



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 28 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 Transmission Line Project Environmental
Impact Statement (DOE/EIS-0447)

Dear Dr. Pell:

The U.S. Environmental Protection Agency (EPA) is providing scoping comments on the U.S. Department of Energy's (DOE) Notice of Intent to prepare an environmental impact statement (EIS) for the DOE's proposed action of granting a Presidential permit to Champlain Hudson Power Express, Inc. (Champlain Hudson) to construct, operate, maintain, and connect a new electric transmission line across the U.S.- Canada border in northeastern New York State. Champlain Hudson proposes to construct and operate an underground and submarine high-voltage direct current (HVDC) electric transmission line that would originate at a converter station in Hertel, Canada and ultimately terminate in Yonkers, New York. The transmission line is a 1,000-megawatt (MW) HVDC Voltage Source Converter (VSC) controllable transmission system, composed of one 1,000-MW HVDC bipole which is two submarine or underground cables connected as a bipole pair. The original notice of intent described two such bipoles, with the other terminating in Bridgeport, Connecticut. During the public scoping meetings, Champlain Hudson announced that the Bridgeport portion of the project had been cancelled.

EPA's scoping comments are as follows:

- The purpose and need statement should establish the evidence that the need for electricity exists in the area, or will exist if projected population and planned land use growth are realized.
- An evaluation of alternatives to the proposed action, including reasonable alternatives not within the jurisdiction of the lead agency.
- A discussion of all potential permits, including Section 404 permits from the U.S. Army Corps of Engineers that may be required for this project should be included in the EIS.
- A comprehensive evaluation of cumulative, indirect, and secondary impacts. The cumulative impacts analysis should consider the environmental impacts of the project as a whole, and if any, as one of a number of other past, present, and

reasonably foreseeable future projects and/or actions in the project area. Please refer to the Council on Environmental Quality's January 1997 guidance, Considering Cumulative Effects Under the National Environmental Policy Act, which can be found at www.whitehouse.gov/ceq/, if you require further guidance on the requirements of this analysis. The evaluation should include, but not be limited to, the impacts from the demolition and replacement of the Crown Point Bridge.

- EPA recommends that the General Conformity Applicability Analyses be included in the environment impact analysis and any environmental performance commitments must be cited in the Record of Decision.
- A full discussion of the siting and environmental impacts of the Yonkers converter station, including the risks of possible flashovers, should be included in the EIS. The siting of the converter station may require a detailed environmental justice analysis.
- Discuss the expected project life, and how the cable will be repaired if necessary.
- With regard to the upland placement of the cables, the General Accounting Office briefing on "Issues Associated with High-Voltage Direct-Current Transmission Lines along Transportation Rights of Way" dated February 2008, stated that electromagnetic fields and stray current could interfere with railroad signaling systems and highway traffic operations, and accelerate pipeline corrosion. The briefing also states that workers may be more likely to be injured given increased safety risk from close proximity of transmission lines to transportation rights of way. These issues should be discussed in the EIS.
- Describe the area and quality of benthic habitat (including oyster beds, submerged aquatic vegetation, etc.) that will be disturbed due to the placement of the cables in the sediments of Lake Champlain and the Hudson River. Also, discuss the area and quality of benthic habitat that will be permanently lost due to the placement of concrete mats on the cables if it is laid on the surface of the sediment. All mitigation plans should be included in the EIS.
- The Champlain Hudson Power Express Cable System Study Report dated January 18, 2010 describes laying the cables using water jetting and mechanical plows. The EIS should clearly describe what construction methods will be used, and where they will be used. The document should also include a discussion of sediment testing and the suspension of sediments during cable laying.
- The EIS should include the historic and cultural reviews of the Hudson River and Lake Champlain.
- EPA Region 2 is involved in the investigation of a tugboat wreck, i.e., the McAllister which sank in Lake Champlain in 1963, for possible fuel tank leaks. The wreck is in approximately 160 feet of water off the coast of Westport, NY. The following link should be reviewed to determine if the cable path may impact upon this area. http://www.epaos.org/site/site_profile.aspx?site_id=5728
- The EIS should discuss whether the proposed project will effect the proliferation of aquatic invasive species in Lake Champlain or the Hudson River.

EPA would also like to use this opportunity to encourage you to implement green practices and techniques during design and construction. For example, air emissions during construction will include particulate matter (PM_{2.5} and PM₁₀). To reduce the potential health and environmental impacts of these pollutants in the project area and to improve the conditions for the workers, the installation of diesel particulate filters (DPF) on construction equipment should be considered. DPFs can reduce diesel particulate emissions by 90 percent for stationary and non-stationary diesel equipment. To learn more about this technology and its application, you may reference DPFs at <http://www.epa.gov/oms/retrofit/nonroad-list.htm> or contact us directly.

EPA appreciates the opportunity to comment on this scoping document. If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in cursive script, appearing to read "Grace Musumeci".

Grace Musumeci, Chief
Environmental Review Section