Document Metadata: DOE-HQ-2018-0004-DRAFT-0001

Document Details

Docket ID: DOE-HQ-2018-0004 ©

Docket Title: Presidential Permit Applications: Clean Power Northeast

Development Inc. *©

Document File:

Docket Phase: Advanced Notice of Proposed Rulemaking (ANOPR)

Phase Sequence: 1

Original Document ID: DOE FRDOC 0001-DRAFT-0675

Current Document ID: DOE-HQ-2018-0004-DRAFT-0001

Title: Comment on FR Doc # 2017-26052 ©

Number of Attachments: 1

Document Type: PUBLIC SUBMISSIONS *®

Document Subtype: Public Comment ©

Comment on Document ID: DOE-HQ-2018-0004-0001 ©

Comment on Document Title: Presidential Permit Applications: Clean Power Northeast

Development Inc. ©

Status: Pending Post ©

Received Date: 12/12/2017 *®

Date Posted:

Posting Restriction: No restrictions ©

Submission Type: Web

Number of Submissions: 1 *

Document Optional Details

Submitter Info

Comment: The Massachusetts Lobstermen's Association submits this letter

of comment See attached file(s) *®

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Submitter's Representative:		
Government Agency Type:		
Government Agency:	©	
Cover Page:	нтя.	
Document Optional Details		
Status Set Date:	03/25/2018	
Current Assignee:	Bacon, Cuttie (DOE)	
Status Set By:	Freeman, Yohanna (DOE)	
Comment Start Date:		
Comment Due Date:		
Legacy ID:		
Tracking Number:	1k1-90b6-9t0m ©	
Total Page Count Including Attachments:	1	
Submitter Info		
Comment:	The Massachusetts Lobstermen's Association submits this letter of comment See attached file(s) *©	
First Name:	Beth *©	
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(5)

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December 5, 2017

Office of Electricity Delivery and Energy Reliability (OE–20), U.S. Department of Energy, 1000 Independence Avenue SW., Washington, DC 20585

RE: OE Docket No. PP-441

To the Office of Electricity Delivery and Energy Reliability; The 1800 member Massachusetts Lobstermen's Association (MLA) submits the following comments of concern to you regarding - OE Docket No. PP-441. Whereas, scores of our Massachusetts lobster fishermen currently fishing in the Gulf of Maine, Lobster Management Area 1 who greatly depend on the continued success of the lobster resource, recruitment of the stock and the overall health of the ecosystem.

The MLA is concerned about the proposed project submitted to the Commonwealth of Massachusetts by Emera, "Atlantic Link" Subsea Cable into the Commonwealth given the lack of data and impacts on the lobster resource. The MLA and commercial fishing industry continues to request that more studies are done on a multitude of areas of concern from Electromagnetic Fields (EMF) and the impacts on the entire ecosytem. While there have been some studies on EMF, nothing compares to the magnitude this project will produce.

Established in 1963, the MLA is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests. The MLA continues to work conscientiously with the Lobster Foundation of Massachusetts, MA Division of Marine Fisheries, the Atlantic States Marine Fisheries, and the New England Fisheries Management Council to ensure the continued sustainability and profitability of the many resources in which our fishermen depend upon.

There have been recent developments for the Gulf or Maine/Georges Bank lobster stock settlement and we are extremely concerned about any unknown negative impacts to the resource from the electromagnetic fields and jet plowing. The MLA is worried given the uncertainty and indefinite impacts to the American Lobster resource the proposed Atlantic Link will have by delivering 5.69 terawatt hours (TWh) of renewable energy directly to Massachusetts is intolerable given the scale of the wattage being delivered.

Whereas, the overall length of the "cable route is 337 miles, including 19 miles in Massachusetts. The cable will pass through the Cape Cod Ocean Sanctuary and the Cape Cod Bay Ocean Sanctuary the Foundation is extremely concerned for the overall health and impacts on the ecosystem these "two 320 kV direct-current cables with a delivered capacity of 1,000 MW" will have on not only lobster but the large whales and ecological species such as the sand lances given these cable will be buried 3 to 6 feet deep.

Lastly, the proposed cable route for the *Atlantic Link* project could not go through a more vital ecosystem, the Gulf of Maine, which contains the United States Northeast's regions most valuable commercial fishery, the American lobster and we hope this cable does not create and underwater electric fence to all the ecologically important species that currently cohesively exist in and around the proposed cable route.

Thank you for the opportunity to comment on this project.

Sincerely, Beth Casoni Executive Director