

From: Schibanoff, Susan [<mailto:susan.schibanoff@unh.edu>]
Sent: Friday, February 12, 2016 12:11 PM
To: Monroe, Pamela
Subject: Public Comment Docket 2015-06

Dear Ms. Monroe,

Please file the following as my comment letter on the Northern Pass project, Docket 2015-06. It was published today, February 12, 2016, as a "My Turn" column in the [Concord Monitor](http://www.concordmonitor.com/home/21004700-95/my-turn-northern-pass-interventions-tell-a-compelling-story).

Thank you.

Susan Schibanoff

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My Turn: Northern Pass interventions tell a compelling story

By SUSAN SCHIBANOFF

For the Monitor

Friday, February 12, 2016

By the close of business on Feb. 5, more than 140 petitions to intervene in the Northern Pass docket had been emailed to the New Hampshire Site Evaluation Committee. All but a dozen came from those who oppose the project as currently configured (132 miles overhead), including New Hampshire property owners; small businesses and tourism groups; municipalities; NGO conservation, recreation and preservation organizations; and elected officials.

This record number of interventions tells the story that, as the state permitting process gets underway, public discontent with Northern Pass is increasing, despite statements to the contrary by project sponsors.

The increase is consistent with the two sets of information sessions held under SEC auspices in September and January: 80 percent of the public comments made in these hearings opposed an overhead Northern Pass. The petitions themselves tell further stories that must be heeded by project sponsors, if they wish to succeed, and by the SEC in its upcoming formal deliberations.

Scores of petitions were submitted by property owners, a number of whom joined together to file group motions. These petitions articulate the varied reasons why Northern Pass is wrong for New Hampshire.

Property owners tell stories of the cherished heritage of their land, of their dreams and plans now under threat by industrialization of the landscape. They include the family who found a retirement home it wanted to buy but then learned that Northern Pass towers would be visible from it; the home owner trying to sell property that has been rejected by half of the people who looked at it when they learned it would have views of Northern Pass towers; the couple who purchased a portion of family land 50 years ago, built a house and raised children there, and want to pass it on to their grandchildren undiminished in value and unscarred by towers; the woman whose plans to start a wedding venue business on her property, with wonderful views of the mountains, have been in limbo since the advent of Northern Pass; and many others.

Northern Pass's expert studies say the project would have no adverse effect on land use in New Hampshire. The recently filed petitions by real New Hampshire property owners tell an entirely different story.

Of the 22 towns that have requested to intervene, all are on the proposed route except two, which abut impacted towns and share their concerns about aesthetic degradation and consequent adverse economic effects. Those towns with the proposed line buried seek clarification of the myriad unanswered questions about the unforeseen long-term costs that might devolve upon a municipality hosting such infrastructure. None has been assuaged by Northern Pass's promise of tax revenue to offset such economic impacts. Too many are aware of, or themselves victims of, Eversource's ongoing legal actions against the towns that do not accept its method of reducing utility valuations.

Nine petitions from conservation, environmental, recreation and preservation NGO's underscore the striking fact that not one such group has ever endorsed Northern Pass, despite the project's efforts to buy friends with a \$3 million fund administered through the National Fish and Wildlife Foundation.

Northern Pass's central claim of environmental benefit – big hydropower as a source of “clean,” carbon-free energy – is disputed by at least one intervenor, the Conservation Law Foundation, which has long noted that large-scale hydropower is neither carbon-free nor without impacts. The overhead project's threat to treasured and historic landscapes in New Hampshire runs counter to the mission of two of the state's oldest and most revered conservation groups that have intervened, the Society for the Protection of New Hampshire Forests and the Appalachian Mountain Club. Both were instrumental in the creation of the state's crown jewel, the White Mountain National Forest, at the turn of the 20th century, and both remain steadfastly opposed to a project that would mar New Hampshire's most valuable asset, its scenery.

Another intervenor in this group, the National Trust for Historic Preservation, which has designated New Hampshire's scenic landscapes a “National Treasure” worth saving, also believes that if the transmission line is to be built, it should “not be at the expense of the character and spirit of the Granite State's special places.” That is, it must be buried completely.

Unique in SEC history, a large, joint group of New Hampshire state legislators – four senators and 64 representatives – has petitioned to intervene on behalf of constituents. The story their novel intervention tells is consistent with that of the other parties: They want to “protect one of New Hampshire’s greatest assets, its natural beauty.” Unless the line is fully buried, they write, “its costs, in marred landscapes and streetscapes, reduced property values, and damaged livelihoods and quality of life,” would be unfairly inflicted upon New Hampshire communities.

Collectively, these interventions against Northern Pass reiterate the same story from multiple angles: An overhead project imposes too high a cost, too steep a penalty on New Hampshire’s signature asset, its historic landscapes and vaunted natural beauty. For nearly two centuries, these assets have attracted national, even international attention, beginning with the early 19th-century American landscape painters who made the scenery of the White Mountains famous worldwide and continuing to the tourists and second home-owners who come to New Hampshire today in search of that still awe-inspiring landscape.

To squander New Hampshire’s signature asset in return for questionable and temporary profits from an optional, merchant power line is unthinkable

The single barrier that stands between the massive intervention filed at the SEC and the eventual construction of this private feeder line from Hydro-Quebec dams to southern New Hampshire is Northern Pass’s unsubstantiated assertion, repeatedly made in the January SEC hearings, that a fully buried line would be “uneconomic.”

With Hydro-Quebec, the financier of Northern Pass, announcing a profit of \$3.38 billion (Canadian) for 2014 and \$2.47 billion for the first three quarters of 2015, and standing to make a handsome gain on this line – a predicted \$200 million per year or \$8 billion over the 40-year life of the project – the “uneconomic” claim lacks credibility. What’s truly “uneconomic” about Northern Pass is that sponsors will have spent \$157 million by the end of 2016 and still lack the public’s support.

The intervention story is now clearly written on the wall for all to read. Project sponsors will ignore it at their peril.

(Susan Schibanoff lives in Easton. She is a member of Responsible Energy Action LLC.)