

Comments on Eversource's

“X-178-2 Transmission Line Rebuild and Optical Ground Wire Installation”

This project description is misleading and in bad faith.

The Forest Service should define the project in its own words not Eversource's.

This proposed project includes the replacement of the existing 795 ASCR/908 amp./1,094 lbs per 1,000' conductor (3) with 1272 ACSS/2,200 amp./ 1,633 lbs. per 1,000' conductor (3).

Eversource proposes to more than double the electrical carrying capacity of the X-178 with new conductor that would increase the structural load by more than 1,500 lbs per 1,000', far more than its proposed replacement of regular shield wire with Optical Ground Wire. The Forest Service appears to be calling Eversource's proposed project “Transmission Line Rebuild and Optical Ground Wire Installation” rather than “Transmission Line Rebuild, and Conductor “Upgrade”” to deflect attention from this increase in carrying capacity, structural load and sag.

Neither the conductor nor the ground wire has been identified by Eversource as in need of replacement.

No need for increased electrical carrying capacity has been identified by the ISO-NE (Independent System Operators of New England.) Eversource's proposed complete X-178 line replacement is not a reliability project.

Optical Ground Wire is not permitted in the terms of the easements, which do not include transmission of 'intelligence.'

The Forest Service's project description states: “Eversource proposes replacing about 140 wooden utility poles (i.e. structures) with steel pole equivalents in the existing ROW, as well as installing about 102,000 linear feet of Optical Ground Wire.”

The H-frame structures have two poles except tangent and dead-end structures which usually have three poles. “i.e.” means “in other words.” 140 poles cannot mean 140 H-frame structures. The Forest Service needs to clarify if 140 poles or 140 structures are proposed to be replaced, and if the figure is 140 poles, how many structures this means.

The steel H-frame structures are not equivalent. They are metal, larger in diameter, taller, spaced farther apart, have rungs, more guy wires, and larger crossbars and insulator strings.

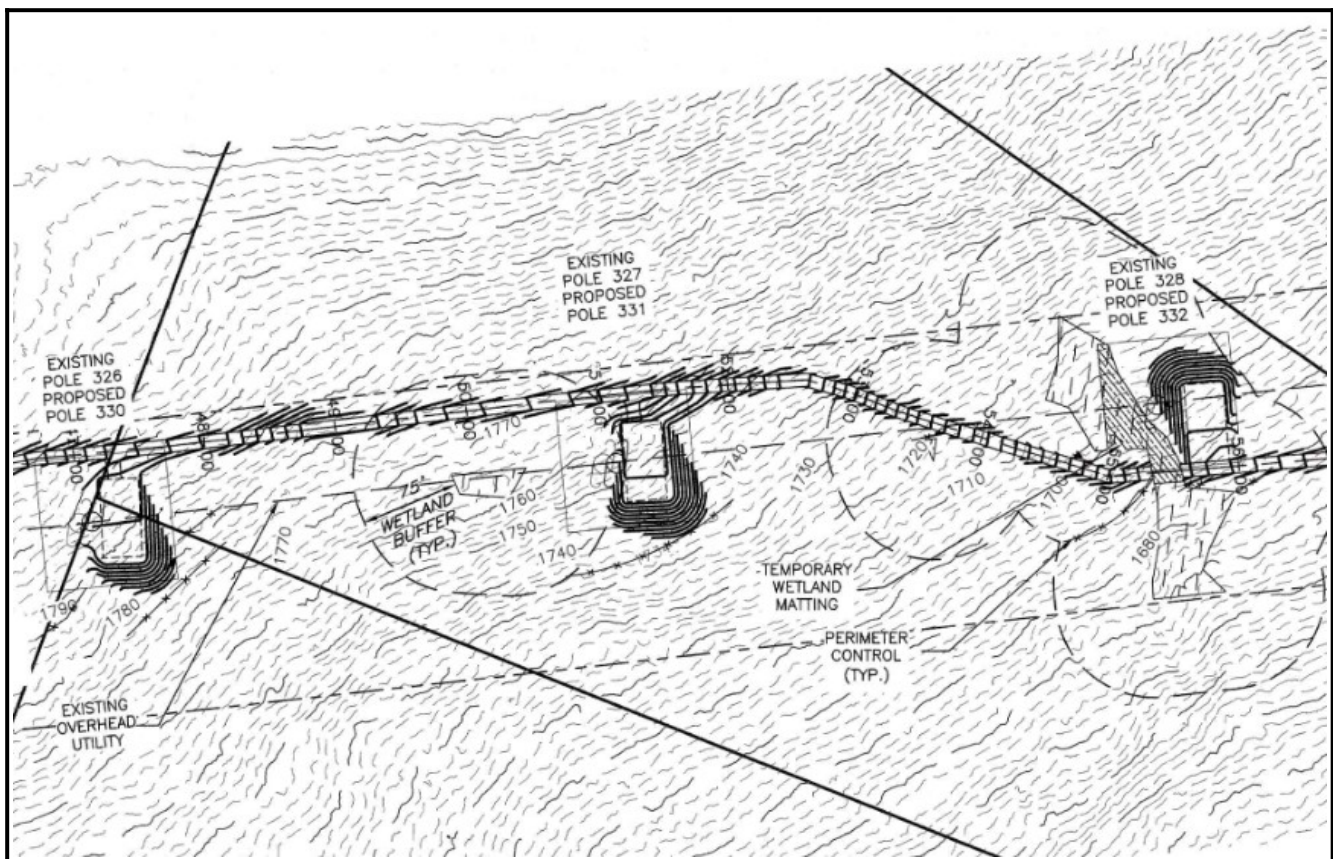
The Forest Service's project description fails to mention the crane pads, pull pads or road.

Given the extensive excavation, fill, and grading planned by Eversource, the Forest Service should title this project “X-178-2 Transmission Line Replacement, Optical Ground wire

Installation, Conductor Upgrade, and Construction of Permanent Crane Pads, Pull Pads and Heavy Equipment Roads.”

102,000 linear feet of Optical Ground Wire [2] is presumably 9.6 miles, a figure that better conveys the extent of the proposed impacts of this project. The Forest Service should add “constructing 9.6 miles of 9” deep, 16-20’ wide permanent gravel heavy-equipment roads” or “constructing X miles of ... roads”, taking into account areas which would be accessed by helicopters rather than subjected to road building, which is in any case not permitted in this roadless area.

The Forest Service should add “construction/excavation of 140 (or 70 or less, where wetland matting is used) permanent 100’ x 100’ level crane pads at heights or depths of up to 20’ above or below the surrounding terrain.”



<https://easton-nh.org/wp-content/uploads/2024/08/es-x178-6-3-planset-stamped.pdf>

Above, construction plans for the X-178-2 Phase I, 2’ lidar-derived contour lines.

These construction plans, when released for the X-178-2 Phase II, which includes White Mountain National Forest, should be posted by WMNF with the other project documents.

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