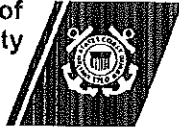


U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Sector Northern New England

259 High Street
South Portland, ME 04106
Staff Symbol: spw
Phone: 207-767-0303
Fax: 207-347-5024

16670

October 9, 2014

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

Dear Mr. Mills:

Under the authority of the Ports and Waterways Safety Act, 33 U.S.C. § 1231 and the Rivers and Harbors Act, 33 U.S.C. § 471, the U.S. Coast Guard provides the following comments to better define the scope of the Environmental Impact Statement (EIS) for the New England Clean Power Link Project, as described in OE Docket No PP-400.

There are several navigational safety risks that existing waterway users and the environment might experience during construction and operation of the subject project. Therefore, the EIS should address the following: how the applicant will identify and verify sufficient burial depth and protection to prevent anchor fouling and damage to the transmission line; how the applicant will account for lake ice and seasonal locks/canals during the construction process and during maintenance periods; how the applicant will avoid the introduction of aquatic nuisance species through proper ballast water management; how the applicant will quantify the effect on magnetic compass deviation; how the applicant will ensure the safety of personnel during construction, to include the recovery of personnel who may fall overboard from construction vessels; and how the applicant will minimize impact to the Marine Transportation System during the construction and operation of the proposed transmission line, to include commercial vessels such as the operators of cable and self-propelled ferries, and recreational vessels, some of which are operated by individuals who may not speak fluent English. We also request the EIS include exhibits that show the transmission line's route on nautical charts, in addition to maps, to most effectively demonstrate impacts to affected waterways and waterway users.

Thank you for this opportunity to provide comments and participate as a cooperating agency. We want to ensure early, often, and thorough discussion among your office, the applicant, and affected stakeholders to discuss how the subject project may impact navigational safety along the route of the proposed transmission line. If you have any questions or concerns, please contact my Waterways Management Division Chief, Lieutenant junior grade David Bourbeau at (207) 347-5015 or by email at david.t.bourbeau@uscg.mil.

Sincerely,

A handwritten signature in black ink that reads "Brian D. Gilda".

B. S. Gilda
Captain, United States Coast Guard
Captain of the Port
Sector Northern New England

Copy: Commander, U.S. Army Corps of Engineers New York District (New England)
Commander, First Coast Guard District (dpw3)