COMMENTS OF NORTHERN PASS TRANSMISSION LLC
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
TOURISM AND LAND USE IMPACT ANALYSIS

Northern Pass Transmission LLC ("Northern Pass" or the "Project") submits this comment on two distinct issues addressed in the Draft Environmental Impact Statement ("DEIS"): impacts on tourism and impacts on land use. In each case, the DEIS suggests that there will be small impacts, but it bases these conclusions on assumptions only, despite the fact that its analysis fails to demonstrate there are impacts.

Tourism

The DEIS explains that DOE undertook a qualitative study of the factors that affect tourism in New Hampshire. The study showed that tourism in New Hampshire is affected by macroeconomic considerations such as consumer confidence, the unemployment rate and the price of gasoline. The study also noted that tourism is affected by weather, e.g., snow cover for winter downhill sports. DOE's study of the issue did not show that transmission lines are among the factors that affect tourism.

Northern Pass agrees with these conclusions. A tourism study, undertaken by the Nichols Tourism Group ("the Nichols Study") to support the Project's permitting application before the New Hampshire Site Evaluation Committee ("SEC"), confirms and reinforces those conclusions.[1] It identified additional factors that also affect visitors' decisions on where they will travel: ease of destination access; range and diversity of tourism products; recently introduced tourism products; scale of marketing initiatives; overall value for the money; and the overall brand identity of the destination. The Nichols Study notes that never in 20 years of tourism-related work have the authors experienced any concern being raised about the presence of power lines.[2]

Northern Pass also agrees with the observation in the DEIS that there are no "authoritative, peer-reviewed studies" that provide quantitative estimates of effects of a transmission line on the tourism industry. DOE notes that it looked at the EISs for other transmission lines for their analysis of impacts on tourism. What it found in those documents is speculation about the kinds of effects a transmission line project might have on tourism, not any

[1] The Nichols Study submitted in the SEC proceeding was done by Nichols Tourism Group, with assistance from the National Laboratory of Tourism and eCommerce at the University of Florida. *See* http://www.northernpass.us/assets/filings/Volume%20XXXIV/Appendix%2045%20Northern%20Pass20%and%20New%20Hampshires%20Tourism%20Industry.pdf.

[2] Id. at 8-9.

actual evidence of impacts. Reinforcing the absence of academic or other studies showing an adverse effect on tourism from transmission lines, the Nichols Study also could identify no instance in approximately 250 tourism-related assignments undertaken by the Nichols Group over a period of 20 years when transmission lines were identified as a negative influence on tourism demand.[3]

Finally, the DEIS purports to rely on "anecdotal evidence" that transmission lines do not affect tourism. The one example it points to, the "Old Man of the Mountain" case study, supports the conclusion that tourism is driven by macroeconomic factors, not by the presence or absence of a single feature in the scenery. More persuasively, the Nichols Study analyzed whether tourism was affected by the construction of two different transmission projects: the Phase II project in New Hampshire in the late 1980s to 1990, and the Maine Power Reliability Program. (As the Nichols Study notes, New Hampshire competes directly with Maine for tourism; thus, the Maine example is highly relevant.) Both cases involved the construction of large, high voltage transmission projects. In both cases, the Nichols Study found that both the number of tourism-related establishments and employees in tourism in the areas where the lines were added *increased* both during and in the years following construction of the new transmission lines. Indeed, the Nichols Study showed that the increase in tourism development and employment in the areas where the transmission lines were located outpaced tourism development and employment in other areas of New Hampshire and Maine respectively for the same periods.[4]

Visitor surveys undertaken as part of the Nichols Study likewise reinforce the conclusion that the presence or absence of visible power lines is not an important factor in selecting a tourism destination.[5]

In the face of both the analysis in the DEIS itself, which revealed no qualitative or quantitative evidence that the presence of transmission lines can affect tourism, the DEIS arbitrarily finds that "it is reasonable to conclude that the Project may have some level of impact to tourism within New Hampshire." The analysis in the DEIS itself and in the Nichols Study make clear that this is a wholly unsupported conclusion that should not be included in the Final EIS. There is simply no basis for concluding that the presence of power lines has any effect on tourism.

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3 Id. at 8 – 9.

4 Id. at 19 – 22.

5 Id. at 24 – 27.

Land Use

Northern Pass concurs in the conclusion of the DEIS that, where the Project uses existing transmission or roadway corridors, there will be no change to the prevailing land use in the area. Northern Pass also agrees with the conclusion in the DEIS that underground construction in public roads will have short-term impacts on traffic. Northern Pass will closely coordinate with state and local officials to minimize those impacts. Finally, Northern Pass agrees that the overall potential impacts are less for Alternative 7 than for the Alternative 2. Notably, the new proposed route under Alternative 7 is fully consistent with the USFS Forest Plan Standards for the White Mountain National Forest.[6]

On the other hand, Northern Pass is having difficulty understanding the basis for the findings in the DEIS with respect to impacts on land use – albeit estimated to be small – during the operational phase. Specifically, Northern Pass disagrees with the suggestion in the DEIS that there is any land use impact to conservation lands, except those Northern Pass pointed out in its January 11, 2016 Comment concerning those DEIS Alternatives that assume it is feasible to bury the transmission line along I-93. As Northern Pass explained there, it does not believe that underground construction along I-93 is feasible:

> [B]ased on its visual examination of the relevant area, Northern Pass has concluded that, except for a narrow shoulder, the area between the I-93 roadway and the outer edge of the I-93 ROW is undisturbed. To construct Northern Pass in that area would require extensive tree, vegetation and ledge removal, measures that are largely unnecessary along the state roads Northern Pass has designated in its project design in the area of the WMNF. Wetland areas likewise also appear to be located along the outer edge of the LAROW and would be impacted as well. Finally, the required clearing and terrain alteration would likely permanently alter the experience of travelers along the I-93 corridor without achieving any benefits that could not be achieved using the state roads Northern Pass has proposed, where the environmental impacts would be temporary and much reduced.

It was in order to avoid this kind of impact on conservation lands, among other reasons, that Northern Pass concluded it should propose building an additional 52 miles of the Project underground in other public roadways where there is available, sufficient, already-disturbed area so that it could avoid any impact on conservation lands. Thus, when the DEIS says there will be impacts on the use of conservation lands, Northern Pass does not know what conservation lands the DEIS references.

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[6] *See* Comments of Northern Pass Transmission LLC on Draft Environmental Impact Statement White Mountain National Forest and Franconia Notch (April 4, 2016) for a more complete discussion of this issue.

With respect to the 40 miles of new ROW that the Project will entail in the North Country of New Hampshire, that area is primarily forested and managed for uses such as timber harvesting operations, recreation and energy facilities. The Project will co-exist with these activities, and the ROW in that area will remain as vegetated open space. There will be no change in land use.

Alternative 7, the proposed route that Northern Pass now supports in lieu of Alternative 2, will have reduced land use impacts that should be noted. For its 1,200 MW design, Northern Pass had estimated that it would occupy 30 acres of a former Franklin campground site for its converter station. With the change in technology that is associated with putting 60 miles of the Project underground, it will now occupy only 10 acres of the Franklin site for the converter station. To avoid offsite noise or visual impacts, Northern Pass is locating the converter station away from the site boundaries.[7] Additionally, as the Supplement to the EIS notes, Alternative 7 involves the addition of new transition stations at Bethlehem and Bridgewater. However, both these transition stations and those required under Alternative 2 will occupy an area of 75 feet by 130 feet, roughly one third of the area the DEIS estimates.[8] Thus, the total of six transition stations required under Alternative 7 will occupy approximately one-half the land area the DEIS estimated would be occupied by the four transition stations envisioned under Alternative 2.

[7] *See* Pre-filed Direct Testimony of Derrick Bradstreet, Joint SEC Application of Northern Pass and PSNH, at 100, http://www.northernpass.us/assets/filings/Volume%20II/NHSEC%20Docket%20No%202015-06%20Pre-Filed%20Testimony.pdf. Northern Pass notes that the DEIS assumed the converter station would occupy 42 acres at the Franklin site. DEIS at 2-13. Northern Pass does not know the basis for that estimate.

[8] *Compare* Pre-filed Direct Testimony of Derrick Bradstreet, Joint SEC Application of Northern Pass and PSNH, at 104, with DEIS at 2-11.