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26 AUG 2015

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

Dear Mr. Mills,

Thank you for the opportunity to comment on the New England Clean Power Link (NECPL) Draft Environmental Impact Statement (DEIS).<sup>1</sup> The U.S. Coast Guard (USCG) Sector Northern New England, with input from First Coast Guard District, evaluated the DEIS to determine how the project may impact navigational safety along the transmission line route under the authority of the Ports and Waterways Safety Act (PWSA), 33 U.S.C. § 1231, and the Rivers and Harbors Act, 33 U.S.C. § 471.

As this is a similar project and route to the Vermont portion of the Champlain Hudson Power Express (CHPE) project, all of the comments submitted by the USCG are applicable to this project in addition to the following:

1. Consistency on Mitigation for Depths Greater than 150 feet:

The cable is described as either laying on top of the surface of the lake bottom or being covered with articulated concrete mats.<sup>2</sup> Based on the CHPE project environmental review, the USCG anticipates the cable will lie on the surface of the lake bottom for depths greater than 150 feet.

2. Emergency Repairs:

The document states that repair time would be brief; however, the DEIS provides no definition of brief.<sup>3</sup> Additionally, there is no evidence to substantiate that repair time of a submarine cable can be brief. In a report completed by Dr. Malcolm Sharples<sup>4</sup>, one particular cable repair took 26 days, working 7-day weeks to complete, which we do not consider brief.

3. Vessel Traffic Services:

<sup>1</sup>001\_05-31-2015-FINAL-Draft-EIS-to-DOE.

<sup>2</sup> Page 2-15, paragraph 3 vice Page 2-16, paragraph 2-3.

<sup>3</sup> Page 5-4, paragraph 1.

<sup>4</sup> <http://www.bsee.gov/Technology-and-Research/Technology-Assessment-Programs/Projects/Project-671/> Page 156

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The document states that the applicant will coordinate with USCG Vessel Traffic Services (VTS) according to an Aquatic Safety and Communications Plan<sup>5</sup>. The USCG does not operate a VTS on Lake Champlain.

4. Route on Nautical Charts:

The DEIS does not display the project route on nautical charts. The USCG requests that at least one figure is shown on a National Oceanic Atmospheric Administration (NOAA) nautical chart for the Lake Champlain portion of the project to ensure there are no conflicts with existing waterway uses or environmental features.

5. Appendix G, TDI-NE General Mitigation Strategies:

This section has no mention of the Navigation Risk Assessment (NRA) that the USCG expects to review and provide a recommendation concerning the impact to waterway safety. Although the document makes reference to minimizing the risk of snagging from anchors through burial and concrete protection<sup>6</sup>, this would be one of several impacts assessed in a thorough NRA. Other potential impacts include the project's effects on Coast Guard missions and effects on electronic navigation systems due to the presence of the submarine transmission cable.

Thank you for this opportunity to participate as a cooperating agency. Should you have additional questions, feel free to contact Lieutenant David Bourbeau, Chief, Waterways Management Division, at 207-347-5015 or david.t.bourbeau@uscg.mil.

Sincerely,



M.A. BAROODY  
Captain, U.S. Coast Guard  
Captain of the Port  
Sector Northern New England

Copy: Commander, First Coast Guard District (dp)

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<sup>5</sup> Page 5-28, paragraph 3.

<sup>6</sup> Appendix G, Page 3.