

June 14, 2012

Brian Mills, Office of  
Electricity Delivery and Energy  
Reliability (OE-20), U.S. Department of Energy,  
1000 Independence Avenue  
SW., Washington, DC 20585;

Subject: Proposed Champlain Hudson Power Express (CHPE), The Towns of Haverstraw, Clarkstown and  
Stony Point, Rockland County NY- **Opposed**

Dear, Mr. Mills

I am requesting that the Department of Energy (DOE) extend the public comment period for the Champlain Hudson Power Express (CHPE) beyond the **June 14, 2012** deadline, as the public Notice and outreach by and from the Champlain Hudson Power Express has not occurred within the land installation areas correctly. The contact phone number on the NYS PSC web site for CHPE comments –is not answered, the web site does not accept emails. I believe that the communication that should have happened with all of the parties has not.

**Updated Public information on Rockland County.**

**Legislative Action**

On Tuesday June 12, 2012, The Legislature of Rockland County passed Resolution [1021](#) of 2012, "OPPOSING THE PROPOSED CHAMPLAIN HUDSON POWER EXPRESS INC., TRANSMISSION LINE IN ROCKLAND COUNTY.

**The Town of Stony Point has requested a meeting with CHPE, it is set for**

***June 26, 2012***

***Location: RHO Building ( Letchworth, Stony Point, NY 10986)***

***Time: 7:00 PM***

This is after the DOE comment session is closed on **June 14<sup>th</sup>** and 3 days before the New York State Public Service Commission's comment period closes on **June 29, 2012**

**Minimal Community Outreach poor communications with the everyday public**

It is very apparent that CHPE does not care if the public is informed. I would ask that the "Notice" process that CHPE has used be reviewed. I am certain that the poor turnout in the Rockland County area was due to the fact that most everyday people do not read the "Federal Register" with their breakfast coffee. I would have to believe that this was the case in most other areas as well.

The contact information listed on the web site by the by the NYS PSC was poorly managed, the phone number simply rings, and the email address does not work.

The Rockland County residents have only recently learned of CHPE's Proposal. On June 6<sup>th</sup>, Nancy Cutler, Opinion Editor/Rockland, The Journal News/LoHud.com. conducted a web cast interview of Donald Jessome, Chief Executive Officer of CHPE. The interview has raised concerns, especially as the residents had not

known this transmission line was being proposed. It is only due to the excellent work of the Rockland County Journal News that the residents have any information on this proposal.

There have been 2 meetings in Rockland, one in 2010. The second meeting was held on April 12, 2012, in the Town of Haverstraw. Unfortunately no one knew of this meeting, I believe due to a lack of notice within the local newspapers.

**Public information on business partners and subsidiaries of the Champlain Hudson Power Express-**

- 1- **Champlain Hudson Power Express-** is a wholly owned subsidiary of the **Blackstone Group L.P.**
- 2- **Blackstone Group L. P.-** Was hired by Mirant when they bankrupted to be the financial advisors, they owned the Lovett and Bowline plants purchased by “Southern” spun off into *Mirant*, bankrupted in 2003. *Chapter 11 Case, Case No. - 03-46590-DML-11, Mirant retains the Blackstone Group L. P. as “financial advisors” (Proposed Attorneys for the Debtors and Debtors-in-Possession, Jointly Administered). July 14, 2003. Mirant emerged from bankruptcy in 2006.*

The North Rockland School District, Towns of Haverstraw and Stony Point have already been ravaged by Deregulation. The Lovett (Stony Point) was demolished in 2008 and the Bowline plant (Haverstraw) currently has minimal use. Our Towns and School District cannot afford more deregulation. It appears that NYS Governor has forgotten that Rockland County exists, so of course close Indian Point(nuclear plant) and install additional infrastructure in Rockland County, a County that apparently the Governor is not concerned about.

**Comments to the Proposal-**

Subject Area	Comment Summary
<b>Purpose &amp; Need for the CHPE</b>	<p>Within the “Gold Book” as published by the NYSIO, presenting what has and what will be needed on zone by zone basis, has the need for the CHPE project been established? Or is the CHPE simply in addition to. In which case shouldn’t this project be subjected to a more stringent review?</p> <p>Has a need for this project been clearly established?</p>
<b>Replacement of Indian Point</b>	<p><b>Will the stated purpose of the installation of the transmission line be flushed out? It is being touted by the Joint Proposal, signers that this is the project to close Indian Point. Is this project being falsely presented to the public?</b></p>
<b>Does this project create an unfair competitive advantage for CHPE</b>	<p><b>This project is using is ROW’s and as such it is able to cross property it would not otherwise be able to. If this project is approved, has the DOE and the NYS PSC created a competitive monopoly for CHPE?</b></p>
	<p>Will other Generators now take the land owners and Towns to court and sue for access to the same ROW’s? Will this transmission line set a precedent that the State and Federal governments have legislated? Who will bear the responsibility of the law suits the Generators bring for the same access as CHPE?</p>

<p><b>Contradictory Statements within the supporting documents</b></p>	<p>Potential Jobs/employment, there are no sustainable nor employable jobs to be had with this project. What we will see is short term employment in Queens (which is not the location that was evaluated in the EIS for the converter station) when building the converter station and then a sharp drop off in employment.</p>
<p>Green Power</p>	<p>How will the DOE and NYS PSC guarantee that green power will be used? CHPE has yet to sign contracts or commit to generators with green power.</p>
<p>Public Involvement</p>	<p>Has been limited due to the poor Public Outreach by CHPE. Has the Notice process been followed correctly? Will the DOE carefully look at what communities are being subjected to a “Land Installation”? CHPE has not done their due diligence in public outreach and spoken to the affected communities. (ie Rockland County, where literally no one knew before 2 weeks ago)</p>
<p>Updated EIS by the DOE</p>	<p>The EIS summary that is available is dated December 2010, before the Joint Proposal and the new route the EIS Summary must be updated.</p> <p>Most of the information available on the CHPE was done or dated in 2010, at that point in time the assumption was that the installation would be done completely in the Hudson River.</p> <p>What studies were done by the DOE and CHPE specifically for the “On Land” installation?</p> <p>What are the consequences of installing a 1,000 megawatt transmission line in Rockland Lake State Park, under “Rockland Lake”?</p> <p>Were studies were done specifically addressing the financial and environmental fallout for installation in close proximity to the residential home owner?</p>
<p>Installation of the transmission line</p>	<p>When does CHPE plan on releasing the installation documents and the specs tot the cooling apparatus? The project is getting bigger and bigger and no one seems to be monitoring it.</p>
	<p>What is the cable spacing on the rail line?– when will it be decided</p>
<p>Updated EIS by the DOE</p>	<p>The EIS must do additional studies to evaluate the impact of the new location for the new Converter Station Location in Queens and not Yonkers.</p>
<p>Eminent Domain</p>	<p>A center line for this project has yet to be established, when it is will “Eminent Domain “ be used to clear family homes and local businesses for the installation of the transmission line?</p>
<p><b>Effects of the Joint Proposal</b></p>	<p>Changed the route and places the transmission line on land in two locations, was additional work does not determine that safety of these routes?</p>

	The EIS must include a study showing lost value of real estate that the transmission line crosses. <b>What will this loss mean to these struggling riverfront communities?</b>
<b>EMF Fallout</b>	In Rockland this project will be installed in principally residential areas, It is essential that the DOE conduct a rigorous and independent analysis of the effects of the Electromagnetic Fields(EMFs) produced by both Direct Current (DC) and Alternating Current(AC) transmission lines on the newly decided on land installation in the residential areas.
<b>Environmental Impacts Associated with Routing Proposed in Joint Proposal</b>	The EIS- must correct some of the more blatant misstatements made by CHPE in the document - This project will definitely cross residential property and NYS Parks, on page 60 of this document to state that the installation will not affect any future land use or development is ludicrous- IT WILL
	States it will not encroach on any additional land outside the existing ROW is wrong.
<b>Table 2-4</b> states No Local or County Parks, Recreational Area, Open Space Areas within study area	WRONG- Stony Point Park on Beach Road, the Marina's, (Grassy Point)The Haverstraw Little league fields, Rockland Lake State park are all properties that this project is within 600 ft of (or close to) and or State and County Open Space and PARKS!
<b>List of Cooling Equipment at Locations Along ROW-Sheet 1- 503-504-mile post 295.75-269.1</b>	Under Stony Point Park (see comment above not to be installed within 600 ft.)
Electric and Magnetic Fields Report project 169201- Report Supplement the Champlain Hudson Power Express Project FINAL	Dated -July 2011- The EIS must validate this report, due to the proximity of installation to residential homeowners, playgrounds and the Haverstraw Little League Field

**I am requesting that the public comment session be held open, until NOTICED and public comment sessions can be held. The residents of Rockland are being asked to once again host Utility Infrastructure that can simply be abandoned when the rate of return is not what the Blackstone Group wants it to be.**

Sincerely,

Signature: *Susan Filgueras*

Print name: Susan Filgueras

Address: 87 Mott Farm Rd, Tomkins Cove, NY 10986

Phone: 845-429-3229

<http://energy.gov/nepa/downloads/eis-0447-amended-notice-intent-prepare-environmental-impact-statement>