



## Memorandum

Date: June 13, 2011  
To: Brian Mills  
Senior Planning Advisor, Office of Electricity Delivery and Energy Reliability  
From: Mountain River East Board of Directors  
Subject: Notice of Intent to Prepare an Environmental Impact Statement for the Northern Pass Transmission LLC Project

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Dear Mr. Mills:

Mountain River East is an 80-unit condominium community located just off of Route 175 in Thornton, New Hampshire. The Right of Way (ROW) for the proposed Northern Pass route crosses the association property and also runs directly alongside many of the association residences.

We, the Mountain River East Board of Directors, are opposed to the Northern Pass project as it is currently proposed and respectfully request on behalf of our 144 association members that the Environmental Impact Statement (EIS) you are preparing contain the following:

1. A detailed study that quantifies the impact on human health in the area around co-located HVDC and HVAC power lines where the AC lines are located 40 to 100 feet below the DC lines. This study should attempt to replicate as closely as possible the power line configuration that will result when the new HVDC lines are installed in the same ROW above and alongside the existing HVAC lines as specified in the project proposal. Specifically, the amount and type of electromagnetic radiation produced at different distances out to a range of 1Km from this power line combination and its impact on the development of children as well as adults and the elderly. This study should specifically address the any potential developmental and health impacts on the children attending the Thornton Middle School on Route 175, the infants and toddlers attending the day care center (which will be nearly underneath the new lines) at the corner of Route 175 and Benton Road, as well as the children, adults, and elderly living and vacationing at Mountain River East.
2. A detailed study that quantifies the impact of said electromagnetic radiation on the health and production capacity of the livestock at the dairy farm just north of Mountain River East on Route 175.
3. A detailed study that quantifies the impact of said electromagnetic radiation on the operation of nearby (out to 1Km) electrical, electronic, and electromechanical devices including AM, FM, Satellite, Short Wave, and Citizens Band Radios, Broadcast, Cable, and Satellite Television Receivers, Cellular and Satellite telephones, Civil, Aviation, and Emergency Radio Transceivers, GPS Devices, Computers, Pacemakers, Insulin Pumps, and other Mobile Medical Devices,
4. A detailed analysis of the ability of Campton/Thornton EMS to respond to a single or multiple tower collapse disaster scenario under different environmental conditions (heavy rainfall/snowfall, extreme temperatures, population surges during holiday and vacation periods, etc...). This

analysis should include projected costs for additional personnel, equipment, and training as well as the ongoing cost to maintain said equipment and skills.

5. A detailed analysis of the impact of this net new generation capacity on renewable energy providers (wind, biomass, solar, small hydro) throughout New Hampshire. Specifically, this analysis must be detailed enough to answer the question of whether the Northern Pass Project makes them more or less competitive and thereby makes their operations more or less viable for the future.
6. A detailed study that quantifies the impact of increased erosion caused by both construction activities as well as by the clear-cutting of additional forest acreage (referred to in the proposal as "widening the existing ROW"). The study should specifically address the impact of increased erosion runoff on sensitive wildlife habitats along the portions of the proposed route that run alongside and/or over the Pemigewasset river.
7. A detailed analysis of the societal impacts of the introduction of large-scale industrial infrastructure into bucolic communities. This analysis should include the specific impacts on the historical and cultural assets of both the town of Thornton as a whole as well as the Mountain River East community.
8. A detailed study that quantifies the visual impact of each and every tower as well as each and every segment of power line. Generalizing the visual effect by referring to "the lines" and/or "the towers" imprecisely accounts for the individual impacts of the individual structures that comprise this project. There is simply no way to accurately account for the cumulative visual impact of this project without examining and accumulating the individual impacts of each tower and each line segment on the populations that observe them.
9. A detailed analysis of the impact of this project on the local and regional economies in Coos and Grafton counties with particular attention paid to the effects of decreased tourism, decreased second home activity (occupancy, construction, renovation, maintenance, and sales), and a potential youth exodus.
10. A detailed analysis of the impact of this project on the municipal property tax revenues in Coos and Grafton counties with particular attention paid to the effects of devalued properties along the proposed route as well as abandoned properties resulting from owners with "underwater" mortgages who are unable to sell their properties or are unable to sell their properties at a price that would satisfy the outstanding mortgage balance. This impact should include both anticipated tax revenue shortfalls as well as options for each municipality to make up said shortfalls considering any additional expenses incurred as a result of the project (EMS training and equipment, aid to newly unemployed, etc...). Note: it is particularly important that "pre-project" property value assessments reflect the value prior to October 2010 when the project was first announced. This timeline is required because of the dramatic and continuing drop in property values that has been observed along the proposed route as a result of the proposal itself. Any use of "current" (post October 2010) property values will not account for the very real and relatively large effect that the project has already had on property values along the route.
11. A detailed analysis of the impact of this project on the housing markets in Coos and Grafton counties with particular attention paid to the effects of devalued properties along the proposed route. This analysis should include a unit by unit analysis of the change in property value for of all condominiums at Mountain River East and all other properties abutting the proposed route for the entire length of the proposed route. The "pre-project" assessed value timeline consideration mentioned above should apply in this study as well.
12. A detailed analysis of the project route that examines and lists each and every parcel of affected land with respect to any changes within the existing right of way to accommodate the proposed additional lines. This analysis should show the number of properties that will need to be acquired

(purchased or taken via eminent domain) in order to modify the existing easement and/or condemn existing buildings. Each of these properties should be listed individually by location/owner and separate studies should be conducted at each of these locations to determine the cultural, social, historical, and economic impact resulting from the acquisition of the property for the purposes of this project. This analysis should also show the amount of forest area required to be cut at each location in order to sufficiently widen the existing ROW as well as the overall total area to be cut along the entire route of the project..

13. A detailed analysis of the impact of this project on tourist-based businesses in Coos and Grafton counties with particular attention paid to the dispositions of displaced workers as a result of decreased tourist activities. This analysis should include the impact on state and local budgets due to increased aid expenditures as well as the impact on local social services agencies, non-profits, hospitals, clinics, shelters, and food pantries that will be coping with this newly unemployed population.
14. Detailed studies that quantify both the noise levels in the area around co-located HVDC and HVAC power lines where the AC lines are located below the DC lines and the long term impact on human health and quality of life from exposure to said noise levels. These studies should address the unique interaction of the separate electromagnetic fields in every proposed configuration (offset distance, orientation angles) along the entire proposed route and the resulting physical forces that produce human audible noise across the entire anticipated temperature range during the life of the project.
15. A detailed analysis of the impact on local groundwater supplies from the runoff of materials used during construction, long term weather exposure and its associated material degradation of the tower structures and lines themselves, paints, lubricants, and insulating materials used during routine maintenance of the towers and lines, as well as chemical defoliants used to maintain the right of way. This analysis should include the specific impacts on the well-based water supply at Mountain River East as well as of those neighbors who share the same or similar water sources.
16. A detailed Environmental Justice analysis in accordance with Executive Order 12898 that compares the demographic characteristics of the populations who are most adversely impacted (including but not limited to abutters, employees of tourist dependent businesses, municipal employees of towns along the proposed route, and residents of towns along the route) to those populations who stand to draw the most benefit over the life of the project (including but not limited to electricity consumers in the greater Boston area and employees/shareholders of the sponsor companies).

Additionally, on behalf of our 144 association members, we respectfully request that any and all future permitting decisions with regard to the Northern Pass project be made only upon completion of and within the context of:

1. A clearly stated and well defined "Purpose and Need" of this project. Given that the project was not requested by ISO New England and given that New Hampshire is already an electricity exporter, we believe that the sole purpose of this project is to distribute HydroQuebec's product to consumers in Southern New England. As such, this is a private, for-profit venture and the overwhelming negative impacts of this venture should be taken in the context of the complete absence of any pressing public need for it. Given that the obvious negative impacts of this project are so numerous and so severe, the project sponsors absolutely must establish that there is a clear public need for this particular project at this particular time before continuing with any permitting activities. Proceeding with permitting activities for an unneeded and environmentally destructive project is, in our opinion, pure folly.

2. A detailed study of each and every viable alternative route regardless of whether the project sponsors have included or discounted the alternative in their project proposal. It is critical that the sponsors' inherent bias towards maximizing profit be removed from this process in order to determine the least environmentally damaging practicable alternative route. Specifically, the most obvious "common sense" alternative route appears to be the existing HVDC corridor in Vermont. The EIS should include a comprehensive comparison of the overall impact of re-using this existing corridor vs. cutting a new corridor for 40 miles and widening another for 140 miles through the state of New Hampshire. Given that the existing corridor in Vermont effectively parallels the proposed route, it is inconceivable to us that reusing it could be anything other than the least environmentally damaging practicable alternative route. Whether or not it is actually the least damaging, this alternative is obviously dramatically LESS damaging than the project as it is currently proposed.
3. A detailed study of each and every viable alternative implementation regardless of whether the project sponsors have included or discounted the alternative in their project proposal. It is critical that the sponsors' inherent bias towards maximizing profit be removed from this process in order to determine the least environmentally damaging practicable alternative implementation. Specifically, the obvious alternative implementation is the use of buried cable as has already been done in similar projects by these very same sponsors (the Champlain Hudson Power Express). The EIS should include a comprehensive comparison of the overall impact of burying the transmission lines vs. suspending them from 100+ foot tall towers. Given that buried cable mitigates or eliminates the vast majority of concerns around visual pollution, health impacts, property value impacts, economic impacts cultural impacts, and impact on wildlife, it is inconceivable to us that burying it could be anything other than the least environmentally damaging practicable alternative implementation. Again, whether or not it is actually the least damaging, this alternative is obviously dramatically LESS damaging than the project as it is currently proposed. Furthermore, buried cables provide the opportunity to employ modern technologies aimed at limiting line loss which make the energy transmission more efficient and cost effective.

On behalf of our 80 association members, we thank you for your consideration in this matter. We look forward to reviewing the draft EIS as soon as it is available.

Sincerely,

The Mountain River East Board of Directors

Normand Vadnais  
Steven Ciras  
Henry Saccoccia  
Alan Crowe  
Timothy Duggan