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**Subject:** Northern Pass Viewshed Analysis, more inadequacies

SEC Rules state:

*301.05 (b) (1) The visual impact assessment shall contain the following components:*

*" A description and **map** depicting the locations of the proposed facility and all associated buildings, structures, roads, and other ancillary components, and all areas to be cleared and graded, that would be visible from any scenic resources, based on both **bare ground conditions** using topographic screening only and with consideration of screening by vegetation or other factors."*

The Viewshed Analysis Supplement does not show visibility of towers from scenic resources with bare ground conditions.

The ROW ("all areas to be cleared and graded") is not shown in the deep purple color of highest impact.

The purple coding for impact obscures the green indicating National or State Forests.

301.05 (b) (3) requires: *" A narrative and graphic description, including maps and photographs, of the physiographic, historical and **cultural features** of the landscape surrounding the proposed facility to provide the context for evaluating any visual impacts;"*

There are many large cultural features that are not delineated but merely designated with dots, on the map, including but not limited to:

- #34) Nash Stream Forest; 39,601 acres
- #1) Connecticut Lake Headwaters; 171,000 acres
- #18) Vickie Bunnel Preserve; 10,500 acres
- #23) Lake Umbagog NWR; 7,000 acres
- #24) Lake Umbagog; 7,830 acres
- #15) Silvio O Conte NFWR; 36,000 acres
- #46) Randolph Community Forest; 10,000 acres
- #77) Penacook Lake; 362 acres
- #69) Newfound Lake; 4.451 acres
- #70) Pemigewasset Lake; 256 acres
- #60) Webster Ridge Conservation Area; 490 acres
- #44) Cohos Trail
- #99) Mt. Kearsarge State forest; 5,000 acres
- #80) Russel Shea State Forest; 125 acres
- #38) White Mountain National Forest, Milan ???

Unmarked are:

Bear Brook State Park; 10,000 acres, Listed to National Register of Historic Places

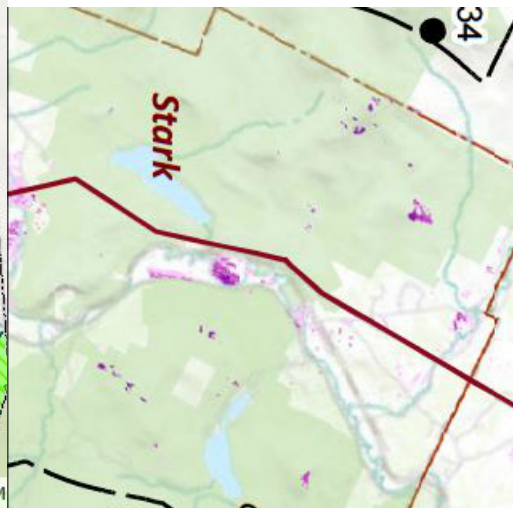
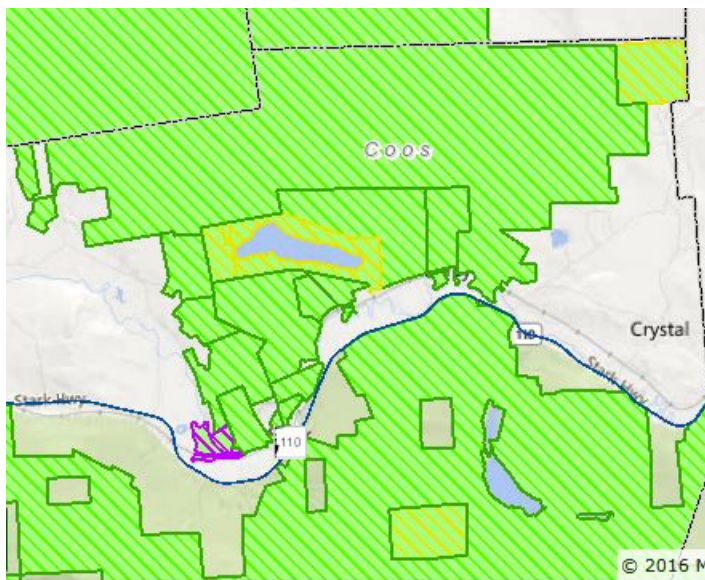
Coleman State Park; 1,530 acres

Pawtuckaway State Park; 5,000 acres

In addition, since the revised Project Area Forms for historical resources for the North Country are not yet finished, the Viewshed Analysis Maps are incomplete.

Supplementary Attachments #8 and #9 do not include the route from Deerfield to Scobie Pond, and the application is therefore incomplete.

In addition, the rod dots and arrows indicating the location and direction of the visual impact simulations obscure the color coding of visual impact. It appears that none of the visual impact simulations were done at locations of highest impact, but it simply can not be determined. Notice the ROW is green, rather than dark purple.



NP map on right fails to show Kaufman State Forest, Percy State Forest, and #34 "shows" the 39,400 acre Nash Stream Forest. DOE map shows impact to Christine Lake.

