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June 14, 2011

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

Dear Mr. Mills:

I write on behalf of the Society for the Protection of New Hampshire Forests to offer comments on the scoping of the Environmental Impact Statement concerning the application of the Northern Pass Transmission, LLC for a Presidential Permit (OE Docket No. PP-371).

The Forest Society is a private, non-profit membership organization with 10,000 member households. We were organized in 1901, and in 1904 our Board of Trustees adopted a mission statement that still guides us today: ***to perpetuate the forests of New Hampshire through their wise use and their complete reservation in places of special scenic beauty.*** At our solar headquarters in Concord, we have modeled the use of renewable energy systems and advocated energy conservation and sustainable energy policies for 30 years.

The Forest Society owns and manages 170 forest reservations in 96 New Hampshire communities, permanently conserving 50,000 acres of working forest land. We also hold more than 700 conservation easements. And over the past 110 years we have participated in collaborative efforts that have created the White Mountain National Forest, as well as state forests and state parks, and protected privately owned working forests.

As the state's oldest and largest land trust, we have a legal and ethical obligation to protect and steward the lands we have helped to permanently protect from disruptive and damaging development. In the 31 towns where Northern Pass is proposing to construct this new power line, the Forest Society holds conservation easements on 89 separate properties protecting 18,660 acres of land, and we own 18 forest reservations totaling 5,269 acres. Because of their scenic, ecological, natural resource and recreational values to the public, these lands were conserved to protect them from future development, including that proposed by Northern Pass.

We also must defend the broad scenic landscapes we have spent 110 years protecting, including the White Mountain National Forest. In New Hampshire our landscapes are a very large part of our economy and our culture, so a new blight on the landscape is also a new injury to our well being.

It is for these reasons we filed for intervenor status last December, in response to your November 16, 2010 invitation posted in the Federal Register.

As the public discussion of the Northern Pass project has unfolded since our petition as an intervenor was granted by DOE, it has become clear that Northern Pass is part of a larger strategic plan by Hydro-Quebec to export more than 4,700 MW of electricity to the United States over the next 25 years. Further, other Canadian utilities are working on projects to export electricity to northeastern United States. These strategic plans by Canadian utilities provided the foundation for a petition submitted to DOE on April 28, 2011 by the Conservation Law Foundation (and a number of other conservation organizations including the Forest Society) to ask DOE to conduct a comprehensive EIS on the larger set of issues posed by these prospective sales of electricity across the International Border. It is far better to look holistically at options for bringing such power to market than to look at each separate project one at a time. Our view is that such a comprehensive analysis by DOE will inform the specific choice of alternatives to study in the Northern Pass EIS, and, therefore, should be undertaken specifically with such a goal in mind.

Given the significant impact the Northern Pass project as proposed would have on 180 miles of New Hampshire landscapes, we believe that DOE must start its National Environmental Policy Act analysis in the EIS with a clear determination that there is a public need for this project and that the public interest is clearly served by moving the project forward. If you find there is no such clear public interest served, we urge you to deny the Presidential Permit.

Many questions were raised about the public benefits of this project by the more than 300 speakers (among 2500 attendees) at your March 2011 scoping hearings in New Hampshire and by the many citizens who have commented since then. The answers to some of these questions have a direct bearing on whether the project as proposed actually serves the larger public interest. We recommend that your public benefits analysis address at least these issues:

- The applicant suggests by virtue of submitting its application that the electricity provided by the project is needed. Is the electricity proposed to be imported from Hydro Quebec needed in New Hampshire or New England, based on current consumption and demand? If there is no immediate need, by what analysis is there determined to be a future need, and when does that need become sufficiently urgent to plan for it outside the existing New England Forward Capacity Market?
- The applicant claims that this power will be competitively priced. What are the measurable benefits to New England and New Hampshire electricity consumers of the project as proposed, and how do these benefits compare with the private benefits to be received by the project applicant if the project were to be built as proposed?
- The applicant claims that the project will provide “low-carbon” power. Is there a clear greenhouse gas (GHG) benefit to this project when a full analysis and accounting is done for all GHG debits and credits on both sides of the border? Has there been a clear demonstration that the construction of this new power line will in fact result in reduced combustion of fossil fuels in New England, given current and future market conditions?

- The applicant claims that the project will provide reliable hydro-electric power to New England. Is there any analysis documenting the capacity and reliability of Mother Nature to provide the water quantity needed to generate the electricity promised over the 40 year life of the project in addition to 1) the projected needs of the Province of Quebec over the same time frame and 2) all other legally contracted exports presently in service?

In determining which alternatives to study in the EIS, we believe that DOE should establish a broad range of alternatives and a rigorous threshold for analysis of each alternative. We urge you to include a comprehensive analysis of at least four options, in addition to the preferred alternative submitted by the applicant:

1. The “No Action” Alternative

Required by law, the “no action” alternative is intended to tell the story of what happens if the project is not built at all. In the case of the Northern Pass project this should include more than simply an assessment of the negative environmental impacts forgone. This alternative should include a structured analysis of the New England energy market without Northern Pass --- a full review of the economic and environmental impacts of not building the project. If the EIS is to offer a full picture of the “No Action” alternative, it should be clear from your analysis that a full accounting of how the New England region plans to meet its future energy needs without Northern Pass has been considered.

2. The Vermont/New Hampshire Existing Corridor Alternative

If National Grid’s existing 2000 MW HVDC corridor, which enters Vermont at the Town of Norton, crosses into New Hampshire on the Upper Connecticut River, and ends at the Sandy Point Substation in Groton and Ayer, Massachusetts, could be upgraded within the existing corridor to host a single 3200 MW line clearly the environmental benefits of using an existing corridor instead of cutting an entirely new swath through 45 miles of un-fragmented forests, family farms, homes, recreation lands, and legally protected conservation areas would be self evident. The environmental disturbances along the existing rights-of-way in the preferred Northern Pass corridor would also be avoided. According to public statements by the applicant, it has to date declined even to approach the State of Vermont and National Grid to explore this alternative. DOE should fully exhaust any and all reconfigurations of the current right-of-way for the existing 2000 MW HVCD line as one alternative in its EIS.

3. A Burial Alternative

Advocates for Northern Pass have repeatedly stated publicly that burying the Northern Pass would “be at least ten times more expensive” than putting the power lines above ground as proposed. DOE should test this claim in the EIS. It should select a viable corridor along an existing transportation right-of-way (where the earth has already been disturbed) and assess what the true cost of burial to current industry standards would be. The goal of the EIS

is to identify the least damaging environmental alternative. While burial may require more cost up front, it may be the most socially and environmentally desirable alternative. At today's wholesale electricity price in New England, total revenues to Hydro Quebec over the 40 year life of this project will be over \$50 billion. Before ruling out a burial option, should we not at least explore what the actual cost would be? At least one DOE option should explore a burial alternative.

4. A New York Alternative

The EIS should also carefully examine alternatives that directly import 1200 MW of electricity to the New York grid. For the past four years ISO-NE has sold up to 5% of its total annual generation of electricity to ISO-New York. There is clearly a more immediate need for this 1200 MW in New York than in New England. The Champlain Hudson Express project was originally scaled to import 2000 MW of Canadian electricity, then more recently reduced to 1000 MW (reportedly for lack of market need in Southern New England). If this project could be a conduit for the 1000 MW it is currently budgeted for plus the 1200 MW proposed to be imported over the Northern Pass project, there would clearly be an environmental benefit and an economic benefit. The environmental benefit is that New Hampshire's landscape would not have to be affected at all. The economic benefit is that this new 2200 MW facility would deliver the power to markets where there is in fact a current need.

The DOE Notice of Intent published on February 11, 2011 identified 18 specific sets of resources that will be addressed for each alternative studied. We believe this list is a good start. You received many comments expanding this list and offering detailed recommendations for your research and analysis of each resource area. We add the following specific recommendations:

1. Require the creation of the best visual impact analysis that current technology can provide for every above ground mile of every alternative studied. The public needs to visualize the impacts of each alternative studied, and the final DOE decision on the Presidential Permit application needs to address this issue thoroughly. For the 31 New Hampshire communities impacted by the project as proposed, for the White Mountain National Forest and for those millions of visitors a year to New Hampshire who choose to recreate in areas where these new towers would be erected, this landscape scarring is one of the most significant negative impacts of the proposed project.
2. Complete a detailed analysis of the impact of each alternative on the conservation values of lands protected by the federal government (the White Mountain National Forest and the National Park Service), the state government (state forests and parks), municipal governments (town forests and open space) and private non-profit land trusts (like the Forest Society). Two core conservation values at issue are the views of the conserved property and the views from the conserved property.
3. Complete a rigorous socio-economic analysis of each alternative, including a thorough discussion of how the proposed alternative would affect real property values, local and regional tourism economies and the potential to expand and develop local and regional alternative energy projects.

4. Fully explore the impact of each alternative on forest and habitat fragmentation, specifically as it relates to sensitive areas identified by the New Hampshire Fish & Game Department's Wildlife Action Plan.
5. Clearly articulate and discuss the impacts of proposed structures on riparian zones, wetlands and other sensitive natural communities.
6. Fully review the current science on two potential health impacts of overhead HVDC transmission lines: 1) the impact of Electro Magnetic Forces on people and animals and 2) the impact of chemical treatments to control vegetation growth within the rights-of-way on people, animals and plants.

We have three final suggestions:

First, the applicant has suggested that it plans to file an application to the New Hampshire Site Evaluation Committee upon the DOE publication of a Draft Environmental Impact Statement. Clearly, your work on this EIS will be an important resource to the NH SEC in its permitting role. We strongly encourage you to reach out to the Chairman of the NH SEC as you determine which alternatives to study to assure that the information needs of federal and state decision-makers are served by your research and analysis.

Second, since the filing of its Presidential Permit application in October 2010, Northern Pass has formally amended its application at least three times. We respectfully recommend that DOE not entertain any further amendments to the original application after today. The preferred alternative of record submitted by the applicant as of today should be the applicant's proposed alternative studied in the EIS. If the applicant requests further amendments to its original application, we suggest that DOE re-set the clock on the NEPA process for the Northern Pass project, and start this process over.

Finally, we believe that when DOE issues its final record of decision for this application, it should be self evident that this is the best informed record of decision that has ever been issued by the Department of Energy for a Presidential Permit. To meet the letter and spirit of the National Environmental Policy Act as they relate to this application, the Forest Society stands prepared to assist you where we can.

Sincerely,



Jane A. Difley
President/Forester