

Plainsandeastern

From: Ron Hairston <ron.hairston@ph-clan.com>
Sent: Tuesday, June 23, 2015 7:10 PM
To: Plainsandeastern
Subject: Plains & Eastern Clean Line Transmission Line - Part 2 Application
Attachments: Amend EIS Draft Dec 2014 - Special Circumstances 1.pdf; Public Comments 3-min 150217.pdf; Public Comments 3-min 150219.pdf; Comments RJH - EIS Draft Dec 2014 Environ Justice 150223.pdf; Amend EIS Draft Dec 2014 - Property Values.pdf; Comments RJH - EIS Draft Dec 2014 Cost Analysis 15.pdf

Please include the attached comments referenced in my letter to you dated 6/19/2015 (filename: Ltr RJH to DOE 150619.pdf) to the application under consideration regarding the Plains & Eastern Clean Line Transmission Line project.

Comments submitted to the draft Environmental Impact Statement and that were referenced in my letter of 6/19/2015 included:

- February 4, 2015, Filename: Amend EIS Draft Dec 2014 - Special Circumstances 150204
- February 17, 2015, Filename: Public Comments 3-min 150217
- February 19, 2015, Filename: Public Comments 3-min 150219
- February 23, 2015, Filename: Comments RJH - EIS Draft Dec 2014 Environ Justice 150223
- March 16, 2015, Filename: Amend EIS Draft Dec 2014 - Property Values
- April 18, 2015, Filename: Comments RJH - EIS Draft Dec 2014 Cost Analysis

The courtesy of a receipt of this email and the attached comments would be appreciated.

Ron Hairston

February 4, 2015

Plains & Eastern Clean Line EIS
216 16th Street, Suite 1500
Denver, CO 80202

Subject: Compensation for Special Circumstances

Request the EIS be amended to allow compensation for special circumstances that adversely affect property owners beyond the easement or right of way. They are not currently being considered for reparation. Such property owners should be offered fair compensation for damages that occur due to the nearby transmission line.

Problem: For property owners near to, but not physically under the transmission line, compensation packages do not provide reimbursement for loss of property value due to the corona noise and visual pollution.

Evidence:

1. Example - Residence located at 1786 County Road 3456, Clarksville, AR 72830.
 - a. The Plains & Eastern 1,000 ft easement and proposed right of way crosses at or very near two points on my property. Even though my residence and surrounding land is in close proximity to massive structures and high voltage wires that emanate corona noise, it is not currently being considered for compensation for damages due to those polluting effects (see Figure-1).
 - b. Destruction of home value due to corona noise. The value of my home, approximately 300 yards from the easement may be permanently damaged by corona noise emanating from the transmission line. If this noise is perceptible, prospective home buyers would not be willing to purchase the property at any price. This same noise pollution would also make the home untenable for the current owners forcing them to sell at considerable loss. The loss could be \$200,000 or more wrecking any financial security tied to the property.
 - c. Destruction of land value. For reasons outlined in paragraph 1.b. above, building sites shown in Figure-1, which are situated much nearer to the transmission line, would be rendered useless for that purpose. Consequently, the already considerable loss to this property owner will be compounded.
 - d. Visual pollution. With the transmission line in such close proximity to the home and building sites their marketable value would be appreciably degraded. The loss to this homeowner due to visual pollution alone could be \$50,000 or more consequently damaging personal financial security tied to the property (see Figures 2 and 3).

2. Corona Noise Difficult to Predict. Corona noise pollution emanating from the transmission line can only be estimated and that estimate is expressed as an average over time value (dBA) (see Figure 4). The peak noise and characteristic periods of higher than average noise levels are not clearly defined in the EIS. Adding to the uncertainty, the propagation of noise is affected by a multitude factors. While the EIS mentions effects such as wind speed & direction, temperature, humidity, and forestation, these effects are difficult to quantify. Potentially more damaging and difficult to predict are the effects of varied terrain found in mountainous or hilly areas. This has been completely ignored by the EIS. Living in the location cited in paragraph 1 above, experience has shown that sounds can be channeled and amplified so that they carry far beyond what one would normally anticipate. For example, it's not unusual for us to be able to hear human chatter originating at the lake more than one-half mile away. Like sounds from the stage of an amphitheater, corona noise as it affects our home and building sites have every potential to far exceed predictions in the EIS and as a result destroy their value.
3. One Size Fits All Approach. It is assumed that the Department of Energy anticipates that property owners affected by the Plains & Eastern Clean Line Project will be treated fairly. Currently, only property owners whose land or structures are under the transmission line and right of way are being offered compensation packages (see Figure 4). As described in paragraph 1, there are circumstances, as in my situation, where measurable damages will occur that ought to be included for compensation. A "one size fits all approach" to compensation prevents fair play by disenfranchising and financially harming those who find themselves in the wake of destruction caused by the project. Surely, Department of Energy doesn't intend this kind of uncompensated collateral damage.
4. Unethical Gaming for Financial Gain. Plains & Eastern Clean Line claims that they are trying to minimize disruption of land owners by following property and existing fence lines whenever possible. However, during community meetings a number of landowners have complained that the route for the right of way unexplainably divides their property. This gives every appearance that Plains & Eastern is doing so to avoid having to provide compensation for property damage extending on both sides of the line. For example:

If a right of way straddles a property line, owners of two parcels of land would receive compensation for financial loss due to proximity of the transmission line and the ROW taken. Moving it only a few feet to one side where it rests on a single parcel does remove ROW damage from the other property owner however, it doesn't remove that owner's financial loss due to proximity of the transmission line (see Figure 4). This circumvents the requirement for Plains & Eastern to compensate for as much as one-half the value they are taking from property owners in their path. Under these circumstances, the value of a home only 50 ft (for example) from the right of way and parcel boundary would be destroyed. A property owner on one side (Owner – B) would be compensated while the one on the other side (Owner – A) who may be financially ruined receives nothing for his

loss. Once again, the financial loss of the disenfranchised becomes the financial gain for Plains & Eastern and their shareholders.

Solutions:

1. For property owners not under the right of way but who are within one-half mile of the right of way, and who can demonstrate a measurable decline in property value caused by corona noise or the visual pollution of lines and structures, fair compensation should be required.
2. After the transmission line is placed into operation, for home sites within one-half mile from the line, the actual level of corona noise not masked by ambient background noise should be measured. Similar measurements should be done upon request of other property owners claiming damage from noise pollution. Whenever a measurable decline in property value occurs from this noise, fair compensation should be required.
3. The routing of Plains & Eastern Clean Line should be closely examined to eliminate routing practices designed to provide them financial gain at the expense of defenseless property owners.



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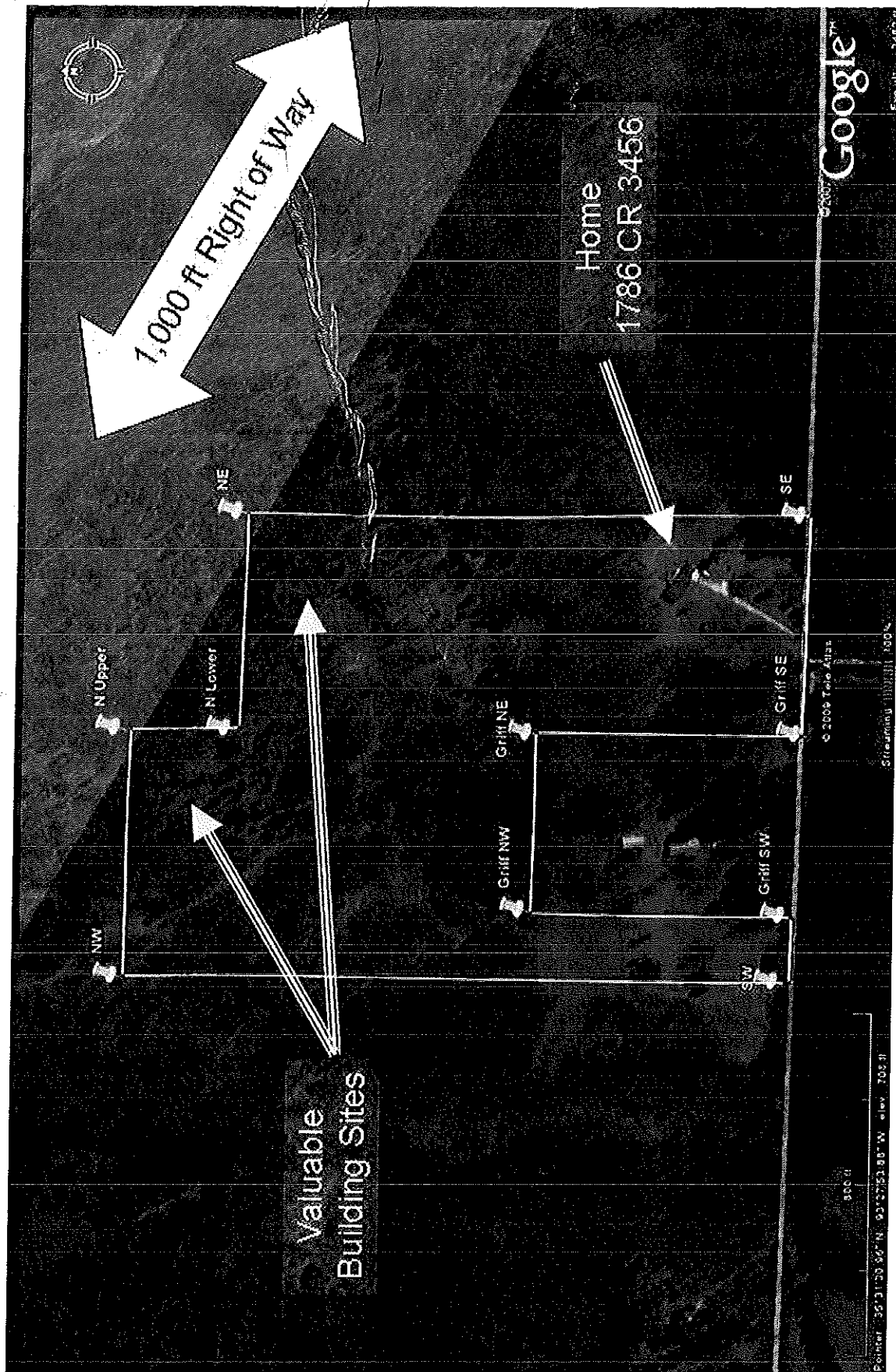


Figure-1
 ROW at 1786 County Road 3456, Clarksville, AR

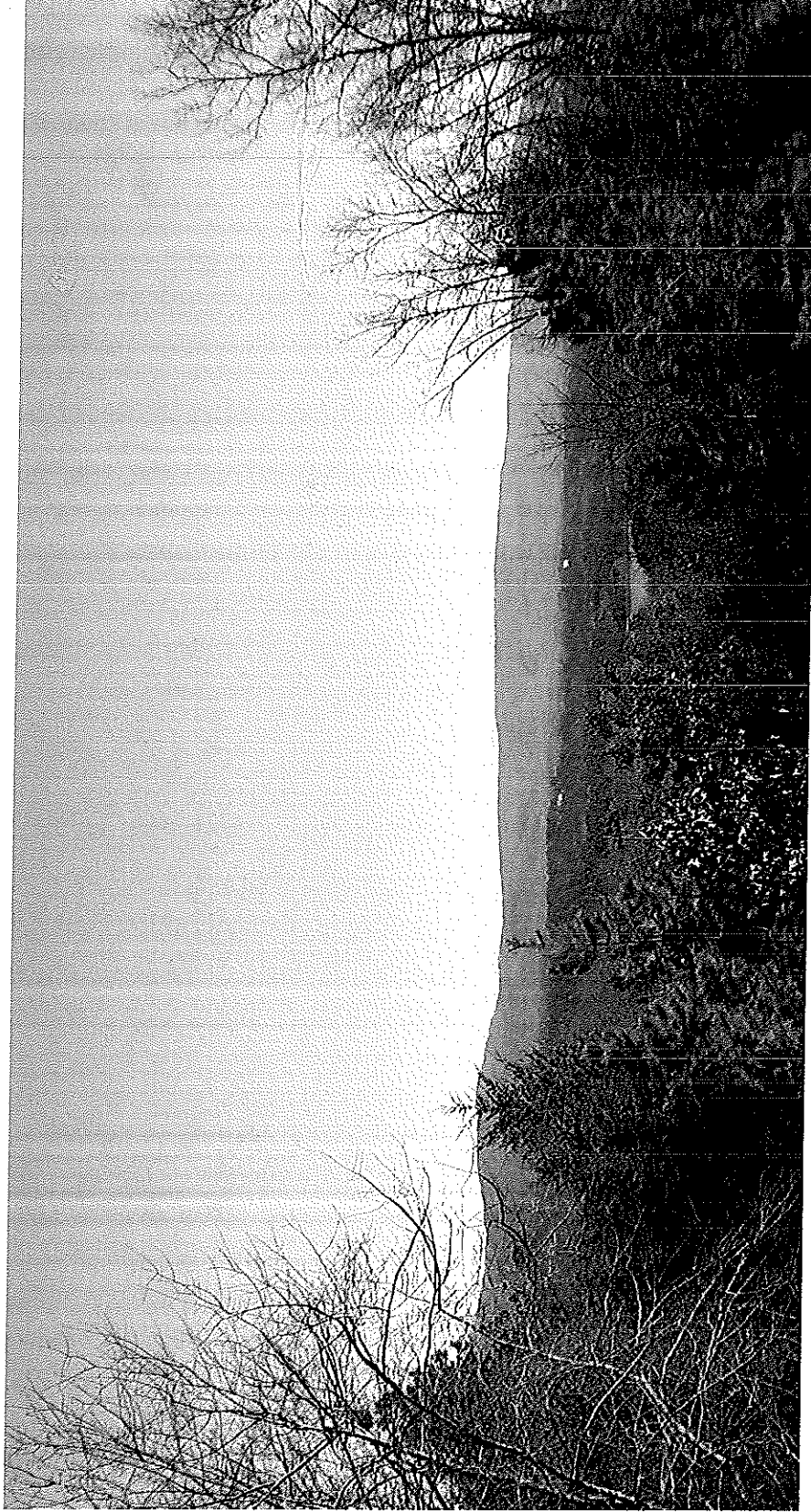
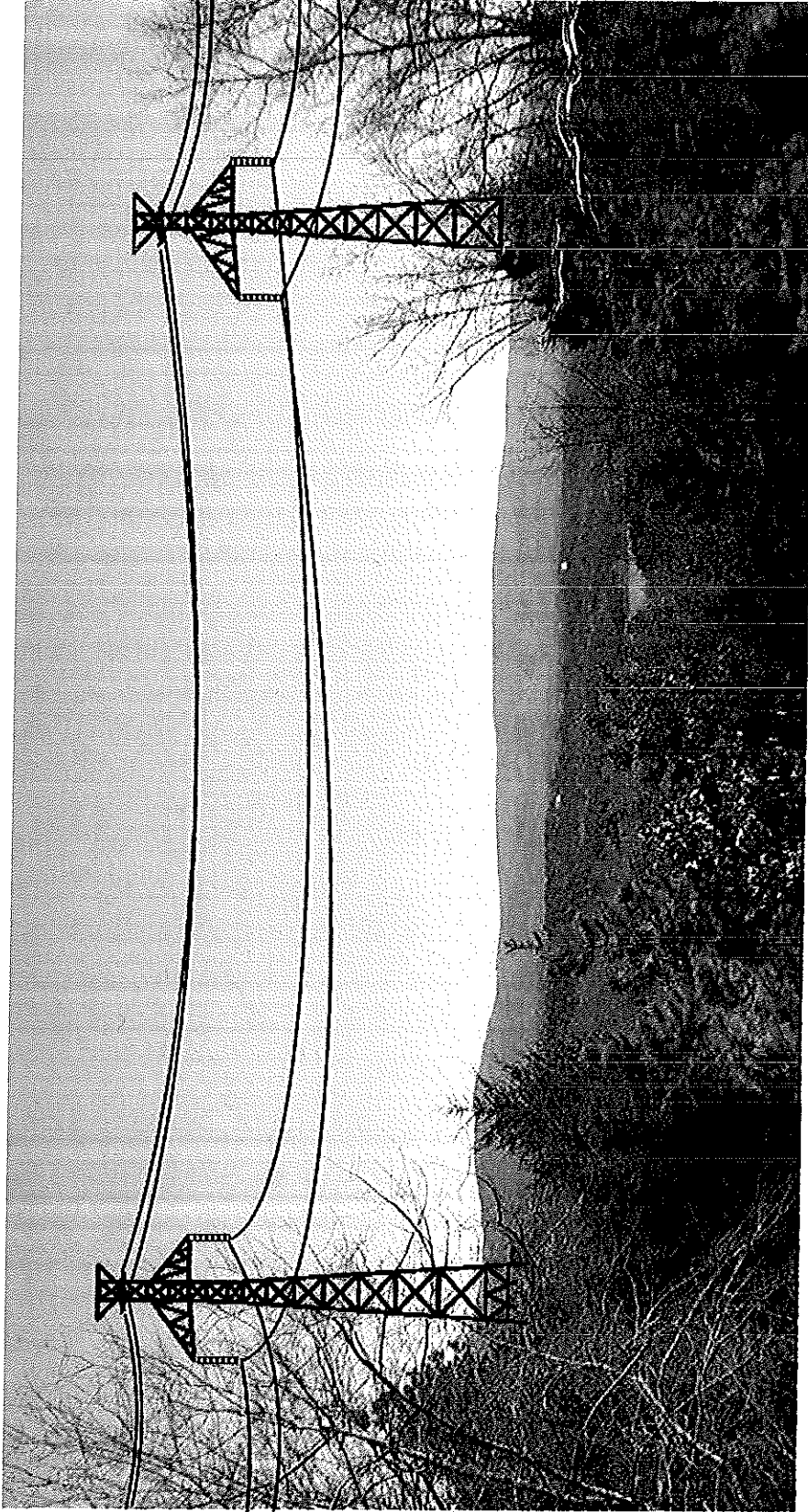


Figure-2
Current View at 1786 County Road 3456, Clarksville, AR



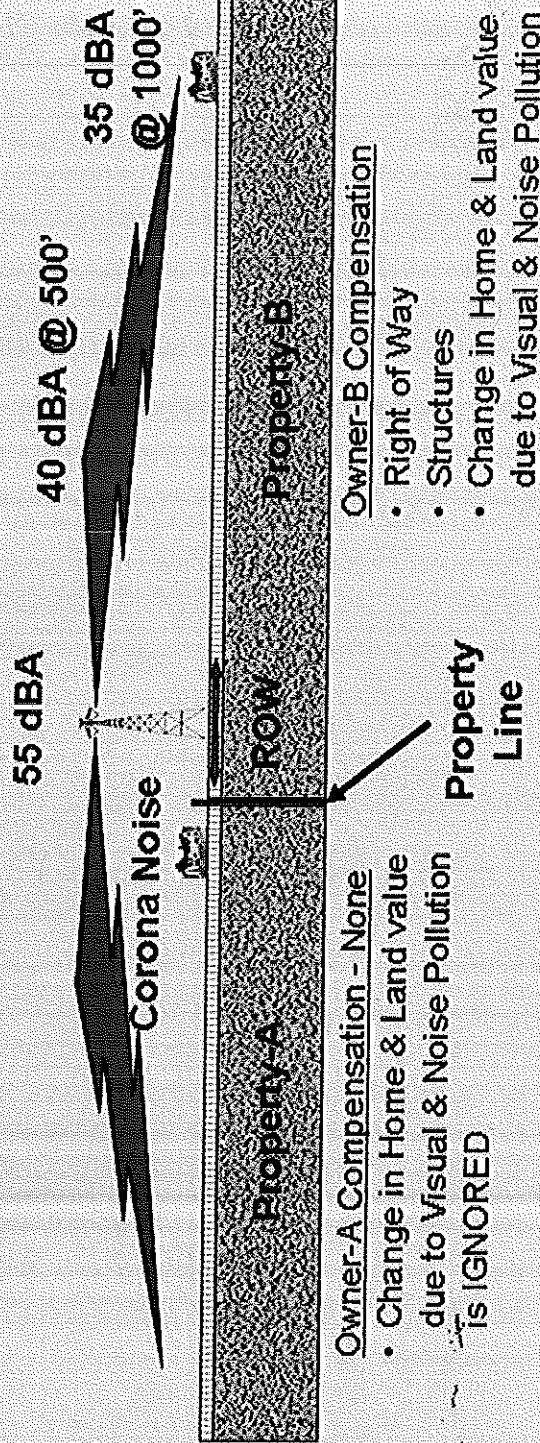
Then Plains & Eastern Clean Line Arrives

- Line structures tower 150-ft over tops of trees
- As little as 300-yd separation from home (much less for future building sites)
- Visual pollution depreciates value of home (and rest of 29-acres)
- Noise pollution (corona effect) makes home (and future building sites) impossible to sell

Figure-3

Future View at 1786 County Road 3456, Clarksville, AR

NOISE POLLUTION DESTROYS HOME VALUE



Low 30 dBA Rural Background Noise



- Corona Noise
- Continuous Hissing & Crackling destroys home values
 - Make homes impossible to sell
 - Ruins value of land set aside for home building

Figure-4
Noise Pollution Destroys Home Value

DRAFT ENVIRONMENTAL IMPACT STATEMENT
Plains & Eastern Clean Line Transmission Project
Public Comments

February 17, 2015

Dr. Jane Summerson
NEPA Document Manager
Plains & Eastern EIS
216 16th Street, Suite 1500
Denver, CO 80202

Dear Dr. Summerson,

My name is Ron Hairston and I live in Clarksville, AR. I'm a retired electrical engineer with 35 years of design, sales, management, and strategic planning experience in the energy industry. I hold both Bachelor and Master degrees. I rely on facts and numbers to lead me to conclusions.

I deeply care about the environment and support clean energy initiatives. I believe it's in our national interests, and that mankind has been given a sacred trust to care for this planet. However, I'm against this Clean Line project. Let me try to explain why.

First of all, Clean Line is not really as clean as advertised. Examination of wind power and Clean Line's financial model shows that 70% or more of the electricity generated will have to come from fossil fuels. The footprint of physical destruction is described as a mere 200 ft wide right of way. But when you look at the combined effects, like rolling up a 700 mile long hose, it's no longer a small thing. Private property razed

by Clean Line amounts to 18,000 acres, equivalent to a 4 Megaton bomb leveling one half the land area of Ft. Smith.

Then there are the radiating effects of corona noise. The constant hissing and crackling will make homes impossible to sell as far as 1,000 ft to either side of the line. No buyer wants to live where he has to listen to this noise every time he goes outside or opens a window. This will financially devastate many who receive no restitution from Clean Line because their property is not squarely under the right of way. Where average family incomes are \$33 thousand dollars a year, absorbing a \$100-200 thousand dollar loss is no small thing. How far reaching is the potential financial damage caused by corona noise pollution? Think of an area 50% larger than Tulsa. Similar financial damage radiates from the effects of visual pollution extending over an area larger than Oklahoma City.

The dirtiest part of Clean Line is the human toll. There are real people being ignored whose lives and futures are being destroyed so a few investors can make a buck. This country was founded on the principles of equality and justice. This may not mean that our outcomes will be equal. However, it does mean our outcomes should be just. When Clean Line forcibly takes value from property owners without restitution, the outcomes are criminally unjust.

Let me ask these four questions:

- On whose back will \$100 million dollars or more of uncompensated property damage fall?
- Who will make financial gain off of our losses?

- Is the transfer of wealth from the poor to the rich acceptable you?
- For those that support Clean Line, will you demand just outcomes for your friends and neighbors?

I thank you for the opportunity to speak to you today about the Plains & Eastern Clean Line Project. Our fate is in your hands.

Sincerely and on behalf of my neighbors,



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DRAFT ENVIRONMENTAL IMPACT STATEMENT
Plains & Eastern Clean Line Transmission Project
Public Comments

February 19, 2015

Dr. Jane Summerson
NEPA Document Manager
Plains & Eastern EIS
216 16th Street, Suite 1500
Denver, CO 80202

Dear Dr. Summerson,

My name is Ron Hairston and I live in Clarksville, AR. I'm a retired electrical engineer with 35 years of design, sales, management, and strategic planning experience in the energy industry. I hold both Bachelor and Master degrees. I rely on as many facts and numbers as I can assemble to lead me to conclusions.

I deeply care about the environment and support clean energy initiatives. I believe it's in our national interests, and that mankind has been given a sacred trust to care for this planet. My comments this evening may create controversy, but my hope is that any angst stirred will also stir our thoughts leading to a broader understanding of the issues we face and appreciation of a greater truth.

Let's first establish the fact that Clean Line will upturn many lives in its wake. There may be \$100 million dollars or more of uncompensated financial loss born by property owners under or near the line. For example, corona noise pollution has the ability to completely destroy the value of a home because no buyer would make an offer once he hears a constant hissing & crackling noise emanating from the overhead wires.

Now, let's make the argument that Clean Line should cross federal lands wherever possible to minimize disruption and financial upheaval of the lives of private citizens. The land taken by the right of way could be leased by the government. The rate established could be based on a fixed dollar amount, on the quantity or value of kilowatt-hours transported, or on a combination of these.

So what are the benefits?

- The lease income generated could be returned to the affected government agency to be used for maintaining and creating new recreational areas.
- The small amount of timber removed in the narrow right of way could be sold and used in a like manner.
- The right of way and access roads created during construction would have value as fire breaks and could provide additional access for campers and others.
- Agencies such as the US Forest Service would be better able to provide oversight of environmental issues such as the spraying of chemical herbicides than private landowners would be.
- And, the cost to establish and transport clean wind energy would be lower because leasing the land from the government reduces upfront capital investment thereby enhancing Clean Line's financial model.

We should expect the government to welcome construction on public lands because after all, the EIS does describe (and Clean Line advertises) just how clean the project is. Furthermore, this proposal creates three winners: the public, private industry, and the federal government.

Let me ask this question: What is the difference between private and public forested areas as it pertains to the preservation of wildlife and other natural resources? After all, much of the private land currently in the path of Clean Line is a virtual extension of forested government land. My land has owls and bats that are likely one or more of four endangered species. Drainage from my land affects streams and a nearby lake.

In conclusion, we must understand that we can't have it both ways. Either:

- Clean Line is as clean as claimed in the EIS and suitable for crossing forested land both private and government owned or,
- It's too dirty to place on federal land and therefore too dirty for similar private lands.

If this creates a conundrum for anyone, then maybe our eyes are not yet fully open. Arguably, private property should have more protection than public lands simply due to the added human toll.

Sincerely and on behalf of my neighbors,



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February 23, 2015

Plains & Eastern Clean Line EIS
216 16th Street, Suite 1500
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Subject: Comments on Environmental Justice Assessment

References: Section 3.5 Environmental Justice
US Census Bureau estimates <http://quickfacts.census.gov/qfd/states/05000.html>
Section 3.4 Electrical Environment
Section 3.11 Noise
Electrical Environment Assessment, Exponent, Inc., January 14, 2014
Noise Technical Report, Ecology and Environment, Inc., December 2013

Main Problems: Significant conclusions in Section 3.5 Environmental Justice are incorrect. Important factors are left out of the methodology and new Census information points to troubling changes in poverty status in affected counties. The factors mentioned below should be added to the methodology and the updated Census information should be used as the Draft EIS is being updated.

1. The conclusion reached in paragraph 3.5.6.6 stating that "No unavoidable adverse impacts were identified" is not reasonable in view of the comments and evidence outlined in this paper.
2. Adverse financial impact incurred as a result of the Project, and borne by property owners who are already victims of increasing poverty levels, has not been addressed in Section 3.5.
3. Financially measurable adverse impacts resulting from corona noise and line-and-structure visual pollution are grossly understated in their respective sections of the EIS. The erroneous conclusions found in these sections are carried forward throughout the EIS thereby compounding the problem.
4. Adverse impacts to nearby property owners who are not under the ROW but are subject to the far reaching effects of noise and visual pollution that may measurably impact home and land valuation are ignored in Section 3.5 and throughout the EIS.

5. The adverse impact of cultural and historical alterations borne by family farmers as a result of the project is ignored in Section 3.5 and throughout the EIS.

Evidence:

1. Avoidable & Unavoidable Adverse Impacts Ignored:

- a. Paragraph 3.5.6.6 stating that “No unavoidable adverse impacts were identified” is an illogical conclusion when one considers the magnitude of the Project and the immense number of complex problems that have to be addressed, solved, and mitigated..
- b. By ignoring the problems listed throughout this paper, both avoidable and unavoidable impacts have been hidden from view, assessment, and active mitigation.
- c. Table 3.5-1 draws from EO 12898 addressing environmental justice and states: *“Requires each federal agency to make the achievement of environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.”* The words “human health or environmental effects” should not be interpreted to exclude financial impact on minority and low-income populations that may be affected by Project activities.

2. Increasing Poverty Levels Ignored:

- a. The poverty level data presented in EIS Tables 3.5-8 and 3.5-11 underestimates affected county poverty levels when compared to current US Census Bureau estimates.
- b. The earlier data used in the EIS reported that there were six (6) counties in Arkansas with poverty levels ranging from 20.1% to 26.0%. Current US Census data shows that median household income in eight (8) of thirteen (13) affected counties now range from 20.1% to 28.1% below the poverty level. This is an increase of two (2) counties falling into an area of concern and worthy of attention. The top poverty level among these counties is another troubling statistic rising from 26.0% to 28.1%.
- c. Comparing earlier US Census Bureau estimates with current estimates shows that nine (9) of thirteen (13) counties have endured increasing poverty levels rather than remaining stable or improving. This statistic and those mentioned above should increase our diligence when assessing environmental justice, and bring to light potentially adverse effects that may have previously been overlooked.
- d. Table 3.5-8 does not include poverty status for three counties (Cleburne, Cross, and Johnson).

3. Disproportionate Impact on the Poor Ignored:

- a. The Environmental Justice section of the EIS fails to capture, analyze, and quantify how the poor in society may suffer disproportionately when compared to middle or high income households.
- b. It doesn't explain how their uncompensated for losses or the hidden consequences of being affected by the transmission line may disproportionately impact various parts of their lives such as: Nutrition, health, current & future financial wellbeing, shelter, transportation, education, and employment.

4. Losses due to Corona Noise & Visual Pollution Ignored:

- a. Uncompensated financial losses in any form may disproportionately and unjustly impact minorities and those below the poverty level. The effect of corona noise and visual pollution from lines and structures with their measurable negative financial consequences for property owners are unjustly ignored for those under the ROW and those near or adjacent to it.
- b. By excluding important information about corona noise from the printed EIS, much of the meaningful description and its effect are hidden from public view. A separate Noise Technical Report provides a partial understanding of corona noise but doesn't provide information needed to answer the question: "How loud will corona noise be N number of feet away?" This key information illustrated by Figure 9, AN Profile in fair and foul weather, is buried in the Electrical Environment Assessment Technical Report.
- c. The EIS throughout falsely assumes that there is no permanent financial loss that will occur a few feet beyond the ROW as a result of corona noise and visual pollution. Home and property owners, real estate agents, and lending institutions say otherwise. The Applicant has elected to use EPA noise level standards that are limited to health and safety concerns rather than recognize that the financial impact ranges far beyond the ROW. From the Noise Technical Report published by Ecology and Environment, Inc.:
 - i. Description of Human Sensitivity to Noise: *"Noise is defined as any unwanted sound. Sound is defined as any pressure variation that the human ear can detect...The unit of noise measurement is a decibel (dB). The most common weighting scale used is the A-weighted scale, which was developed to allow sound-level meters to simulate the frequency sensitivity of human hearing...The A-weighted scale is logarithmic, so an increase of 10 dB actually represents a sound that is... [perceived by humans as only]... twice as loud. Typical human responses to changes in noise level include: A 3-dBA change is the threshold of change detectable by the human ear. A 5-dBA change is readily noticeable. A 10-dBA*

change is perceived as a doubling (or halving) of noise level... [Sound Pressure Level] changes in inverse proportion to the square of the distance from the sound source. In a large open area with no obstructive or reflective surfaces, it is a general rule that at distances greater than 50 feet, the SPL from a point source of noise drops off at a rate of 6 dB with each doubling of distance away from the source... The drop-off rate also will vary with both terrain conditions and the presence of obstructions in the sound propagation path." pp.5-6.

- ii. Correlation of EPA Noise Level Standards Fits Public Health – Not Financial Impact: *"The US EPA considers [a daytime noise level] of 55 dBA to be the maximum sound level that will not adversely affect public health and welfare by interfering with speech or other activities in outdoor areas...an additional 10-dB weighting imposed on the equivalent sound levels occurring during nighttime hours (10:00 p.m. to 7:00 a.m.), which accounts for peoples' greater sensitivity to sound during nighttime hours."* p. 12.
- iii. Applicant Chooses to Ignore Financial Impact on Affected Property Owners: *"Although the US EPA limit is a guideline, Clean Line [wrongly] used this limit to evaluate impacts [financial and other] from operations and maintenance by comparing the Project operation noise levels estimated for the noise-sensitive receptors to the [daytime] limit of 55 dBA."* p. 12.
- d. EIS Sections 3.5 Environmental Justice, 3.11 Noise, and the Noise Technical Report wrongly assume that corona noise will be obscured by ambient background noise within a short distance from the transmission line. The Applicant wrongly assumes that at distances from the transmission line greater than 130 ft, home and property owners will not be burdened with unacceptable noise levels. Background noise measured in the quiet rural area at my home is less than 30 dBA. Against this low ambient noise common to rural areas, corona noise 2,000 ft or more from the transmission line may be audible. The effects of varied terrain such as found in mountainous areas has not been studied or assessed. I can hear chatter of human voices over one half mile away and church bells from over three miles away. Some of this is assumed to be due to the channeling or amplifying effects of the local terrain, much as commonly experienced at an outdoor amphitheater.
- e. EIS Sections 3.5 Environmental Justice, 3.11 Noise, and the Noise Technical Report also wrongly assume that corona noise pollution, except at levels observed within a few feet of the line, is not financially damaging. Using EPA standards that do not correlate to corona noise impact on home and property values is a grossly unjust metric. The fact is that no buyer of a home or home site will want their home to be within any audible level of electrical hissing and crackling emanating from a nearby transmission line. This is particularly problematic in

rural areas where ambient or background noise may be a very low 20 to 30 dBA providing little ability to mask irritating corona noise as far as 1,000 ft or more away. The inability to sell a home due to this kind of noise pollution can be financially devastating for adjacent homeowners as well as for those whose property is under the ROW. As a case in point, two-thirds of the value of my home and the 29 acres it sits on is tied to the house. It is prized for its beautiful view and quiet setting. The devastating nature of corona noise pollution, not to mention visual pollution, from the transmission line will remove most of the value of the home and degrade the value of the surrounding acreage. The combined loss may be as much as 85%. This is no small amount and it is not a unique circumstance. I continue to hear other property owners stating that they will be similarly affected.

- f. The Electrical Environment Assessment Technical Report and Figure 9 (AN profile in fair and foul weather) does not extend the X-axis to the minimum point that corona noise may be audibly perceived and thereby cause devastating financial harm to homes and other property.
- g. The actual impact of corona noise on home and other property owners will not be known until after the transmission line is built and placed into operation. By then, it will be too late to justly address the issue.
- h. The visual impact is also financially negative. It may range further than noise pollution depending on terrain shape and vegetation.

5. Adjacent and Nearby Property Owner Loses Ignored:

- a. Particularly egregious for those below the poverty line, only property owners under the right of way are identified for compensation. Those whose property values will be affected by the far reaching effects of corona noise and visual pollution are ignored.
- b. As illustrated in the attached figure on page 10, property owners, near the damaging effects of the transmission line but who are not under the ROW, may incur financial damage as do their neighbors who are under the ROW. In some instances, these adjacent property owners may actually incur more financial damage than an owner whose property is under the ROW.

6. Unique Agrarian Lives and Difficult Recovery from Impacts Ignored:

- a. The environmental justice assessment fails to address how farmers and other rural property owners, often living below the poverty line, can be unjustly affected. The consequences they bear are unique to agrarian life. Section 3.5 ignores the difficulty they may have recovering from the impacts borne by them as a result of the project.

- b. Unlike living and working in or near a city where options for homes and jobs abound, a farmer can't simply move and take his livelihood elsewhere. Unlike "spec" houses and look-alike neighborhoods, finding another farm or rural property in the proximity to family and having virtually the same attributes, may be impossible.
- c. Often, when property is removed from his use, compensation for the land taken and for the loss of productivity falls short of making the farmer or landowner whole. This unjust exchange can destroy without compensation the use of future home sites set aside for the next generation of family farmers. The landowner may lose the very reason he chose the location, possibly for the peace and quiet it provides or the beauty that binds him to the land.
- d. In addition to financially related impacts, there are other social implications that we simply cannot place a value on. Where the farm or land has supported multiple generations, what is the just value that can be placed on breaking a chain of family history and the proud culture removed from the generations that follow? What price can we place on historical homes where family members have been born and where cemeteries bear ancestors?
- e. It is difficult for many of us to comprehend (many of us never will) how the farmer with his family and land are one. Like a married couple, the two become one unit. Taking any part of it away is like removing part of their oneness; part of their identity. These kinds of life changing events are more than unjust, they are unconscionable.

Solutions:

1. Avoidable & Unavoidable Adverse Impacts:

- a. Addressing each of the problems and the evidence mentioned above, assess the issues, quantify impacts to the maximum extent possible, and characterize those that cannot be quantified in a meaningful way. Catalog all identified adverse impacts into an Avoidable and Unavoidable Adverse Impacts List in the EIS.
- b. For avoidable impacts, clearly describe how they may be mitigated so that just outcomes prevail.
- c. For unavoidable impacts, look for and assess new routes that may eliminate or reduce the adverse impacts. Where unavoidable adverse impacts remain, describe and quantify what parts of each impact can or cannot be mitigated.

2. Increasing Poverty Levels:

- a. Update the EIS to include the most recent US Census data for poverty levels in the affected counties.

- b. Drawing on historical data and future projections, estimate poverty levels in affected counties over the next five years, or longer if practicable.
- c. Assess the impact of the direct and indirect effects of the Project on financially disadvantaged property holders under and near the right of way.
- d. Include and assess the impacts of increasing poverty levels into the list described in Solutions para. 1.

3. Disproportionate Impact on the Poor:

- a. Capture, analyze, and quantify how affected property owners in economically challenged counties may suffer disproportionately when compared to middle or high income property owners in more affluent counties.
- b. For this group, identify potential uncompensated losses that may impact various parts of their lives such as: Nutrition, health, current & future financial wellbeing, shelter, transportation, education, and employment.
- c. Include the identified disproportionate impacts on the poor into the list described in Solutions para. 1.

4. Corona Noise and Visual Pollution:

- a. Integrate the information from the Noise Technical Report and Electrical Environment Assessment Technical Report into the Sections 3.5 Environmental Justice and 3.11 Noise so that the analysis and conclusions regarding corona noise may be easily accessed.
- b. Identify and list in the EIS all properties within audible range of corona noise emanating from the transmission line.
- c. Recognize that the impact of corona noise pollution can destroy the value of homes and other property far beyond the ROW. Recognize that the impact of visual pollution can degrade the value of homes and other property far beyond the ROW.
- d. Assess and catalog the adverse impacts of corona noise and visual pollution into the list described in Solutions para. 1.
- e. Describe the Applicant's plan for noise abatement and restitution of home and other property values impacted by corona noise and visual pollution.

5. Adjacent and Nearby Property Owners:

- a. Identify and list in the EIS all properties within 2,000 ft of where the actual ROW will be located.
- b. Recognize that adjacent and nearby property owners may be affected by corona noise and visual pollution just as those property owners whose land is under the ROW.
- c. Assess and catalog the adverse impacts borne by adjacent and nearby landowners into the list described in Solutions para. 1.

6. Unique Agrarian Lives:

- a. Capture, analyze, and quantify how farmers and rural landowners are unique in their ties to the land and why recovery from land altered by the project or relocating to a comparable property is so difficult.
- b. List any uncompensated financial losses that may occur as well as the cultural and historical losses possible due to changes to their way of life even though difficult to quantify.
- c. Include the identified unique impacts to agrarian lives in the list described in Solutions para. 1.

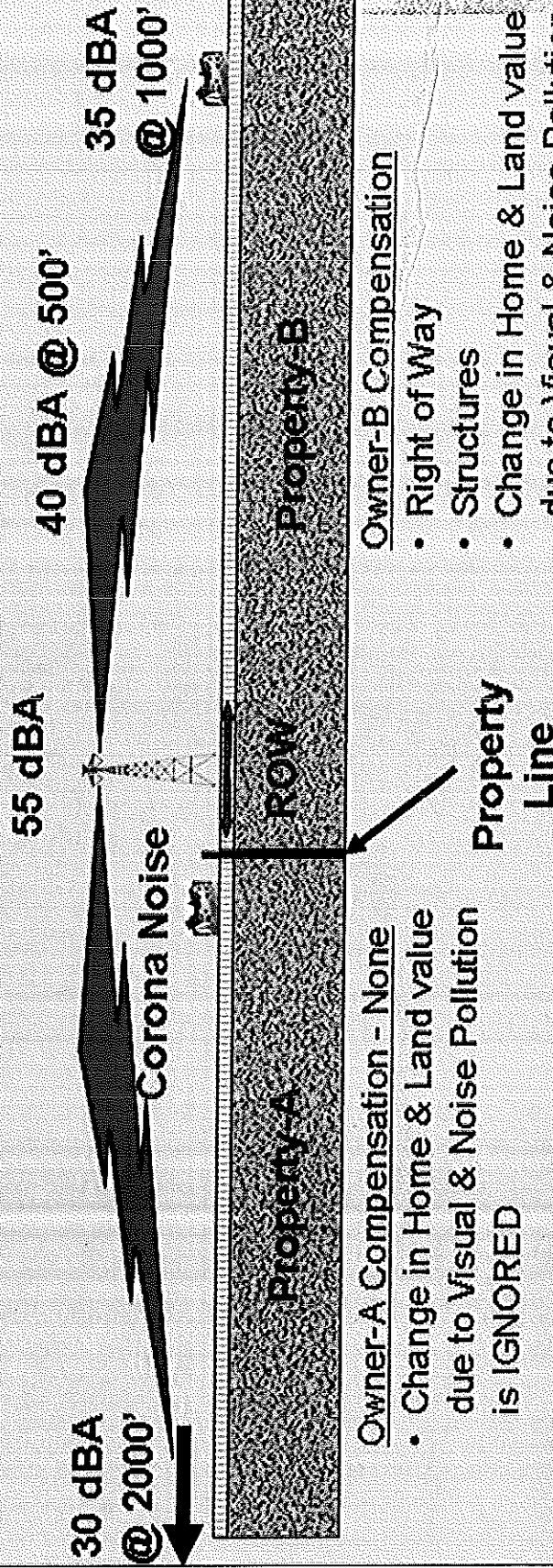
Of all the problems and solutions mentioned, the issues surrounding corona noise pollution must take priority. The far reaching effects have the potential to be financially devastating to property owners, especially those living below the poverty line. Currently this is not recognized as a problem, there is no plan for just compensation, and the details remain hidden from plain view of the public who are expected to comment on the EIS.



Ron Hairston

Attachment:
Figure-Noise Pollution Destroys Home Value

NOISE POLLUTION DESTROYS HOME VALUE



Owner-A Compensation - None

- Change in Home & Land value due to Visual & Noise Pollution is IGNORED

Owner-B Compensation

- Right of Way
- Structures
- Change in Home & Land value due to Visual & Noise Pollution

Low 30 dBA Rural Background Noise



Corona Noise

- Continuous Hissing & Crackling destroys home values
- Make homes impossible to sell
- Ruins value of land set aside for home building
- Actual effects known only after line is placed into operation—too late then!

March 16, 2015

Plains & Eastern Clean Line EIS
216 16th Street, Suite 1500
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References:

Draft EIS Chapter 3, Section 3.13—Socioeconomics, Paragraph 3.13.6.2.5 Property Values
Draft EIS Chapter 3, Section 3.11—Noise
Noise Technical Report, Ecology and Environment, Inc., December 2013
Electrical Environment Assessment, Exponent, Inc., January 14, 2014
2005 Energy Policy Act, Title XII—Electricity, Subtitle B—Transmission Infrastructure
Modernization, Section 1223 (Advanced Transmission Technologies), Public Law 10-58,
Aug. 8, 2005
Comments from individuals recorded on the Plains & Eastern EIS website:
<http://www.plainsandeasterneis.com/comments-on-the-draft-environmental-impacts-statement/category/36-other-groups-and-members-of-the-public-comments.html>

Main Problem: The conclusions reached in the Draft EIS (dEIS) regarding the project's impact on property values are grossly understated. This is clearly reflected in the tone of public comments recorded on the Plains & Eastern EIS website.

Executive Summary: Failure to reasonably assess the impact of the project on property values leads to a number of unjust consequences, for example:

1. As described in the dEIS, the project leads to unjust compensation for hundreds of directly affected property owners who are under the right-of-way (ROW). Unprecedented corona noise and visual impacts that are characteristic of this "Advanced Technology" transmission line (Section 1223, 2005 Energy Policy Act) are caused by the extraordinarily high voltage and size of structures used in the project. The impacts extend well beyond the ROW where there is no compensation for measurable loss of property value. As a result, just outcomes for directly affected property owners do not prevail.
2. The impacts of corona noise and visual pollution reach well beyond property owners under the ROW as described in the preceding paragraph. Hundreds of adjacent property owners who are not currently considered as a casualty of the project will suffer losses in an unprecedented manner. Their measurable losses will be significant and they will inflict an unprecedented level of financial harm to this disenfranchised group. Just outcomes will not be realized for adjacent property owners.
3. As written in the dEIS, grossly understated corona noise and visual impacts on property values lead to the applicant unjustly taking by force hundreds of millions of dollars from the livelihood, savings, and investments of defenseless property owners.

Contributing Factors: The Plains & Eastern Clean Line project carries with it unprecedented negative impacts on property values. This leads to unjust outcomes for a likewise unprecedented number of property owners along the path of the project. Major contributing factors include:

1. Noise Impact. The record high level of corona noise emanating from a 600,000 volt DC transmission line has an unparalleled impact on property values. In too many instances, this noise will make homes difficult or impossible to sell causing egregious financial harm to hundreds along the path of the transmission line. Throughout the dEIS we find claims that the negative impact from corona noise is inconsequential. However, when reviewing the technical data presented in the Noise Technical Report and the Electrical Environment Assessment, we find that financially destructive corona noise can impact the homes of property owners up to 2,000 ft from the transmission line and ROW. See the Reports & Studies Deficiencies paragraph below.
2. Visual Impact. The height of the structures used in the project (up to 200 ft) dwarf typical transmission lines (50 ft to 100 ft) found along the proposed route in Arkansas and Oklahoma. The visual impact is not linear. While local forestation and topography may reduce or exacerbate negative visual impact, structures that are two times (2X) higher may have a four times (4X) greater impact. Likewise, structures that are four times (4X) higher may have a sixteen times (16X) greater impact.
3. See the enclosed illustration, Noise Pollution Destroys Home Value.

Reports & Studies Deficiencies: The analyses in the dEIS draw on reports and studies that are incomplete or lack sound correlation to the actual region of impact under consideration. For example:

1. The research referenced in dEIS Section 3.13.6.2.5—Property Values and Section 3.11—Noise falls short in a number of ways:
 - a. The analysis relies on prior studies that do not include the unprecedented impact of intrusive 55 dB-A corona noise emanating from the 600,000 volt DC transmission line as it relates to property values in the region of impact.
 - b. The analysis does not include an assessment of how the penetrating nature of corona noise may override a variety of typical ambient background noises found along the route of the line.
 - c. The analysis does not include the impact of a transmission line having extraordinarily tall structures on property values beyond the ROW as it correlates to the actual region where there is greater visual sensitivity (i.e. Western Arkansas).
 - d. The analysis does not take into account the nature of the actual property market along the route and how unprecedented noise and visual pollution may measurably differ from that previously studied and referenced in the dEIS.

- e. The analysis does not take into account the audio and visual sensitivities to unprecedented corona noise and visual pollution along the route that may impact other socioeconomic factors.
2. The Noise Technical Report and the Electrical Environment Assessment are incomplete and lack correlation to the real human impact inflicted by the project.
- a. While important for health and safety, Environmental Protection Act standards used for comparison do not correlate to the unprecedented corona noise and visual pollution radiating from this project. Beyond health and safety concerns are property value issues. Corona noise emanating from the transmission line will inflict uncompensated financial losses on directly affected and adjacent property owners up to 2,000 ft to either side of the route.
 - b. The data presented in the reports prematurely cutoff the projection of corona noise at 500 ft from the transmission line where the level is still 40 dB-A. This level of intrusive corona noise can easily be heard over the low level background noises typical in rural areas along the route. Noise pollution from the line only dissipates into the background at four times (4X) that distance. See the enclosed corona noise graphs (as published and with the extended projection).
 - c. The reports fail to measure and predict how difficult it is for ambient background noise to mask the electrical hissing and crackling that is characteristic of corona noise. For an example of how corona noise is not easily masked by background noises, see the Corona Noise Simulator at <https://youtu.be/Kk09d2a-qqw> . The enclosed image illustrates the simulation tool used in the evaluation.
 - d. The corona noise levels presented in the Electrical Environment Assessment reflect a median value (p 25) that may be experienced over a one year period. The calculated data should include the peak value plus a number of lesser values with estimates of the duration for each. Further data about corona noise should be provided that predicts how variables such as seasons, temperature, wind direction, and wind speed affect its propagation..

Conclusions:

1. Erroneous conclusions in the dEIS state that property values beyond the ROW will be negligibly impacted. Nothing can be further from the fact. The far reaching impact of unprecedented corona noise and size of the structures proves that these conclusions are false. The fact that adjacent property owners will bear measurable negative financial consequences further nullifies the erroneous conclusions in the dEIS.
2. Addressing the issues raised in the preceding paragraphs (Reports & Studies Deficiencies, and The Noise Technical Report and the Electrical Environment Assessment) can lead to an honest and more complete appraisal of the unparalleled impacts of corona noise and visual pollution on property values. A careful reading of the public comments concerning property values recorded on the Plains & Eastern EIS website demonstrates public concern. What is troubling is that the unprecedented corona

noise emanating from the "Advanced Technology" HVDC line and the size of its supporting structures may carry consequences worse than many property owners currently anticipate.

3. Just outcomes should be afforded to everyone along the path of the line who will be measurably affected by this transmission project. The magnitude and range of negative impact due to corona noise and visual pollution is unprecedented in this project.
4. Rerouting through existing rights-of-way, along interstate highways, and through less occupied state and federal land will reduce the negative impact on property owners.
5. For routes that cannot avoid property owners, just compensation reaching beyond the right-of-way and extending to adjacent property owners must be made. Doing otherwise will lead to the applicant unjustly taking by force hundreds of millions of dollars from the livelihood, savings, and investments of defenseless property owners.

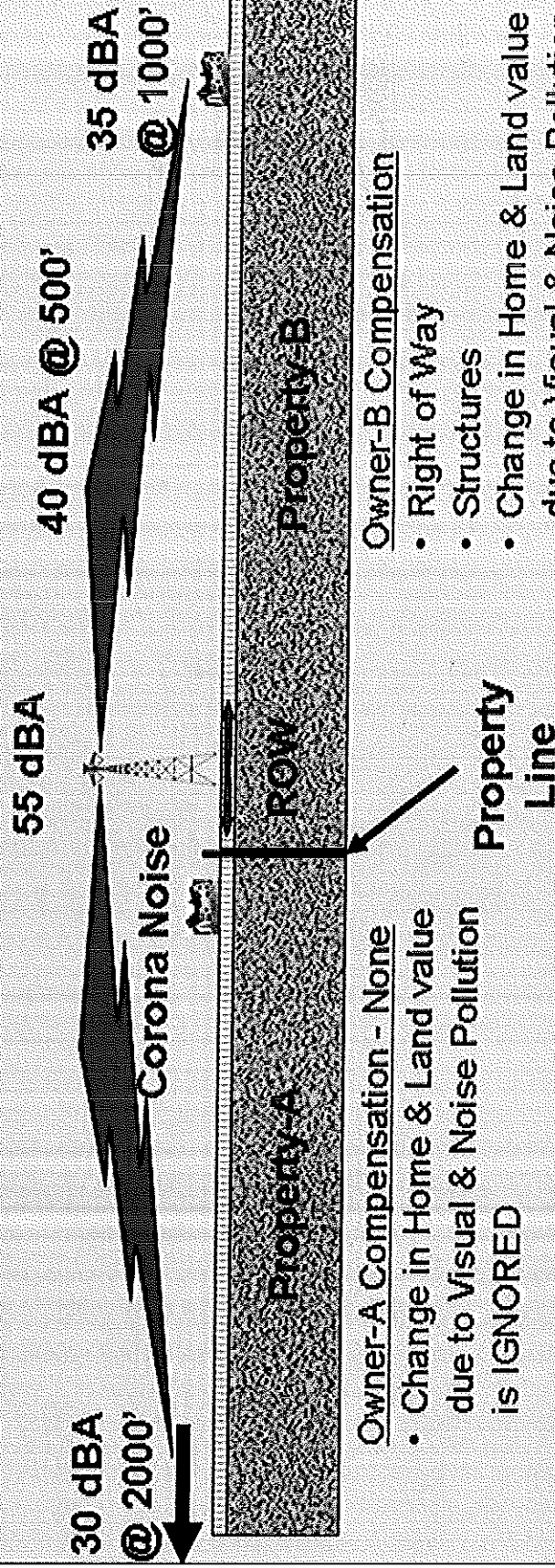


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Enclosures:
Illustration, Noise Pollution Destroys Home Value
Graph, Corona Noise
Graph, Extended Noise
Image, Corona Noise Simulation Tool

NOISE POLLUTION DESTROYS HOME VALUE



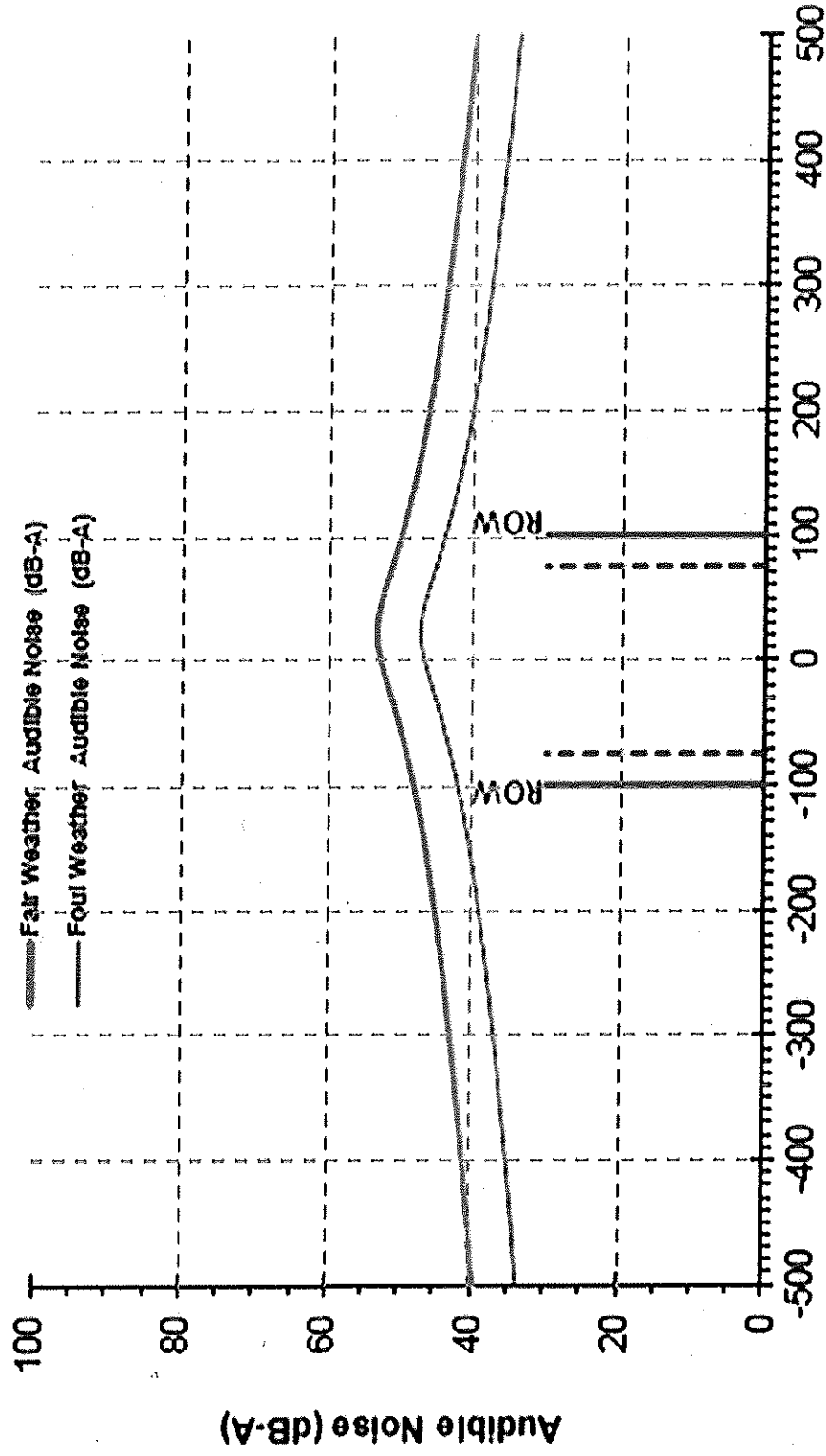
Low 30 dBA Rural Background Noise



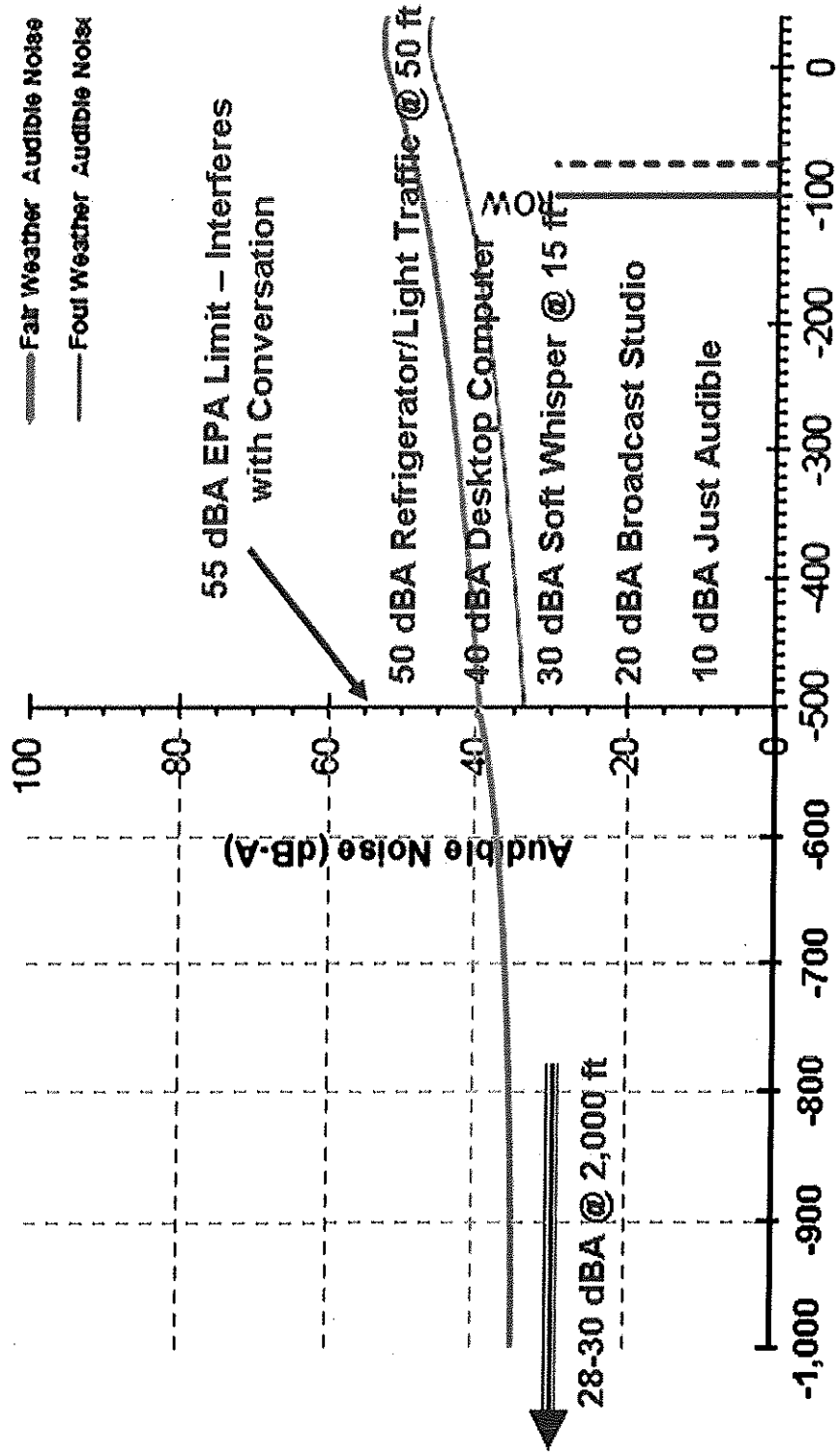
Corona Noise

- Continuous Hissing & Crackling destroys home values
- Make homes impossible to sell
- Ruins value of land set aside for home building
- Actual effects known only after line is placed into operation—too late then!

Corona Noise Graph



Extended Noise Graph



Amend EIS Draft Dec 2014 - Property Values.doc

April 18, 2015

Plains & Eastern Clean Line EIS
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There has been total silence and lack of transparency when it comes to comparing the potential use of public lands to the routes currently proposed by Plains & Eastern Clean Line. Why is that data being hidden from public view? Why is it more acceptable to take away and destroy the value of property held by hard working citizens than to route the transmission line along nearby public lands such as the national forest where there will be much less adverse impact?

To do a reasonable and fair cost analysis, other currently hidden costs need to be included. For example, the cost to property owners that reaches far beyond the right-of-way has been ignored. The true extent of financial impact borne by them has to take into account how 55 dBA corona noise may degrade or destroy property values 1,000 to 2,000 ft on either side of the transmission line. The intrusive noise levels generated from line voltage that is five (5) to ten (10) times greater than typical will propagate across unprecedented distances making affected homes impossible to sell and building sites useless. Towers that are two (2) to four (4) times taller than typical will have an unprecedented four (4) to sixteen (16) times visual impact on property values. This will permanently mar irreplaceable scenic land and degrade property values to the extent that the towers can be seen.

I ask you to remove the cloak that hides the cost of using public lands for routing this transmission line. I ask you to uncover and present the true costs borne by property owners who will be negatively impacted by corona noise and visual pollution. I ask you to present a true and completely honest picture of costs for all routing options.

As long as Clean Line and the EIS continue to hide the costs for alternative routing on public land, and to cover up the full and honest impact of the proposed project, I and my neighbors will fight vigorously against its approval.

On behalf of my friends and neighbors,



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