TOWN OF CANAAN

March 14, 2016

TOWN OF CANAAN P.O. BOX 159 318 CHRISTIAN HILL CANAAN, VT 05903

Via email (Brian.Mills@hq.doe.gov)

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

Via email (Pamela.Monroe@sec.nh.gov)

Pamela Monroe, Administrator New Hampshire Site Evaluation Committee 21 S. Fruit St., Suite 10 Concord NH 03301

> Re: Northern Pass Transmission LLC Application for Presidential Permit Subjects: Section 106: Cultural and Historic Resources Draft EIS: Viewshed/Scenery, Alternatives, Property Values, Water Courses, Wetlands, Soil Erosion, Traffic, Vermont Permitting

New Hampshire Site Evaluation Committee Project No. 2015-06

Dear Mr. Mills and Ms. Monroe:

The undersigned Selectmen of the Town of Canaan, Vermont have not been consulted by Northern Pass Transmission LLC or informed by any federal or state agency about the Northern Pass Transmission project and its anticipated impacts on our town or our rights and remedies if we should object to the project.

Based on information that we have been able to gather on line and from our neighbors across the river in New Hampshire, it is apparent to us that Northern Pass anticipates using our town roads to transport laborers, materials, heavy machinery and heavy equipment to multiple transmission tower construction sites for this project just a few hundred yards north of our border with the Town of Pittsburg, NH. Town roads involved would be Old Canaan Road and Halls Stream Road in the Beecher Falls section of Canaan. They are the only public roads that the developer can use to get access to its proposed project entry point from Canada into Pittsburg across Halls Stream. Traffic congestion, road blockages, road damage and road safety are just some of our concerns in this regard.

Phone: 802-266-3370 Fax: 802-266-8253 In addition, it appears that much of the construction proposed by the developers will impact major watercourses, wetlands and intermittent streams that drain downhill from the transmission line tower construction sites into our town and into the waters of the Connecticut River and Halls Stream. This causes us numerous concerns about potential damage to our wetlands and watercourses, potential erosion and flooding, and mitigation issues—especially since the developer has not sought any permits from the relevant State of Vermont permitting authorities copied on this letter.

Of greatest concern is that the proposed transmission line and 20 Northern Pass steel lattice transmission towers are proposed to be built in an entirely new corridor that will be cleared and constructed through southwestern Pittsburg running west to east just a few hundred yards north of the state line border with the Beecher Falls section of Canaan. This segment of the Northern Pass transmission project would be highly visible in much of Canaan and all along the Connecticut River and its federally designated Connecticut River Scenic and Cultural Byway. The segment that is proposed to be built in Canada would also adversely impact many Canaan properties that have superlative views of Mount Hereford to the north. We understand that Hydro Quebec proposes to build its above ground transmission line link to Northern Pass across the southern slope of Mount Hereford in Quebec in a clear cut right of way that will be starkly visible from our town but conveniently hidden from Eastern Township population centers on the Quebec side of the border. We have never been shown any visual simulations of these Northern Pass and Hydro Quebec transmission line impacts; so we can only note the potential loss in property value and viewshed scenic beauty that this project would have on our town, its property owners and our real property tax base.

We think we should have been included in information briefings and consultations so that we and our residents might know more about this project and its undoubted impacts on our town. We also believe that we have been either intentionally or negligently left out of any consideration or examination in the Draft EIS. This needs to be corrected by amending the Draft EIS and holding at least one DOE meeting in our town so that our citizens can be informed of the impacts of this proposed project and given an opportunity to comment.

As far as we can tell, much of our Beecher Falls village will be within the one mile Area of Potential Effect ("APE") of the proposed transmission line, yet no Federal or Vermont State Section 106 work has been initiated that we are aware of; and we and our local Historical Society have not been given any notice of our rights to participate in that process. Taking a look at the consultations page on the DOE Northern Pass website, we actually see what appears to be an intentional blocking out of any Section 106 detail for our entire town area with the PAE of the project. See Section 106 public information maps on numbered pages 6 and 7 at this url:

http://media.northernpasseis.us/media/Part 2 of 7 Great North Woods Draft PAF REDACT ED reduced.pdf.

Any effort to go forward without including our town and the State of Vermont in the Section 106 process would be flawed and invalid.

Lastly, we have not been asked by Northern Pass whether or not Canaan would be interested in hosting an underground portion of the proposed transmission line. We would like to know much more about the project and its undergrounding impacts before committing support to such an alternative, but it is obvious that many of our viewshed/scenery concerns could be resolved if the transmission line was placed underground in a roadbed. Undergrounding in our

roads through Beecher Falls would make it totally unnecessary to traverse the southern border of Pittsburg and would actually shorten the route proposed for each of the draft EIS Alternatives 4a, 4b, 4c, 6a and 6b by more than four (4) miles. We fail to understand why this substantially shorter alternative has not been explored by Northern Pass or the Department of Energy EIS consultants.

Please register this letter as a Comment on: (1) the Draft EIS; (2) the Section 106 process; and (3) the New Hampshire Site Evaluation Committee Project No. 2015-06.

Copies of this letter are also being sent to Northern Pass and to State officials and agencies that may have an interest in helping us or in coordinating or reviewing needed permit applications given the project's undoubted impacts on our town and its Vermont residents and landowners—which impacts have been ignored thus far. Thank you for your attention and anticipated action.

Sincerely,

TOWN OF CANAAN Selectman Selectma Selectman

cc: Governor Peter Shumlin 109 State Street Pavillion Montpelier, VT 05609

> Senator Patrick Leahy 87 State Street, Room 338 Montpelier VT 05602

Senator Bernie Sanders 357 Western Ave., Suite 1B St. Johnsbury VT 05819

Congressman Peter Welch 128 Lakeside Ave., Suite 235 Burlington VT 05401

info@northernpass.us Northern Pass Transmission, LLC c/o William Quinlan President of Eversource NH Operations 780 North Commercial Street Manchester NH 03101 <u>Pete.LaFlamme@vermont.gov</u> Laura.Woods@vermont.gov Vermont Department of Environmental Conservation Watershed Management Division1 National Life Drive, Main 2 Montpelier VT 05620-3522

Vermont Public Service Board 112 State Street Montpelier, VT 05620-2701

Craig.Keller@Vermont.gov Vermont Agency of Transportation One National Life Drive Montpelier VT 05633-5001

James.Duggan@Vermont.gov Historic Preservation Review Coordinator Vermont Agency of Commerce & Community Development Vermont Division for Historic Preservation 1 National Life Drive, Davis Bldg, 6th Floor Montpelier VT 05620-0501

Dennis Fuller canvthistsoc@gmail.com Canaan Historical Society PO Box 214, Canaan VT 05903

Elizabeth Muzzey, Director New Hampshire Division of Historical Resources 19 Pillsbury Street Concord NH 03301

Jennifer Goodman, Executive Director N.H. Preservation Alliance 7 Eagle Square PO Box 268 Concord, NH 03302-0268