



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

August 6, 2015

Regulatory Division
CENAE-R-PEC-NAE-2013-2689

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

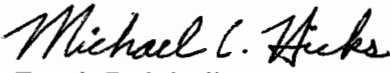
Dear Mr. Mills:

We appreciate the opportunity to comment on the "Draft New England Clean Power Link Project Environmental Impact Statement".

The document generally addresses the environmental impacts of the project and of the preferred alternative. However, we believe additional information should be provided within Section 2 of the Draft EIS on alternative routes considered in evaluating the proposed project. These alternatives should include overland routes that are alternatives to the Lake Champlain Segment. We suggest that Appendix D include the information on alternatives provided in the Corps application. This information will be required for our permit review. The attached sheets detail these and other specific comments concerning the Draft EIS.

If you have any questions, please contact Mr. Michael S. Adams at our Vermont Project Office at 802 872-2893.

Sincerely,

for 
for Frank Delgiudice
Chief, Permits and Enforcement Branch C
Regulatory Division

Attachment

Copies furnished:

Mr. Brian Mills
Department of Energy
Brian.Mills@hq.doe.gov

Ms. Beth Alafat
U.S. Environmental Protection Agency
ALAFAT.BETH@epamail.epa.gov

Mr. Tim Timmerman
U.S. Environmental Protection Agency
timmerman.timothy@epa.gov

Ms. Maria Tur
U.S. Fish and Wildlife Service
maria_Tur@fws.gov

Ms. Michele DesAutels
USCG
Michele.E.DesAutels@uscg.mil

Ms. Laura Lapierre
VT Department of Environmental Conservation
Laura.Lapierre@state.vt.us

Mr. Josh Bagnato
Champlain VT, LLC, d/b/a TDI-NE
Josh.Bagnato@chvtllc.com

Comments
Draft New England Clean Power Link Project
Environmental Impact Statement

Summary

Page S-8 – The description indicates that at depths greater than 150' the cables will be protected with concrete mats. This is not the case, at this depth the cable will lay on the lake bottom and over time they are expected to settle into the lake bottom.

Page S-10 – Construction and Schedule: The project is expected to start in 2016 and be completed in 2018. On Page 6-4 the construction is anticipated to occur between 2017 and 2019.

Page S-10 – The description on how deep the aquatic transmission cable will be buried in the lake bottom varies throughout the document.

Page S-12 – In the US Army Corps of Engineers (COE) application the terrestrial transmission cable will be buried 4 to 6 feet deep, in the Draft EIS it will be buried 4'.

Page S-13 – It's not clear in the description on whether the trench plugs will be left in place or removed before the trench is backfilled.

Page S-16 – Table S-2: Installation of the cable in the lake is expected to take 7 months. Later in the document, page 5-10, the work will take 8 months. Does this time period include the grapnel run?

Pages S-17 and 2-22 – Transportation and Traffic: There is a potential for a short-term effect to commercial and recreational navigational use of the lake in and around the location of the proposed cofferdams. There is no mention on how long these structures will be in the lake.

Pages S-18 and 2-23 – Aquatic Habitats and Species: In the COE application about 2.5 acres of lake bottom will be filled by the concrete mats.

Pages S-20 and 2-25 – Wetlands: In the COE application the project will temporarily impact about 4.5 acres of wetlands. About 1.95 acres of forested wetland will be cleared, with about 1.21 acres being allowed to grow back. About 0.74 acre of forested wetland will be permanently converted to palustrine emergent or palustrine scrub-shrub wetlands.

Sections

Page 1-2 – Identify the specific mitigation measures that have been incorporated into the project.

Pages 2-7, 2-15 and 5-21 – At depths greater than 150' the cables will be laid on the lake bottom and over time will settle into the lake bottom.

Page 2-18 – Discuss how excess material from the overland trench will be disposed of. The excess material should be disposed of in an upland, non wetland location. Move the discussion on how to dispose of debris removed from the lake to Section 2.4.7.1.

Page 2-19 – Other Alternatives: It would be helpful to include a detailed discussion of the alternatives considered, including the Overland Alternatives, in this Section. The evaluation should include a comparison of the alternatives and a conclusion on why the proposed action is the preferred alternative.

Page 3-1 – 3.1.1.2: Vermont has jurisdiction within Lake Champlain below the mean lake level (95.5') and the Corps has jurisdiction beyond the ordinary high water (98') mark in the lake.

Page 3-25 – Electrical Systems: There are several electrical lines between Vermont and New York. These lines need to be identified and included in the final EIS.

Sheet 3-46 – The project will terminate at the Coolidge Substation located in Cavendish, Vermont.

Page 3-61 – Include the scientific name for all tree species.

Page 3-67 – Table 3-25 describes the four field-identified archeological resources not Table 3-24.

Page 5-2 – Discuss the effects the work barges and cofferdams/guide shaft used during HDD will have on navigation in the lake. How long will the HDD process take? The 10" diameter conduits that will be pulled into the drill holes may temporarily affect traffic on the lake before being installed. Will the conduits be assembled as they are being pulled or before and floated on the lake surface then pulled into the drill holes? These conduits are a minimum of 1200' and 700' long and have the potential to temporarily impact navigation on the lake.

Page 5-2 – Clarify that the cable route will be depicted on nautical charts after the construction is completed and not just during construction.

Pages 5-4 and 5-21 – No concrete mats at depth greater than 150'.

Page 5-9 – Aquatic habitat and Vegetation: During the installation of the transmission cable the project has the potential to disturb and spread invasive species in the lake. Include a discussion on the potential effects the project will have on invasive species and how they will be monitored during and after construction.

Pages 5-10 and 5-15 – About 2.5 acres of lake bottom will be covered with concrete mats according to the description in the COE application.

Pages 5-18 and 5-19 – What is the rate of installation for the terrestrial portion of the Lake Champlain?

Page 5-21 – Include the effect of dredging at the HDD site in Alburgh, not just Benson.

Page 5-24 – The project will cross several existing electrical lines within the Lake Champlain Segment ROI.

Page 5-27 – There will be a longer temporary impact to recreational boaters in the area of the HDD.

Page 5-51 – Does the northern long-eared bat detect magnetic fields? If so, include them in this discussion.

Page 5-52 – In the COE application the project will temporarily impact about 4.5 acres of wetlands. About 0.74 acre of forested wetland will be permanently cleared and converted to emergent and scrub-shrub wetland. An additional 1.21 acres of forested wetland will be cut and allowed to grow back. Table 5-7 does not include impacts to wetland buffers.

Page 5-54 – The COE Vermont In-Lieu Fee Program will be used to mitigate for the proposed permanent and temporary change in cover type to forested wetlands by the project. The project will impact about 4.5 acres of wetlands, not 4.01 acres.

Page 5-55: Include a discussion on how invasive species in the lake will be monitored after construction and for how long.

Page 5-65 – Table 5-8 provides comparable noise levels within 100 feet of construction, not Table 3-7.

Page 6-1 – The Vermont Green Line is a new HVDC transmission line being proposed between Beekmantown, New York and New Haven, Vermont. The proposal by Anbaric and National Grid will involve similar lake and terrestrial impacts as the NECPL Project. This project should be included.

Page 7-1 – U.S. Army Corps of Engineers New England District, not “Vermont District”.