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DEPARTMENT OF ENERGY SCOPING PUBLIC MEETING, PEMBROKE, NH, MARCH 14, 2011  
NORTHERN PASS TRANSMISSION PROJECT ENVIRONMENTAL IMPACT STATEMENT

My name is Christophe Courchesne, and I am a staff attorney at the New Hampshire office of the Conservation Law Foundation. CLF is a member-supported non-profit organization that uses law, science, and markets to protect New England's environment. We will submit written comments as part of the scoping process, so my comments this evening will be brief. I am grateful for the opportunity to speak at this meeting.

To date, CLF has had serious concerns about DOE's review of the Northern Pass project. But we are encouraged by DOE's willingness to host seven scoping meetings throughout New Hampshire and by Northern Pass Transmission, LLC's withdrawal of its consultant from preparation of the EIS. We hope these developments mark a new beginning for this permitting process.

CLF's message tonight is simple - DOE must conduct a wide-ranging, independent, and rigorous review of this project, as NEPA requires. This project is one of the largest and most significant in New Hampshire history, and DOE's review of the project deserves every analytical resource DOE has at its disposal. A world-class, in-depth analysis is the only way that DOE's decision on the project will reflect the "hard look" at **impacts and alternatives** the law mandates.

**Impacts**

It is critical that DOE engage in a detailed and scientifically sound assessment of the many impacts of the project, such as its effects on New Hampshire's scenic landscapes, forests, wetlands, rivers, wildlife, and endangered species, as well on historic and cultural resources. In addition, DOE must fully assess the socioeconomic impacts of the project, including on tourism, local property valuations, and recreational attractions, and its ramifications for New Hampshire's and New England's energy future. DOE needs to consider the cumulative impacts of the project when combined with existing and future projects, including renewable energy projects in New Hampshire, and its many indirect impacts on the environment and the local, state, and regional economies.

DOE also must evaluate the environmental impacts of the project in Canada, including the effects of Hydro-Québec's related plans to expand its generating capacity. Likewise, DOE must provide a full accounting of the net greenhouse gas emissions of the project and the electric power that would flow through it. Only with these assessments can DOE and the public judge the truth of the developer's claim that the project will be a source of low-carbon, clean energy and advance New



Hampshire's climate action plan. At the same time, DOE needs to document and take into account the public's many other concerns, including the opposition to the current proposal.

### **Alternatives**

It is also vital that DOE conduct a robust analysis and comparison of alternatives. This comparison is the heart of DOE's NEPA review. DOE must consider all reasonable alternatives that are better for the environment and local communities, and must not hesitate to reject the proposed route or design in favor of those alternatives, even if such alternatives involve higher costs for Northern Pass Transmission, LLC. CLF urges DOE to provide a detailed, meaningful analysis of the use of the existing HVDC right of way in Vermont, as well as the burial of the transmission lines, including in railroad rights of way. DOE must also fully and impartially consider whether the superior alternative is the "no action" alternative. If it is, DOE may and should deny the developer's application.

Above all, DOE's ultimate decision should advance (and not hinder) an energy future for New Hampshire and the region that reduces global warming pollution; provides safe, reliable power with minimal environmental and socio-economic impact; and is supported by a strong, local clean-energy economy.

### **Timeline and Public Process**

Given these issues, DOE should take whatever time it needs to study all the potential impacts and alternatives and should not be limited by its announced timeline. To ensure a legitimate process, encouraging meaningful public involvement will be especially important. In this spirit, CLF recommends that the period for written comments on the scope of the EIS be extended for an additional three weeks, to May 3<sup>rd</sup>, to solicit as much public input as possible. In addition, **CLF urges DOE to release a proposed scope and outline for the EIS for public comment before preparation of the draft EIS begins in earnest, rather than publishing just a summary of the scoping comments received, as is apparently planned.**

Thank you very much for your attention. Again, CLF will be providing additional, more detailed written comments.

*\* Admitted in Massachusetts, motion for admission pending in New Hampshire*