

Comment on FS proposed Categorical Exclusion of the X-178 rebuild from NEPA review.

To the Forest Service and NH Division of Historical Resources,

your agencies failed to ask the most basic questions not only about the need for the project (unproven) but also the structure heights, specifically at the National Register listed Appalachian Trail and Reel Brook Trail.

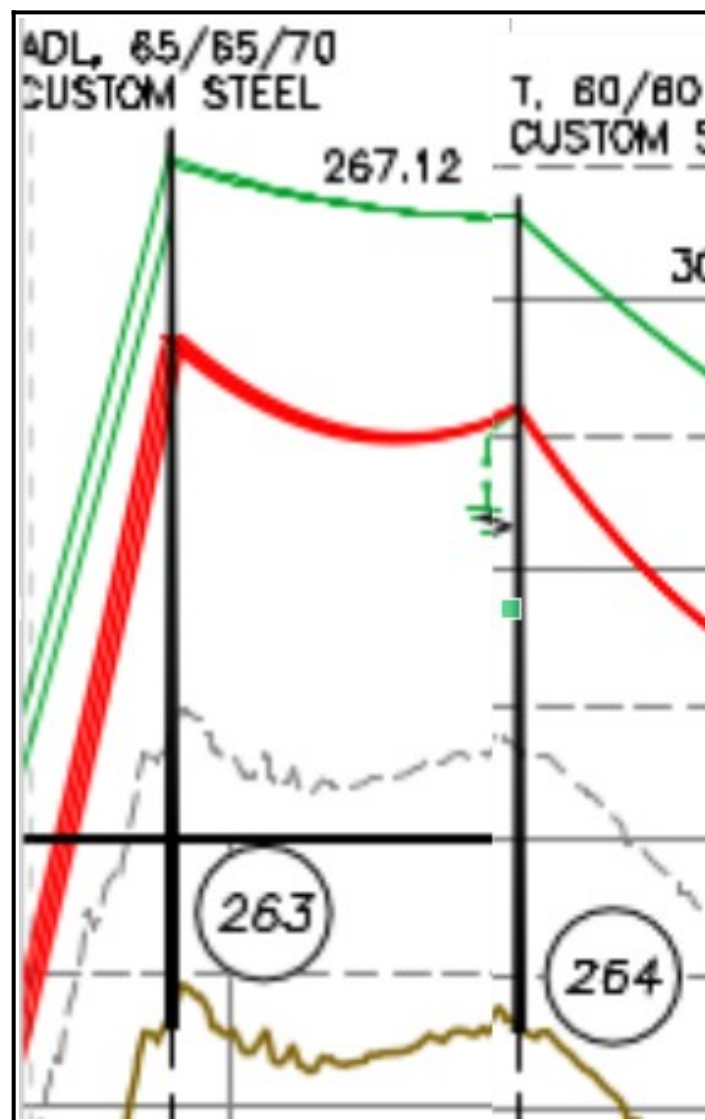
Eversource's proposed structure (259/263) height at the Appalachian Trail overlook of the powerline crossing of Bog Pond is 65'. The existing structure is 49.75'. The next structure west (260/264) is 47.5' planned to be replaced with a 60' structure.

The required clearance for conductors over pedestrian or restricted traffic only areas is 16.1'. Machinery is not used for mowing between the Appalachian Trail structure and several structures east and west of it.

Right: Section of Eversource profile drawing provided to the N.H. Site Evaluation Committee, Exhibit 2.

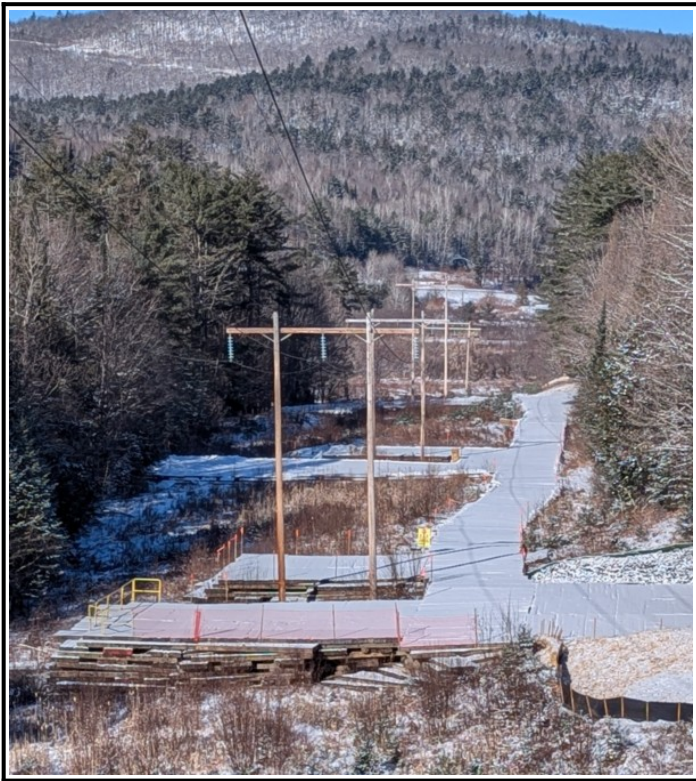
Green line = OPGW  
Red line = conductors  
Dark Brown line = ground  
Horizontal lines = 10'

Where the X-178 crosses the Appalachian Trail Eversource plans to exceed the clearance required by Code by 28'.



It appears that the proposed structures could be 28' shorter than Eversource plans and claims is necessary.

The Forest Service and NH DHR also failed to address to Eversource's planned vast increase in industrial infrastructure in the Bog Pond viewshed from the Appalachian Trail crossing. For comparison, the area of occupation of the U-199 infrastructure in the viewshed below Mt. Eustis Rd. increased by 1.7 because of the taller, wider structures, cross-bracing, longer insulators and 30% wider conductors.



(1/20/2025)



(5/15/2025)

Eversource's planned increase in structure heights would add 660' of poles to the Bog Pond viewshed, all above 43'. The permanent 16' wide road sections and 100' x 100' leveled/bermed construction pads would be visible on the hill beyond Bog Pond.





(photo by John Compton: <https://1happyhiker.blogspot.com/2015/09/accessing-bog-pond-from-kinsman-ridge.html>)

Some time after the N.H. Site Evaluation Committee determined on March 17, 2025 that Eversource's planned rebuild of the X-178 would be a significant increase, Eversource pulled its project maps and structure height change lists from its X-178 "site." Several months later, without notification, it posted new project maps. Its X-178 (2) plan, which covers the White Mountain National Forest, is dated July 11, 2025. This plan has significant changes in the locations of laydown areas and access roads yet Eversource did not give it to the Forest Service, which had no copy until I sent it to them on August 21, 2025. Eversource has not re-posted any old or new structure height change documents.

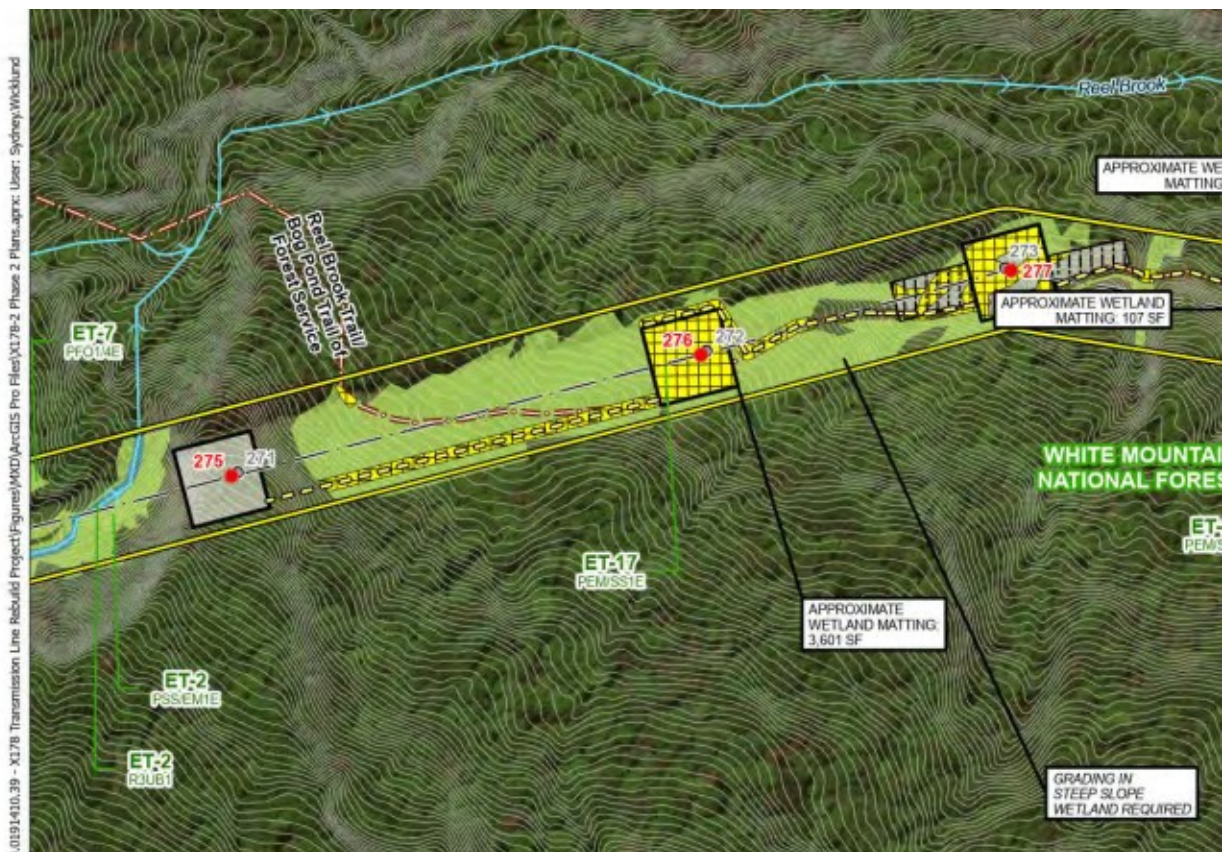
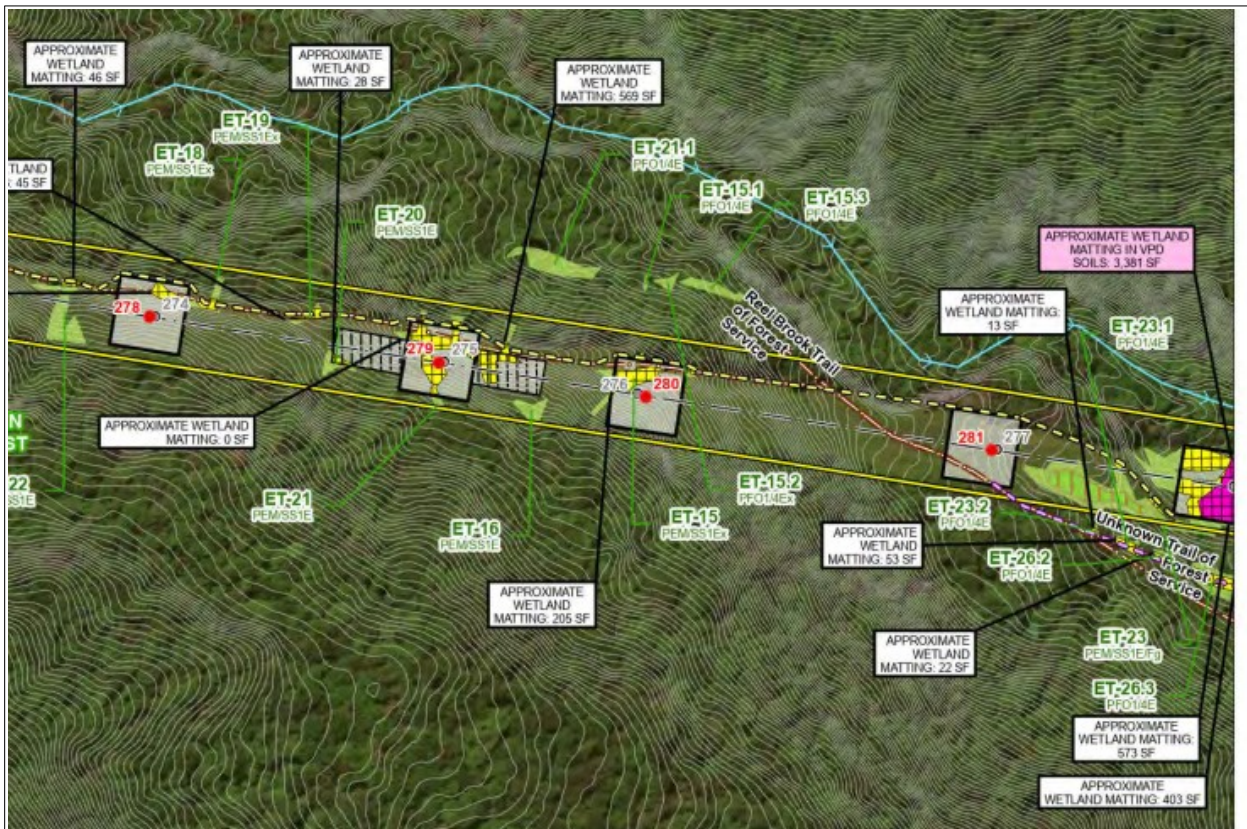
Eversource's new maps show the Reel Brook Trail on the easement from where the trail meets the powerline to existing structure 275, the westernmost structure planned to be accessed via helicopter.

The Forest Service map (right) of the Kinsman Trail relocation shows it in the woods south of the easement.





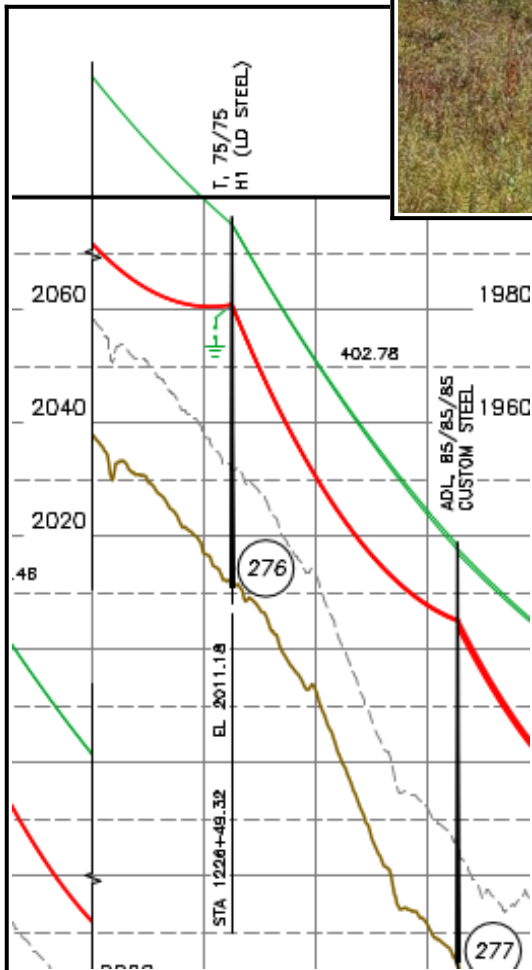
There is nothing in the 2025 legend that corresponds to the dashed yellow line that, in 2024 was shown as “proposed access”, meaning a new, permanent heavy equipment road.





Eversource plans to replace the 50' and 52' structures on either side of the National Register listed Reel Brook Trail crossing with 61' and 74' structures.

Right: Existing structures 276/280 and 277/281, view looking east. The closer structure would be almost 50% higher if replaced.



The required clearance for the trail crossing is 20.1'.

Eversource plans to exceed this clearance by 16'. It appears Eversource's planned structure heights could be 16' lower.

The Forest Service has also failed to enforce its mandate that the project, given its proposed location within the Appalachian Trail Management Area, must constitute the "only feasible and prudent alternative to meet an overriding public need." No state or federal agency has determined that there is any public need for this project.