



Sierra Club
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Dr. Jerry Pell
Office of Electricity Delivery and Energy Reliability (OE-20)
U. S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Sierra Club Atlantic Chapter Comments for the Scope of the Environmental Impact Statement – DOE /EIS-40447 Champlain Hudson Power Express Transmission Line Project

Dear Dr. Pell

The Scope of the Environmental Impact Statement must consider the following:

- The exact trajectory route and depths for the proposed underwater electric cable must be determined.
- A analysis of the projected underwater sediment disturbance caused by the dredging and or trenching techniques throughout the trajectory via the Richelieu River, Lake Champlain and the Hudson River onto wildlife, fish habitat, endangered species, micro-organisms, vegetation and human activities such as swimming and fishing.
- The potential impacts of sediment disturbances in the Superfund Area onto drinking water quality supplied by the Hudson River to the residents of Rhinebeck, Port Ewen and Poughkeepsie.

- A cumulative analysis for the potential resuspension and redistribution of the PCBs in the Hudson River.
- A analysis of impacts caused by the electromagnetic frequencies for the High Voltage direct current (DC) and the alternating current (AC) sections of the proposed transmission cable and the impacts onto wildlife, fish habitat, endangered species, micro-organisms, vegetation and human activities.
- The technology used by the proposed underwater cable has never been installed over 50 miles. What is the feasibility of installing such a system beyond 300 miles?
- How will the reliability of the regional electric grid be impacted?
- The proposed electric transmission line is designed to transport electricity from hydroelectric dams built on lands and rivers belonging to the Innu People in the Canadian Provinces of Quebec and Labrador-Newfoundland. **Segmentation exists between the electric source supply and it's delivery to New York electric consumers.**
- The EIS must address the Environmental Justice concerns expressed by the Town of Yonkers and the impacts of the proposed action onto the Indigenous communities caused by the construction of more hydroelectric dams.

<http://www.grandriverkeeperlabrador.ca/files/Download/HydropowerNotGreen.PDF>

- The eligibility criteria for hydropower in the New York State Renewable Standard, effective since September 24, 2004, does not allow for projects that include water impoundment which causes flooding and run-of-the-river projects with over 30 mw capacity.
- <http://documents.dps.state.ny.us/public/Common/ViewDoc.aspx?DocRefId=%7BB1830060-A43F-426D-8948-F60E6B754734%7D> See Appendix B, page 2.

The developer of the project, Transmission Developers Incorporated, must discontinue misleading decision-makers and the public by promoting the source of the electric supply as “Renewable Energy”. The DOE must require that a retraction with explanation be made and publicized to counter balance this misrepresentation of fact.

- Is there a need for the proposed action?
- Is this electric transmission proposal in the public interest?
- Alternatives studies must include the “No Action” alternative as a reasonable course of action.

Thank you for your consideration of these Comments.

Sincerely,

Annie Wilson

Energy Committee Chair
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