

UPPER VALLEY
LAND TRUST

March 23, 2011

Mr. Brian Mills
Office of Electricity Delivery and Energy Reliability (OE-20)
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Mr. Mills,

I am writing to outline several concerns of the Upper Valley Land Trust relating to the Northern Pass alternate route (Central Section, Option 1 route, skirting the White Mountain National Forest) which includes a section through the eastern portions of Haverhill, Piermont and Orford, NH.

The Upper Valley Land Trust (UVLT) is a regional land conservancy working in 44 New Hampshire and Vermont towns in the Connecticut River Valley. Over the past 25 years, we have assisted our local communities as they have studied natural resources, formulated priorities, developed consensus and implemented land conservation strategies. Our conservation success relies upon voluntary choices made by landowners and area residents. This collaborative approach has resulted in the conservation of over 40,000 acres and 425 parcels of privately owned land in our service area.

The proposed alternative route carefully skirts several properties under conservation easements held by the Upper Valley Land Trust. What the route planners did not consider were conservation initiatives under development - parcels that would be conserved in the next twelve to 48 months. These represent collective effort on the part of landowners, communities and land trusts. There are several in the path of the proposed alternative route.

We ask that the scope of the impact analysis include the following considerations:

1. **Wildlife Habitat and Water Resources:** The proposed line cuts through land with very high natural resource value as indicated in several natural resource inventories. Resources that co-occur in the proposed route include unfragmented forest land, "Tier 1" wildlife habitat from the NH Wildlife Action Plan, FEMA floodplain, and aquifer as mapped by the USGS. The route transects an area with one of the highest levels of co-occurrence in Orford. It runs through important songbird habitat identified by Vermont Audubon where there is an ongoing stewardship and landowner education program (The "Forest Bird Initiative"). It would create openings through core forest. We are concerned about potential impacts on important habitat and water resources and we are concerned that construction of the transmission line will have negative impacts on the conservation of these resources.

2. **Water Quality:** The proposed route also passes through wetlands that form part of the watershed of the Baker River crossing between and near (within 2000 feet of) two pristine water bodies, Upper Baker Pond and Lower Baker Pond. The Orford Conservation Commission's water testing indicates that the water quality in these ponds



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is excellent. This is an area that has been identified as a conservation priority and where UVLT has been working with landowners. We are concerned about adverse impact on these important water resources and opportunities to conserve watersheds.

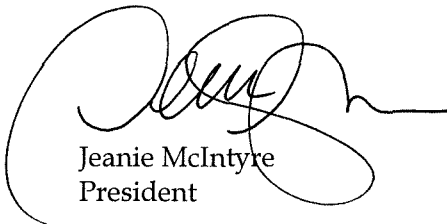
3. **Economic Impacts:** The eastern portions of Haverhill, Piermont and Orford consist largely of forestland without road access spreading over upland ridges. Over the past several decades these communities have diversified their land-based economies to include emphasis on green-tourism. The local tax base includes seasonal residences and businesses linked to resource stewardship. The proposed alternate route crosses through the property of three children's summer camps, Camp Moosilauke, Camp Merriwood, and Camp Pemigewasset. The beauty and pristine qualities of the landscape are directly linked to its attractiveness for this type of development and stewardship. We are concerned that construction of a new power line through this area will discourage responsible stewardship of the surrounding area and potentially undermine the economic development strategies of local communities. For these reasons, we ask that the short-term and long-range impacts on landowner attitudes and stewardship practices and consequences to the local economy be examined.

4. **Visual and Recreational Resources:** The proposed alternative route will have a very significant impact. Because it requires new right-of-way and represents new fragmentation of scenic resources, it is materially different and potentially much more harmful than the route that is preferred in the proposal. The impacted area is much larger. In Haverhill, Piermont and Orford, the new line would be in the scenic view from Mt Cube and other elevations popular for recreation. It would degrade views east to Piermont Mountain and Mount Moosilauke. It would cross the Appalachian Trail between Upper and Lower Baker Ponds, a popular recreation area for fishing, swimming, boating and hiking. We ask that the impact analysis study these consequences.

We believe the proposed route through Haverhill, Piermont and Orford poses risk to conservation resources and community health as outlined above. We trust that you will diligently examine these concerns and we'll be glad to assist by providing additional information upon request.

Thank you for your attention to this matter.

Sincerely yours,



Jeanie McIntyre
President