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Dr. Jerry Pell, CCM
Principal NEPA* Document Manager
Permitting, Siting, and Analysis (OE-20)
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
Washington, DC 20585

Re: B watt Underrwater cable, Quebec to NY
Docket # PP-362

Dear Dr. Pell,

PROTECT has since 1982 actively opposed import of Canadian hydropower and construction of high voltage transmission facilities to accommodate that power. We were involved initially in legal action to oppose the Marcy-South Transmission Line which brings hydropower from James Bay in Quebec and have since been active participants in other efforts to limit this policy of bringing enormous electricity resources south from Canada for consumption in the United States.

PROTECT has partnered with many organizations in advocacy of legislative action and in legal actions concerning energy projects – partners such as Sierra Club, Audubon Society, Friends of the Earth, NRDC, Solidarity, Citizens Environmental Coalition, Hudson River Sloop Clearwater, the Grand Council of the Crees of Quebec¹, the City of New York, and many others representing a very broad and comprehensive cross-section of American and North American communities.

¹ PROTECT was a registered agent for the Grand Council of the Crees of Quebec during the 1990s but that registration is no longer applicable and we do not in any way represent the Crees at this time, nor since 1997.

Our concerns are primarily environmental. The generation and transmission of electricity has serious environmental impacts regardless of where it occurs. This activity across a national border will for example result in the following:

- It will limit efforts to constrain the disproportional consumption of electricity in the United States because in part the environmental impacts involved are far out of sight and mind, suffered only by distant and often native people whose concerns are not of concern to US consumers. This power will support the illusion that electricity is an unlimited resource and can be used and wasted without concern.
- It will limit production of power in this nation for our own consumption in part because the availability of imported power removes the sense of urgency for development of power here that is environmentally acceptable, for which we take responsibility for its development, construction and full range of impacts including socioeconomic impacts.
- Impacts upon the Canadian environment and the social and economic impacts upon native people affected by hydropower development in Canada are severe and must not be ignored by the United States. Canada is under censorship internationally for its refusal to fully honor the rights of its aboriginal people. The United States must not become party to that by purchasing the power generated at the expense of those native communities. New York State has in the past declared hydropower from Quebec to be so environmentally devastating in Quebec that it is not acceptable in New York. NEPA must consider the advisability of a similar decision.
- It is important to note that while this power is supposedly from Labrador, in fact, it is part of the pool of power in which Hydro-Quebec is involved, a pool that is supplied by ever-increasing damming and diking and flooding of rivers and wilderness areas in Quebec, almost exclusively on native lands. The relationship between the Labrador facility and Hydro-Quebec's overall development plans needs close examination. The United States should not be Hydro-Quebec's partner in their *Plan du Nord*.
- The profits will be in Canada. How will the US re-coup fiscal damages in the event of a disaster?

The proposed cable itself is also of enormous concern and we ask that you consider the serious threat to water supplies should some accident or engineering flaw result in leaks or breaks in that line. It appears to be policy that permits are granted in the belief that no accidents will occur: There will be no leaks from under-sea oil drilling, no explosions or water contamination from Marcellus gas extraction; no mine explosions from coal mining. Recent history and the enormous environmental damages done as a result of those assumptions have proven that the energy industry is naive or irresponsible about the consequences of its actions, and that it is the American people and future generations who will ultimately bear the cost of the related errors in judgment on the part of governmental agencies which have allowed these

activities to continue without adequate planning for the problems they can (and lately often do) cause.

American Rivers has recently announced that the Delaware River is THE most endangered river in our nation, because of the Marcellus gas extraction. The sort of thinking that has led to this horrendous situation must change for the protection of the American people! The B-watt Underwater Cable, Quebec to NY, poses potentially disastrous consequences for major waterways, Champlain and the Hudson River, as well as Long Island Sound, and for surrounding communities.

Proponents of this facility must be held accountable by NEPA for considering and discussing openly every possible contingency, every possible problem that the line could cause, and every detailed plan to immediately repair damages and prevent contamination of the environment through which the line passes. It is not enough for them to simply say that such facilities are being operated successfully elsewhere. That no accident has occurred to date does not mean that no accident will occur. The question is what will be done to contain damages should problems develop? – And, further, is it even possible to consider or imagine every sort of problem that may develop in the future?

Our major waterways must not be used for the experimentation this project represents.

It is past time for the US Government and government at all levels to look ahead at the negative possibilities and refuse to permit development of what are essentially experimental facilities when the worst-case scenarios threaten the water we must have to continue as a society and a culture; the safety and the environmental health that are far more essential to our lives than is another supply of electricity for us to consume in excess at rates far beyond the per capita rate of energy consumption in other parts of the world.

There is an alternative to this line and that alternative is sensible and easily applicable energy efficiency, from which experts such as Rocky Mountain Institute estimate we could obtain another 60% and more of the power available to us today. In other words, we are wasting through inefficiency more than half the power we produce (a modest estimate compared to those proposed by most energy experts today). Through elimination of that waste we could provide electricity to tide us over until non-fossil fuel resources are developed within the United States.

PROTECT urges you to seriously and comprehensively consider alternatives to this proposed transmission line.

Please include us in all correspondence and activity regarding the EIS for this project. We ask that this letter be included in the record.

Sincerely,

Doris Delaney

Doris Delaney
For PROTECT