

ADIRONDACK COUNCIL
Defending the East's Greatest Wilderness

August 2, 2010

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Dr. Jerry Pell

Office of Electricity Delivery and Reliability (OE-20)
US Department of Energy
1000 Independence Ave, SW
Washington, DC 20585

**Re: Champlain Hudson Power Express Inc. (CHPEI); Comments
regarding Notice of Intent to prepare an Environmental Impact Statement
(EIS)**

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Dear Dr. Pell,

The Adirondack Council would like to register our concerns, re; the Champlain Hudson Power Express Project, a power line proposed to run underwater the length of Lake Champlain and much of the Hudson River. The Adirondack Council is a non-profit environmental advocacy organization, with members in all fifty states. We are dedicated to ensuring the ecological integrity and wild character of New York's Adirondack Park. At 6 million acres, Adirondack Park is the largest in the lower 48 States; nearly half is publicly protected Forest Preserve, under the "Forever Wild" clause of the New York State Constitution. The Park extends half way across Lake Champlain, where New York meets Vermont. The proposed power line route, on the New York side of the lake, is within the Adirondack Park and in the middle of the Champlain-Adirondack Biosphere Reserve, the latter an honorary designation bestowed by the United Nations on the area to recognize the ecological and cultural importance of the whole Champlain watershed.

Our main concerns with the Champlain power line proposal are that energy conservation and efficiency, as alternatives to expanded infrastructure, are not adequately considered; less damaging routes along existing roads and railroads are barely discussed; and the impacts on Canada's waterways and lands from

The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK.

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more exports of “clean” energy are not disclosed. Conservation should be the top priority, infrastructure should stay in already developed areas, and large dams should not be built.

The Adirondack Council supports clean energy and recognizes the need for reliable sources of clean power for all New Yorkers. We respectfully remind consumers and energy providers that the cleanest and most reliable means of meeting energy needs are through *conservation* and *efficiency*. Helping New Yorkers drive less, better insulate their homes, and reduce daily electricity demand will do more to secure our energy future than will any new sources of electricity. Decentralized power production systems – “distributed energy” – will generally be cleaner and safer than will massive centralized systems. At too large a scale, even wind, solar, and hydro power become environmentally destructive.

Although the Adirondack Park is the Adirondack Council’s focus, we favor protection of wild lands and waters wherever possible, and we recognize that ultimately, preserving and restoring wildlife in the Park depends on preserving and restoring wildlife throughout eastern North America. Ecological systems are interconnected. New Yorkers should not export the environmental costs of their consumption. To the extent that Hydro-Quebec dams rivers to meet Americans’ excessive appetite for cheap power, energy coming from eastern Canada will not be clean or green. The Champlain Hudson Power Express Inc. (CHPEI) project should not be marketed as “clean energy” if it encourages more dams to be built.

Nor will the energy be clean if it damages American waters. Burying the CHPEI electric transmission line beneath Lake Champlain and the Hudson River may be unnecessarily disruptive ecologically and hydrologically. Why not bury the line entirely along existing railroads and roads? We believe this should be considered as an alternative. If land-owner permission is a problem, cannot railroad and highway right-of-ways be used? The land-owner issues of a land-based line are minor compared to the potential ecological problems stirred up by dredging in Lake Champlain and the Hudson River. The safety record of underwater lines may be good, but why incur the ecological costs of lake and river bottom dredging when rail and road corridors run the whole distance on the US side?

A much fuller ecological and climatological (carbon-footprint) analysis of the project is needed. It is laudable that the CHPEI project would significantly reduce emissions of carbon dioxide, sulfur dioxide, and nitrogen by New York City (p.9-10 Application of CHPEI for Certificate of Environmental Compatibility and Public Need); but what about emissions and effects in Quebec? Large dams are not climate-friendly. Their construction involves heavy use of fossil fuels, and their impoundments lead to slow releases of methane. Large dams and wind turbines disrupt wildlife movement and flood or fragment forest habitat.

A full Environmental Impact Statement (EIS) should be required, as the applicant anticipates (Information Regarding Potential Environmental Impacts, p.15). The EIS should carefully review all relevant studies on the effects of power lines on aquatic and terrestrial wildlife and habitats, including possible effects from increased turbidity in the water column, resuspension of contaminants, electromagnetic fields, thermal resistivity, and shoreline disturbance. The EIS should also anticipate possible worst-case scenarios (as the present crisis in the Gulf of Mexico so painfully reminds us), if any of the infrastructure or equipment used in its installation fails in any way.

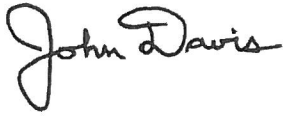
We are concerned about the implications of possible ecological effects, such as these: “The presence of the cable and protective covering would permanently alter the type and contour of the substrate. The covering may also modify and/or reduce the habitat value of the original substrate ...” (Information Regarding Potential Environmental Effects, p.17-18). “Resuspension of silt and sediments may result in an increase in turbidity, which can impair aquatic communities and habitats” ... (Info p.24) “Resuspension may cause contaminants adsorbed to sediment particles to dissociate from the sediment particles, thereby becoming more readily available to aquatic organisms” (Info p.25).

Lake Champlain and the Hudson River both have rich faunas, together providing habitat for scores of native fish species. The proposed power line would go through or near habitats of many aquatic species listed as threatened or endangered by the state or federal government, including Lake Sturgeon, Mooneye, Eastern Sand Darter, Round Whitefish, and in the Hudson River, Shortnose and Atlantic Sturgeon (Info p.43). It would also cross or approach habitats of numerous threatened or endangered terrestrial species, including Piping Plover, Roseate and Common Terns, Bald Eagle, Peregrine Falcon, Short-eared Owl, Northern Harrier, Upland Sandpiper, Least Bittern, Sedge Wren, Indiana Bat, Timber Rattlesnake, Seabeach Amaranth, Sandplain Gerardia, and Small-whorled Pogonia. Possibly even more disturbing as a precedent, the power line would cut through the Hudson River National Estuarine Research Reserve, one of the few Marine Protected Areas in a region that urgently needs more and more-strictly protected MPAs. The EIS should fully examine the potential impacts on each of these species listed above.

In sum, the Adirondack Council is not convinced that utility officials have found the best way to provide electricity for New York City. One of the possible energy source companies, Hydro-Quebec, has a dubious environmental record, including some of the most destructive dams in North America. The planned route on lake and river bottoms could mean damage to critical habitats and wildlife. The potential energy sources need to be carefully screened for ecological compatibility; the power line should be buried in existing railroad and road right-of-ways, sparing Lake Champlain and the Hudson River avoidable harm.

All appropriate mitigation measures should be considered to avoid sensitive aquatic and terrestrial habitats, cable installation during mating, spawning and migration seasons, resuspension of contaminants and permanent alternation of lake and/or river bed substrates. We urge government officials to require CHPEI parties to pursue conservation measures and consider an alternative route along roads and railroads. Lake Champlain and the Hudson are state and national treasures; we should avoid any undue adverse impacts to their beds, waters, flora and fauna.

Respectfully,

A handwritten signature in black ink that reads "John Davis". The signature is written in a cursive, flowing style.

John Davis, Conservation Director