

RESTORE:



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SUBMITTED VIA DOE WEBSITE (<http://www.northernpasseis.us/process/>)

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

Dear Mr. Mills:

These comments are submitted on behalf of RESTORE: The North Woods (RESTORE) pursuant to the scoping process for the Northern Pass Project Environmental Impact Statement. RESTORE is a nonprofit (501(c)(3) organization based in New England. RESTORE has hundreds of members who live in, have visited, or plan to visit the area that would be affected by the proposed Northern Pass Project.

We urge the Department of Energy to reject the Northern Pass Project application. The Project is unnecessary and would cause significant harm to ecological, wilderness, scenic, and recreational values in northern New Hampshire and Vermont. Moreover, it would undermine efforts to address climate change.

RESTORE strongly opposes the Northern Pass Project for several reasons:

It would transmit hydroelectric power from Hydro-Quebec in Canada. Hydro-Quebec dams and reservoirs generate power by drowning rivers, smothering forests, extirpating wildlife, and driving out native peoples. The Northern Pass transmission project would send more of this tainted power to New England, forcing ratepayers to help finance the construction of more Hydro-Quebec dams.

Northern Pass would be an ugly, 187-mile industrial corridor hacked through northern New England. It would slash through the White Mountain National Forest. It would cut across the legendary Appalachian Trail. It would degrade the Conte National Wildlife Refuge. It would slice through state forests, towns, and farmlands.

The Northern Pass corridor would cut through the White Mountain National Forest (WMNF) and across important connections from the WMNF to other major blocks of habitat. This includes cutting through two roadless areas, Kinsman Mountain-Gordon Pond and Kilkenny. As a result, the Northern Pass Project would significantly damage important ecological, wilderness, scenic, and recreational values. It would also undermine efforts to address climate change and increase cumulative development impacts on the WMNF.

- Ecological values. The Project would cross the Kinsman Mountain-Gordon Pond area, which has been proposed for wilderness designation. The Project would threaten unspoiled forests, including old-growth northern hardwoods; unusual ecosystems, such as acidic brownwater lakes and ponds, acidic talus forests, circumneutral cliff communities, and level bogs; rare plant species, such as Pickering's reed bent-grass and alpine azalea; fragile alpine gardens with lichen, dwarf blueberry, Labrador tea, mountain cranberry; and sensitive wildlife such as the long-tailed shrew and golden-crowned kinglet.

The Project would also cross a portion of the Kilkenny roadless area, which has been proposed for wilderness designation. Moreover, it would slice across a vital wildlife corridor connecting the WMNF to the Nash Stream Forest to the north.

- Wilderness values. The Project would degrade the wild and untrammled character of the Kinsman Mountain-Gordon Pond and Kilkenny roadless areas. This would disqualify a portion of each of these areas from wilderness designation.
- Scenic values. The Project's giant towers, power lines, and clearcut right-of-way would be an ugly intrusion into the wild Kinsman Mountain-Gordon Pond and Kilkenny roadless areas. Visitors to these areas would be able to see this industrial facility from miles away. This would degrade the scenic values of the area for thousands of visitors each year.
- Recreational values. The Project would damage wilderness recreation opportunities in the Kinsman Mountain-Gordon Pond and Kilkenny roadless areas. It would also cross a rugged and scenic part of the Appalachian Trail, which traverses this area. This would degrade the recreational experience of thousands of visitors each year.
- Climate change. The Project would increase carbon emissions that add to climate change by clearcutting forests that are now storing carbon. It would block the migration of wildlife as habitats change with the climate. It would provide an incentive for Hydro-Quebec to build more hydroelectric dams and reservoirs, which destroy vast forests and result in massive carbon emissions.
- Cumulative impacts. The Project would add to the impacts growing development pressures on the White Mountain National Forest, to carbon emissions and climate change, and to the loss of lands where people can find wilderness recreation in a scenic, unspoiled environment.

The Northern Pass Project Environmental Impact Statement must include a full and comprehensive assessment of the Project. This includes a justification of the need for the Project, a thorough cumulative analysis of ecological, wilderness, scenic, recreational, and climate impacts, and a reasonable range of alternatives that includes truly green options, such as energy conservation, solar power, and wild power.

Thank you for the opportunity to comment on the Northern Pass Project Environmental Impact Statement. I can be reached at kellett@restore.org or (978) 392-0404.

Sincerely,



Michael J. Kellett
Executive Director