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September 10, 2012

Hon. Jaclyn A. Brillling, Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Dear Secretary Brillling,

Please forgive my sending you these additional comments on the New York State Gas & Electric Company's application for its Columbia County Transmission proposal. My earlier comments were written in response to comments by others; the ones below were written in response to the application itself. It is of great concern to my neighbors and myself that no stone be unturned in the effort to find a more acceptable solution to the problem than the one proposed in the current documents submitted to the Commission. At a meeting of more than a hundred Ghent Residents on May 21, Andrew Davis of your agency said that in his many years of experience, only in one or two cases had the Public Service Commission ever failed to certify (with qualifications) an application once the Commission had accepted it. It is the goal of this letter to draw the Commission's attention to missing information in NYSEG's application—information that I do not believe has been requested by other parties to the case, but which would seem to be important information to include in such an application—that I would hope would be helpful in better understanding the application and deciding whether to accept it or to request that it be improved.

My comments are listed according to the documents presented as part of NYSEG's application:

1. Alternate Routes (Exhibit 3)

A. The Route 22 Solution.

-The application does not address the solution proposed by a special committee appointed by the Town of Ghent to add 115 Kv cables to existing or newly erected utility poles along County Route 22 to bolster the power coming into the Klinekill substation without creating a new transmission corridor through Ghent. Since such a less-intrusive solution

combining 115 Kv cables with lower-voltage ones on the same poles is currently operating successfully elsewhere in New York State, and since the Town of Ghent was predisposed to prefer this option, I don't understand why NYSEG would not consider it as an alternative in its application.

B. The 34.5 Kv Solution.

- The application does not include a map, a route, a drawing, or a physical description of the so-called 34.5 Kv alternative. Someone who was not at the meetings at which this idea was discussed could not make an informed judgment on it—nor accept NYSEG's rejection of it--without knowing what it is, where it would or could run, and what it would look like compared to the proposed line.

C. The Underground Solution.

- Although burying the line would be more desirable for Ghent residents, and is an alternative very much on the minds of everyone involved, the application does little to explain why underground transmission cables were not considered a viable alternative to aboveground ones for this project. For those of us without specialized knowledge in these matters, it is hard to understand why an underground transmission cable would be worse for the environment than an aboveground one, why an underground cable would be more expensive to maintain than an above-ground one, and just how much more expensive an underground cable would actually be than an aboveground one.

D. Other Alternate Routes.

-The application does not provide a proposed alternate route for the long section of the line between Fowler Lake Road and Route 9H. Instead of jogging north of Art OMI, couldn't the route as easily go south or straight? Why, after going north around OMI, does the line proceed so sharply SW only to turn west again, when it could proceed in a more direct way going SSW? I ask this question in particular because it is this part of the proposed route that crosses my land and that of my nearest neighbors.

-Although Exhibit E-4 explains the mechanical justification for bringing "a new 115 Kv source to the NYSEG Mechanicville Division Chatham Area" by bolstering the Klinekill station with a 115 Kv line connected to the National Grid line to the west, it fails (as far as I have been able to see or understand) to explain why bolstering the Wynantskill and Stephentown substations in a similar way from other directions would not be equally effective, less intrusive, and less costly.

2. Environmental Impacts (Exhibit 4).

-Section 4.1 “Introduction.”

-The proposed route for the transmission line relies on the false premise that putting a new transmission line through open land is less intrusive than putting one through populated areas. In fact the opposite is true. Populated areas contain existing non-natural infrastructure including overhead wires and telephone cables, sewage pipes, gas lines, dish antennas, roads, driveways, houses, warehouses, industrial facilities, etc. Adding one more element to this existing infrastructure is less intrusive than to put one on open land that has never been disturbed. Unpopulated areas are more likely to contain the types of historic landscapes singled out in the Town of Ghent Comprehensive Plan--places that have remained the same for generations and that define the character of the place. They are the views that the populated areas see, whether from houses, from roads, from sidewalks, or from public recreation sites. A solution that preserved these areas while still accomplishing NYSEG’s goals, such as the Route 22 plan or the underground solution, would seem to be far more acceptable under the Town of Ghent Comprehensive Plan.

-Section 4.1.2.5 “Structure installation in Upland Areas.”

-Although containing drawings, the application fails to include photographs of the type of wood utility pole proposed. The pole is described as “similar to other wood pole utility lines that are common within the current landscape” (Section 4.2.3.3), but since I have observed several different types of wood pole in use in this landscape, from common roadside utility lines to taller cross-county high-voltage lines, it would be important to be able to visualize in a real-life situation which type of pole NYSEG actually has in mind.

-Section 4.2.6, “Environmental Effects and Mitigation.”

-This section suggests that the only lasting impact on agricultural areas will be “from the loss of land at the structure base which will be limited in area.” The application fails to account for the lasting impact of permanent tree loss in the 100-foot-wide right-of-way, which will have a permanent negative effect on the livelihood of my neighbor, a maple syrup farmer.

-Section 4.3.1, “Visual Resource Inventory.”

-The inventory fails to list the most significant visual effect of the proposed transmission line: the cutting of a 100-foot-wide corridor and erection of 70’ utility poles through 11 miles of historic trees, fields,

woods, and streams, almost all of which can be seen from the roads, houses, recreation areas, and commercial areas of the town. One good way to begin quantifying how far-reaching the visual impact of the project would be would be to provide a count of the number of cars that drive daily along Route 9H, County Route 22, County Route 21, Leggett Road, Letter S Road, Snyder Road, Waltermire Road, Habeck Road, Fowler Creek Road, and all of the other roads across, near which, or along which the proposed line would run.

-Section 4.3.2, “NYSDEC Policy Inventory.”

-The effect of this section is to suggest that land not under specific state or federal protection is not of scenic or historic value. In fact all of the roads mentioned in the previous paragraph pass through scenic and historic landscapes and are recognized as scenic roads in travel guidebooks as well as by visitors and residents of Ghent and surrounding townships. Loss of these landscapes would be just one more of too many lost landscapes in Columbia County, the Hudson Valley, and Upstate New York.

-Section 4.3.4. “Environmental Effects and Mitigation.”

-The claim that the point at which the proposed line crosses Route 9H is “an area of low scenic integrity” is unjustifiable, as anyone standing on Old Post Road, looking west along the proposed route for the transmission line across Route 9H toward the Catskill Mountains, can attest.

-The claim that 70-foot wooden transmission poles, with cable arching regularly between them across an average span of 300 to 400 feet, passing down a 100-foot corridor through open fields and old forests “is not likely to be a defining landscape characteristic” is unjustifiable.

-The section on Art Omi speaks for itself. The new transmission line would be visible from a popular cultural attraction dedicated to the enjoyment of visual art in an unspoiled natural setting.

-Section 4.5.1.1 “Environmental Effects.”

-The application fails to list the actual effects of “the long-term conversion of existing forested communities to managed grassland” on the 47.5 acres of forest that would be affected by the project. Not only do forests possess quantifiable financial values that can and should be assessed in the “Financial Effects” section of this application (if NYSEG sold the wood, wouldn’t the profit somewhat offset the cost of the project?), but they serve important health and ecological functions such as cooling the air, absorbing excess rainwater, and absorbing the carbon created by the

burning of fossilized fuels used to make the electricity that would be carried along the wires of the proposed transmission line.

-Table 4-12. “Summary of Wildlife.

-If only to illustrate the thinness of the research in this section, the table fails to include such common local birds as the great blue heron, the pileated woodpecker, the ruby-throated hummingbird, and the red-tailed hawk—just a few of the many not listed (only rather frightening ones such as the Black Vulture and the American Crow seem to make the list!) that I have directly observed nesting, pecking, swimming, and flying along the path of the proposed transmission line.

Section 4.9.2. “Environmental Effects and Mitigation.”

-The application fails to present an adequate plan for mitigating the effects of constructing the transmission line along Fitting Creek, a designated Class C trout stream that runs through my property and that of my neighbors. For much of the route along Fitting Creek, the transmission line would seem from the map to pass over or less than 100 feet from the stream. Since this would involve permanent clearing over or along the stream, the claim that “any potential impacts to streams and other water bodies, such as minor increases in turbidity, would be short-term and would have no long-term effect” is unjustifiable. The use of the unexplained technical term “BMPs” makes it difficult to understand what might be proposed, but it seems clear that the applicant proposes to propose its proposal only after the project has been certified “in the EM&CP.” Since it seems as if it would be difficult to judge NYSEG’s plan to mitigate the environmental effects of its transmission line on Fitting Creek until a mitigation plan was presented, I would think that it would be equally difficult to issue a certificate of environmental compatibility until such a plan was presented as well.

3. Engineering Justification (Exhibit E-4).

-Nothing in the engineering justification seems to suggest that an underground 115 Kv solution would be less effective than an aboveground one.

5. Economic Effects (Exhibit 6)

-The application fails to estimate the total loss of market value of 1) properties across which the overhead line would be built and 2) properties whose views would be affected by the overhead line.

-The application fails to estimate the loss in tax revenues for the Town of Ghent from reductions in the assessed value of properties across which line would be built.

-The application fails to estimate the loss in income for residents, such as my neighbor who runs a maple syrup business, from loss of income-producing trees and fields along the proposed right-of-way for the transmission line.

-The application fails to estimate the loss in dollar value of the 47.5 acres of forest that would be cleared for this project (it is easy to calculate the value of lost forest using the standard foresters' formulas combining species, size, and location—see articles by D.J. Nowack in the *Journal of Arboriculture*, especially 18(4): July 2002, pp 194-199m “Compensatory Value of Urban Trees in the United States.”

-The application fails to estimate the increased annual revenue that NYSEG will receive on its bills to customers throughout Columbia County for system improvements once the new transmission line is completed.

6. Cost of Proposed Facilities (Exhibit 9).

-The application rejects several alternative routes as too expensive, yet fails to justify why the cheapest and most intrusive alternative is the most appropriate. I note that the average costs given for one of the alternatives (the 34.5 kv option) range from \$3.1 million to \$13.3 million. Since the projected cost of the whole project is \$28.3 million, I fail to see why the projected estimates for the alternatives (estimates based not on research but on a statistical formula) should remove from the table options that would be more palatable to everyone in Ghent. The lack of any estimate for an underground line, when such careful work has been done to provide an estimate for an aboveground one, suggests that the applicant didn't seriously consider the alternative that would solve its problem in what would seem to be the most environmentally and socially responsible way.

Thank you in advance for accepting these additional comments. I appreciate the opportunity to make them!

Sincerely,

Benjamin Swett