

Plainsandeastern

From: Ron Hairston <ron.hairston@ph-clan.com>
Sent: Thursday, July 09, 2015 1:06 PM
To: Plainsandeastern
Subject: DOE Getting the "Cart Before the Horse" - Issue #3
Attachments: Amend EIS Draft Dec 2014 - Property Values.pdf

Plains & Eastern Clean Line remains silent on a multitude of questions. For this reason, DOE's decision regarding Clean Line's application should be withheld until outstanding issues are resolved and been given an adequate opportunity for debate and cross examination by qualified representatives of the opposing property owners. DOE should appoint, with property owner endorsement, "ad-litem" legal and technical representation to ensure property owners get fair consideration on the plethora of issues attending this complex project.

Another issue that has never been properly addressed relates to the unanswered questions in my letter dated March 16, 2015 (attached) that brings to light a number flaws in claims and data presented regarding noise and visual pollution. Shortcomings like this have a demonstrable impact on the lives and fortunes of property owners found a considerable distance from the power line.

DOE needs to be diligent and make sure that all issues that remain a concern for property owners are investigated in a manner that protects their rights as property owners. To do otherwise creates a violation "...by arbitrary seizures of one class of citizens for the service of the rest." James Madison

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March 16, 2015

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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:

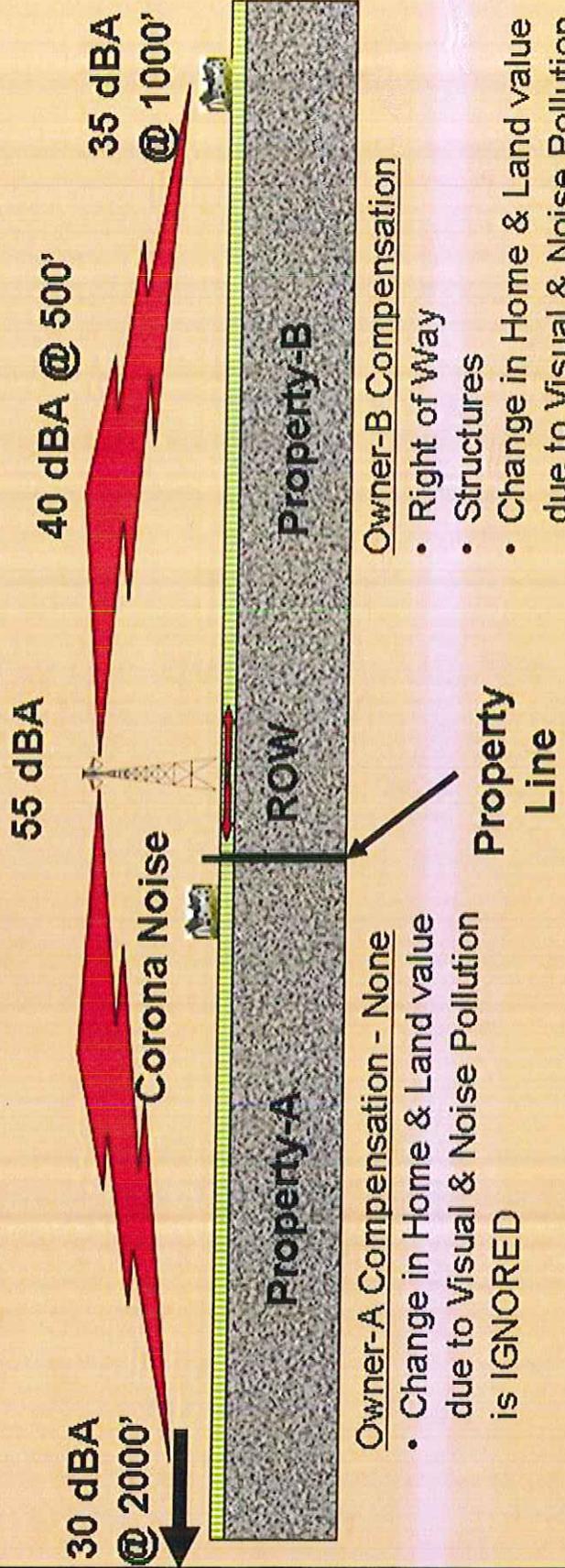
Illustration, Noise Pollution Destroys Home Value

Graph, Corona Noise

Graph, Extended Noise

Image, Corona Noise Simulation Tool

NOISE POLLUTION DESTROYS HOME VALUE



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

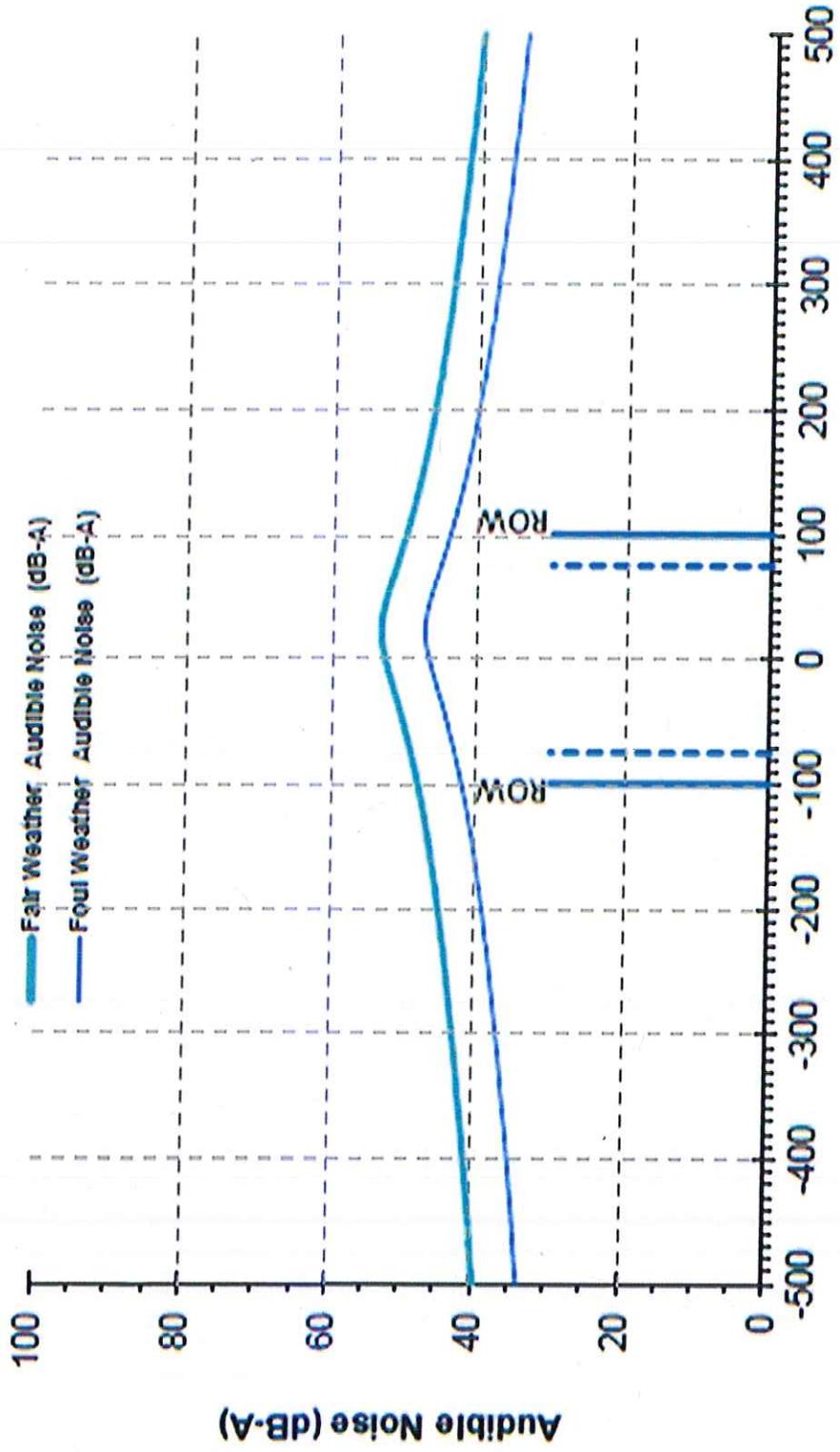
Low 30 dBA Rural Background Noise



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!

Corona Noise Graph



Extended Noise Graph

