding wildlife has been that this will provide foraging areas and safe travel routes. I will make it short and sweet - NO wildlife expert will tell you that man-made steel towers cutting through a forest is better for wild animals than forests left naturally occurring.
4. NH power customers - It has been stated that Northern Pass "may" reduce the electric bills for NH consumers. I come from a long history of financial strategy and planning and there is no way Northern Pass doesn't know EXACTLY how much this project will cost them - and exactly the impact, financially, on their consumers in New Hampshire. If they claim they don't, why are we letting such an irresponsible (financially) company tear through our state? If they DO know, why are they not honest and transparent rather than claiming "maybe"?
Anyone with an ounce of common sense knows that my arguments stand on good merit and based in fact backed by science, history and study.

1022-1

1022-2

1022-3

1022-1
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.

1022-2
Thank you for your comment. Impacts to motorized and non-motorized uses are analyzed in the Recreation Technical Report. Access to the transmission corridor would be determined by the underlying landowner; for many portions of the transmission corridor, the right to build and operate the Project would be authorized through an easement with individual landowners. Therefore, the Applicant would not have a legal role in determining access to large segments of the corridor.

1022-3
Thank you for your comment. Impacts to forested land in the Northern Section are described in the EIS in Section 4.2.12 (Vegetation) and in the Vegetation Resources Technical Report in Section 3.1.2.1 (Impacts from Construction, Northern Section). Additionally, general impacts to wildlife from temporary or permanent changes to habitat caused by the project are discussed throughout Section 4.1.11.1 (Impacts from Construction, Terrestrial Species), of the EIS and Section 3.1.1.2.1 (Impacts from Construction, Terrestrial Species) of the Wildlife Technical Report.

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

1029-1

1029-2

1029-1
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.

1029-2
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.

My name is Bill Felling. I'm here tonight to urge you to look very closely at the entire path of construction that Hydro-Quebec and its partner Eversource plan to wreak on our state, the great state of New Hampshire. New Hampshire is famous for mountains, forests and natural beauty. Over the years its citizens have been careful stewards of land across the state to ensure a quality of life unparalleled now and for future generations. Whole swaths of forests have been preserved from development through easements, pastures are protected, entire mountain ranges cover the 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 cannot win anything. I'm here to speak for the members of 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, members of the Percy Summer Club worked with the state of New Hampshire and the Forest Society to ensure that the water and viewshed of Christine Lake would be permanently protected, preserving the unique area for feature generations. Easements on Percy's Summer Club land combined with state management of the Nash Stream tract and longtime club member John Kauffmann's donation of the nearly 2000-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 feet in height, using the existing PSNH right-of-way which runs along the ridge on the entire southern shore of the lake. Unlike the current towers in the right-of-way, 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 right-of-way runs directly through the Kauffmann Forest making a mockery of John's lifelong efforts to secure the viewshed. When the right-of-way was originally granted to Public Service New Hampshire, there was in fact a public service involved, the need to provide reliable electricity to the residents of Coos County. While no one is busy taking 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 exists to bury this new and intrusive power line. They are, after all, proposing to do exactly that in 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 our 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 the 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 to New Hampshire. 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. Deny this application. Thank you.

1030-1

1030-1
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 final EIS analyze potential construction and operational impacts to the identified 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. These impacts are discussed in Section 4.2.6 of the EIS. Visual impacts to this area are discussed in Section 4.2.1 of the EIS. Recreation impacts to this area are discussed in Section 4.2.3 of the EIS. Two simulation viewpoints were prepared within the Nash Stream Forest; see KOP ST-3 and KOP ST-4 in Appendix E.

From: William Sprecher <william.sprecher@gmail.com>
Sent: Monday, August 03, 2015 11:17 AM
To: draftEIScomments@northernpasseis.us
Subject: Northern Pass Draft EIS Comments

I approve of the current DOE draft report and we MUST bury the new electrical lines. Hiking in the areas effected by the Northern Pass is one of my favorite pass times and will be damaged or destroyed visually if they are not buried. 1031-1

Thank you,

Will

--
William Sprecher

1031-1
Thank you for your comment. Impacts to the recreation experience are analyzed in Sections 4.1.3, 4.2.3, 4.3.3, 4.4.3, and 4.5.3 of the EIS. A range of alternatives including different alignments and configurations of overhead and underground transmission are analyzed in the EIS, with a range of potential impacts to recreation.

From: Chad Pepau <chad.pepau@gmail.com>
Sent: Monday, September 21, 2015 9:15 PM
To: draftEIScomments@northernpasseis.us; Section106comments@northernpasseis.us
Subject: The Cohos Trail Association and Northern Pass
Attachments: Northern Pass EIS - opposition letter1.doc

To Whom it May Concern,

Attached, please find a document expressing concern of the draft EIS regarding the Northern Pass Transmission Project in New Hampshire.

Regards,

Chad E. Pepau, President
The Cohos Trail Association
P.O. Box 332
W. Stewartstown, NH 03597
603-331-5396
cohos@cohostrail.org
www.cohostrail.org

THE COHOS TRAIL

A 165-MILE TRAIL THROUGH RUGGED COOS COUNTY NH

The Cohos Trail Association P.O. Box 332 West Stewartstown, NH 03597
Voice: 603-331-5396 Web: www.cohostrail.org E-mail: cohos@cohostrail.org

September 21, 2015

Brian Mills
NEPA Document Manager
Office of Electricity Delivery & Energy Reliability,
OE-20 - U.S. Dept. of Energy
1000 Independence Ave.
SW, Washington D.C. 20585

Dear Mr. Mills,

After careful review of the draft Environmental Impact Statement for the Northern Pass Transmission Project, The Cohos Trail Association finds it deficient in its failure to focus on environmental and aesthetic impacts on New Hampshire's Cohos Trail. The Cohos Trail is a relatively new and important hiking trail in N.H. that runs some 165 miles (south to north) from U.S. Route 302 in Crawford Notch to the U.S./Canada border in Pittsburg. At the Pittsburg port of entry the Cohos Trail meets its neighboring trail system, Sentiers Frontaliers, making it an international hiking trail.

There are no visual simulations in the EIS of the multiple above-ground transmission line crossings of this trail proposed by Northern Pass. The visual impact and visual simulations of these crossings in Stewartstown and Stark need to be provided in the final EIS in a far more robust documentation of the environmental impact that the project will have on this important hiking trail.

The U.S. Dept. of Energy draft EIS states in its 'Recreation' section: "Construction and operation of an overhead transmission line (including periodic vegetation management) would result in long-term visual impacts. These impacts detract from the experience of users by affecting their sense of primitiveness and remoteness. There would be no long-term visual impacts resulting from underground cable." Therefore, The Cohos Trail Association's Board of Directors asks for the EIS to address and document the impact of the hydro-transmission line/towers and corridor, on the Cohos Trail. The Cohos Trail Association also wishes to go on record as opposing the Northern Pass project.

Respectfully submitted,

Chad E. Pepau

Chad E. Pepau, President

1032-1

1032-1
Thank you for your comment. The final EIS, Recreation Technical Report, and Visual Impact Assessment Technical Report have been updated to include analysis of the Cohos Trail. Short-term impacts could result from Alternatives 2, 3, 5a, 5b, 5c, and 7 north of Lovering Mountain where the Project would be underground along the trail for 1.8 miles. Additionally, under Alternatives 2, 5a, 5b, 5c, and 7 the Project would cross the Cohos Trail three times as an overhead line, and the trail could be impacted indirectly by visibility of the Project. A Key Observation Point (KOP) has been added to the final EIS and Visual Impact Assessment Technical Report in Stark at the location where the Project would cross the Cohos Trail (KOP ST-4). See Section 4.2.1 and Appendix E of the final EIS. See Section 4.2.3 of the final EIS for a brief discussion of recreation impacts to this resource; additional information has been added to the Recreation Technical Report.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Oct 13, 2015

ID: 8432

Date Entered: Oct 13, 2015

Source: Website

Topics: Recreation, Tourism

Name: Eliza Hazen

Organization: Appalachian Mountain Club member, employee

Title: Hut Crew

Email: eliza.hazen@umontana.edu

Mailing Address: 1420 Jackson Street

City: Missoula

State: MT

Zip: 59802

Country: US

Comment: I urge the agency as well as the applicant to consider the alternatives- specifically alternative 1 as well as all others that include underground wires. The White Mountain National Forest and surrounding mountains and trails are far from pristine however they are precious. They are uniquely located in an accessible position to much of the New England and Quebec population. This is a trans-international boundary recreational resource that needs to be respected. Power lines dangling overhead of the thousands of hikers that use this area every year would significantly reduce the enjoyment of the area. Consider the summit of South Kinsman, 7 miles from the road, you hear nothing. Nothing but the protected lands around you. There is also a view of Franconia Ridge offered, which was just rated one of the top 20 hikes in the world by National Geographic. Power lines overhead would dilute this experience. As Section 102 of the National Environmental Policy Act describes "unquantified environmental amenities and values may be given appropriate consideration in decision making". The view afforded atop any of the mountains in the White Mountain National Forest is an environmental amenity that must be considered. This is where families connect away from the busy worlds of work, school and superficial technology. This is where families say goodbye to loved ones lost who cherished the Whites and chose this as the final resting place for their memories. This is where children find their hiking legs and become to next generation of employees, skiers, hikers and stewards of the White Mountains. While New England does need uninterrupted

1034-1

1034-2

1034-1
Thank you for your comment. Impacts to recreation, including visual impacts, in the WMNF are analyzed in Section 4.5.3 of the EIS.

1034-2
Thank you for your comment. Impacts to South Kinsman and the Kinsman Ridge Trail are analyzed in the Recreation Technical Report and the EIS (see Sections 3.3.3 and 3.5.3 of the EIS). A Key Observation Point (KOP) visual simulation was also created to portray the vista located near the top of South Kinsman Mountain on the ANST looking down into the Bog Pond area (Viewpoint LI-5c in Appendix E).

power, consider providing this power with out interrupting the views and experiences of my childhood, the memories of my young adulthood and the future of my own children.

This area draws thousands for overnight trips. This provides vital funds to protect, as well as employ, the area's residents. Over head power lines could deplete the number of tourists visiting the area negatively affecting the northern New Hampshire intensely seasonal economy.

Section 101 of the National Environmental Policy Act describes that the policy of the Federal government is "to create and maintain conditions under which man and nature can exist in productive harmony". This is lofty- but now is the time to act.

Consider the alternatives is the DEIS for the Northern Pass- consider that overhead power lines will detract from the White Mountain National Forest . Consider there are other options to maintain this productive harmony.

1034-3

1034-3
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.

Northern Pass EIS Website Comment Receipt

Refers to Comment placed on Aug 31, 2015

ID: 8361

Date Entered: Aug 31, 2015

Source: Website

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

Organization:

Comment: The draft EIS is deficient in its failure to focus on environmental concerns concerning New Hampshire and Vermont waterways and systems as well as its impact on the Cohos Trail.

For instance, there is no serious discussion of the impact the Northern Pass project will have on the viewshed from the Connecticut River and its tributary, Halls Stream in Pittsburg, NH. This is the entry point of the project from Canada into NH just a few hundred yards north of the Vermont border. Approximately 20 lattice transmission towers averaging 90 feet high with some over 100 feet high are planned to be erected across the Halls Stream wetlands and then into an upland area that stands high above the Connecticut River. In many cases these towers will be visible from the Connecticut River and various points in the towns of Canaan, Vermont (including Beecher Falls), Stewartstown, New Hampshire, Clarksville, New Hampshire and Pittsburg, New Hampshire. This section of the Connecticut River is known to fishermen as the "trophy stretch" and is well known to canoe and kayak enthusiasts as the Connecticut River Paddlers Trail. There is absolutely no discussion of the environmental impact that this will have on the cultural and scenic landscapes on the Vemont side of the Connecticut River; and the discussion of the visual impacts on the New Hampshire side is superficial and unenlightening. Certainly, visual simulations of this impact should have been included, but were not. It is therefore requested that the final EIS include visual simulations from several locations focusing on the impact that these first 20 planned transmission towers and cables would have on this very important scenic river and related scenic and cultural byways in Vermont and New Hampshire as the proposed transmission line runs from the Canadian border to the Connecticut River. 1037-1

In addition, Northern Pass's latest plans show that it plans to build a transition station in Pittsburg on the northwest side of the Connecticut River in what appears to be a large wetland area that drains into the river. This transition station was originally located in a non-wetlands area. The DOE environmental consultants should, at a minimum, investigate and report on the impact of this change and the many others now proposed by Northern Pass in its new campaign "Forward NH" that was announced after the completion of the draft EIS. 1037-2

The Cohos Trail is a relatively new and important hiking trail in New Hampshire that runs south to north to the Canadian border in Pittsburg. There are no visual simulations of the multiple above ground transmission line crossings of this trail proposed by Northern Pass. The visual impact and visual simulations of these crossings in Stewartstown and Stark need to be provided in the final EIS in a far more robust documentation of the environmental impact that the project will have on this 1037-3

1037-1
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.

1037-2
Thank you for your comment. Analysis of potential impacts to water resources and wetlands resulting from the transition station in Pittsburg have been verified. Impact estimates are described in Section 4.2.13 of the final EIS.

1037-3
Thank you for your comment. The final EIS and Visual Impact Assessment Technical Report have been updated to include analysis of the Cohos Trail. Under Alternatives 2, 5a, 5b, 5c, and 7 the Project would cross the Cohos Trail three times as an overhead line. A visual simulation has been prepared at the location where the Project would cross the Cohos Trail in Stark, NH, and the location has been analyzed as a Key Observation Point (KOP ST-4). See Section 4.2.1 and Appendix E of the final EIS.

important hiking trail.

Finally, the amazing and popular 740 mile Northern Forest Canoe Trail runs through Stark, NH on the Upper Ammonoosuc River. Northern Pass proposes to erect HVDC transmission towers on both banks of Upper Ammonoosuc in Stark and to string 1000MW DC cables over the Northern Foest Canoe Trail. In addition, it proposes removing an existing small AC transmission line strung on 50 foot high wooden poles and replacing that AC transmission line with steel tower poles up to 100 feet high. In other words, the adverse visual impact of the project on the Northern Forest Canoe Trail in Stark will be dramatic. Two wooden structures will be replaced with four steel structures that are twice as high carrying multiple transmission cables over the river. This adverse impact needs to be discussed in detail and the visual impact must be documented with visual simulations of the impact showing the crossing from various vantage points on the river as it would be seen by travelers on the Northern Forest Canoe Trail.

1037-3 Continued
1037-4

1037-3 cont'd

1037-4

Thank you for your comment. While the Northern Forest Canoe Trail is not a designated scenic resource, these sections of the trail are included in the landscape analysis. The visual impact of proposed new and relocated towers are analyzed in the EIS and Visual Impact Assessment Technical Report. No simulations were added in response to this comment. Impacts to the recreation experience on the Ammonoosuc River, which the Northern Forest Canoe Trail follows, are discussed in the Recreation Technical Report and the Northern and Central sections of the EIS (see Sections 4.2.3 and 4.3.3 of the EIS). Both short- and long-term impacts were analyzed. Long-term visual impacts could impact the recreational experience of boating along stretches of the River, including parts of the Northern Forest Canoe Trail.

From: Chris Porter <cdptrans@gmail.com>
Sent: Monday, August 10, 2015 6:56 PM
To: draftEIScomments@northernpasseis.us
Subject: Northern Pass Draft EIS Comments

I am writing in strong opposition to the selection of Alternative 2 as the preferred alternative for the Northern Pass transmission line.

Alternative 2 will have significant visual impacts on the communities of central and northern New Hampshire in general, and especially on the scenic resources of the White Mountain National Forest and the Appalachian National Scenic Trail. I have hiked the AT through the Kinsman Notch region including directly under the existing transmission line. I can tell you that adding a larger, steel-tower line here would provide added blight on what is otherwise a wilderness type area. In contrast, removing the overhead line and installing an underground transmission line would be a major aesthetic improvement. 1039-1

The costs of undergrounding the line are acknowledged to be about double the costs of Alternative 2. However, the Draft EIS still notes that significant savings in electricity costs for New England customers will be realized even with a fully undergrounded line. Why not sacrifice a small percentage of those savings to eliminate the negative visual impacts of the steel-towered industrial scale transmission line? 1039-2

I do not have a strong preference amongst the fully underground alternatives, except to suggest that alignment along major highways is likely to reduce impacts on the natural environment compared to running the corridor through remote woodlands. However I would defer to the communities of New Hampshire on the best choice that minimizes impacts on their communities and the natural environment.

--
Chris Porter
28 Lakehill Ave.
Arlington, MA 02474
cdptrans@gmail.com
617-233-7191

1039-1
Thank you for your comment. The EIS analyzes in detail several alternatives including underground cable at the ANST crossing (Alternatives 3, 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, and 7). Specific impacts in the Kinsman Notch area are analyzed in Sections 4.3.3 and 4.5.3 of the EIS. General short- and long-term impacts to recreation are analyzed in Section 4.1.3 of the EIS, including impacts to ANST.

1039-2
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.

From: Mills, Brian
To: Travis Beck
Subject: FW: Northern Pass Draft EIS Comments
Date: Tuesday, November 17, 2015 6:15:14 AM

comments

-----Original Message-----
From: Taras Kucman [mailto:tkucman@gmail.com]
Sent: Monday, November 16, 2015 8:56 PM
To: Mills, Brian <Brian.Mills@hq.doe.gov>
Subject: Northern Pass Draft EIS Comments

Dear Mr. Mills

My name is Taras Kucman. I am a concerned resident of Concord NH who is urging the burial of the Northern Pass Project for National Security reasons. The alternating current service corridor between Franklin and Deerfield NH as it is today has two (2) 115KV transmission lines that are 200 ft. apart typically, and they are supported on either 55 ft. high wooden towers or 85 ft. mono-poles. Both transmission lines, since their creation, have never posed a potential National Security risk. They are, by design, separated so that their lines will never intersect.

If the Northern Pass Project proceeds as planned, that will all change. The Hydro-Quebec 345KV artery centered between the 115KV transmission lines will be seated atop 140 ft. lattice towers, and both 115KV services will be on 85 ft. high mono-poles crammed within a 250 ft. wide Right of Way.

I ask you to recall the blackout of 2003 which knocked out service from Massachusetts west through the Great Lakes and deep into Ontario. 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 a transmission line fault caused by natural forces and excess summer loads resulting in direct contact with vegetation. Power generators who went off line exacerbated the problem, and the subsequent cascading of increasing loads on other transmission lines led to more contact with vegetation. The avalanching sequence of events took 2 hours by the time the blackout was complete. All of this was seemingly unforeseeable and human error had also played a part in the black out. The repairs and the restoration of power was not a big deal as all repairs were completed within a week.

I would now ask you to consider what if, someone who is hell bent on creating real mischief, was to bring down both 115KV services by blowing the mono-poles and directing their fall inward toward the 345KV artery, while at the same time taking out several of the 345KV lattice towers, to tangle with both 115KV transmission lines. I would submit that in contrast, the cascading electrical fault would occur in milliseconds, not hours. The repairs would require considerably more effort than brush clearing or resetting relays and circuit breakers. We were fortunate that the 2003 black out occurred in August. What if my scenario were to occur in February?

I don't know what the impact would be to the Northeast Power Grid should this happen, but I would expect that Eversource should provide their best estimates on the extent of the outage in this scenario, the time that it would take to repair the damage, and ultimately restore service. Eversource, I would submit, might also consider that

1043-1

1043-1
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.

going forward; an appropriate countermeasure against these acts of terrorism would be to bury the lines.

Today, the excuses for unintended or unforeseen consequences are everywhere and on everything from faulty accelerators and brakes, to stuffed animal choking hazards. Where our National Security is involved, I would not want this scenario to be unforeseen.

Most Sincerely,

Taras Kucman

Concord, NH

1043-1
Continued

1043-1 cont'd

From: Franklin Platt <Fnplatt@aol.com>
Sent: Monday, December 14, 2015 9:01 AM
To: draftEIScomments@northernpasseis.us
Subject: Comment Regarding the Draft EIS

Gentlemen,

I and many others oppose any HVDC aerial power transmission through New Hampshire and urge you to reject the Draft EIS:

1. DC transmission will unavoidably waste a very large percentage of the power transmitted in the form of heat released into the atmosphere. The heat released can significantly contribute to global warming. The energy wasted could be 30% or more -- a significant amount of heat and enough to affect our climate. Conversely, AC transmission which is the worldwide standard, will avoid such waste, protect the environment, is safer and easier to protect, and should also be less costly to install and maintain.

2. I also believe there is a strong case that this project will adversely impact the regional economy. Jobs will be lost, property values diminished and property taxes will increase. Northern Pass's claims to the contrary are unrealistic and not supported by independent analysis. Instead, they are heavily promoting benefits that will likely never happen.

3. I see no mention of red aircraft warning lights so that aircraft will not hit the towers or the power lines, which are clearly a hazard to navigation. There are many low flying aircraft in this region using local airports and private air strips, sea planes on lakes and ponds, search and rescue operations, helicopter, evacuation, hunters and sightseeing. And we have a lot of low clouds and fog in this region. Bright warning lights and markers on the wires would seem necessary. Installing, inspecting, and maintaining adequate warning systems will be costly.

4. The proposed aerial transmission will require a wide right-of-way that must be kept clear of brush. What assurances are there that they will not spray Agent Orange from aircraft to keep the brush down? A defoliant spray will likely kill many animals, birds, insects and can easily spread onto water supplies and human food chains. Underground transmission will be much safer and easier and can utilize narrow rights-of-way beside roads or railway tracks that are already kept clear of brush.

5. Aerial transmission will be a magnet for troublemakers eager to shoot out wires or insulators. Also, the towers can be toppled with bombs easily carried in by backpack, or by construction equipment brought in and removed undetected. Protecting an aerial transmission system in such sparsely developed country will be very difficult, costly and likely ineffective.

The proposed project does not serve New Hampshire's public interest, health or safety. It offers us nothing of value. And in fact, will likely cost the public and the economy if approved.

A large majority in New Hampshire want the government to: (1) Require that Northern Pass bury the entire transmission system and (2) Convert to AC as soon as the power enters the U.S. I realize that Canada must supply DC power because the US and Canadian grids are not synchronized.

I cannot attend a public hearing, but will appreciate your considering my views.

Thank you,

1044-1

1044-2

1044-3

1044-4

1044-5

1044-1
Thank you for your comment. Direct Current (DC) transmission has current flowing in one direction all the time, and is not impeded by inductance, has negligible capacitive losses from which heat is produced. This is the reason that DC transmission, particularly at high voltage, is selected for longer distances of transmission. Heat generated by the proposed DC transmission conductors would be negligible and immeasurable in terms of potential contribution to global warming.

1044-2
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. The socioeconomic analysis presented in this EIS was conducted by an independent contractor to DOE and does not consider the Applicant's claims.

1044-3
Thank you for your comment. The Applicant has developed and committed to implementing a list of Applicant-Proposed Impact Avoidance and Minimization Measures, including observing Federal Aviation Administration (FAA) requirements for transmission lines in proximity to airports (see Appendix H in the EIS). The Applicant would be required to adhere to all relevant federal, state, and local requirements, including guidance from the FAA.

1044-4
Thank you for your comment. The commenter is correct that current vegetation management activities in existing PSNH transmission corridors do not use herbicides on an ongoing basis. According to the applicant, all vegetation management and maintenance would be in accordance with the state Division of Forest Lands' best management practices for utility maintenance. The applicant has also stipulated in its Applicant Proposed Measures, found in EIS Appendix H, that they would not use herbicides.

1044-5
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.

Franklin Platt

- - - - - -

Franklin N. Platt
55 Paris Road
Stark, NH 03582-6657

Tel: (603) 449-2211
E-Mail: Fnplatt@aol.com
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