

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

Scoping Report

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**United States Department of Energy
Office of Electricity Delivery and Energy Reliability
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1.0 INTRODUCTION AND BACKGROUND

Executive Order (E.O.) 10485, as amended by E.O. 12038, requires the issuance of a Presidential permit for the construction, operation, maintenance and connection of facilities at the international border of the United States for the transmission of electric energy between the United States and a foreign country.

Northern Pass Transmission, LLC (Northern Pass) applied to the U.S. Department of Energy (DOE) for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the United States border with Canada. Northern Pass is owned by NU Transmission Ventures, Inc., a wholly-owned subsidiary of Northeast Utilities, a publicly held public utility holding company. Northern Pass filed its original Presidential permit application on October 14, 2010.

In response to the Presidential permit application, on February 11, 2011 the DOE published the *Notice of Intent to Prepare an Environmental Impact Statement and to Conduct Public Scoping Meetings and Notice of Floodplains and Wetlands Involvement* (the NOI) in the *Federal Register*. In the NOI DOE announced its intention to prepare an Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA) to assess the potential environmental impacts of issuing a Presidential permit, the federal action, to Northern Pass to construct, operate, maintain, and connect a new electric transmission line across the U.S.-Canada border in northern New Hampshire (NH). The DOE NOI invited the public to comment on the scope and content of the EIS through the DOE's scoping process.

The EIS, Northern Pass Transmission Line Project Environmental Impact Statement (DOE/EIS-0463), will address potential environmental impacts of the proposed action, the no action alternative, and the range of reasonable alternatives. The U.S. Forest Service-White Mountain National Forest (USFS), the Army Corps of Engineers-New England District (USACE), the U.S. Environmental Protection Agency-Region 1 (EPA), and the NH Office of Energy and Planning (NHOEP) are cooperating agencies in the preparation of the EIS.

The EIS will also provide the analysis to support a USFS decision on whether to issue a special use permit. The Forest Supervisor for the White Mountain National Forest (WMNF) is the Responsible Official for the USFS decision.

Following the first round of scoping meetings (see Section 2.2), Northern Pass informed the DOE that it would be amending its application. On July 1, 2013, Northern Pass filed an amended application with the DOE which reflected several changes, including a modified northern section for the proposed project route.

DOE published an Amended Notice of Intent (amended NOI) in the *Federal Register* on September 6, 2013, reflecting changes to the Presidential permit application, per the amended application. This scoping report summarizes the comments received during the public scoping period. These comments will inform the preparation of the Draft EIS. This scoping report does not present individual comments received, nor does it present responses to the scoping

comments. The public scoping period remained open almost continuously since the original NOI was published.

2.0 SCOPING PROCESS

2.1 Approach

During the scoping process, the DOE invited public input and participation on the scope of the EIS through, but not limited to, written comment (including electronic submission via e-mail and the EIS website) and oral comment at scoping meetings.

Specifically, the February 11, 2011 NOI and the September 6, 2013 amended NOI identified several methods by which the public could submit both oral and written comments to the DOE on the proposed project:

- Public scoping meetings
- U.S. Mail
- Facsimile transmission (fax)
- Telephone
- Email, and
- the EIS website (www.northernpasseis.us)

All comments, regardless of how they were submitted, will receive equal consideration in the preparation of the Draft EIS. Persons submitting scoping comments, whether orally or in writing, will be notified when the Draft EIS is available for their review.

2.2 Public Scoping Meetings

The DOE hosted two rounds of public scoping meetings.

The first round of public scoping meetings took place in March 2011 at the locations, dates, and times indicated below:

- Pembroke, NH – Pembroke Academy Cafeteria, 209 Academy Road; Monday, March 14, 6-9 pm
- Franklin, NH – Franklin Opera House, 316 Central Street; Tuesday, March 15, 6-9 pm
- Lincoln, NH – The Mountain Club on Loon, Hancock Room, 90 Loon Mountain Road; Wednesday, March 16, 6-9 pm
- Whitefield, NH – Mountain View Grand Resort and Spa – Presidential Room, 101 Mountain View Road; Thursday, March 17, 6-9 pm
- Plymouth, NH – Plymouth State University, Hanaway Theatre, Silver Center for the Arts, 114 Main Street; Friday, March 18, 6-9 pm
- Colebrook, NH – Colebrook Elementary School, 27 Dumont Street; Saturday, March 19, 1-4 pm
- Haverhill, NH – Haverhill Cooperative Middle School, 175 Morrill Drive; Sunday, March 20, 1-4 pm

The second round of public scoping meetings, held in response to changes to the project identified in the amended Presidential permit application, filed July 1, 2013, took place in September 2013 at the locations, dates, and times indicated below:

- Concord, NH – Grappone Conference Center, 70 Constitution Avenue; Monday, September 23, 6-9 pm
- Plymouth, NH – Plymouth State University, Hanaway Theater, Silver Center for the Arts, 114 Main Street; Tuesday, September 24, 5-8 pm
- Whitefield, NH – Mountain View Grand Resort and Spa – Presidential Room, 101 Mountain View Road; Wednesday, September 25, 5-8 pm
- Colebrook, NH – Colebrook Elementary School, 27 Dumont Street; Thursday, September 26, 5-8 pm

In both rounds, the scoping meetings were structured in two parts: first, an informal “open house” session during which the public could interact with both agency and applicant representatives as well as view project maps; and second, a formal public comment session, which was transcribed by a court stenographer. The transcripts are posted on the project website.

2.3 Scoping Participation

A total of 7,560 comments were submitted from over 6,400 unique individuals, businesses, municipalities, government agencies and other organizations during the public scoping period through the various mechanisms identified in Section 2.1 above. NH residents were the primary source of comments, representing about 68 percent of all comments received. Approximately 17 percent of comments were submitted from New England states other than New Hampshire and about 6 percent of comments came from outside New England. The most common states where comments were received from are listed in Table 1, below.

**Table 1:
Scoping Participation by State**

State	Number of Comments	Percent of Total
New Hampshire	5,106	67.5
Massachusetts	919	12.2
Rhode Island	130	1.7
New York	113	1.5
Connecticut	107	1.4
Vermont	73	1.0
Maine	71	0.9
Other ^a	307	4.1
Location Not Specified	734	9.7
TOTAL	7,560	100

^a Other States include but are not limited to CA, MD, FL, OH, DC, IL, NC, CO, DE, GA, TN, WA, and Canadian provinces such as Quebec and Ontario.

Electronic comment submission accounted for 64 percent of all comments received as nearly 57 percent of the commenters used the Northern Pass EIS project website (www.northernpasseis.us) to submit comments and over 7 percent submitted comments via email. Submission of comments via oral statements at the public meetings accounted for about 3 percent of the comment documents received during the scoping period; additionally, many individuals who spoke at the public meetings also submitted additional comments in other forms. Comments submitted by mail or fax accounted for about 33 percent of the submittals.¹ Table 2 presents this data.

**Table 2:
Scoping Participation by Source**

Source	Number of Comments	Percent of Total
Website	4,294	57
Letter (incl. Fax)	2,489	33
Email	543	7
Oral	219	3

¹ Comment cards distributed by the Society for the Protection of New Hampshire Forests (SPNHF) accounted for 2,159 of the comments submitted by “Letter” and account for approximately 29 percent of all comment submittals.

3.0 SUMMARY OF SCOPING COMMENTS

3.1 Comment Analysis Process

Comments received during the public scoping period were entered into a database to be categorized and analyzed. The regulations, 36 CFR Part 215, provide guidance for the purposes of the USFS's decision and define, "substantive" comments as those that are: (1) within the scope of the proposed action; (2) are specific to the proposed action; (3) have a direct relationship to the proposed action; and (4) include supporting reasons for the Responsible Official to consider. For analysis purposes, comment submissions with multiple comments embedded were tallied and coded by topic per substantive comment. For example, a commenter may include within a single document (i.e., email, letter, oral comment) comments on alternatives, wildlife, and air quality, thus providing multiple substantive comments as well as non-substantive comments. A total of 4,718 substantive comments were extracted and coded across 25 broad categories (listed in Table 3 below).

Non-substantive comments include opinions, general comments, and other non-specific information that would not fall into one of the four categories listed above, and thus would not assist in the determination of the scope and the significant issues to be analyzed in depth in the environmental impact statement (40 CFR 1501.7(a)(2)). All comments received can be viewed on the Northern Pass EIS website: www.northernpasseis.us.

Following the initial extraction and coding, a quality assurance process was conducted to ensure substantive comments were being entered and coded properly. After this quality check process, substantive comments were re-coded into one of 79 sub-resources within the broader overarching categories. The sub-resource categories are presented in the Section 3 tables. For example, comments related to the vegetation category were further classified into the following sub-resources: (1) Tree removal/habitat fragmentation, (2) Herbicides to clear the right-of-way (ROW), (3) Carbon sequestration from forested lands, (4) Threatened, Endangered, Sensitive (TES) species, and (5) General.

The scoping comment database will be used to track comments received and issues identified through the scoping process. This database will also help the DOE consider public input during preparation of the Draft EIS.

The following sections summarize the categories of issues derived from the substantive comments received during the scoping period (see Table 3). This summary does not evaluate the comments. The labels are intended to categorize and summarize the substance of the comments, not reproduce the exact wording of individual comments. As noted above, individual comments may be viewed in their entirety on the Northern Pass EIS website. The comments summarized in each category illustrate the varied, and at times contradictory, issues, concerns, and desired future conditions expressed by commenters.

**Table 3:
Summary of Substantive Comments**

Comment Category	Report Section	Number of Comments	Percent of Total
Alternatives	0	805	17.1
Economy	0	489	10.4
Purpose and Need	0	369	7.8
Health and Safety	0	362	7.7
Tourism	0	313	6.6
Private Property/Land Use	0	305	6.5
NEPA Process	0	284	6.0
Viewshed/Scenery	0	273	5.8
Cumulative Effects	0	243	5.1
Wildlife	0	229	4.8
Taxes	0	164	3.5
National Forest and Conserved Lands	0	143	3.0
Vegetation	0	122	2.6
Water/Wetlands	0	115	2.4
Recreation	0	87	1.8
Historic/Cultural	0	86	1.8
National Security	0	71	1.5
Design Criteria/Mitigation Measures	0	70	1.5
Air Quality	0	40	0.8
Other	0	34	0.7
Noise	0	29	0.6
Environmental Justice	3.22	29	0.6
Soils	0	24	0.5
Quality of Life	0	21	0.4
Traffic/Transportation	0	11	0.2
TOTAL		4,718	100

3.2 Alternatives

The majority of the comments associated with alternatives suggested other ways to construct the proposed transmission line with potentially fewer impacts to the residents of NH. Of these, most pertained to burying the line, such as within existing infrastructure or transportation right-of-way (ROW). Commenters strongly expressed their desire to understand why this would be cost-prohibitive and gave examples of where this alternative has been employed.

Other comments suggested that this project is not sustainable, and that other forms of green energy such as wind should be explored instead. Still other comments simply supported the ‘no build’ alternative, and indicated that the potential environmental impacts of the proposed project are extensive. Table 4 lists the sub-resources and number of comments within this resource category.

**Table 4:
Summary of Alternative Comments**

Sub-resource	Number of Comments	Percent of Total
Buried line	292	36.3
Other ROW	146	18.1
Local/US power generation	121	15.0
Use other projects	70	8.7
Reduce power consumption	50	6.2
Interstate	23	2.9
New report on alternatives	25	3.1
Substation locations	5	0.6
General	73	9.1
TOTAL	805	100

3.3 Economic Impacts

Comments on the economy indicated concern over how the project may impact NH’s land-based economy, primarily in terms of tourism. They stated that NH’s appeal is largely based on its scenery and aesthetics; many of the comments expressed concerns over how the presence of new, or larger, transmission lines may impact those agrarian aesthetics, leading to subsequent impacts to NH’s tourism economy.

Other economy-related comments pertained to skepticism surrounding the number, longevity, and quality of jobs that the project may create; the long-term impact to niche industries such as organic farms, commercial forests, and maple syrup producers; impacts to real estate (see also Section 3.7, Private Property and Land Use); impacts to small renewable energy producers in New Hampshire; and, the subsequent impacts to towns and tax revenues due to potentially decreased tourism. Table 5 lists the sub-resources and number of comments within this resource category.

**Table 5:
Summary of Economic Comments**

Sub-resource	Number of Comments	Percent of Total
Jobs and job creation	123	25.2
Energy market and rates	191	39.1
Other industries	77	15.7
General	61	12.5
Specific businesses/locations	37	7.6
TOTAL	489	100

3.4 Purpose and Need

The purpose and need category collected comments regarding the need for the project in general (as presented by the applicant) as well as comments on the agency purpose and need statements. Comments largely questioned whether or not there is a clearly defined need for the power to traverse NH. Comments expressed that the power is not needed in NH and, thus, the project should not be imposed on the residents of NH for the needs of the greater New England region.

Many of the purpose and need comments also related to the NEPA process and expressed concern that the agency purpose and need statements were overly narrow. Commenters were also concerned that the applicant’s purpose and need was not clearly demonstrated or defined before project alternatives were developed and considered.² Other comments spoke to the requirements of the Presidential permit and whether or not the project is in the best interest of the public. Table 6 lists the sub-resources and number of comments within this resource category.

**Table 6:
Summary of Purpose and Need Comments**

Sub-resource	Number of Comments	Percent of Total
Need for power*	164	44.4
National/state/regional energy goals*	86	23.3
Those impacted receive no benefit†	61	16.5
Not in public interest/for private interests†	48	13.0
General	10	2.7
TOTAL	369	100

† Agencies’ purpose and need statements;
* Applicant’s purpose and need

² It is noted that the range of reasonable alternatives to be analyzed in the EIS have not yet been determined.

3.5 Health and Safety

Comments regarding health and safety were diverse. Many comments pertained to the potential health effects of prolonged exposure to Electromagnetic Field (EMF) radiation and high-voltage power lines, comments also included citations to studies that note a correlation to higher incidences of cancer, childhood leukemia, and other illnesses. Many other comments conveyed concern for children who would live, play, and attend school in close proximity to the proposed project.

Other health and safety comments related to psychological stress inflicted upon humans and animals as a result of the proposed project, the ability of municipalities to provide effective emergency services and communications, physical damage and weather impacts to the proposed power line, and construction related concerns. Table 7 lists the sub-resources and number of comments within this resource category.

**Table 7:
Summary of Health and Safety Comments**

Sub-resource	Number of Comments	Percent of Total
Cancer, childhood leukemia and other illnesses	86	23.8
Physical damage/weather impacts to line	85	23.5
Exposure to EMF	59	16.3
Children/Schools	32	8.8
General	100	27.6
TOTAL	362	100

3.6 Tourism

Tourism is closely related to viewshed/scenery and the economy because, as expressed above, the tourism economy depends heavily on the aesthetics of NH's landscape. Thus, comments in the tourism category were similar to those discussed above in the economy category and below in the viewshed/scenery category. Comments expressed concerns over how the presence of new or larger transmission infrastructure could impact NH's land-based economies, especially in northern New Hampshire, which is noted for being relatively less disturbed than more developed areas of NH. Commenters further expressed that the presence of towers and transmission lines would deter people from visiting and recreating in NH. Also, as noted by commenters, many businesses rely upon a tourism economy, so fewer visitors could have a far-reaching impact on the overall economy. Table 8 lists the sub-resources and number of comments within this resource category.

**Table 8:
Summary of Tourism Comments**

Sub-resource	Number of Comments	Percent of Total
Scenery	179	57.2
Economy	107	34.2
Recreation	22	7.0
General	5	1.6
TOTAL	313	100

3.7 Private Property and Land Use

Comments associated with private property and land use overwhelmingly focused on property values. These comments ranged from people who are relying on the value of their land to pay for their retirement to concerns over how decreased property value may impact municipal tax revenues. Comments indicated an overall desire to see more studies and examples of how property values could be impacted by the presence of transmission lines, or in the case of the existing ROW, higher, larger transmission lines, as well as maps that show exactly which properties could be most impacted.

Additional themes that emerged included the potential impacts to specific land uses and business (such as agriculture, schools, recreation/trails, commercial forests), use of eminent domain and constitutional rights, visual impacts to private property, impacts to privacy, the ability for future generations to inherit and live on family properties, and possible impacts to private conservation lands. Table 9 lists the sub-resources and number of comments within this resource category.

**Table 9:
Summary of Private Property/Land Use Comments**

Sub-resource	Number of Comments	Percent of Total
Eminent domain	33	10.8
General	272	89.2
TOTAL	305	100

3.8 Presidential Permit and NEPA Processes

Comments addressing the NEPA process related largely to transparency, clarity, and due diligence. Commenters raised concerns that the process has not adequately informed the public about the project details, the range of reasonable alternatives, and the agencies' purpose and need statements.³ Commenters are also concerned over whether or not their input will be heard,

³ As mentioned in Section 3.2, the range of reasonable alternatives and purpose and need are developed and refined through the NEPA process, of which the scoping period is an important initial component.

addressed, or ultimately inform decision-making. Some comments pertained to the Presidential permit and whether that process and application review has been carried out thoroughly.

Other comments on the NEPA process pertained to specific logistics on dates, how the public is asked to comment, and the adequacy of the information that has been made public. Lastly, comments raised questions about the project team, the DOE's (or, more generally, the EIS process') ability to thoroughly analyze the impacts of the project, and the appropriateness of the involvement of Normandeau Associates,⁴ and other perceived potential conflicts of interest within the team. Table 10 lists the sub-resources and number of comments within this resource category.

**Table 10:
Summary of Presidential Permit and NEPA Processes
Comments**

Sub-resource	Number of Comments	Percent of Total
Public Engagement/Scoping Process	119	41.9
Contractor Issues/Conflict of Interest	52	18.3
Disclosure of Alignment/ NPT Permit Application	46	16.2
General	67	23.6
TOTAL	284	100

3.9 Viewshed/Scenery

As discussed above, comments concerning viewshed and scenery were often closely related to comments about tourism and economy. Comments regarding impacts to viewsheds and scenery generally raised concerns over how the potential presence of new, or larger, transmission infrastructure would affect the scenery of NH. There are many comments that related to specific properties/areas, the Scenic Byway, summer camps, or the WMNF in particular. Issues ranged from concerns over personal viewsheds and experience, to impacts on the greater economy of NH. Commenters expressed concerns that the infrastructure would decrease the appeal of NH for tourism and recreation, as the pristine, undisturbed viewshed is largely the basis for both.

Some comments related specifically to the North Country, as this largely agrarian area is seen as particularly undisturbed and reliant upon scenery-based tourism. Other comments related specifically to the design of the towers and concerns that they would not be well-integrated into the landscape (with heights taller than trees, etc.). Table 11 lists the sub-resources and number of comments within this resource category.

⁴ In response to public comment, preparation of the EIS was suspended until the DOE identified a new contractor (SE Group) to assist the DOE in the preparation of the EIS.

**Table 11:
Summary of Viewshed/Scenery Comments**

Sub-resource	Number of Comments	Percent of Total
Specific locations	126	46.2
Private property	26	9.5
General	121	44.3
TOTAL	273	100

3.10 Cumulative Effects

Comments related to cumulative effects were diverse, but often related to the proposed project’s overall sustainability when evaluated in combination with other energy projects in the Northeast. Commenters suggested that the proposed project would hinder the ability of U.S.-based clean energy enterprises to succeed. Others questioned whether the practices that are required to generate the hydroelectric power in Canada, such as flooding, are ecologically sustainable. Additional comments on cumulative impacts related to the potential environmental impact of multiple new transmission projects in the Northeast, in terms of wildlife and ecology, the economy, and quality of life. Table 12 lists the sub-resources and number of comments within this resource category.

**Table 12:
Summary of Cumulative Effects Comments**

Sub-resource	Number of Comments	Percent of Total
Hydro-Québec	182	74.9
Multiple transmission projects	32	13.2
Increased transmission development	17	7.0
General	12	4.9
TOTAL	243	100

3.11 Wildlife

Many commenters raised concerns regarding their particular property, similar to other categories, or raised concerns over specific species (e.g., hummingbirds, wood frogs, timber rattlesnakes) or general endangered, threatened and sensitive species. Dozens of species or groups of species were identified, but comments generally pertained to the loss of habitat. Commenters also raised concerns regarding the impacts of EMF or noise on the behavior of species with acute hearing such as dogs, wolves, coyotes, deer, bear, bobcat and other mammals. It was also suggested by commenters that bats’ ability to navigate may be impaired by the noise from the proposed line. Table 13 lists the sub-resources and number of comments within this resource category.

**Table 13:
Summary of Wildlife Comments**

Sub-resource	Number of Comments	Percent of Total
Habitat/fragmentation/migration	73	31.9
Avian, bat and pollinators	45	19.7
Threatened, endangered and sensitive species	39	17.0
Noise/EMF	26	11.4
Aquatic species	19	8.3
Terrestrial species	5	2.2
General	22	9.6
TOTAL	229	100

3.12 Taxes

Comments related to taxes focused on the potential loss of municipal tax revenues and the deterioration of the tax base as a result of property devaluation. Commenters noted that NH, without sales tax or state income tax, relies heavily on property tax revenues and saw this potential loss of property tax revenue as having far-reaching ramifications for NH municipalities. For example, commenters suggested that decreased property tax revenue could lead to a loss in public service provision, e.g., local education expenditure. Additionally, commenters expressed concern that decreased tax revenues from directly affected properties could result in increased property taxes for properties not directly affected by the proposed project. As with most other comment categories, a number of tax-related comments were about specific locations and properties.

In addition to the major themes listed above, the manner and specifics of Northern Pass’s disclosure of potential tax benefits for NH municipalities was questioned. Many commenters believed Northern Pass had either over-estimated tax benefits to communities or only presented one side of the equation by not accounting for the tax effects of potentially devalued properties. There are no sub-resources for the taxes category. Table 14 lists the number of comments within this resource category.

**Table 14:
Summary of Taxes Comments**

Sub-resource	Number of Comments	Percent of Total
General	164	100
TOTAL	164	100

3.13 National Forest and Conserved Lands

The majority of comments in this category were related to the protection and potential degradation of conserved lands, both in and outside of the WMNF. Commenters noted that the WMNF is conserved land held in trust for all the people of the U.S. and that this protected land should not be used for such a purpose as the proposed project. Similarly, commenters suggested that non-federal conserved lands (i.e., state forest and parks, private lands with conservation easements, and conservation lands held by non-profits) should also be protected from such development.

Other USFS and conserved lands comments addressed the use of and recreation in the WMNF, compliance with USFS regulations and the WMNF Land and Resource Management Plan, and issues pertaining to the existing PSNH ROW across Silvio O. Conte National Wildlife Refuge. Table 15 lists the sub-resources and number of comments within this resource category.

**Table 15:
Summary of Forest Service/Conserved Lands Comments**

Sub-resource	Number of Comments	Percent of Total
WMNF	58	40.6
Silvio O. Conte National Wildlife Refuge	6	4.2
General	79	55.2
TOTAL	143	100

3.14 Vegetation

Many of the vegetation comments received were related to the loss of forested land associated with the proposed project; the use of chemical defoliants to clear the ROW and the associated impacts to plant life; threatened, endangered and sensitive species; the spread of invasive species; and, habitat fragmentation. Habitat fragmentation comments were similar to those discussed under wildlife, although these comments focused on plant communities rather than animal habitat. As with most other comment categories, comments related to specific private properties or locations were also offered. Table 16 lists the sub-resources and number of comments within this resource category.

**Table 16:
Summary of Vegetation Comments**

Sub-resource	Number of Comments	Percent of Total
Herbicides to clear the ROW	64	52.5
Tree removal/fragmentation	33	27.0
Invasive species	15	12.3
Threatened, endangered, and sensitive species	6	4.9
General	4	3.3
TOTAL	122	100

3.15 Water and Wetlands

Comments related to water and wetlands ranged from concerns over ground water contamination to regulatory requirements and wetland inventorying. Many of the water and wetlands comments received pointed to water impacts resulting from the clearing of the ROW and the use of chemical defoliant. Compliance with the Clean Water Act and other regulations was also of importance to many commenters. Location-specific concerns, often centering on private properties, were also a major theme in water and wetlands comments.

In addition to the major themes listed above, a number of other issues were raised in water and wetlands comments. Runoff, erosion and sedimentation, design criteria and mitigation measures, construction concerns, the NEPA process, and wildlife were also identified by the commenters. Table 16 lists the sub-resources and number of comments within this resource category.

**Table 17:
Summary of Water/Wetlands Comments**

Sub-resource	Number of Comments	Percent of Total
Location specific	43	37.4
Clean Water Act and other regulations	20	17.4
Wetland inventorying	16	13.9
Runoff, sediment and erosion	15	13.0
General	20	17.4
TOTAL	115	100

3.16 Recreation

Many of the recreation comments received were related to either impacts to the Appalachian National Scenic Trail or impacts to the recreational activities that make NH a regional recreational tourism destination. Commenters believe that degradation of these recreational resources could occur as a result of the proposed project and that these impacts could have a devastating effect on the tourism industry that supports much of the state. As with most other

comment categories, a number of comments related to specific private properties or locations were also provided.

In addition to the major themes listed above, comments were received in relation to impacts to recreation-based businesses and effects on snowmobile use in and around the ROWs. Table 18 lists the sub-resources and number of comments within this resource category.

**Table 18:
Summary of Recreation Comments**

Sub-resource	Number of Comments	Percent of Total
Appalachian National Scenic Trail	51	58.6
Location specific	12	13.8
General	24	27.6
TOTAL	87	100

3.17 Historic and Cultural

The majority of comments in this category were related to specific historic or cultural resources, either on private or public property. These specific sites include historic districts, private properties (some listed on the National Register of Historic Places), and non-profit-owned properties, such as the Poore Family Homestead Historic Farm Museum, and other historic homesteads and farms.

A number of historic and cultural comments also referenced the agrarian cultural landscape of NH, and particularly the North Country, which is largely based on the rural and natural character of the land. Prehistoric and Native American sites and/or resources were also identified by the commenters as being important for the historic and cultural analysis. Some commenters requested to be a party the National Historic Preservation Act (NHPA Section 106) consultation process for the project. Table 19 lists the sub-resources and number of comments within this resource category.

**Table 19:
Summary of Historic/Cultural Comments**

Sub-resource	Number of Comments	Percent of Total
Specific resources	38	44.2
Consultation/106 compliance	18	20.9
General	30	34.9
TOTAL	86	100

3.18 National Security

Comments in this category hinged upon the national security implications of creating additional reliance on foreign energy sources through the proposed project. Issues raised in relation to this

reliance included questions of whether foreign entities should have control over such a major U.S. power source, especially given the variable nature of hydro-power and its vulnerability to extreme weather events; whether the proposed project is in line with national security and energy goals; the political ramifications of such a dependence; and, the potential for increased terrorism as a result of foreign political ties.

Other major themes in national security comments included: the vulnerability of the proposed transmission line to weather and attacks; a general increase in the potential for terrorism; and, the opening up of a new travel corridor for drug smugglers, illegal immigrants and others. There are no sub-resources for the national security category. Table 20 lists the number of comments within this resource category.

**Table 20:
Summary of National Security Comments**

Sub-resource	Number of Comments	Percent of Total
General	71	100
TOTAL	71	100

3.19 Design Criteria and Mitigation Measures

Many of the design criteria and mitigation comments were related to ROW issues, such as the width of the ROW, the number of power lines on the proposed ROW, vegetation maintenance on the ROW, mitigation of Off-Highway Vehicle (OHV) use, and trespass via the ROW. Of specific interest was the potential encouragement of OHV encroachment on the Appalachian National Scenic Trail System and the WMNF through the creation of a new potential travel corridor (i.e., the ROW).

Beyond ROW issues, design criteria and mitigation comments focused on the size of the towers and tower design; route alignment; responding to weather conditions (snow/ice loads); social and economic mitigation; wildlife mitigation measures; accommodation of other land uses (golf courses) and development parcels (housing); and, the location, size, and configuration of the converter station. There are no sub-resources for the design criteria/mitigation measures category. Table 21 lists the number of comments within this resource category.

**Table 21:
Summary of Design Criteria/Mitigation Measures
Comments**

Sub-resource	Number of Comments	Percent of Total
General	70	100
TOTAL	70	100

3.20 Air Quality

Many of the air quality comments received were related to carbon sequestration, greenhouse gas emissions, hydro-power generation and contribution to global climate change, and the clearing of the ROW. Many commenters suggested the air quality impacts resulting from the generation of power being transmitted through the proposed line should be considered in the EIS analysis. Some commenters requested an analysis of the loss of carbon-sequestering vegetation along the ROW and the resultant air quality impacts. The potential effect of the proposed project on domestic renewable energy production, and the associated air quality impacts, were also of concern to commenters.

Air quality comments were also received in relation to construction activities, demand side management options, and aerosol pollutants that may be attracted to the EMF generated by the proposed line. The potential reduction in dependence on fossil fuels was also raised by commenters. There are no sub-resources for the air quality category. Table 22 lists the number of comments within this resource category.

**Table 22:
Summary of Air Quality Comments**

Sub-resource	Number of Comments	Percent of Total
General	40	100
TOTAL	40	100

3.21 Noise

Many of the noise comments were related to the hum that may be produced by high voltage transmission lines, including the noise levels of the existing power lines in the ROW compared to the proposed lines, potential effects on sleep patterns, changes in humidity and weather conditions, and effects of the humming on wildlife.

In addition to the major themes listed above, noise comments also raised the issue of construction noise from blasting and heavy machinery. Although temporary, some commenters expressed concern that this construction noise could have significant impacts to both quality of life and wildlife. Comments also discussed impacts to protected lands, specifically the WMNF and the Appalachian National Scenic Trail, which are thought to require quiet to maintain their quality. Table 23 lists the sub-resources and number of comments within this resource category.

**Table 24:
Summary of Noise Comments**

Sub-resource	Number of Comments	Percent of Total
Construction	3	10.3
General	26	89.7
TOTAL	29	100

3.22 Environmental Justice

Many of the environmental justice comments were related to the generally disadvantaged northern area of NH, particularly Coös County. Commenters noted that Coös County is the most economically depressed county in the state, as well as one of the poorest counties in the nation. Many commenters stressed that it is inappropriate to further burden this already disadvantaged area with impacts associated with the proposed project. It was also expressed that the impacts of the proposed project would be the worst in these northern areas, in part because a new ROW/alignment would need to be secured and created.

Another major theme of environmental justice comments was the idea that the NH residents impacted would receive no benefit from the proposed project. Commenters expressed concern that while they would have to bear the brunt of the impacts of the proposed project, they would not be using the power, they would not see a reduction in energy prices, and they would not receive positive economic benefits in the long run. In addition to the major themes listed above, environmental justice comments related to route selection and disproportionate impacts to minority and low income populations, health concerns, and the legal requirements of environmental justice considerations. There are no sub-resources for the environmental justice category. Table 25 lists the number of comments within this resource category.

**Table 25:
Summary of Environmental Justice Comments**

Sub-resource	Number of Comments	Percent of Total
General	29	100
TOTAL	29	100

3.23 Soils

Soils comments mostly related to concerns over erosion and associated sediment loads to streams. Erosion related to construction activities, i.e., deforestation of the ROW, construction of stream approaches, use of portable bridges, and extreme weather events were identified as important to commenters. Potential erosion impacts to specific watercourses, such as the Pemigewasset and Wild Ammonoosuc Rivers, were also identified.

Commenters noted that the mountainous region of NH generally has little topsoil and can be especially susceptible to erosion and invasive species. Construction concerns, primarily related to the use of heavy machinery, as well as effects on farming and prime agricultural soils, were also raised by commenters. As with most comment categories, some specific location and soil-type comments were also submitted. There are no sub-resources for the soils category. Table 26 lists the number of comments within this resource category.

**Table 26:
Summary of Soils Comments**

Sub-resource	Number of Comments	Percent of Total
General	24	100
TOTAL	24	100

3.24 Quality of Life

In general, quality of life comments focused on preserving the way of life in NH in terms of lifestyle and the socio-cultural environment. Some commenters believe the proposed project would detract from many of the qualities they value about NH and their local communities. The qualities identified were wide-ranging consisting of features such as natural beauty, serenity, views, wildlife, self-reliance, agrarian livelihoods, and others.

Quality of life comments related to aesthetics and environment were based on views, scenery, surroundings, wildlife, forests and natural resources in general. Comments related to growth and the economy considered occupations, traditions and social character, and the desirability for future generations to live and work in these communities. There are no sub-resources for the quality of life category. Table 27 lists the number of comments within this resource category.

**Table 27:
Summary of Quality of Life Comments**

Sub-resource	Number of Comments	Percent of Total
General	21	100
TOTAL	21	100

3.25 Traffic and Transportation

Traffic concerns raised by commenters included the potential for the proposed project to impact aircraft travel and NH airports, as well as impacts to adjacent land owners for the construction and maintenance of access roads along the ROW. There are no sub-resources for traffic and transportation. Table 28 lists the number of comments within this resource category.

**Table 28:
Summary of Traffic and Transportation Comments**

Sub-resource	Number of Comments	Percent of Total
General	11	100
TOTAL	11	100

3.26 Other

Comments in the other category were extremely diverse and did not fit into any other identified comment categories. Given the broad range of other comments, sub-categories were not generated. Comments primarily included concerns over interference with communications and electronics. Comments also raised concerns regarding the ability of NH and the United States to regulate how much power will and/or must be provided through the proposed line. There are no sub-resources for other comments. Table 29 lists the number of comments within this resource category.

**Table 29:
Summary of Other Comments**

Sub-resource	Number of Comments	Percent of Total
General	34	100
TOTAL	34	100

4.0 FURTHER PUBLIC INVOLVEMENT

The public scoping period ended on November 5, 2013. All comments submitted through the mechanisms identified in Section 2.1 by that date, as well as comments submitted prior to the start of the development of this scoping report (early February 2014) were accepted, analyzed, and summarized in this scoping report.

A public comment period for the Draft EIS will begin when the EPA publishes a Notice of Availability of the document in the *Federal Register* and will be at least 45 days in length. The DOE will also hold at least one public hearing on the Draft EIS (per 10 CFR §10.02313(b)). Public hearings will be announced at least 15 days in advance and the announcement will include the location, date, and time of the public hearing or hearings.