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Dear Dr. Pell,

On behalf of the Lake Champlain Committee (LCC) I am writing to provide input to the Public Scoping Report on the Champlain Hudson Power Express Project. LCC is a bi-state membership supported non-profit organization dedicated to protecting Lake Champlain's environmental integrity and recreational resources for this and future generations. Lake Champlain is a waterbody of international ecological and cultural significance. It is a designated National Heritage area and forms the core of the United Nations [Champlain Adirondack International Biosphere Reserve](#), a designation that recognizes it as "one of the world's important ecosystems." The Champlain Hudson Power Express project proposes to lay an electric cable below Lake Champlain and along its entire length, and thus is of great interest to our organization.

The scope of the Environmental Impact Statement should include the following items:

### **Purpose and Need For Action**

The purpose of the proposed project is to meet the existing and future electricity demands of New York City. The scope of the EIS should be similarly broad. The proposed power line is only one of many alternatives to meeting those needs. Other alternatives to be addressed in the EIS include aggressive energy efficiency and conservation measures, diversified generation within and around the city, and transmission from locations other than Quebec.

### **Alternatives**

One alternative for transmitting electricity from Quebec to New York that should be considered in the Environmental Impact Statement would be utilization of existing rights of way, including rail lines. This alternative could eliminate the need for burying a cable in Lake Champlain.

### **Impacts**

The proposed power line under Lake Champlain presents many possible impacts which need to be thoroughly investigated in the EIS:

- Fish and other wildlife – After consulting with New York DEC, Vermont Fish and Wildlife, and the US Fish and Wildlife Service, the EIS should address whether the proposed line disrupts any known fish spawning areas.
- Lake bottom sediment disturbance – The installation of the cable will cause both permanent (where concrete mats or rip-rap are needed) and temporary disturbances of sediments. The EIS should indicate the location and extent of any proposed permanent alterations to the lake and the project should make every effort to minimize the extent of such disturbances. Some examples of areas of concern include:
  - The impacts of these disturbances on benthic populations and any known or discovered fish spawning areas.
  - There are known or likely accumulations of paper-processing waste including PCBs in the areas of Cumberland Bay and near the mouth of the LaChute River. The area around the existing International Paper Plant in Ticonderoga should also be considered a potential area of contamination.
- Recreation – The EIS should explain impacts of the proposed project and alternatives on anchoring boats in Lake Champlain. The issue would be particularly relevant in the shallow and narrow southern part of the lake. If there are any risks to swimmers, divers, or snorkelers, these should also be addressed in the EIS.
- Electromagnetic fields – The EIS should examine impacts permanent electric fields generated by a submerged cable would have on behavior and reproduction of fish and other animals.
- The proposed route needs to avoid:
  - Wetlands - The route of the proposed cable should avoid disruption to any lake side wetlands, particularly in the southern portion of Lake Champlain.
  - Historic shipwrecks - There are numerous historic shipwrecks on the bottom of Lake Champlain. The power line route should minimize any impacts to these.

### **Cumulative Impacts**

As part of the discussion of the cumulative impacts of the proposed project the EIS should consider the source of the energy that would be transmitted by the power line. If the power line creates a demand for additional large-scale hydroelectric dams in northern Quebec then the cumulative environmental impacts of the power line will extend far beyond the project itself.

### **Mitigation**

Finally, the proposed project will pass through Lake Champlain but provide no benefits to the communities of the Lake Champlain region. Project proposers should consider mitigation opportunities for these communities. As one possible example, there have been discussions about the role of the Champlain Canal as a vector for invasive species into Lake Champlain. Would it be possible for the electric cable, whose planned route passes by the canal, to supply power for an invasive species barrier in the canal?

Thank you for the opportunity to provide input into the Scoping Report on the Champlain Hudson Power Express Project. We will have additional comments after the EIS is prepared and the full impacts of the project become clearer. Please do not hesitate to contact us for further information on our questions and concerns.

Sincerely,

Mike Winslow  
Staff Scientist  
Lake Champlain Committee