

Dear Mr Lawrence, Mr.Jessome, and Mr. Ryan:

Grand Riverkeeper Labrador, Inc. is an environmental Non Governmental Organization and a member of the US Waterkeeper Alliance. We have spent years fighting to save our river (the Churchill) in Labrador from destruction by mega hydro dams and we have a very keen interest in what is happening in the Northeastern States as it pertains to various transmission lines proposed, including the Champlain Hudson Power Express, to bring power from our river and Quebec rivers through Quebec and into the Northeastern States and New York.

We understand that the current issue is that you have been requested to provide a new permit for the CHPE project to cross the US border and that although they received a permit in 2014 that there is a new corporation involved which appears to us to be TDI and Hydro Quebec's way of confusing the public and the DOE and trying to slip a project under the door that is substantially different with regards to routes and environmental issues than the one they proposed in 2014. At GRK we feel this is an excellent time for your departments to re-assess the environmental and social justice issues related to this project.

Perhaps you have heard of the Churchill Falls Hydro electric project. It produces nearly 5400 MW of power, one of the largest power projects on the continent. Hydro Quebec owns all but about 500 MW of this power in a contract that is effective until 2041. At any moment in time, power that is produced by our river could be transferred over Quebec lines and onto the CHPE power line. Thus any issues with the "other end of this power cord" are certainly a major concern for our group.

Our own Newfoundland and Labrador (NL) Crown Corporation, Nalcor Energy, has nearly completed the Muskrat Falls project near our community (36 km upstream), on this same river and now Nalcor, and the Premiers of Quebec and Newfoundland and Labrador are in discussion to build yet a third project on our river at Gull Island (2300 MW). NL does not need this power. These projects are being built specifically for export to the Northeastern States and New York and these proposed transmission will eventually transfer power from these projects as well, IF they are allowed to be built.

These massive dams on our river are causing huge environmental, social, cultural and health problems. Spawning shoals for fish are being destroyed, the warming of the water in the reservoirs will destroy habitat, millions of fish will be destroyed as they pass through the turbines and if they live through that, gas bubble disease can finish the job down past the dams. Methyl mercury created by flooding the land will increase in the fish, birds and seals that our Inuit communities depend on for subsistence. The Churchill Falls project came on stream in 1972 and still some species of fish in the river are twice the limit of mercury that Health Canada says is safe to eat. (Nearly 50 years later) Yet more projects are planned. Harvard University predicted that if the Lower Churchill project (Muskrat Falls and Gull Island) proved, some Indigenous people could see up to 300 to 400 % increase of mercury in their bodies depending on how much they consume and to tell an Inuk that they cannot eat their traditional food is tantamount to cultural genocide as hunting for the community is a shared responsibility. (See Harvard's study at www.makemuskratright.org Besides that, food in these northern communities is extremely expensive and jobs to make the money to buy the store food are scarce. Methyl mercury is a neurotoxin and can affect small children in a way that cannot be easily detected. Studies show that children can be affected in various ways such as their learning ability and their ability to succeed in school. These are often subtle effects and very difficult to diagnose. Our northern communities have enough trouble trying to survive in this day and time without having to deal with a poison that is created in amounts that affect their children's learning abilities just to provide

electricity to you folks in the United States over power lines like the Champlain Hudson Power Express. (CHPE). Indigenous people in these communities Northern Quebec and Labrador are not properly consulted and even if their voices are heard, their issues are rarely ever considered. See information here on what an Independent Inquiry had to say about the Muskrat Falls project in Labrador: here: <https://www.aptnnews.ca/national-news/inquiry-finds-environment-of-mistrust-after-lack-of-indigenous-consultations-for-muskrat-falls-project/>. This is not an isolated case. Hydro Quebec is also guilty of neglecting to consult with Indigenous people whose land they destroy: See here: <https://www.thetelegram.com/news/local/consultation-efforts-not-good-enough-chief-jean-charles-pietacho-says-285517/>. Buying power from our rivers makes New York and your departments complicit in these issues morally if not legally. These kinds of projects could never be built in the United States any more, yet you seem to have no compunction in approving a transmission line to bring power to your communities that has already caused great harm to our communities and that will absolutely cause more dams to be built on our rivers. This is an act of injustice that we cannot allow to go un-resisted.

All or most all power generated in Canada is generated by State Owned Corporations called Crown Corporations. These power projects more often than not end up way over budget and the costs are much higher than it is possible to sell that power for on the open market or by contract. This means that because the corporations are state owned, we, the citizens of the Provinces where the power is produced get to pay the difference in the cost to produce and the selling price. For example, the cost to produce the power at Muskrat Falls is about \$0.65cents per kilowatt hour. The selling price would be at this moment in time, somewhere around \$0.05 cents per kWh. No doubt you see where this is going. The ratepayers and taxpayers in our Province of NL will SUBSIDIZE the power that will eventually be transported on any power line coming from the Quebec border into the United States, including the CHPE project, especially if Hydro Quebec is the entity that eventually builds the Gull Island power project, and it is looking very much like that could be the scenario. To review how Nalcor Energy in particular, has come nearly to a point of bankrupting the province of NL and may yet, you have only to review various media reports: Here: <https://business.financialpost.com/opinion/the-rock-in-a-hard-place-newfoundland-and-labrador-is-on-the-brink-of-bankruptcy> Here: <https://www.cbc.ca/news/canada/newfoundland-labrador/muskrat-falls-inquiry-misguided-project-1.5492169>. and Here: <https://nationalpost.com/news/canada/the-rock-on-the-rocks-newfoundland-labrador-bankruptcy>.

When considering the impacts of these transmission lines, your environment departments are obviously not considering the impacts these hydro projects have on our communities. It is clear to us that damming rivers to the extent that the various Crown Corporations in Canada have in the past, are in the process of doing now, and have various plans for thousands of more megawatts in the future are causing huge issues, but, not just for us in the communities adjacent to these projects, a few of which we have mentioned above; they are affecting communities in your jurisdictions as well. Like the Covid-19 virus, which we all know has spread globally, so do massive numbers of hydro dams spread their destruction far and wide.

Fisheries in the St. Lawrence River, in the Gulf of Maine and the Grand Banks of Newfoundland are greatly diminished due to heat pollution, sediment/silica starvation, and loss of thousands of hectares of fish habitat and spawning grounds. A document called "The Future of Cod in the Gulf of Maine" by Andrew J. Pershing of the Gulf of Maine Research Institute discusses overfishing as one issue but clearly outlines the problem of environmental changes, including rising temperatures and changes in forage fish as the need to "develop a comprehensive picture of stock structure and life history variability. Including

environmental conditions and more realistic stock structure in assessment models”, in order to better understand and design management strategies. We believe, based on information from Department of Fisheries and Oceans biologists from the Bedford institute in Nova Scotia and from Russia and California that dams in Quebec and Labrador are a huge part of the “picture of stock structure and life history variability” of these fish stocks and would be more than happy to provide you with various studies.

In GRK’s opinion, it makes no sense for your departments to turn a blind eye to these massive hydro projects and expect that assessing the environmental damage of just the transmission line will be sufficient while continuing to ignore the fact that like Covid-19, ecosystems do not abide by jurisdictions or man made borders. Massive dams on Canadian Rivers are currently affecting ecosystems even as far as New York and your environment departments need to review studies and documents that are available that show the effects on your own citizens of the end of the CHPE power cord.

Thank you for considering our comments.

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