

RIVERKEEPER.

April 5, 2010

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

Re: Champlain Hudson Power Express, Inc. Application for Presidential Permit

Dear Dr. Pell,

Please accept the following comments and request for intervenor status for Riverkeeper, Inc. ("Riverkeeper"). Riverkeeper's mission is to protect the ecological integrity of the Hudson River and its tributaries, and to safeguard the drinking water supply of New York City and the lower Hudson Valley. For more than 40 years Riverkeeper has been New York's #1 clean water advocate. We have helped to establish globally recognized standards for waterway and watershed protection and serve as the model for the growing Waterkeeper movement that includes more than more than 180 Keeper programs across the country and around the globe. We are an independent, member-supported organization with over five thousand members in the Hudson Valley and New York City.¹

Pursuant to federal regulations at 18 CFR §385.214, Riverkeeper hereby requests intervenor status in the above-referenced proceeding. At present, Riverkeeper has not determined its position regarding the proposed project, due to the fact that much of the environmental assessment and resulting studies that would inform our position have yet to be prepared by the applicant or reviewed by Riverkeeper. *See* §385.214(b)(1). However, Riverkeeper does represent members living in the Hudson Valley and New York City whose interests may be affected by the proposed project. Therefore, Riverkeeper is seeking party status in this permit proceeding to represent the interests of our members and the general public. *See* §385.214(b)(iii). Those interests include, but are not limited to, environmental impacts associated with the construction and operation of the HVDC cable and land use impacts related to the construction of converter stations, as well as the potential positive benefits resulting from the increased use of renewable energy and the downward pressure on regional energy prices that the project may provide.

Riverkeeper welcomes new energy generation and transmission proposals that seek to bring renewable energy into the downstate New York metropolitan area using sustainable, environmentally friendly technologies. We also recognize that all energy generation and transmission projects result in environmental impacts on a regional and site specific level, and such impacts must be carefully assessed before any decision is made to approve or reject a proposal.

¹ For more information on Riverkeeper's history and current priorities, go to www.riverkeeper.org



Riverkeeper looks forward to fully participating in the DOE's permitting and environmental review process as it moves forward, and encourages DOE to take every opportunity to engage the general public in this process. Riverkeeper can support the agency's efforts by alerting our members to upcoming meetings and comment deadlines on our website.

Thank you for this opportunity to comment and become involved in this process. Please address any notices or other correspondence relating to this proceeding to me at the address below. Feel free to contact me if you have any questions regarding this submittal.

Respectfully submitted,



Phillip Musegaas, Esq.
Hudson River Program Director
Riverkeeper, Inc.
828 South Broadway
Tarrytown, NY 10591
914-478-4501 ext224
phillip@riverkeeper.org

cc: Don Jessome, TDI