



The American Waterways Operators

www.americanwaterways.com

801 North Quincy Street
Suite 200
Arlington, VA 22203

John A. Harms
Manager - Atlantic Region

PHONE: (703) 841-9300, extension 292
CELL: (703) 615-1774
FAX: (703) 841-0389
EMAIL: jharms@vesselalliance.com

September 15, 2014

Mr. Jun Yan, P.E.
Project Manager, Eastern Section Regulatory Branch
U.S. Army Corps of Engineers
26 Federal Plaza, Room 1937
New York, NY 10278

RE: Champlain Hudson Power Express (CHPE)
Transmission Project Environmental Impact
Statement (EIS No. 20140227)

Dear Mr. Yan:

The American Waterways Operators is the national trade association for the U.S. tugboat, towboat, and barge industry. Our industry's 4,000 tugboats and towboats and more than 27,000 barges safely and efficiently move more than 800 million tons of cargo each year. This includes more than 80 percent of New England's home heating oil, 60 percent of U.S. export grain, and significant petroleum products transported on the Hudson River. We appreciate the opportunity to comment on the Champlain Hudson Power Express (CHPE) cable route transmission system Environmental Impact Statement (EIS).

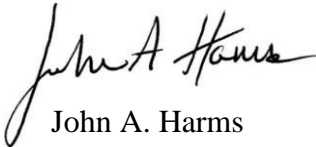
As proposed, the CHPE cable route presents a risk to the safe operations and economic vitality of the tugboat and barge industry. The Hudson River's congressionally-authorized navigation channel accommodates a wide range of vessels that must be able to engage in emergency maneuvers to avoid collisions, allisions, and groundings by quickly deploying an anchor or anchors. In addition, vessels must be able to anchor during the sudden onset of fog or other inclement weather. The presence of an underwater cable, even a cable buried seven feet deep as proposed for certain portions of the project, would prevent vessels from deploying an anchor due to the risk that the anchor could be damaged or become entangled in the cable. Sound and common sense public policy dictates that cables within a congressionally-authorized navigation channel should be placed perpendicular to the channel and buried to a sufficient depth to minimize the cable's impact on vessel traffic.

AWO is pleased that the CHPE EIS provides for the cable to be buried at least fifteen feet deep on certain portions of the river that are federally maintained by the Army Corps of Engineers. However, the EIS provides for the cable to be buried to a depth of only seven feet on certain portions of the river that are not federally maintained. A burial depth of seven feet is inadequate to prevent snags by anchors that can weigh twelve tons and that are designed to dig deep into the riverbed. In addition, the EIS provides that the cable shall not be buried at all on certain portions of the river where cable burial is impossible. In these instances, the EIS provides for the cable to

be covered by articulated mattresses, which are just as likely to cause anchor fouling as an inadequately buried cable. The articulated mattresses are also unlikely to adequately protect the cable from anchor strikes. ***AWO strongly recommends that the cable be buried at least fifteen feet deep. If the CHPE cable cannot be buried to a depth of fifteen feet throughout the entire congressionally-authorized channel, the CHPE cable route application must be denied due to the increased risk to commercial vessels operating on the Hudson River.***

Thank you for the opportunity to comment on the CHPE cable route transmission system EIS. AWO stands ready to work with the Corps to find an alternative solution that maintains safe navigation and facilitates economic growth. AWO would be pleased to answer any questions or provide further information as the Corps sees fit.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Harms". The signature is written in a cursive style with a large initial "J".

John A. Harms

CC: Mr. Brian Mills, U.S. Department of Energy