



Appalachian National Scenic Trail Delaware Water Gap National Recreation Area Middle Delaware National Scenic and Recreational River

New Jersey and Pennsylvania



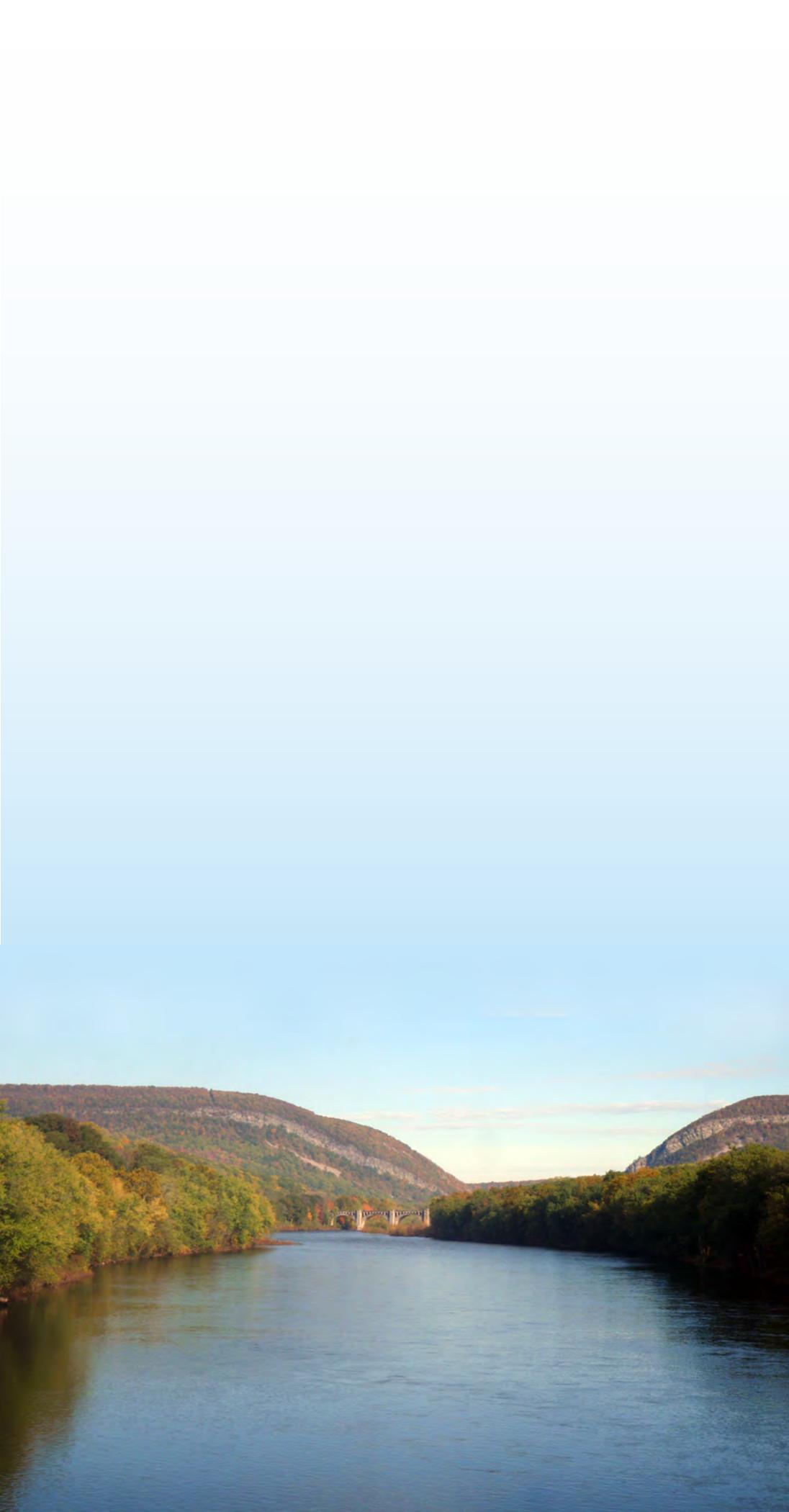
**Susquehanna to Roseland 500kV Transmission Line Right-of-Way
and Special Use Permit Final Environmental Impact Statement**

August 2012
Volume III

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National Park Service
U.S. Department of the Interior

Appalachian National Scenic Trail
Delaware Water Gap National Recreation Area
Middle Delaware National Scenic and Recreational River



FINAL PUBLIC COMMENT ANALYSIS REPORT

**SUSQUEHANNA TO ROSELAND 500 kV TRANSMISSION
LINE RIGHT-OF-WAY AND SPECIAL USE PERMIT**

DRAFT ENVIRONMENTAL IMPACT STATEMENT



May 2012

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LIST OF ACRONYMS AND ABBREVIATIONS

APPA.....Appalachian National Scenic Trail
 DEISDraft Environmental Impact Statement
 DEWADelaware Water Gap National Recreational Area
 kVkilovolt
 MDSR.....Middle Delaware National Scenic and Recreational River
 NEPA.....National Environmental Protection Act
 NPCANational Parks Conservation Association
 NPS.....National Park Service
 PEPCPlanning, Environment, and Public Comment
 PJM.....PJM Interconnection
 PPLPPL Electric Utilities Corporation
 PSE&GPublic Service Electric and Gas Company
 ROW.....Right-of-way
 S-R Line.....Susquehanna to Roseland Transmission Line

INTRODUCTION AND GUIDE

Introduction

PPL Electric Utilities Corporation (PPL) and Public Service Electric and Gas Company (PSE&G), jointly known as the applicant, have proposed constructing a double 500,000-volt (500-kV) transmission line, the S-R Line, including crossings of the Appalachian National Scenic Trail (APPA), the Delaware Water Gap National Recreation Area (DEWA); and the Middle Delaware National Scenic and Recreational River (MDSR), in Pennsylvania and New Jersey. Applicant has applied for a permit to allow the construction, maintenance, and operation of the S-R Line across three units of the national park system, and the replacement of their existing 230-kV transmission line. This existing 230-kV transmission line runs from the northwest to the Bushkill substation crossing a small segment of DEWA, and from Bushkill substation across DEWA, MDSR, and APPA, connecting to the Kittatinny substation, and is referred to in this document as the Bushkill-Kittatinny line or B-K Line. The B-K Line towers are approximately 80 feet in height and its right-of-way varies from 100 to 300 feet in width through the Parks. The applicant's proposal would replace the B-K Line with a new set of towers up to 195 feet tall on a widened right of way carrying both the S-R Line and a replacement B-K Line. The replacement B-K Line would be capable of carrying 500 kV, though initially energized at 230 kV. The NPS has prepared a draft Environmental Impact Statement (DEIS) to evaluate the impacts to the natural and human environment from the applicant's proposal and to assist in making a decision on the issuance of permits.

Summary of Public Comment Process

On November 21, 2011, the NPS released the DEIS for the Susquehanna to Roseland Transmission Line (S-R Line) for public review and comment. The DEIS included a description of the proposed project and alternatives proposed, a description of the resources found within the study area, and an analysis of the impacts of the proposed project on these resources. The DEIS was available for public review until January 31, 2012.

During the comment period, three public meetings were held in Pennsylvania and New Jersey from January 24 through 26, 2012. Meetings were held in Bushkill, Pennsylvania (January 24); Stroudsburg, Pennsylvania (January 25); and Lafayette, New Jersey (January 26). Each public meeting had an open house from 2:30 p.m. till 4:30 p.m. and a public hearing from 6:00 p.m. until 9:00 p.m. During the open house, the public was invited to look over the DEIS and ask park staff questions regarding the DEIS. The public hearing began with a meeting overview by the NPS project manager and welcome from the Parks' Superintendents. Formal public comment sessions were then recorded by a court reporter. The evening concluded with a return to an open house. NPS staff were on hand to visit with meeting participants and to answer questions.

A total of 368 individuals attended the public comment meetings in Pennsylvania and New Jersey, and a total of 102 participants spoke during the formal public comment sessions. The number of participants and formal commenters at each meeting was as follows:

- Bushkill, Pennsylvania – 66 participants, 18 formal commenters
- Stroudsburg, Pennsylvania – 88 participants, 27 formal commenters
- Lafayette, New Jersey – 214 participants, 57 formal commenters

The public was able to submit comments on the project using any of the following methods:

- Electronically through the NPS Planning, Environment, and Public Comment (PEPC) website
- In person at the public meetings
- By mailing comments to the NPS
- By emailing comments to the NPS

Nature of Comments Received

Nearly 27,000 pieces of correspondence from all 50 states, the District of Columbia, and 29 countries were received during the public comment period. Approximately 26,000 pieces of correspondence were form letters submitted by the National Parks Conservation Association (NPCA), and the Sierra Club. All form letters submitted by the NPCA and Sierra Club were read to determine if they contained any additional substantive material. Correspondences that did not contain any substantive material that differed from the form letter were included as a signature to the form letter. Correspondences with additional substantive text were considered individual correspondences. Of the correspondences submitted during the public comment process, 908 were not form letters. Of the 1,177 letters on PEPC, 896 were not associated with either the NPCA or Sierra Club form letter submittal.

Approximately 8,388 of the correspondences submitted were from individuals living within the proposed areas for the S-R Line (Pennsylvania and New Jersey), and of these, only 733 were not from the NPCA and Sierra Club submissions. After Pennsylvania and New Jersey, California, Florida, and New York were the states with the greatest number of submittals. Commenters who identified themselves as being outside the United States were mainly from Italy, France, Sweden, and Germany.

Among the comments received, a majority were expressions of support for the no action alternative, general opposition to the project, and opposition to the proposed mitigation. Commenters cited concerns over impacts to natural and cultural resources, as well as the visitor experience as reasons they did not support the proposed project.

These are some of the concerns expressed in the comments received:

- The project violates NPS mandates and policies to protect natural and cultural resources.
- Alternatives for routing and energy production – the park and/or applicant should explore other alternative means of energy production, including local generation, energy conservation, solar power, wind power, and new transmission technologies.
- The proposed project would result in cumulative effects to air and water pollution from the use of coal-fired generating plants.
- The need of the project is either unclear or is not necessary based on the decrease of energy demand within the local area.
- The scope of the project, including the study area, is not adequate to address the true impacts from the line.
- The methodology for establishing impacts was insufficient –commenters noted that the scope and/or method for impact analysis did not adequately assess the impacts of the proposed action.
- The width identified for alternative 2 that would be needed for construction is overestimated and the impacts should be reanalyzed with the narrower width.
- Visitor impacts – the proposed project would alter the experience of those who visit the parks, particularly from visual and sound impacts of the transmission line.

- Homeowners/townships expressed concerns of the placement of the transmission line through populated areas. Safety concerns include the health of individuals, especially the children attending schools along the proposed routes, the impact of construction to emergency vehicles, and cancer clusters.
- Commenters are concerned that the removal of vegetation for the transmission line ROW and the access roads would destroy habitat for many wildlife species, create habitat fragmentation, increase soil erosion, and degrade the water quality of the Delaware River.
- There is a migratory bird corridor that crosses the proposed transmission line routes. Commenters are concerned that there would be an increase in bird-strikes.
- The alternate proposed routes would pass through other park lands including Cherry Valley National Wildlife Refuge, Lehigh Gorge, and other state parks which are used by many locals in the area. Commenters feel these areas should also be preserved, and need to be included in the analysis.
- Wetlands would be impacted along the alternate routes due to destruction of the wetlands, alterations to hydrology, and from filling of wetland areas.
- Commenters suggested alternatives to the applicant's proposed mitigation, including additional specific measures for mitigation.
- Commenters expressed opposition to the applicant's proposed mitigation.
- Commenters expressed concern that cumulative impacts were not analyzed sufficiently.
- Alternatives 3, 4, and 5 are not viable alternatives.

All comments, regardless of their topic, were carefully read and analyzed, and representative examples are presented in this report. Commenters will continue to be notified of the project's progress, and are encouraged to visit the NPS PEPC website at www.parkplanning.nps.gov/dewa to view information pertaining to this project.

Definition of Terms

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It should include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or an opinion debating the adequacy of the analysis.

Substantive comment: Substantive comments are those comments that challenge the impact analysis, provide additional relevant information, dispute information accuracy, cause changes to the preferred alternative, or suggest new viable alternatives.

Code: A grouping centered on a common subject. The codes were developed during the comment process and are used to track major subjects throughout the EIS process.

Concern: Concerns are a written summary of all comments received under a particular code. Some codes were further separated into several concern statements to provide a better focus on the content of the comments.

The Comment Analysis Process

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision makers and the S-R Line EIS Team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to National Environmental Protection Act (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

This report includes a synopsis of concerns voiced by citizens and groups regarding the project. These concerns are captured in “concern statements” followed by a quote from a letter best representing that concern. The representative quotes are not intended to be an exhaustive list of every comment. Due to the volume of comments, this report allows us to summarize the concerns with a representative quote to efficiently identify what concerns will be further addressed in the EIS. The tallies in the report are not exact, but are a representation of the types of comments received on the scope of the EIS.

Some individuals submitting comments choose to list themselves as a member of a group. This does not necessarily mean that the comments represent the official group, but the PEPC system listed the group’s name as a result of the individual’s reference to it. We are sensitive to that particular aspect of the PEPC system and will treat every comment, group or individual with equal concern in our review of comments.

The comment analysis process includes five main components:

1. Developing a coding structure
2. Employing a comment database for comment management
3. Reading and coding of public comments
4. Interpreting and analyzing the comments to identify issues and themes
5. Preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondences and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting, and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, email messages, mailed comments, and comments stated at the public meetings. All comments were read and analyzed.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on content of the comment rather than the number of times a comment was received. This report is intended to be a summary of the comments received, rather than a statistical analysis.

Guide to this Document

This report is organized as follows:

Content Analysis Report: This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

Public Comment Summary: This report summarizes the substantive comments received during the comment process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and have not been edited; therefore, some spelling and grammar errors were not corrected. Representative quotes further clarify the concern statements.

Correspondence Index of Organizations: This provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC: business; civic groups; conservation/preservation groups; county government, federal government; non-governmental groups; recreational groups; state government; town or city government; unaffiliated individuals. In many instances, the organization type was not defined by the commenter; therefore, organizations were listed as "Unaffiliated Individuals". Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in indentifying the way the NPS addressed their comments. This list is organized alphabetically.

Correspondence Index of Individual Commenters: This provides a listing of all of the individuals who submitted comments during the public comment period. Like the previous index, each correspondence was assigned a unique identification number which can be used to assist individuals in identifying the way in which NPS addressed their comments. This list is organized alphabetically. Those correspondences identified as N/A represent individuals who did not submit their first or last name.

Index by Organization Type: This list identifies all codes that were assigned to each individual piece of correspondence and is arranged by organization type. In many instances, the organization type was not defined by the commenter; therefore, organizations were listed as "Unaffiliated Individuals". Those correspondences identified as N/A represent individuals who did not submit their first or last name.

Comment Index by Code: This list identifies which commenters or authors (identified by PEPC organization type) commented on which topics, as identified by the codes used in this analysis. The report is organized by code, and under each code is a list of the authors who submitted comments that fell under that code, and their correspondence numbers. Those correspondences identified as N/A represent unaffiliated individuals.

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CONTENT ANALYSIS REPORT

Correspondence Distribution by Code

CODE	DESCRIPTION	NUMBER OF CORRESPONDENCES	NUMBER OF SIGNATURES
AL1100	No Action Alternative: Supports	567	26339
AL1110	No Action Alternative: Opposes	7	7
AL1700	Deny Permit	3	3
AL1710	Issue Permit	0	0
AL1750	Opposes New Powerline	238	238
AL1751	Opposes Project: Impacts to Park Natural and Cultural Resources	99	99
AL1752	Opposes Project: Impacts to Visitor Use and Experience, Recreation, Visual Quality, and Aesthetics	36	36
AL1753	Opposes Project: Impacts to Socioeconomics, Jobs, and Human Health	29	29
AL1760	Supports New Powerline	23	23
AL1800	Alternatives: Questions the Alternative Development Process	5	6
AL1850	Alternatives: Alternatives Considered but Dismissed	3	3
AL1900	Action Alternative 2: Support	30	30
AL1910	Action Alternative 2: Oppose	17	17
AL1920	Action Alternative 2: Suggest Change to Alternative	1	1
AL1930	Action Alternative 2b: Suggest Change to Alternative	3	3
AL1940	Action Alternative 2b: Support	17	17
AL1950	Action Alternative 2b: Oppose	12	12
AL2000	Action Alternative 3: Support	0	0
AL2010	Action Alternative 3: Oppose	10	10
AL2020	Action Alternative 3: Suggest Change to Alternative	3	3
AL2100	Action Alternative 4: Support	1	1
AL2110	Action Alternative 4: Oppose	9	10
AL2120	Action Alternative 4: Suggest Change to Alternative	2	3
AL2200	Action Alternative 5: Support	3	3
AL2210	Action Alternative 5: Oppose	9	10
AL2220	Action Alternative 5: Suggest Change to Alternative	2	3
AL2500	Suggest New Action Alternative	247	247
AR3000	Archeological Resources: Study Area	0	0
AR4000	Archaeological Resources: Impact of Proposal and Alternative	5	5
AR5000	Archeological Resources: Cumulative Impacts	0	0
AT1100	Appalachian Trail: Comments Specific to Park	4	4
CC1100	Consultation and Coordination:	4	4
CL3000	Cultural Landscapes: Study Area	1	1
CL4000	Cultural Landscapes: Impact of Proposal and Alternatives	10	10

CODE	DESCRIPTION	NUMBER OF CORRESPONDENCES	NUMBER OF SIGNATURES
CL5000	Cultural Landscapes: Cumulative Impacts	0	0
ED1000	Editorial	8	9
FP3000	Floodplain: Study Area	0	0
FP4000	Floodplain: Impact of Proposal and Alternatives	1	1
FP5000	Floodplain: Cumulative Impacts	1	1
GA1100	Impact Analysis: Overall Impacts to Park Resources	140	6,088
GA3000	Impact Analysis: General Methodology For Establishing Impacts/Effects	13	13
GR3000	Geologic Resources: Study Area	0	0
GR4000	Geologic Resources: Impact Of Proposal And Alternatives	8	8
GR5000	Geologic Resources: Cumulative Impacts	0	0
HH3000	Human Health and Safety: Study Area	1	1
HH4000	Human Health and Safety: Impact of Proposal and Alternatives	30	30
HH5000	Human Health and Safety: Cumulative Impacts	1	1
HS3000	Historic Structures: Study Area	1	1
HS4000	Historic Structures: Impact of Proposal and Alternatives	6	6
HS5000	Historic Structures: Cumulative Impacts	0	0
IA1100	Impact Analysis: Topics Dismissed	12	12
IN3000	Infrastructure, Access, and Circulation: Study Area	0	0
IN4000	Infrastructure, Access, and Circulation: Impact of Proposal and Alternatives	3	4
IN5000	Infrastructure, Access, and Circulation: Cumulative Impacts	0	0
MG1100	Generally Opposes Mitigation Proposal	140	140
MG1200	Generally Supports Mitigation Proposal	17	17
MG1300	Recommendations for Mitigation Proposal	34	34
MT1200	Miscellaneous Topics: To Be Re-Coded	1	1
NS1100	Non Substantive Comment	74	75
NS1200	Non Substantive Comment Outside the Scope of Analysis	98	98
PI1100	Public Involvement Process	4	4
PN2000	Purpose And Need: Park Purpose And Significance	5	5
PN3000	Purpose And Need: Scope Of The Analysis	21	22
PN4000	Purpose And Need: Park Legislation/Authority	18	19
PN8000	Purpose And Need: Objectives In Taking Action	3	3
PO3000	Park Operations: Study Area	0	0
PO4000	Park Operations: Impact Of Proposal And Alternatives	6	6
PO5000	Park Operations: Cumulative Impacts	0	0
RF1000	References: General Comments	3	3
RU3000	Rare and Unique Communities: Study Area	0	0
RU4000	Rare and Unique Communities: Impact Of Proposal And Alternatives	1	1

CODE	DESCRIPTION	NUMBER OF CORRESPONDENCES	NUMBER OF SIGNATURES
RU5000	Rare and Unique Communities: Cumulative Impacts	1	1
SE3000	Socioeconomics: Study Area	0	0
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	32	32
SE5000	Socioeconomics: Cumulative Impacts	0	0
SS3000	Soundscapes: Study Area	0	0
SS4000	Soundscapes: Impact of Proposal and Alternatives	1	1
SS5000	Soundscapes: Cumulative Impacts	0	0
TE3000	Threatened And Endangered Species: Study Area	1	1
TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives	12	12
TE5000	Threatened And Endangered Species: Cumulative Impacts	0	0
VE3000	Visitor Experience: Study Area	0	0
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	104	6052
VE5000	Visitor Experience: Cumulative Impacts	0	0
VQ3000	Visual Quality: Study Area	1	1
VQ4000	Visual Quality: Impact of Proposal and Alternatives	29	29
VQ5000	Visual Quality: Cumulative Impacts	0	0
VR3000	Vegetation And Riparian Areas: Study Area	0	0
VR4000	Vegetation And Riparian Areas: Impact Of Proposal And Alternatives	11	11
VR5000	Vegetation And Riparian Areas: Cumulative Impacts	0	0
WH3000	Wildlife And Wildlife Habitat: Study Area	1	1
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	33	33
WH5000	Wildlife And Wildlife Habitat: Cumulative Impacts	1	1
WS3000	Wild and Scenic Rivers: Study Area	1	1
WS4000	Wild and Scenic Rivers: Impact of Proposal and Alternatives	1	1
WS5000	Wild and Scenic Rivers: Cumulative Impacts	0	0
WT3000	Wetlands: Study Area	0	0
WT4000	Wetlands: Impact of Proposal and Alternatives	4	4
WT5000	Wetlands: Cumulative Impacts	0	0

(Note: Each correspondence may have multiple codes. As a result, the total number of Correspondence may be different than the actual comment totals)

Correspondence Signature Count by Organization

ORGANIZATION TYPE	CORRESPONDENCES	SIGNATURES
Business	14	15
Churches, Religious Groups	4	4
Civic Groups	0	0
Conservation/Preservation	150	6099
County Government	1	1
Federal Government	5	5
Non-Governmental	32	32
Recreational Groups	8	8
State Government	3	3
Town or City Government	5	5
Tribal Government	1	1
Unaffiliated Individual	953	20777
University/Professional Society	1	1
TOTAL	1177	26951

Correspondence Distribution by Correspondence Type

TYPE	NUMBER OF CORRESPONDENCES
Web Form	696
Letter	339
Transcript	103
Park Form	28
E-mail	6
Petition	2
Fax	1
Other	1
TOTAL	1177

Correspondence Distribution by State

NAME	FORMLETTERS	PEPC CORRESPONDENCES	TOTAL	PERCENT
<i>United States</i>				
Alabama	105	1	106	0.4
Alaska	48	0	48	0.2
Arizona	512	2	514	1.9
Arkansas	69	0	69	0.3
California	3516	0	3516	13.1
Colorado	636	1	637	2.4
Connecticut	302	3	305	1.1
Delaware	60	0	60	0.2
District of Columbia	50	4	54	0.2
Florida	1236	2	1238	4.6
Georgia	284	0	284	1.1
Hawaii	85	0	85	0.3
Idaho	60	0	60	0.2
Illinois	898	1	899	3.3
Indiana	281	1	282	1.1
Iowa	133	0	133	0.5
Kansas	122	0	122	0.5
Kentucky	139	0	139	0.5
Louisiana	87	0	87	0.3
Maine	120	2	122	0.5
Maryland	415	1	416	1.5
Massachusetts	613	9	622	2.3
Michigan	593	2	595	2.2
Minnesota	348	4	352	1.3
Mississippi	44	0	44	0.2
Missouri	277	0	277	1.0
Montana	82	0	82	0.3
Nebraska	61	1	62	0.2
Nevada	143	0	143	0.5
New Hampshire	135	0	135	0.5
New Jersey	2670	576	3246	12.1
New Mexico	271	0	271	1.0
New York	1606	46	1652	6.2
North Carolina	444	0	444	1.7
North Dakota	17	0	17	0.1
Ohio	595	0	595	2.2

NAME	FORMLETTERS	PEPC CORRESPONDENCES	TOTAL	PERCENT
Oklahoma	92	2	94	0.4
Oregon	502	1	503	1.9
Pennsylvania	4985	157	5142	19.2
Rhode Island	76	1	77	0.3
South Carolina	136	1	137	0.5
South Dakota	37	0	37	0.1
Tennessee	257	0	257	1.0
Texas	844	3	847	3.2
Utah	108	2	110	0.4
Vermont	93	0	93	0.3
Virginia	465	6	471	1.8
Washington	784	2	786	2.9
West Virginia	86	30	116	0.4
Wisconsin	406	0	406	1.5
Wyoming	30	0	30	0.1
Unknown	0	28	28	0.1
N/A	0	1	1	0.0
TOTAL	25958	890	26848	100.0

Correspondence Distribution by Country

NAME	FORMLETTERS	PEPC CORRESPONDENCES	TOTAL	PERCENT
Argentina	1	0	1	1.0
Australia	1	0	1	1.0
Belgium	1	0	1	1.0
Canada	3	0	3	2.9
Costa Rica	1	0	1	1.0
Croatia	2	0	2	1.9
Czech Republic	2	0	2	1.9
Denmark	4	1	5	4.8
Estonia	1	0	1	1.0
Finland	1	0	1	1.0
France	18	0	18	17.3
Germany	12	0	12	11.5
Greece	3	0	3	2.9
Honduras	1	0	1	1.0
Israel	2	0	2	1.9
Italy	21	3	24	23.1
Mexico	4	0	4	3.8
Netherlands	1	0	1	1.0
Nicaragua	1	0	1	1.0
Overseas Military	2	0	2	1.9
Pakistan	1	0	1	1.0
Phillipines	1	0	1	1.0
Poland	1	0	1	1.0
Puerto Rico	2	0	2	1.9
South Africa	3	0	3	2.9
Spain	3	0	3	2.9
Sweden	1	3	4	3.8
United Arab Emirates	1	0	1	1.0
United Kingdom	2	0	2	1.9
TOTAL	97	7	104	100.0

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PUBLIC COMMENT SUMMARY

AL1800 - Alternatives: Questions the Alternative Development Process

Concern ID: 37260

**CONCERN
STATEMENT:**

Commenters expressed concern over the process upon which the proposed alternatives were created and decided. Some commenters stated that the range of alternatives chosen was too narrow, while others questioned why the routes were chosen and the nature of the relationship between the applicant and federal officials.

Representative Quote(s): **Corr. ID:** 1896 **Organization:** American Canoe Association

Comment ID: 259112 **Organization Type:** Unaffiliated Individual

Representative Quote: The no action alternative must be selected, because the NPS failed to consider a reasonable range of alternatives that met the mandate of protecting NPS resources. Since the NPS is required to evaluate a no action alternative, the failure to include other alternatives in the DEIS that avoid all park resources, demonstrates that NPS did not do due diligence in meeting the intent of the DEIS process which requires the NPS to consider a range of alternatives.

A no action alternative must be selected until additional alternatives are considered that identify how the proposal could be built avoiding all or nearly all NPS resources, as it may be impossible to entirely avoid impacts to the Appalachian Trail under any alternative as even underground, there would be short-term impacts.

Corr. ID: 2040 **Organization:** *Not Specified*

Comment ID: 258752 **Organization Type:** Unaffiliated Individual

Representative Quote: I've heard many speakers speak about the environment, about jobs and about the "need for energy reliability". There were three routes and I still don't understand to this day why this one was chosen.

Corr. ID: 2228 **Organization:** National Parks Conservation Association

Comment ID: 258332 **Organization Type:** Unaffiliated Individual

Representative Quote: I call for full disclosure in the final EIS (if this project is not cancelled by wise people in the Executive branch in the nearer future) of exactly what pressure and perks were applied by companies proposing the project to try to entice federal officials in the states being discussed

Response:

Alternative development was guided by the NPS's expressed purpose and need (see pages 3-4) and objectives in taking action (see pages 14-16). The alternative development process is described in the DEIS (see pages 33-35). It is normal and appropriate for an agency to have discussions with an applicant about their proposal. Meetings between the applicant and the parks concerning development of alternatives are documented in meeting summaries in the administrative record. The preparers of the EIS (see pages 728-732) were not party to meetings between the applicant and other federal officials. The range of alternatives presented in the DEIS was sufficient. The DEIS analyzed a number of alternative routes and alternative power transmission solutions. Many of these alternatives were dismissed, and a reasonable range of alternatives was carried forward in the DEIS

analysis (see pages 66-68).

Concern ID: 37377

**CONCERN
STATEMENT:**

A commenter noted that issues with alternative 3, 4, and 5 have been documented and those documents have been provided to the NPS, namely alternatives 4 and 5 are not functionally equivalent to alternatives 2 and 2b. The commenter is concerned about the lack of mitigation presented for alternatives 2 and 2b when compared to removal of the B-K Line as mitigation for alternatives 3, 4, and 5.

Representative Quote(s): **Corr. ID:** 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259360 **Organization Type:** Business

Representative Quote: General Comments Applicable to Alternatives 3, 4 and 5
The Applicants' September 13, 2010 comment letter on Alternatives from John Lain to the DEWA EIS Planning Team detailed the many significant problems with Alternatives 3, 4 and 5 and those comments are incorporated herein reference. Additionally, the DVD attached as Exhibit 1 shows critical constraints on these Alternatives that make them infeasible.

Another problem is that Alternatives 3, 4 and 5 are premised on the assumption that the impacts of these possible new routes proposed by the NPS would be substantially "mitigated" by removal of the B-K Line from DEWA. Two major analytical problems result from the inclusion of this assumption about Alternatives 3, 4 and 5 in the DEIS. The problems flow both from the inclusion of the assumption, and from the way the assumption is presented.

The first problem is that DEIS makes no analogous assumption about the possibility of substantial mitigation under either of the other alternatives, namely, those proposed by the companies. The two sets of alternatives are apples and oranges. The decision-maker and reader are unable to draw any reliable comparisons and contrasts between the alternatives proposed by the companies (2 and 2b) and those proposed by the NPS (3, 4 and 5).

As discussed in Section 1.D., Alternative 4 is not functionally equivalent to Alternative 2 or 2b and would not resolve the grid stability issues that are at the heart of the Applicants' Special Use Permit and ROW application. In the Applicants' comment letter to the NPS on the Alternatives dated September 13, 2010, the Applicants pointed out the critical flaws that made Alternative 4 infeasible. The Applicants hereby incorporate those same comments by reference as nothing presented in the DEIS has changed the Applicants' opinion as to the infeasibility of Alternative 4. In further support of the infeasibility of the construction of Alternative 4, the Applicants have enclosed a DVD of a flyover of critically constrained portions of the Alternatives.

As discussed in Section 1.D., Alternative 5 is not functionally equivalent to Alternative 2 or 2b and would not resolve the grid stability issues that are at the heart of the Applicants' Special Use Permit and ROW application. In the Applicants' comment letter to the NPS on the Alternatives dated September 13, 2010, the Applicants pointed out the critical flaws that made Alternative 4 infeasible.

Response:

Alternatives 3, 4, and 5 are reasonably feasible alternatives. NPS included removal of the B-K Line as mitigation to reduce the impacts of these alternatives; the effects of the removal are addressed under each resource topic in chapter 4 of the DEIS. The applicant did not provide the mitigation package for alternatives 2 and 2b until

after the publication of the DEIS; therefore, we could not include it in the document.

AL1850 - Alternatives: Alternatives Considered but Dismissed

Concern ID: 37261

**CONCERN
STATEMENT:**

Commenters stated that several alternatives that were considered but dismissed should not have been dismissed under NEPA. NPS must consider a reasonable range of alternatives, including alternatives that only partially meet the objectives, and cannot reject alternatives based on cost.

Representative Quote(s): **Corr. ID:** 1737

Organization: PEER

Comment ID: 257329

Organization Type: Non-Governmental

Representative Quote: THE DEIS EXCLUDES OTHER REASONABLE ALTERNATIVES

The DEIS authors were instructed during 2011 to eliminate alternatives from further consideration in the internal draft of the DEIS that would have routed the proposed new power line so as to require little, if any, crossing of the NRA. Because a wider range of alternatives would complicate and prolong NPS and public review, PPL explicitly requested the elimination of Alternatives 6 and 7.

Prior to seeking a new right-of-way from the NPS, PPL obtained rights-of-way on lands outside of, and on both sides, of the NRA. PPL demands Alternative #2, because only that route forms the most direct link between their rights-of-way outside the NRA. No other route would do. They told the Secretary and his officials to not even consider the alternatives.

The Interior officials carried out PPL bidding by using a subterfuge. They altered the criteria the NPS used to evaluate the range of reasonable alternatives. The NPS tailored the criteria for reasonable alternatives to deftly eliminate #s 6 and 7. Nonetheless, the eliminated alternatives are within the realm of reasonable choices. Whether PPL approved of their consideration or not (and they did want them considered) is immaterial. NPS refusal to consider these alternatives violates both the letter and spirit of NEPA.

Corr. ID: 2394

Organization: Earthjustice

Comment ID: 259047

Organization Type: Non-Governmental

Representative Quote: - Smart grid: The DEIS dismissed this alternative because it allegedly "does not meet the reliability requirements put forth by PJM." Id. (explaining that "smart grids provide automated switching for transmission lines but do not provide the redundancy required to meet improved reliability requirements for the transmission grid"). However, the Park Service is required to consider alternatives that may partially meet the project's purpose and need. In any case, it is unclear whether there are any remaining reliability issues for the S-R Line to resolve.

- Distributed energy generation sites and localized renewable energy: The DEIS declines to consider these potentially viable alternatives because "ordering the adoption of such systems is beyond the authority of the NPS." However, as set forth above, agencies must consider alternatives that are outside of their jurisdiction

to implement.

Corr. ID: 2394

Organization: Earthjustice

Comment ID: 259046

Organization Type: Non-Governmental

Representative Quote: - Underground transmission lines: The DEIS rejected this alternative "because its construction cost would be five to eight times the cost of conventional construction methods" and "blasting the bedrock for an underground line could produce major irretrievable and irreversible impacts on geology." DEIS at 67. However, the Park Service cannot reject an otherwise feasible alternative solely because it is more expensive than the applicant's proposal. The Final EIS should consider whether it may be possible to bury portions of the line without destroying geological formations.

- Superconductor lines (direct current): This alternative was also rejected on cost grounds without any attempt to show that costs of "three to five times that of conventional transmission line construction" would be unaffordable. Id. Nor is there analysis of what impacts would result from new converter stations.

- Aluminum conductor composite core (ACCC): ACCC conductor is designed to carry twice the current of a conventional conductor, with lighter core allowing the use of more aluminum without a weight penalty. In this way, using ACCC has the potential to enable longer spans between fewer and shorter structures (i.e. towers), and it can increase transfer capacity while improving line and reducing line losses by as much as 30 to 40 percent according to vendors.² Nevertheless, ACCC was dismissed from consideration in the alternatives analysis on grounds that "it is not a separate alternative by itself" DEIS at 67. However, to the extent that ACCC has the potential to reduce tower height and perhaps the overall need for towers, it should be given upfront consideration in the EIS, rather than deferring consideration of its use until after the NEPA process is over.

Response:

CEQ's regulations implementing NEPA (40CFR 1502.14(c)) direct federal agencies to develop a range of alternatives that meet the NPS expressed purpose and need. The NPS believes that it has developed and presented an adequate range of alternatives within the EIS to satisfy the purpose, need and objectives of the plan as required by NEPA and did not violate NEPA by dismissing alternatives. The rationale for dismissing alternatives from further study remains the same (see pages 66-68). Cost was not a primary reason for dismissal.

AL1920 - Action Alternative 2: Suggest Change to Alternative

Concern ID:

37378

**CONCERN
STATEMENT:**

A commenter stated some details in the DEIS regarding alternative 2 are incorrect, including the width that would be cleared for construction and maintained for operation, the existence of access roads currently used, and the proposed access road around Arnott Fen. Commenters noted that the gravel roads used for access roads would not be permanently maintained as stated in the DEIS, and most would be revegetated and restored once construction was complete.

Representative Quote(s):

Corr. ID: 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259328

Organization Type: Business

Representative Quote: The DEIS states that access roads with gravel surfacing would remain in place and continue to be maintained following construction of the

transmission line (p. 342). This statement is not correct because most of the access roads would be temporary and would be revegetated and/or restored following construction. The Applicants would only maintain permanent access roads on areas that are existing roadways or needed for ongoing maintenance as described in the Construction and Restoration Standards ("C&R Standards") attached as Exhibit 4.

Corr. ID: 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259347 **Organization Type:** Business

Representative Quote: Alternative 2

There are several statements in the DEIS that either do not correctly state the Applicants' proposal or overstate the impacts of the Applicants' proposal. These mistakes and overstatements often seem to arise from a fundamental failure to acknowledge the character of the existing 230 kV B-K Line and the fact that it has been a part of the landscape shared with the NPS Units (and their visitors) since the moment each of them was created.

The DEIS assumes that a 350-foot wide corridor would have to be cleared (175' on either side of the centerline) for all action alternatives (pp. 46, 359, 393). The Applicant has only requested an additional 50 feet of ROW for a .76 mile section that is currently only 100 feet. Therefore, it is legally impossible for the Applicants' to clear a 350 feet ROW contemplated as by the DEIS. In terms of actual clearing within the ROW, it is presently cleared, or scheduled to be cleared with respect to PPL sections, in a range from 100 to 200 feet depending upon the ROW section. Following construction, the Applicants expect to maintain the line to a cleared width of no more than 200 feet. Thus, the only additional ROW clearing that would be needed as a result of Alternative 2 is an additional 25 feet on either side of the centerline for 0.76 mile in PA or approximately 4% more cleared transmission corridor than exists now.

The DEIS mischaracterizes the amount and character of the existing access roads associated with Alternative 2 (p. 38, DEIS Table 3:50). The DEIS does not acknowledge the existence of access roads that are currently being used for maintenance of the B-K Line. These roads are suitable for pickup truck traffic now and would need to be improved for construction traffic, but the necessary improvements are not as severe as the construction of new roads.

The DEIS states that an access road is proposed in the Amott Fen (p. 371). Although this was originally correct, it is important to note that the Applicants have subsequently met with the NPS and USFWS. As a result of these informal consultations an alternate proposed access road to the south of the Fen was identified that would have no impact to the Fen. It is the Applicants' intent to utilize this southern access road, upon final approval from the NPS and using this road results in approximately 0.4 acres less of road impacts.

Response:

NPS primarily used the information presented by the applicant in their proposal. We used a 350-foot ROW based on industry standard for constructing a double 500-kV transmission line safely. It should be noted, the applicant has a 380-ft ROW in some sections of NJ, for the purposes of analysis however we analyzed a uniform 350-ft ROW. The proposal stated that the access roads would be 20 feet wide during construction and narrowed to 15 feet wide permanently; the proposal did not identify permanent and temporary roads. The access road through Arnott Fen was likewise presented in the proposal as the preferred access road route. In their comments, the applicant stated they would use access roads as presented for 2b

which means the road through Arnott Fen would not be used; the NPS will analyze the impacts of this route in the FEIS. We restate that there are no existing access roads and all roads in the proposal would need to be created for this project.

AL1930 - Action Alternative 2b: Suggest Change to Alternative

Concern ID: 37380

CONCERN STATEMENT:

A commenter disagrees with several statements for the description of alternative 2b, including a proposed access road through Arnott Fen, the amount of access roads needed, and the location of an access road near the banks of the Delaware River.

Representative Quote(s): **Corr. ID:** 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259359

Organization Type: Business

Representative Quote: The DEIS states that an access road is proposed in the Arnott Fen (p. 371). This is incorrect and the NPS and USFWS have been provided with constructability drawings that show the proposed access is south of the Fen and would have no impact to the Fen.

The DEIS overstates the amount of access roads needed for 2b (p. 38 DEIS Table 3; 56). While 2b could have slightly more access roads than Alternative 2 because more towers are required, the road acreage is essentially the same as shown in Table 2 for Alternative 2.

The DEIS states that access roads would be constructed within 200 feet of the bank of MDSR (p. 646). This statement is incorrect as the closest access road in Pennsylvania is approximately 1,000 feet from the MDSR and the closest access in New Jersey is located approximately 500 feet from the MDSR.

Response:

NPS does not agree with the statement that the DEIS is incorrect in proposing an access road in Arnott Fen. We also do not agree with the statement that the DEIS overstates the amount of access roads needed for alternative 2b. On page 382 of the DEIS, we state, "Access roads were designed to avoid impacts on Arnott Fen under alternative 2b." The table on page 38 of the DEIS shows that the mileage and the acreage of access roads for alternative 2b is slightly less than alternative 2. We do agree with the last statement. The distance from the banks of the Delaware River to the access roads is incorrect, and the updated information will be incorporated into the FEIS. Review under Section 10(a) of the Wild and Scenic River Act is still applicable. Any roads within a 1/4mile of the river bank do not result in protection and enhancement of the values which caused the River to be included in the system.

AL2020 - Action Alternative 3: Suggest Change to Alternative

Concern ID: 37264

CONCERN STATEMENT:

A commenter stated that the right-of-way alternative 3 follows does not belong to Metropolitan Edison Company any longer, because the company has released its rights as it crosses the Shebelsky property.

Representative Quote(s): **Corr. ID:** 1326 **Organization:** Law Offices of John "Duke" Schneider and Lara Anne Dodsworth

Comment ID: 256013 **Organization Type:** Business

Representative Quote: We have been informed that the National Park Service has proposed alternative routes to the route preferred by PPL for the transmission line to pass through NPS lands.

A portion of the route shown in Alternative 3 would cross our clients' property. In analyzing Alternative 3 it appears from the plat map that you believe that this alternative route would be located on an existing Metropolitan Edison Company right of way as it crosses our clients' property.

Please be advised that Metropolitan Edison Company has released its right of way which crosses the Shebelsky property by Release dated September 19, 2003 and recorded in Deed Book Volume 2196 at page 9993.

Response: The area referenced in the comment is outside NPS boundaries; however, alternative 3 remains a viable alternative because acquisition of property rights and easements are standard procedure for development of transmission lines.

Concern ID: 37381

CONCERN STATEMENT: A commenter questioned the length of alternative 3 presented in the DEIS. Additionally, the width cleared for alternative 3 (350 feet) should be compared to the actual width cleared for alternative 2, which is overstated in the document, according to the commenter.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259361 **Organization Type:** Business

Representative Quote: The NPS assumes a right of way of 350 feet for Alternative 3 (p. 56). The DEIS should compare this anticipated ROW width with the actual ROW width of Alternative 2 as presented in Section ILB above.

The DEIS states that duration of construction impacts would be less than 8 months (p. 549). This understates the likely construction impacts because the additional 1.1 miles of line, and the construction of new access roads, should be assumed to be greater than Alternative 2.

The DEIS inconsistently states length of Alternative 3 affecting NPS Units by stating on p. 549 that the length is 4.5 miles when correct length is 5.4 miles as correctly stated elsewhere in the DEIS.

Response: NPS used a 350-foot ROW to evaluate impacts from alternatives 2, 3, 4, and 5 based on industry standard for constructing a double 500-kV transmission line safely. We agree with the first statement; alternative 3 encompasses 5.4 miles of NPS land. We will fix this error in the FEIS.

AL2120 - Action Alternative 4: Suggest Change to Alternative

Concern ID: 37401

CONCERN STATEMENT: According to commenters, the DEIS incorrectly states that no new crossings of the Middle Delaware National Scenic and Recreational River would be required,

commenters state that alternative 4 would require a new crossing. Commenters also state that alternative 4 would require widening of the ROW across APPA in the Cherry Valley NWR. Additionally, the width cleared for alternative 4 (350 feet) should be compared to the actual width cleared for alternative 2, which the commenters believe is overstated in the document. They were also concerned that the DEIS included the incorrect assumption that the BK Line would be removed under alternatives 4 and 5.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259362 **Organization Type:** Business

Representative Quote: Alternative 4 would add a new overhead transmission line crossing of the Delaware River at the existing Delaware River Viaduct approximately 2 miles south of DEWA, as compared to crossing the Delaware at an existing transmission line ROW. The DEIS correctly states that no new crossing would be required of the MDSR, but does not reflect the requirement for a new transmission line crossing of the Delaware River in other locations.

Alternative 4 would require an expanded ROW at the existing crossing of APPA in the CVNWR.

The NPS assumes a right of way of 350 feet for Alternative 4 (p. 56). The DEIS should compare this anticipated ROW width with the actual ROW width of Alternative 2 as presented in Section ILB above.

Corr. ID: 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259325 **Organization Type:** Business

Representative Quote: The DEIS incorrectly assumes that the existing power line would be removed if Alternative 4 or 5 were selected. PJM studied the Susquehanna-Roseland 500 kV Project under the assumption that the Bushkill-Kittatinny 230kV line (the "B-K Line") would remain in service. It should be understood that the S-R Line is required in addition to the existing system of 230 kV lines located in the eastern PA and Northern NJ areas, which includes the B-K Line section. The proposed S-R Line is not a replacement for any part of the existing electric power system.

Response:

NPS verified the Delaware River crossings. Alternative 3 would follow an existing transmission line ROW across the Middle Delaware River where it is designated wild and scenic. Alternatives 4 and 5 would not use an existing transmission line crossing, and the new transmission line would cross in the same location as the Delaware River Viaduct. The alternatives would not result in a new crossing because the crossing transects the river in a segment that is not designated as a wild and scenic river. Alternative 4 would require a widening of the ROW as it crosses the Appalachian Trail; however, the Trail is not within the boundaries of Cherry Valley National Wildlife Refuge at the junction of alternative 4. We used a 350-foot ROW to evaluate impacts from alternatives 2, 3, 4, and 5 based on industry standard for constructing a double 500-kV transmission line safely. Under alternatives 3, 4, and 5, we would require the removal of the B-K Line as mitigation for the impacts the S-R Line would cause. We recognize that the applicant has not analyzed the effort it would take to relocate the B-K Line; however, we contend that the line could be collocated with the S-R Line along the routes of alternatives 3, 4, or 5.

AL2220 - Action Alternative 5: Suggest Change to Alternative

Concern ID: 37402

**CONCERN
STATEMENT:**

According to a commenter, the DEIS correctly states that there would be no new crossings of the Middle Delaware National Scenic and Recreational River, but that the crossing proposed would impact the Delaware River Viaduct. The commenter also stated that alternative 5 would require widening of the ROW across APPA in the Cherry Valley NWR. Additionally, the width cleared for alternative 5 (350 feet) should be compared to the actual width cleared for alternative 2, which is overstated in the document, according to the commenter.

Representative Quote(s): **Corr. ID:** 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259364 **Organization Type:** Business

Representative Quote: The DEIS correctly states that no new crossing would be required of the MDSR, but does not reflect the requirement for a new transmission line crossing of the Delaware River in other locations. This crossing would be at the Delaware River Viaduct which is a significant historic structure.

Alternative 5 would require a significant expansion of an existing ROW at the crossing of APPA, which is located in the CVNWR.

The NPS assumes a right of way of 350 feet for Alternative 5 (p. 56). The DEIS should compare this anticipated ROW width with the actual ROW width of Alternative 2 as presented in Section II.B above.

Response:

NPS verified the Delaware River crossings. Alternative 3 would follow an existing transmission line ROW across the Middle Delaware River where it is designated wild and scenic. Alternatives 4 and 5 would not use an existing transmission line crossing, but would cross at the same location as the Delaware River Viaduct where the river is not designated as wild and scenic; therefore, the alternatives would not result in a new crossing. Additionally, the crossing at the Delaware River Viaduct is outside the scope of this EIS, and therefore would not be included in the analysis of historic structures. Alternative 5 would require a widening of the ROW as it crosses the Appalachian Trail; however, the Trail is not within the boundaries of Cherry Valley National Wildlife Refuge at the junction of alternative 5. We used a 350-foot ROW to evaluate impacts from alternatives 2, 3, 4, and 5 based on industry standard for constructing a double 500-kV transmission line safely.

AL2500 - Suggest New Action Alternative

Concern ID: 37266

**CONCERN
STATEMENT:**

Commenters suggested several alternative forms of energy generation and transmission instead of the construction of the proposed line. Alternatives for generation mentioned included solar, wind, geothermal, nuclear, hydrogen fuel, and hydroelectric power. Other ideas included demand response, energy conservation, local generation, and allowing the existing lines to expire and removing them.

Representative Quote(s): **Corr. ID:** 8

Organization: *Not Specified*

Comment ID: 244266 **Organization Type:** Unaffiliated Individual

Representative Quote: I'd much rather see solar panels and wind turbines in the landscape than bigger power towers. Solar panels don't have to be shiny glass panels anymore (search for "solar paint") and wind turbines can be quite demure now as well (see "vertical axes", "tesla", "squirrel cage" turbines).

Corr. ID: 1352 **Organization:** *Not Specified*

Comment ID: 255859 **Organization Type:** Unaffiliated Individual

Representative Quote: Additional alternatives need to be examined in the final EIS including non-transmission alternatives
-Demand response programs, energy efficiency and conservation, and renewable local energy generation can obviate the need for this line, and do not require the use of ratepayer money to construct obsolete infrastructure projects. Energy demand in New Jersey has dropped over the past three years in part due to such programs and this project has not been updated to reflect that change in energy use.

Corr. ID: 1518 **Organization:** *Not Specified*

Comment ID: 256208 **Organization Type:** Unaffiliated Individual

Representative Quote: I would even go as far as to ask that the right-of-way for the existing transmission lines be allowed to expire and the lines be removed completely.

Corr. ID: 1721 **Organization:** Blairstown Environmental Commission

Comment ID: 257371 **Organization Type:** Town or City Government

Representative Quote: This money could be better invested in renewable energy sources for our state, including solar panels, or fuel cells, or other alternate energy projects.

Has there really been enough creative thought about what a billion dollar investment in clean energy technology might look like? Based upon an estimated \$5 per watt installation cost, a \$1billion investment would result in 200,000 kW installed capacity, which is equal to 246 million kW-hours per year. Assuming the average home uses 5,000 kW-h per year, that investment could power about 50,000 homes. Those 50,000 homes could also be supplying electricity to the grid during peak usage times when the electricity is most needed.

Corr. ID: 2044 **Organization:** *Not Specified*

Comment ID: 258000 **Organization Type:** Unaffiliated Individual

Representative Quote: Maybe conservation is the way to go. Could we cut down on some of the lights that we use? Some of the electricity? We don't really have to have all of this power. We haven't considered it. Maybe we should. Conservation is the way to go. Not more generation to promote more consumption

And there are better ways to generate electricity, as it's been mentioned before; wind, solar, wave, tidal power, hydroelectric. I think that's the way to go. By all means, I think whatever electricity we generate, I think we should do it closer to where it's consumed, not generating it from the polluting power plants that are in Pennsylvania

Corr. ID: 2346 **Organization:** National Parks Conservation Association

Comment ID: 258484 **Organization Type:** Conservation/Preservation

Representative Quote: Long transmission lines are not the best way to get electrical power. Local generation is cheaper and much less harmful to the environment.

Corr. ID: 2366 **Organization:** National Parks Conservation Association

Comment ID: 258508 **Organization Type:** Conservation/Preservation

Representative Quote: We need to rid ourselves of such energy systems and turn to solar, wind and geothermal renewable energy sources.

Response:

The purpose of this document is to respond to the applicant's request for construction and right-of-way permits through the parks. The regional transmission operator, PJM Interconnection, has stated that "there are no suitable lower voltage local alternatives for providing the required relief from the significant transmission system reliability and congestion challenges identified for the northeast portion of the PJM region". The alternatives suggested by the public do not meet the purpose and need or the criteria for the alternatives, as presented in chapters 1 and 2, respectively, in the DEIS.

Concern ID:

37335

CONCERN STATEMENT:

Many commenters provided ideas for altering the proposed route of the transmission line, with many stating particularly that they did not want the proposed project to run through the parks. Commenters suggested running the lines along interstates, north of the parks, and in more populated areas.

Representative Quote(s): **Corr. ID:** 2049 **Organization:** Not Specified

Comment ID: 257747 **Organization Type:** Unaffiliated Individual

Representative Quote: there is a direct route that they could take, which is Route 80, and I believe Route 280 or 287, 280, I believe. If they would move it to Route 80, the gentleman whose hoping to create 2,600 jobs, an independent study would say take three years and you would have 5,000 jobs. And if they decided to remove the existing lines because then they wouldn't need it as a transmission line, that would extend another year on to that. So you could increase labor, jobs, you could make very -- all of the homeowners that are bordering that that have easements very happy

Corr. ID: 2067 **Organization:** Sierra Club

Comment ID: 257856 **Organization Type:** Conservation/Preservation

Representative Quote: If the line must be built, take a northern route which avoids the parklands of the Delaware Water Gap. Use of settled areas would no doubt be more expensive, but the damage to the wild areas, recreational areas, and scenic areas would be more costly in permanent losses to irreplaceable community assets than any money figures based on the need to compensate landowners for a northern route around the Delaware valley.

Corr. ID: 2178 **Organization:** National Parks Conservation Association

Comment ID: 258272 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly oppose running transmission lines across the Delaware Water Gap. This power line would severely damage the scenery in the

Park, which is what the park was created to preserve.

I realize that the East Coast requires electricity, but surely a path for the transmission lines can be found that does not cross a National Park.

Response:

During the alternatives development stage of this project, NPS considered many alternative routes; however, no matter the route, the S-R Line must cross the Appalachian Trail. As stated in chapter 2 of the DEIS, no new crossings of the parks were considered. Following National Electric Safety Code, we also tried to avoid sensitive areas, including residences, schools, businesses, and other protected resources, such as public lands.

Concern ID:

37336

CONCERN STATEMENT:

One commenter suggested using helicopters to install the proposed transmission line as an alternative for construction.

Representative Quote(s):

Corr. ID: 1705

Organization: *Not Specified*

Comment ID: 257260

Organization Type: Unaffiliated Individual

Representative Quote: I suggest that helicopters be used to drop equipment and personnel in very rugged areas and to carry old tower sections out or new ones into the Right of Way.

The power companies should find another way around the park lands to put in this power line!

Response:

NPS discusses the use of helicopters for construction of the proposed transmission line in chapter 2 of the DEIS. Helicopter use has limitations, in that they cannot transport monopole towers because they are too heavy.

Concern ID:

37769

CONCERN STATEMENT:

Commenters suggested new technologies as alternatives to the proposed 500-kV transmission line, such as placing the transmission lines underground, using wave technology, constructing the lines higher than the tree level so that no ROW clearance would be needed, and doubling up the lines to give twice the capacity.

Representative Quote(s):

Corr. ID: 1223

Organization: *Not Specified*

Comment ID: 254726

Organization Type: Unaffiliated Individual

Representative Quote: With whichever alternative is chosen, my suggestion is to force the utilities to build an extra-high transmission line, a line high enough that tree clearing below the line will be unnecessary. While there are downsides to doing this, the benefits to the environment far outweigh those issues.

Corr. ID: 1723

Organization: *Not Specified*

Comment ID: 257060

Organization Type: Unaffiliated Individual

Representative Quote: Where is the study that says that they need 5 times the power transmission capacity?

An alternative would be to double up the existing conductors to give twice the capacity at the same 230kV lines with little or no environmental impact. This has already been done on other ROW's in NJ. Check the lines that run through Cedar Grove in Essex County. They are a double conductor 230kV line.

Corr. ID: 2107 **Organization:** Sierra Club

Comment ID: 258163 **Organization Type:** Unaffiliated Individual

Representative Quote: I would rather see safe nuclear power and go underground then repalnt. It can be done.Wires and Towers are ugly eye sores to see in a pristine place

like the gap. What about the power of the ocean .Wave technology is a good way to sink the line and yank them up for service if needed far out to sea and use existing sites to transfer the power.

Corr. ID: 2191 **Organization:** National Parks Conservation Association

Comment ID: 258287 **Organization Type:** Unaffiliated Individual

Representative Quote: All power lines should be placed underground. It might be expensive to install but money would be save from lines causing fires or being blown down and causing power outages.

Response:

NPS considered alternative technologies during the alternatives development process but it was determined these alternatives were not feasible, as discussed in chapter 2 of the DEIS (pages 67-68). Construction standards (regarding height of the line and the number of lines on the towers) have to comply with industry standards and safety requirements. Tower height has been constrained by the limit imposed by the Federal Aviation Administration (FAA) before a structure is considered a safety hazard of concern, at which point the FAA may make recommendations for lighting. Tower height is somewhat constrained by FAA regulations. Larger towers would require an “obstruction evaluation” by the FAA to determine the effect, if any, that the proposed construction or alteration would have on navigable airspace. However, once issued, a hazard/no-hazard determination has no enforceable legal effect. The FAA is not empowered to prohibit or limit proposed construction it deems dangerous to air navigation. Lighting of the towers and conductors would require additional analysis by the NPS to determine potential impacts to migratory birds, visitor use and experience and scenic resources.

AR4000 - Archaeological Resources: Impact of Proposal and Alternative

Concern ID: 37267

CONCERN STATEMENT:

The parks are rich in archeological resources, and commenters believe these resources would be negatively impacted by the proposed transmission line project. Additionally, not all sites within the parks are known. Some of these sites may be eligible for the National Register, and should be protected from this project.

Representative Quote(s): **Corr. ID:** 1751 **Organization:** NJ Sierra Club

Comment ID: 257346 **Organization Type:** Non-Governmental

Representative Quote: The taller tower would impair the scenic resources, harm raptor migrations and the construction would have long-term impacts on one of the most archeologically important areas in the country, and countless environmental resources.

Corr. ID: 1811 **Organization:** *Not Specified*

Comment ID: 258626 **Organization Type:** Unaffiliated Individual

Representative Quote: The Delaware Water Gap National Recreation Area contains many unique historic, archaeological and cultural resources. The National Historic Preservation Act (NHPA) of 1966 requires that federal agencies take action to minimize harm to historic properties. How can we maintain the current intergrity of visitor's experiences if we add blatantly modern components to the 18th - 20th century setting - and, by removing natural vegetation and artificially maintaining the areas in the extended ROW's, change the cultural landscape?

There are sites and structures currently on or still eligible for the National Register, which would be denied the very protection that status would seek to offer. It is difficult to pinpoint with certainty that all sites with potential archeological resources are known. In addition to 300+ years of settlement, initiated by European explorers and early colonists, there had been an extended period when Native people had first lived within this region.

Response:

An NHPA Section 110 survey for archeology sites has not been completed for DEWA, but the analysis in the DEIS is based on best available information. Please see the References section of the DEIS for studies used in the DEIS. We agree with the commenters and acknowledge that there are adverse effects on cultural resources, as stated in the DEIS on pages 503-534. Best Management Practices (BMPs), such as avoidance of known archeological sites or development of exhibits and other kinds of interpretive materials, but there will be unavoidable adverse effects that will be mitigated. An agreement with SHPOs will be prepared that will include BMPs during construction to protect newly identified resources.

Concern ID:

37382

CONCERN STATEMENT:

[A commenter stated that additional information on archeological resources is available and should be incorporated into the EIS.](#)

Representative Quote(s):

Corr. ID: 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259353

Organization Type: Business

Representative Quote: The intensive Phase I survey identified 25 archeological sites along the alignment for alternatives 1,2 and 2b. Three of these sites (2 prehistoric, 1 historic) were within the APE. The Applicants have asserted that the remainder would not be affected by construction activities (Berger 2010b) by using strategies of avoidance and/or non-ground-disturbing construction techniques. Additional fieldwork conducted in 2011 (Berger 2011) has not been incorporated into this document.

The complete, Section 106 complaint, Phase I/II report detailing the results of the archeological investigations of Alternatives 1, 2 and 2B will be submitted to the NPS in the near future. That report will detail that only two archeological sites (prehistoric) are recommended eligible for the National Register of Historic Places and that the Project will not affect the site as the Project will employ strategies of avoidance and/or non-ground-disturbing construction techniques in that area. All other sites identified were either recommended not eligible or were not evaluated for eligibility because the Project will employ strategies of avoidance and/or non-ground-disturbing construction techniques thereby precluding the need to determine eligibility as the Project will not impact the site and therefore its eligibility is not relevant.

Response:

NPS received additional cultural resources reports from the applicant; however, we did not receive them in time to include the data in the DEIS. We will summarize and reference this information in the FEIS.

AT1100 - Appalachian Trail: Comments Specific to Park

Concern ID: 37269

**CONCERN
STATEMENT:**

Commenters believe that the scenic values and the experience of hiking the Appalachian Trail would be degraded by the construction of the proposed transmission lines. Additionally, commenters expressed concern about the lack of design details in the EIS, limiting the ability to fully evaluate the impacts to the Appalachian Trail.

Representative Quote(s): **Corr. ID:** 1878 **Organization:** Appalachian Trail Conservancy

Comment ID: 257634 **Organization Type:** Non-Governmental

Representative Quote: In short, the action alternatives fail to meet ATC's long-standing criterion that there be "no net loss of Trail values or quality of Trail experience" (see DEIS, "ATC Roads and Utilities Policy," Appendix B, pages B-13 and 14).

It is difficult for ATC to adequately evaluate impacts of the proposed action alternatives for a number of reasons, particularly the lack of detailed information specific to the Appalachian National Scenic Trail on tower heights and locations, rights-of-way (ROW) widths, locations of access and spur roads and other construction operations, and routes of the various alternatives beyond park boundaries. While the Delaware Water Gap National Recreation Area was extensively analyzed, the ANST as a separate and unique unit of the National Park System, was not.

Corr. ID: 1882 **Organization:** Rock the Earth

Comment ID: 259150 **Organization Type:** Non-Governmental

Representative Quote: The Appalachian Trail is one of the most important scenic locations in the United States presenting unique opportunities to millions of citizens and visitors. This "unique opportunity" will disappear when a large industrial development cuts across the Trail. We believe that it is not feasible to design and operate the proposed transmission and generation facilities to be compatible with the surrounding, unique, and unparalleled scenic characteristics of the Trail.

Response:

NPS realizes that the proposed transmission line would impact the values of the Appalachian Trail. We analyzed, specifically, the impacts on the experience of Trail users under each alternative in the visitor use and experience section of the DEIS (pages 625-643). We recognize that the DEIS does not present all of the details of the proposed transmission line. We requested this data from the applicant, but were not provided with any additional information. Many details would not be known until detailed engineering design is complete, including exact tower locations, locations of spur roads, locations of wire pulling and pulling and splicing locations, and the locations of the alternatives beyond NPS boundaries. We used the best available data in our analysis. If new information is provided by the applicant prior to completion of the FEIS, it will be incorporated.

CC1100 - Consultation and Coordination

Concern ID: 38308

**CONCERN
STATEMENT:**

Commenters stated that additional consultation and coordination for permitting and mitigation measures would be needed for project implementation which were not adequately discussed in the DEIS.

Representative Quote(s):**Corr. ID:** 11**Organization:** Shawnee Tribe**Comment ID:** 259414**Organization Type:** Tribal Government

Representative Quote: We have no issues or concerns at this time, but in the event that archaeological materials are encountered during construction, use, or maintenance of this location, please re-notify us at that time as we would like to resume consultation under such a circumstance.

Corr. ID: 1234**Organization:** Pennsylvania Fish and Boat Commission**Comment ID:** 259413**Organization Type:** State Government

Representative Quote: If an alternative other than Alternative 1 is selected and a waterway encroachment application is submitted to the Pennsylvania Department of Environmental Protection (DEP), the applicant would need to further coordinate with DEP, PFBC and other environmental regulation agencies to achieve the appropriate avoidance, minimization and mitigation measures.

Corr. ID: 2397**Organization:** USEPA - Region 2**Comment ID:** 259443**Organization Type:** Federal Government

Representative Quote: We understand that preliminary scoping and coordination has occurred with the U.S. Army Corps of Engineers, Philadelphia District (Corps), with respect to possible impacts to wetlands and waters of the United States, and that the Corps has made a preliminary determination that either a Nationwide Permit or SPGP-3 would apply to this project. We encourage NPS and the applicant to continue coordination with the Corps and other resource agencies, including EPA, Pennsylvania Department of Environmental Protection and New Jersey Department of Environmental Protection regarding permitting requirements.

In addition, EPA does not believe the mitigation plan included in Appendix F provides sufficient information to determine whether impacts to wetlands are being fully mitigated; EPA recommends additional agency coordination to ensure a more comprehensive evaluation of wetland and stream impacts. Moreover, EPA recommends that practices used to minimize impacts to streams and wetlands be specified in the Final EIS, including all wetlands mitigation plans.

Corr. ID: 2400**Organization:** NOAA-National Marine Fisheries Service**Comment ID:** 259476**Organization Type:** Federal Government

Representative Quote: there are American shad between the Delaware Water Gap and the New York border; and additionally, there may be also be shad in the Philadelphia reach of the river. Given that a more detailed discussion of potential impacts to trust resources and that further information regarding the transmission line crossing of the River was included in the DEIS, additional EFH consultation with HCD by the federal action agency will not be required as part of the federal permit process.

PRD concluded that because there were no federally listed species within the project area, no further consultation with NOAA Fisheries would be necessary unless project plans or new information became available.

Response: The DEIS described initial consultation and coordination processes that were carried out to the extent possible without having a preferred alternative identified. The FEIS identifies a preferred alternative and the NPS is continuing consultation and coordination on the specific details of that alternative. All permitting requirements are being identified and will be incorporated as conditions of the NPS Special Use/ROW permits and must be obtained by the applicant prior to the start of any activities that require such permits. Mitigation measures in the DEIS were based on the information made available by the applicant at that time. Since the DEIS was released, the applicant has publicly offered additional mitigation that is currently being evaluated by the NPS. The Record of Decision will contain a detailed mitigation plan that will be part of the alternative ultimately selected for implementation. In addition, the NPS is consulting on adverse effects to historic properties under Section 106 of the National Historic Preservation Act with the consulting parties, the NJ and PA State Historic Preservation Officers, and the Advisory Council on Historic Preservation. These resolution of these effects will be formalized either through the ROD or a Programmatic Agreement which, when executed, will stipulate agreed-upon measures to mitigate adverse effects to archeological resources, cultural landscapes, and historic structures. The final stipulations outlined in the ROD or Programmatic Agreement will be incorporated as conditions of the NPS Special Use/ROW permits.

CL4000 - Cultural Landscapes: Impact of Proposal and Alternatives

Concern ID: 37271

CONCERN STATEMENT: [One commenter was concerned that the construction of the transmission lines would further desecrate lands considered sacred to American Indians, especially the Lenape.](#)

Representative Quote(s): **Corr. ID:** 1602 **Organization:** *Not Specified*

Comment ID: 256385 **Organization Type:** Unaffiliated Individual

Representative Quote: What you may not have considered is that this is also sacred land to the Lenape. There are still American Indians living in this area. They hold sacred these mountains and waters. Please respect their wishes and route your power line and it's right of way elsewhere. Enough has been taken from them already, as Pennsylvania, Manhattan and New Jersey were their territory. They have nothing else but the sacred mountains. Other mountains have been topped and valleys filled in for shopping malls and parking lots. We owe it to them (and ourselves) to consider for once that this is a permanent disfiguring scar on the mountain and on the State as a body. We have disfigured enough mountains that are sacred to the American Indians in this country.

Response: No federally recognized tribe has identified sacred sites within the area of impact (see Chapter 5 of the FEIS for information on tribal consultation). NPS is in correspondence and onsite consultation with tribal governments. Tribes have stated that burial sites may exist but specific sites have not been identified. Should sites be discovered during construction, the MOA and BMPs would incorporate provisions of American Indian Religious Freedom Act, Executive Order 13007 - Sacred Sites, and Native American Graves Protection and Repatriation Act of 1990 to protect burial and sacred sites.

Concern ID: 37354

**CONCERN
STATEMENT:**

A commenter stated that the project area is rich in cultural resources, some of which have not yet been documented. There is concern that construction of the transmission lines would preclude some resources from being listed on the National Register.

Representative Quote(s):**Corr. ID:** 520**Organization:** *Not Specified***Comment ID:** 254379**Organization Type:** Unaffiliated Individual

Representative Quote: Within the boundaries of the Delaware Water Gap National Recreation Area and in immediate proximity thereto are more French & Indian War fortifications and outposts than in any other park or location in the nation: Ellison's Fort, New Fort, Fort Van Campen, Fort Walpack, Adam Dingman's Post, Fort Johns (Headquarters Fort), Fort Shappanack, Fort Carmar, Fort Nominack, Fort Westbrook, Fort Brinks, Fort Coles, Uriah Westfalls Post, Fort Gardiner, Tisshock Post, Van Etten Post, Henry Cortracht Post, Fort Hyndshaw and Dupui's Fort.

As the National Park Service moves forward to select its preferred alternative, I ask the NPS to stay its decision until such time as the Service can complete for public scrutiny a thoroughly documented Cultural Landscape Report that specifically focuses upon this rich heritage that we seek to preserve and interpret for the benefit of future generations.

Corr. ID: 1680**Organization:** morris county trust for historic preservation**Comment ID:** 257194**Organization Type:** Unaffiliated Individual

Representative Quote: With particular respect to cultural resources, we note that the report covers only the effects on "recognized" resources. The sites which have been formally listed are believed to include considerably less than 10% of those that deserve recognition.

The route of this line crosses an area of New Jersey where cultural resources are more seriously under-inventoried than almost anywhere else in the state. The project's consultants have not had time to more than scratch the surface. Furthermore, they have been looking within an artificially narrow APE, negotiated as a compromise with the NJ SHPO. These limits of time and space effectively preclude our benefiting from the Sect. 106 review process requirement to locate and protect resources that were hitherto undiscovered. Attempts to create an inventory of significant scenic sites are relatively new, so that the work is proceeding essentially de novo, often carried out by professionals with relatively little experience with this resource type. A comprehensive inventory of these resources is crucial, before this project forever destroys more layers of our early history.

Response:

A Phase I Cultural Landscape Inventory has been completed and existing cultural landscapes within NPS lands have been identified. Relevant information was included in the DEIS; with reference to specific reports. Consultation with the State Historic Preservation Offices is ongoing. The New Jersey and Pennsylvania SHPOs are responsible for identification of cultural resources outside the parks.

FP4000 - Floodplain: Impact of Proposal and Alternatives

Concern ID: 37258

CONCERN STATEMENT: A commenter is concerned about the amount of erosion that would occur from the expansion of the ROWs for all of the alternative routes.

Representative Quote(s): **Corr. ID:** 1970 **Organization:** *Not Specified*

Comment ID: 257812 **Organization Type:** Unaffiliated Individual

Representative Quote: All of our forests are along the stream valleys, the steep stream valleys. Any expansion of the power lines in that area would cause severe erosion.

Response: NPS assessed the impacts of sedimentation and erosion as part of the analysis of soil resources. We used the U.S. Forest Service's Water Erosion Prediction Project (WEPP) model to determine the impacts on water quality. The modeling demonstrated that minimal short term and long term increases in total suspended solids for some tributaries and undetectable increases in total suspended solids in the Delaware River. The model did not detect differences between the alternatives (page 23 of the DEIS); therefore, soil resources was dismissed. Applicant will be held to implementing construction best management practices that reduce or eliminate impacts of sedimentation and erosion.

FP5000 - Floodplain: Cumulative Impacts

Concern ID: 37272

CONCERN STATEMENT: One commenter is not satisfied with the cumulative impact analysis on floodplains both inside and outside the study area. This commenter identified specific projects that should be analyzed for cumulative effects to floodplains.

Representative Quote(s): **Corr. ID:** 2394 **Organization:** Earthjustice

Comment ID: 259059 **Organization Type:** Non-Governmental

Representative Quote: The Park Service failed to consider the cumulative impacts of several projects on floodplains. For example, the EIS should assess whether projects including but not limited to the Tennessee Gas Line Proposal, the Columbia Gas Transmission Company pipeline proposal, and the Northeast Supply Link Expansion Project will contribute to adverse impacts on floodplains in the study area. Further, the EIS should assess whether these projects and others, including Marcellus Shale gas development, the Dominion/Allegheny Power Transmission Line project, and other proposed residential and commercial projects in both New Jersey and Pennsylvania could contribute to adverse impacts on floodplains outside the study area. All of these projects could potentially have an adverse impact on the natural flow of rivers and streams and the ability of floodplains to absorb excess amounts of water from increased runoff.

Response: NPS has reviewed the cumulative impact analysis for floodplains and have determined it is sufficient and appropriate. Impacts to floodplains are not expected to be significant, they would be temporary and most would be avoided using best management practices.

GA1100 - Impact Analysis: Overall Impacts to Park Resources

Concern ID: 37774

**CONCERN
STATEMENT:**

Many commenters expressed concern for the high level of impacts to park resources, resulting in permanent loss and degradation of natural and cultural resources and scenery, diminishing visitor experience. Commenters cited the scarcity of such resources in the highly developed east and the fact that the national parks were created to preserve these resources in perpetuity. A number of commenters stated that the loss and degradation of park resources would constitute impairment, which would violate the Organic Act, noting that the NPS could not issue a permit for the proposed transmission line if it would result in impairment.

Representative Quote(s): **Corr. ID:** 1337 **Organization:** *Not Specified*

Comment ID: 263603 **Organization Type:** Unaffiliated Individual

Representative Quote: The "No Build" option is the only alternative that will not cause the impairment of Park Resources. Under the Organic Act of 1916 and the NPS Management Guidelines of 2006, NPS cannot allow projects to move forward that cause impairment of park resources, unless a law directly allows for the project. Do not let this happen and everything that was fought for in 1916 be for nothing.

Corr. ID: 1365 **Organization:** *Not Specified*

Comment ID: 263606 **Organization Type:** Unaffiliated Individual

Representative Quote: I have many a happy memory canoeing and hiking in the water gap. Its pure beauty and pleasure will be forever changed if we allow PSE&G to scar and deface it for their profit.

These unsightly towers and its construction would cause an impairment of Park resources that would not be "temporary." Construction of access roads, staging areas, widening rights-of-way and the destruction of acres of forests will result in permanent destruction of park resources, especially core forests and landscape connectivity values. The Parks are a vital part of our ecosystem requiring Protection of the functions and values provided by upland forests and wetlands in combating flooding, providing habitat to threatened and endangered species, and allowing for groundwater recharge provide a greater public benefit than the Susquehanna-Roseland project.

These natural resources are the only thing that we have in this congested Northeastern area that is pure and untouched and meant for all. We cannot give this away. It is our duty and responsibility to future generations to maintain this natural treasure.

Corr. ID: 1399 **Organization:** *Not Specified*

Comment ID: 263608 **Organization Type:** Unaffiliated Individual

Representative Quote: Any "build" alternative would have serious, irreversible impacts on Park resources including endangered species, scenic vistas, forests, and visitor experience. This project will impair the scenic and cultural landscapes that these park units were created to preserve.

Corr. ID: 1432 **Organization:** *Not Specified*

Comment ID: 263609 **Organization Type:** Unaffiliated Individual

Representative Quote: Our environment has been subject to so much development, and we need the unspoiled beauty of the Park. And after all it was created to preserve the land, forests and wildlife. We need the Park to be there for our children and grandchildren.
All action alternatives will result in an impairment of Park resources and the mitigation plan does not go far enough to prevent the impairment of Park resources.

Corr. ID: 1612 **Organization:** Musconetcong Mountain Conservancy

Comment ID: 263613 **Organization Type:** Unaffiliated Individual

Representative Quote: "...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

The proposed transmission line would degrade the natural scenery,destroy natural and historic objects ,both known and undiscovered,and degrade and destroy wildlife communities within the park.Were you to permit the unnecessary construction of this transmission line, my and my children's capacity to enjoy the Delaware National park as we know it, would be forever diminished.

Corr. ID: 2394 **Organization:** Earthjustice

Comment ID: 262064 **Organization Type:** Non-Governmental

Representative Quote: ...the DEIS conclusively demonstrates that the proposed Susquehanna to Roseland line would impair Park resources in violation of the National Park Service Organic Act. As the Park Service's own analysis makes clear, the agency cannot grant the requested right-of-way and special use permit without fundamentally degrading the unique natural, scenic, and cultural resources that these Parks were established to preserve. While recent news reports suggest that PPL Electric Utilities Corporation (PPL) and Public Service Electric and Gas Company (PSE&G) (collectively "the applicants") may be contemplating mitigation efforts in the form of land purchases or conservation easements, it is not possible to eliminate impairment to areas of special significance by expanding Park boundaries.

...the Park Service further acknowledges that allowing the S-R Line to cross through the middle of the Park, through areas of extraordinary significance along Route 2 or 2b, "poses high risk for irreparable damage to significant ecological communities and drastic scenic degradation that could violate the Organic Act (impairment)." Based on the analysis presented on the DEIS, the Park Service must conclude in the Final EIS that siting the S-R Line along any of the analyzed routes would result in impairment of the Parks in violation of the Organic Act and the Wild and Scenic Rivers Act.

Response:

NPS Management Policies 2006, Section 1.4.3 states, "NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values." This means that NPS managers must take reasonable, affirmative steps toward avoiding or minimizing adverse impacts, but it does not constrain the NPS's discretion to allow impacts when necessary. As evidenced by the impact analysis in the DEIS, the NPS acknowledges that the adverse impacts of constructing the proposed transmission line across the national

park units are high; in some cases, the impacts are significant. The NPS is fully aware of its responsibility to protect the resources and values of the three national park units and that while we can make a decision that would result in significant adverse impacts to park resources, we cannot make a decision that would result in impairment, in violation of the Organic Act. The FEIS identifies the NPS preferred alternative in accordance with the regulations of the Council on Environmental Quality (CEQ); however, the FEIS is not a final decision on the permit requested by the applicant nor is a decision by the NPS to select a particular alternative as preferred imply a judgment concerning whether selection of that alternative would meet the threshold for impairment under the Organic Act. A final decision on the permit application will be made in a Record of Decision (ROD) selecting an alternative for implementation. In accordance with current NPS Impairment Guidance, a written determination on impairment for the selected alternative will be appended to the ROD.

GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects

Concern ID: 37273

CONCERN STATEMENT:

Commenters expressed concern with the lack of details for construction components, namely tower height and design, locations of spur roads, pulling and splicing sites, crane pad locations and the location of the routes outside of the parks.

Representative Quote(s): **Corr. ID:** 1878 **Organization:** Appalachian Trail Conservancy

Comment ID: 257635 **Organization Type:** Non-Governmental

Representative Quote: General Comments: It is difficult for ATC to adequately evaluate impacts of the proposed action alternatives for a number of reasons, particularly the lack of detailed information specific to the Appalachian National Scenic Trail on tower heights and locations, rights-of-way (ROW) widths, locations of access and spur roads and other construction operations, and routes of the various alternatives beyond park boundaries. While the Delaware Water Gap National Recreation Area was extensively analyzed, the ANST as a separate and unique unit of the National Park System, was not.

Sufficient details regarding tower heights and design (lattice versus monopole), new or upgraded access roads, spur roads, pulling and splicing sites, crane pad locations and route locations outside park boundaries are absent or suppositional. Although more specific detail is provided for the applicant's preferred alternative 2 and 2b, even there detailed information is often lacking. In many cases, the DEIS provides a range of design possibilities based on "Industry Standards" and "Best Management Practices." These are not acceptable substitutes for actual dimensions, square footages, acreages, and facility locations as they relate to the Trail.

Corr. ID: 1968 **Organization:** Appalachian Trail Conservancy

Comment ID: 258717 **Organization Type:** Recreational Groups

Representative Quote: ATC is troubled by the lack of specifics in the Draft Environmental Impact Statement. It is impossible for stakeholders, including the Appalachian Trail Conservancy, to adequately evaluate the impact and for a myriad of reasons. Although, more specific detail is provided for the applicant's Alternative

2 and 2B, even there, some of the information provided is at best speculative in nature. Details regarding power lines, rights-of-way widths, tower design, new or upgraded access roads, spur roads, pulling and splicing sites and crane pad locations are absent or hypothetical for the other alternatives.

Corr. ID: 1985 **Organization:** Appalachian Trail Conservancy

Comment ID: 257899 **Organization Type:** Non-Governmental

Representative Quote: It is impossible for stakeholders, including ATC, to adequately evaluate impacts of the identified alternatives for a myriad of reasons. Although much more specific detail is provided for the Applicant's preferred Alternative 2, even there, some of the information provided in the DEIS is, at best, speculative.

Response:

NPS recognizes that the DEIS does not present all of the details of the proposed transmission line. We requested this data from the applicant, but were not provided with any additional information. Many details would not be known until detailed engineering design is complete, including exact tower locations, locations of spur roads, locations of wire pulling and pulling and splicing locations, and the locations of the alternatives beyond NPS boundaries. We used the best available data in our analysis.

Concern ID:

37332

**CONCERN
STATEMENT:**

Commenters consider the cumulative impacts analysis to be insufficient.

Representative Quote(s):

Corr. ID: 1887

Organization: New Jersey Highlands Coalition

Comment ID: 257788

Organization Type: Non-Governmental

Representative Quote: Under NEPA, NPS must consider the cumulative impacts of the project. It should address "coincident effects (adverse or beneficial) on specific resources, ecosystems, and human communities of all related activities, not just the proposed project or alternatives that initiate the assessment process." Further, "the range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects."

Clearly, in an analysis under NEPA, NPS is directed to analyze impacts to more than just the project area within the agency's immediate jurisdiction, and NPS is directed to include the impacts of similar actions that are connected by geography or timing, including future actions if they are reasonably foreseeable. The range of actions, or the scope of the analysis that the EIS must include are those that when considered cumulatively are significant (CFR 40 1508.25).

Corr. ID: 2394

Organization: Earthjustice

Comment ID: 259050

Organization Type: Non-Governmental

Representative Quote: The DEIS analysis of cumulative impacts both inside and outside the Parks is similarly unhelpful. While the Park Service lists various foreseeable projects and development, the DEIS does not attempt to quantify or otherwise characterize with any particularity how these new pressures on natural, scenic, and cultural resources will collectively manifest.

DEIS at 357. Ultimately, the reader is left with the sole conclusion that cumulative impacts will be "adverse." This general observation does not allow for a meaningful comparison of alternatives or the development of well-tailored mitigation measures.

Nevertheless, the DEIS adopts this approach to cumulative impacts analysis repeatedly.

Response: NPS reviewed the analysis; it is considered adequate and meets the requirements of CEQ. The cumulative impacts are generally the same for all action alternatives because the routes are in the same area. The DEIS identifies the cumulative impacts and the overall impacts when the SR Line project is added.

Concern ID: 37383

CONCERN STATEMENT: A commenter believed that the impacts from deconstruction of the line would be similar to those from the construction of the line, and that these impacts need to be considered in the EIS.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259326 **Organization Type:** Business

Representative Quote: Additionally, the deconstruction of the existing line would have the same construction impacts as the construction of the S-R Line. The same roads would be needed and similar ground disturbances would occur. The DEIS should include a discussion of those impacts.

Response: The impacts from the deconstruction of the existing line are addressed in the DEIS under each applicable resource topic in chapter 4.

GR4000 - Geologic Resources: Impact Of Proposal And Alternatives

Concern ID: 37274

CONCERN STATEMENT: Commenters do not agree that the full impacts to geologic resources, including unique geologic resources, have been analyzed in the DEIS. According to commenters, blasting and geotechnical boring plans and modeling data need to be provided in the EIS and their direct impacts analyzed for each alternative.

Representative Quote(s): **Corr. ID:** 2143 **Organization:** Not Specified

Comment ID: 258230 **Organization Type:** Unaffiliated Individual

Representative Quote: Towers that will need a large concrete base to support their massive column. I been told by a PSE&G representative that they must create a 40 foot deep hole for the concrete base/footing needed for the monopole tower construction.

I have seen twenty foot holes dug and can only imagine what a forty foot hole would look like blasted in geologically sensitive areas. What will the construction company due with the tailing from these forty foot foundation holes? Fill in some wet lands? What will the impacts be on wildlife and its habitat the we come to enjoy?

Corr. ID: 2394 **Organization:** Earthjustice

Comment ID: 259058 **Organization Type:** Non-Governmental

Representative Quote: The DEIS correctly concludes that Alternatives 2, 2b, 3, 4, and 5 would result in adverse impacts to geologic and topographic resources. However, there are several potential impacts to geologic and topographic resources

that were overlooked in the DEIS. First, the Park Service states that for the purposes of new tower construction, geotechnical boring would need to occur in order to determine the depth of competent bedrock. See DEIS at 350. The geotechnical boring could then be followed the use of chemical compounds that could potentially be released into the environment. The Park Service should assess what compounds will be used, their potential for release, and the potential impacts on soil and geologic resources in the event of release.

Second, in its discussion of impacts to wetlands resources, the Park Service states that Alternatives 2 and 2b would require blasting that could adversely impact unique geologic formations and could lead to a decrease in groundwater availability and quality. With respect to both alternatives, the Park Service states that it does not currently know how blasting would impact unique geologic formations that lie under wetlands that will be impacted, and that a blasting and post-construction monitoring plan would be needed in order to assess these impacts. As discussed above, deferred analysis is not sufficient under NEPA. The Park Service should require the applicants to supply more information on the potential impacts of blasting on these unique geologic formations. Moreover, the applicants should provide a specific blasting plan with respect to each alternative, as well as a post-blasting monitoring plan, and the public should be afforded an opportunity to comment on these plans.

Response: NPS did not allow the applicant to conduct geotechnical boring along all of the alternatives because the process would cause direct environmental impacts. We would require the applicant to haul all tailings from geotechnical borings and drilling offsite unless there is a park need for the tailings. This is consistent with the NPS standard. We have decided to limit the applicant to drilling for installation of the tower foundations. We will remove all references to blasting and the impacts that would occur from blasting from the FEIS.

Concern ID: 37384

CONCERN STATEMENT: A commenter disagreed with the impacts to geologic resources, and noted that geotechnical investigations performed outside the parks indicate that no blasting may be needed, or that techniques that do not require blasting can be used.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259334 **Organization Type:** Business

Representative Quote: The current plans for installation of the foundations for the tubular steel structures will likely involve drilling as the primary method of excavation rather than blasting. This should substantially minimize the NPS' concerns for the impact to the park with respect to geology, limestone formations, soils, and other resources. Once the Applicants are able to perform geotechnical investigations, the specific designs can be finalized and foundation requirements established. However, considering the geotechnical investigations that have been performed outside the DEWA, it is likely that blasting will not be required. Similarly, Applicants believe that blasting would not be necessary for Alternative 2b. The Applicants are also exploring some additional design options, different structure types, and construction methods that could reduce or possibly eliminate the need for access road construction near some of the most sensitive areas of the DEWA. These approaches could also eliminate the need for any blasting for foundation installation.

Response: Based on the applicant's contention that blasting would not be required, the NPS decided to limit the applicant to drilling for installation of the tower foundations. We will remove all references to blasting and the impacts that would occur from

blasting from the FEIS. We would require any alternative design options, structure types, and construction methods proposed by the applicant to meet all restrictions detailed in the EIS. These restrictions are put in place to avoid and minimize impacts to park resources.

HH3000 - Human Health and Safety: Study Area

Concern ID: 37275

CONCERN STATEMENT: A commenter suggests that the cumulative impacts analysis should include the effects of the high power lines on people living outside of the parks, including residents of the Pocono Mountains and the New Jersey Highlands.

Representative Quote(s): **Corr. ID:** 1973 **Organization:** Delaware Riverkeeper Network
Comment ID: 257817 **Organization Type:** Unaffiliated Individual

Representative Quote: However, I urge you to expand your scope of these public health impacts to consider those impacts to the residents throughout the Pocono Mountains and the New Jersey Highland regions where the Susquehanna-Roseland line will be constructed. If it raises your blood pressure in the park, it can certainly do the same thing outside the park.

Response: NPS recognizes that health concerns related to electromagnetic field (EMF) exposure outside of the parks are a point of interest; however, this analysis is outside of our jurisdiction. As discussed on page 337 of the DEIS, despite over two decades of research, conclusions on the effects of EMF on human health are still inconclusive.

HH4000 - Human Health and Safety: Impact of Proposal and Alternatives

Concern ID: 37278

CONCERN STATEMENT: There were several health concerns that commenters expressed, including fears about the unknown effects of EMFs and concerns about a higher incidence of cancer associated with proximity to the lines. Commenters also noted concerns about air pollution and water quality issues related to the line having public health impacts.

Representative Quote(s): **Corr. ID:** 1610 **Organization:** Not Specified
Comment ID: 256903 **Organization Type:** Unaffiliated Individual

Representative Quote: This project will be hazardous to a friend and his family - he has a pacemaker and doubling the height and tripling the voltage could endanger him and his family. I am totally opposed to this being passed by the National Parks Agency.

Corr. ID: 1665 **Organization:** Otzinachson Group, Sierra Club
Comment ID: 257363 **Organization Type:** Non-Governmental

Representative Quote: If built, the Susquehanna Roseland line will precipitate some of the oldest and dirtiest coal plants in the country to increase output and therefore air pollution because coal produces electricity is cheapest more cheaply

and would receive priority for transmission. This pollution will exacerbate mercury contamination, ground-level ozone formation, regional haze, acid rain, fine particulate pollution and, as a result, asthma and other respiratory illnesses, heart attacks, and premature deaths.

In addition to the impacts from coal-fired plants, is the impacts of nuclear energy, which would also feed into the Susquehanna-Roseland line. Although nuclear energy plants do not emit greenhouse gases, they do produce harmful radioactive waste such as Depleted Uranium (DU). DU is, according to the to the Military Toxins Project, the radioactive byproduct of the uranium enrichment process, is "roughly 60% as radioactive as naturally occurring uranium and has a half-life of 4.5 billion years."

Corr. ID: 1798 **Organization:** *Not Specified*

Comment ID: 258619 **Organization Type:** Unaffiliated Individual

Representative Quote: The safety to humans of transmission lines is controversial at best. Health risks associated with transmission lines continue to be explored and studied by healthcare providers and epidemiologists. The cancer rates in New Jersey are already too high to risk any additional exposure by the transmission lines.

A publication by Marcilio and others (2011) document an increase risk of leukemia of those living close to power lines. Miller & Green (2010) explore leukemia, brain cancer and lymphoma related to electro-magnetic exposure, supporting the apparent carcinogenic nature of exposure. The risk seems highest for children, as well as harmful for adults

Corr. ID: 1895 **Organization:** *Not Specified*

Comment ID: 257724 **Organization Type:** Unaffiliated Individual

Representative Quote: Beyond aesthetics, there is no conclusive research about what the effect of electromagnetic fields (EMF) emitted by 200' tall, 500 KV power lines is on human health. There are documented cancer clusters (mostly brain cancer) in neighboring towns where developments are built right next to the existing-height power line towers.

Corr. ID: 2010 **Organization:** Green Sanctuary Community, Unitarian Universalist Fellowship of Sussex County

Comment ID: 258051 **Organization Type:** Churches, Religious Groups

Representative Quote: Increased amounts of sediment in these streams will cause contamination resulting in dangerous public health effects.

Another great concern is that these higher towers will cause a vastly increased EMF, electro magnetic field. The towers will be near to homes and schools, which will impact public health

Response:

As discussed on page 337 of the DEIS, despite over two decades of research, conclusions on the effects of EMF on human health are still inconclusive. Therefore, the effects of EMF are not discussed in the EIS. We dismissed air quality and water quality as impact topics because, with implementation of BMPs, the impacts to these resources were very minor. Concerns related to increased use of coal fired plants is outside the scope of this analysis, therefore concerns related to potential impacts to human health from increased air pollution from coal-fired plants is also outside the scope of analysis.

Concern ID: 37330

CONCERN STATEMENT:

Commenters identified issues relating to safety of the proposed lines. Some commenters expressed concerns about the potential of the lines causing fires, and others noted concerns about construction equipment interfering with the safety of visitors to the park.

Representative Quote(s): **Corr. ID:** 1578 **Organization:** Appalachian Mountain Club

Comment ID: 257386 **Organization Type:** Non-Governmental

Representative Quote: Construction of the new transmission line and towers would mean "potential safety hazards associated with construction, equipment related hazards, and transportation of materials," creating a dangerous environment for outdoor recreation.

Corr. ID: 1780 **Organization:** citizen and member stop the lines

Comment ID: 257235 **Organization Type:** Unaffiliated Individual

Representative Quote: One area against this deplorable, unnecessary and dangerous (yes, dangerous) project that I have not heard much information come forward is the danger of ULTRA HIGH VOLTAGE LINES above the 52 miles from Roseland to Bushkill. Does anyone at the Park Service understand the amount of voltage that will be arching above the National Park Land? There will be no way to safely put out any fires that result from switching surges that WILL occur. Only a small amount of research has been done to explore the possible biological effects of ultra high transmissions lines. Studies of workers in Russia and Spain report incidences of excitability, headaches, drowsiness, fatigue, nausea etc. on employees near switchyards of these lines. None of these ultra high lines can be practicably be made safe.

PSE&G has failed to inform the public about the new dangers of these lines. One has to just go onto the internet sites which show the devastation that can occur when something goes wrong with ULTRA HIGH POWER LINES.

Corr. ID: 1815 **Organization:** *Not Specified*

Comment ID: 257375 **Organization Type:** Unaffiliated Individual

Representative Quote: Digging near those lines is extremely hazardous and could even start a forest fire. Residents of affected communities are worried about the ugliness and health hazards associated with these monster-sized towers. Health risks that apply to humans, esp. children, must apply to small woodland creatures as well, namely cell mutation or cancer.

Response:

NPS consulted with transmission line engineers for this project who determined that the minimum horizontal clearance to the edge of the ROW under high wind conditions to prevent conductor blowout was determined to be greater than 100 feet. Alternatives 2, 3, 4, and 5 would follow these guidelines as described in the DEIS. The applicant has stated that for alternative 2b two additional towers would be required to meet safety guidelines in the area where the ROW is 100 foot wide. We have expressed our concerns about the potential fire hazards associated with alternative 2b in chapter 2 (page 55) and in chapter 4 (page 662) of the DEIS. We have also addressed safety concerns from construction equipment in chapter 4 (pages 656-665).

HH5000 - Human Health and Safety: Cumulative Impacts

Concern ID: 37279

CONCERN STATEMENT: One commenter is concerned about potential impacts to the health of people who live near the transmission lines.

Representative Quote(s): **Corr. ID:** 1609 **Organization:** *Not Specified*

Comment ID: 256901 **Organization Type:** Unaffiliated Individual

Representative Quote: The long term health impact of living close to the high these high power lines is a major issue in the future of those living near these lines.

Response: NPS recognizes that health concerns related to EMF exposure outside of the parks are a point of interest; however, this analysis is outside of our jurisdiction. As discussed on page 337 of the DEIS, despite over two decades of research, conclusions on the effects of EMF on human health are still inconclusive.

HS3000 - Historic Structures: Study Area

Concern ID: 37281

CONCERN STATEMENT: A commenter is concerned that the NPS and the applicant vary on the size of the APE studied.

Representative Quote(s): **Corr. ID:** 1963 **Organization:** *Not Specified*

Comment ID: 258708 **Organization Type:** Unaffiliated Individual

Representative Quote: I think that we've got an additional problem that we need to look at as well, in that the utilities have pointed to a rather narrow area of potential effect, whereas the park service in their presentation has pointed to an APE that's defined by .8 miles laterally out.

So on the one hand you've got one party saying 2 to 4 miles, the park service says the area is .8 miles. You know, guys, we need to be on the same page when it comes to this stuff. So I'm asking you to find the time to get together and to resolve this issue, decide exactly where the area of potential effects is and then deal with it accordingly.

Response: Within the park boundary, NPS defined an APE that extends 8 miles laterally from each proposed alternative alignment. Outside the park boundary, we defined an APE that extends 0.5 mile laterally from each proposed alternative alignment. The width of the APE is governed by visual split locations (VSLs), the first point at which the applicants would have a choice of routes for the transmission line outside the study area. The APEs for New Jersey and Pennsylvania are outside NPS lands. The applicant was conducting an impact analysis for the NPS and the states, hence a difference. For the methodology used to analyze impacts on historic structures, please see pages 512-513 of the DEIS.

HS4000 - Historic Structures: Impact of Proposal and Alternatives

Concern ID: 37283

**CONCERN
STATEMENT:**

Commenters have noted a lack of information in identifying all of the historic structures that could be affected by the proposed project, as well as incorrect information on the location of Old Mine Road. However, one commenter noted that there are no expected impacts to historic properties known in the proposed project area.

Representative Quote(s): **Corr. ID:** 11 **Organization:** Shawnee Tribe

Comment ID: 244271 **Organization Type:** Tribal Government

Representative Quote: The Shawnee Tribe's Tribal Historic Preservation Department concurs that no known historic properties will be negatively impacted by this project.

Corr. ID: 1777 **Organization:** Celebrating the Delaware

Comment ID: 257230 **Organization Type:** Unaffiliated Individual

Representative Quote: Nor does the current Environmental Impact Statement adequately address the impact on the original Old Mine Road, which, in fact, is not at the location stated by the National Park Service. Contrary to the National Park Service assertion that the Old Mine Road is one and the same as the River Road, the original road is immediately adjacent to the Delaware River.

The Environmental Impact Statement does not take into account the unique and precious historic legacy of stone-retaining walls associated with this original location, nor does it address the total degradation the 500 kV Transmission Line will bring to miles of the Old Mine Road, nor does it address the impact on us as a community and a nation when we willingly allow the trashing of national, unique, extraordinarily rare historical treasures.

Corr. ID: 1963 **Organization:** *Not Specified*

Comment ID: 258707 **Organization Type:** Unaffiliated Individual

Representative Quote: This particular map shows us a couple of interesting things. In the corridor, as defined by Alternatives 2, 2B, we see that it passes through the Shoemaker General Store and post office. As it continues down to the Delaware it passes right through the homestead of Philip Bus, but more significantly when we look at the area potential effects which by the Luis Berger Group, together in consultation with the Bureau for Historic Preservation was defined within certain parameters. We see that in that APE. In that zone we've also got two schools.

The first school is alongside the Delaware adjacent to the J.C. DeWitt property. The second school back in the 1860s was on the Hog Back Ridge and it's a school that our area historians tell us was the oldest in Monroe County. To me this is significant. It is also a cause for worry and concern because as good as the parties are and as diligent as they have been, they just haven't been thorough enough so far, because none of this information has appeared in either of their presentations.

Response: An update on the Old Mine Road Historic District has not been completed to document historical routing and re-routing of the road. NEPA does not require an

exhaustive data collection, but rather use of best available information and NPS has sufficient information to analyze potential impacts to historic structures. We acknowledge there will be adverse effects to structures; the mitigation of these impacts will be negotiated through an agreement with the SHPOs. Mitigation measures from consultation will be included in the ROD, and permit (if issued).

Concern ID: 37385

CONCERN STATEMENT: A commenter stated that information regarding the eligibility for listing on the National Register of the current transmission line and corridor is available and should be incorporated in the EIS.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259358 **Organization Type:** Business

Representative Quote: The DEIS should be revised to inform the decision-maker and the public that the existing transmission line and corridor through the DEWA is itself considered a historic component of the existing visual environment and cultural landscape. As part of the permitting requirements necessary for the proposed Project, the potential historic component of the PNJ Interconnection - Wallenpaupack to Siegfried Line and the Bushkill to Roseland Line, which includes the corridor and existing 230 kV through the DEWA, has been evaluated for eligibility for listing in the National Register of Historic Places (National Register). The results of the study conducted by The Louis Berger Group (Berger) concluded that the line and corridor appear to possess historical significance and integrity that qualify it as a resource eligible for listing on the National Register. The line and corridor are significant on a national level (in both New Jersey and Pennsylvania) with a period of significance from construction of Lake Wallenpaupack Dam, Pipeline, and Hydroelectric Plant (begun in 1924), the inception of the interconnection agreement in 1927, through the expansion of the interconnection into the Pennsylvania-New Jersey-Maryland Interconnection (PJM) in 1956. Both the Pennsylvania Historical and Museum Commission (PHMC) and the New Jersey Historic Preservation Office (NJHPO) concurred with the study via letters dated August 29 and September 9, 2011, respectively, and confirmed the line and corridor as National Register eligible. While these letters were received relatively late in the DEIS process, the Applicants note that the eligibility status of the line and corridor as a National Register-eligible historic property was not included in DEIS and request that this eligibility status be included.

The existing line currently continues to function in its historical capacity. While the Applicants acknowledge that Alternative 2 would have an adverse effect on the historic nature of the existing line and corridor through the DEWA, the Applicants as well as the PHMC and NJHPO recognize that alterations and changes to the line itself, upgrade of towers and wires, etc., may be viewed as part of the necessary evolution of our infrastructure in keeping with modern technological advancements, demands, and requirements of the electrical grid system.

Response: This information was received after publication of the DEIS. NPS is in consultation with the SHPOs. This consultation will address any historic structures in the project area; all information from consultation will be added to chapter 5 of the FEIS. Mitigation measures from consultation will be included in the ROD, and permit (if issued).

IA1100 - Impact Analysis: Topics Dismissed

Concern ID: 37285

CONCERN STATEMENT:

Commenters stated that several impact topics dismissed in the EIS should be considered, due to the extent of impacts to these resources. The resource topics identified include air quality, water quality and watersheds, and climate change and global warming, and landslide modeling.

Representative Quote(s): **Corr. ID:** 1983 **Organization:** Not Specified

Comment ID: 257880 **Organization Type:** Unaffiliated Individual

Representative Quote: The one thing was the parks decision not to assess water resources in the EIS. I think that's very important that that's reconsidered in the scope of the draft EIS and is expanded now to incorporate more resources, not only in the park, I think throughout the entire Delaware River but especially the Upper Delaware River where the Susquehanna-Roseland will cross the Lackawaxen and other tributaries of the Delaware River above the National Recreational Area.

Corr. ID: 1994 **Organization:** New Jersey Highlands Coalition

Comment ID: 257952 **Organization Type:** Unaffiliated Individual

Representative Quote: All projects require land clearing for rights-of-way, access roads, and staging areas. Because each project is routed through the highest watershed valued upland forests, the impacts on the functional values of the watersheds are much greater than the sum of the acres disturbed. Each project, if viewed alone, has measurable impacts that impair the ecological functions of forested watersheds in the Highlands, ultimately impacting the water supply to major population areas in New Jersey. The cumulative impacts to this water supply, which is potentially huge, has not been assessed.

Corr. ID: 2394 **Organization:** Earthjustice

Comment ID: 259056 **Organization Type:** Non-Governmental

Representative Quote: The Park Service must consider the impacts on air quality resulting from the S-R Line. Each of the action alternatives that the Park Service proposes will have significant impacts on air quality during construction, which would involve not only the line itself but also access roads, and, in some alternatives, deconstruction of existing power lines.

This construction will require large diesel trucks to haul heavy equipment through the Parks and the surrounding communities...All of this equipment will emit exhaust and create fugitive dust that will impact surrounding air quality.

As the line is expressly intended to open up eastern power markets to coal-fired power generators in western PJM, it can be expected to drive increases in power generation at coal-fired power plants that currently are operating below capacity. Increased reliance on coal in the East Coast has the potential to significantly degrade air quality by increasing emissions and ambient concentrations of air toxics...This pollution would harm public health and further exacerbate endemic acid rain and smog problems, which, not incidentally, plague many national parks.

The Park Service cannot ignore the increase in coal-fired power production that the

S-R Line would encourage. An agency must consider the growth-inducing impacts of its actions.

several counties in Pennsylvania and New Jersey are designated non-attainment for PM_{2.5}. Increased emissions from the S-R Line would exacerbate the health and environmental risks posed by non-attainment of the NAAQS and impede the ability of these states to come into attainment.

In addition, deposition of pollution from coal-fired power plants into water is responsible for mercury contamination of fisheries, acidification, and eutrophication. Effects include changes in water chemistry that affect aquatic vegetation, invertebrate communities, amphibians, and fish. The deposition of nitrogen also contributes to nutrient enrichment in coastal and estuarine ecosystems, which can cause toxic algal blooms, fish kills, and loss of plant and animal diversity. Deposition also can cause chemical changes in soils that affect soil microorganisms, plants, and trees. Plant species composition and abundance may change where nitrogen overstimulates growth, favoring some types of plant species and inhibiting growth of others. The EIS should address the impacts of increased deposition on waterways, wetlands, floodplains, soils, and vegetation.

Corr. ID: 2394 **Organization:** Earthjustice

Comment ID: 259057 **Organization Type:** Non-Governmental

Representative Quote: The Park Service's failure to address climate change and greenhouse gas emissions in the DEIS must be rectified in the Final EIS. "The impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct." ..."[T]he fact that climate change is largely a global phenomenon that includes actions that are outside of the agency's control does not release the agency from the duty of assessing the effects of its actions on global warming within the context of other actions that also affect global warming."...Thus, even though the Park Service does not control coal plant operations, it still must consider the extent to which its actions will spur increases in CO₂ emissions that contribute to climate disruption.

The DEIS must further consider how adverse impacts associated with the S-R Line would impact the resilience of resident ecosystems in light of threats posed by climate change. For instance, would construction and operation of the S-R Line hinder the ability of plant and animal communities to adjust to climate changes? Over the next fifty years and beyond, the Parks will be increasingly stressed by rapid climate shifts, and it is important to provide as much of a buffer as possible to allow for adaptation.

The DEIS does not fully consider the S-R Line's impacts on energy resources and conservation potential. Although the construction of the S-R Line may not affect Park Service facilities, the Park Service has the opportunity to encourage energy conservation in its selection of an alternative. The no action alternative would likely bolster growing reliance on energy efficiency programs.

While the DEIS recognizes that the S-R Line will affect how land within the park boundaries is used, it does not provide any further detailed analysis of impacts to land use. However, as the Park Service recognizes, the authorization of the requested right-of-way and special use permit could create a precedent, resulting in many additional Park crossings that incrementally would carve up the Parks. Importantly, the S-R Line is one of several linear utility projects that threatens major adverse environmental impacts in the immediate region. The cumulative impacts of these projects on the land use of the Parks are potentially devastating

and must be considered accordingly.

Response:

NPS dismissed these resource topics because the effects were comparatively similar for all action alternatives and would not drive the assessment of the alternatives. The impacts for air quality, water quality and watersheds, and climate change and global warming would be minor. Climate change was dismissed as an overall impact topic, but the impacts from climate change are included in the discussion of cumulative impacts in chapter 4. Additionally, BMPs and permit conditions would greatly reduce impacts. The rationale for dismissing these topics is located in the DEIS in chapter 1 (pages 21-25). Because we have decided to limit the applicant to drilling for installation of the tower foundations, the dismissal language in the FEIS will change for water resources. The FEIS will include a General Conformity Analysis for areas of nonattainment.

The applicant would build the S-R Line regardless of whether it was allowed through the park. Analyzing impacts from coal plants is outside the scope. Analyzing impacts from coal plants is outside the scope. Concerns related to increased use of coal fired plants is outside the scope of this analysis, therefore concerns related to potential impacts from increased air pollution from coal-fired plants is also outside the scope of analysis. .

IN4000 - Infrastructure, Access, and Circulation: Impact of Proposal and Alternatives

Concern ID: 37286

CONCERN STATEMENT:

A commenter expressed concerns about the ability of the NPS to close roads to protect migrating wildlife during a transmission line emergency.

Representative Quote(s): **Corr. ID:** 1966 **Organization:** Not Specified

Comment ID: 258716 **Organization Type:** Unaffiliated Individual

Representative Quote: That last statement I make because I can see a clash, when the roads have to be closed, they have to be closed. That's not going to work. When you have an emergency in the power line, you're going to say I'm going through. We talked about these little creatures that have to cross the road in the summer and you can't get across the road, what are you going to do with these power lines? They're going to demand the right to get in. It's a clash between two opposite uses that are too foreign to one another.

Response:

The applicant does have legal right to access their ROW. NPS will work with them to make them aware of any sensitive natural or cultural resources and to help the applicant avoid impacts when possible.

Concern ID: 37386

CONCERN STATEMENT:

Impacts to NPS roads would be largely mitigated by restoration measures undertaken by the applicants, resulting in no lasting impact on NPS roadways at the conclusion of the construction and restoration period.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259329 **Organization Type:** Business

Representative Quote: Appendix F of the DEIS describes mitigation measures

that could be applied to road damage, but incorrectly assumes that the mitigation would not be sufficient to change the level of impacts to NPS roads. The Applicants' plan to restore the public roadways to their preconstruction condition (unless otherwise instructed by the NPS for purposes of closing roads or limiting access) and see no reason why they would not be able to accomplish that commitment and thus there would be no lasting impacts to public roads within DEWA following construction.

Response: Currently many of the NPS roads that would be impacted by construction, maintenance and operation do not meet Park Road Standards for heavy equipment. NPS did take into account mitigation as proposed in Appendix F (page 547 of DEIS) but the mitigation would not be sufficient to change the level of impact.

Concern ID: 37772

CONCERN STATEMENT: One commenter noted that impacts discussed from off-road vehicle use are applicable to all alternatives, and would be mitigated by the applicants.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 263618 **Organization Type:** Business

Representative Quote: The DEIS expresses concern over unauthorized off-road vehicle use that would occur as a result of access road construction associated with Alternative 2 (p. 548). The Applicants have two comments to this statement. First, if off-road vehicle use is a concern, then it should be applicable to all alternatives and not just to the existing ROW. Second, as a part of its mitigation, the Applicants can and will take the steps described in the C&R Standards to discourage off road vehicle use on temporary and pennant access roads.

Response: NPS agrees with the commenter. The use of off-road vehicles could increase with all action alternatives and is included in the analysis of the visitor experience, common to all action alternatives. Please see pages 631-632 of the DEIS. Various mitigation measures would be implemented to discourage off-road vehicle use on access roads. Please see appendix F of the FEIS for mitigation measures.

MG1300 - Recommendations for Mitigation Proposal

Concern ID: 37289

CONCERN STATEMENT: Commenters stated that mitigation measures are not adequate, and suggested that additional measures need to be taken. Some commenters believed more options for mitigation should be considered, while others also thought that no decisions on the project should be made until there is a detailed mitigation plan.

Representative Quote(s): **Corr. ID:** 1605 **Organization:** NY-NJ Trail Conference and Adirondack Mt. Club

Comment ID: 259074 **Organization Type:** Unaffiliated Individual

Representative Quote: The mitigation plans are not sufficient, and more alternatives must be included.

Corr. ID: 2014 **Organization:** *Not Specified*

Comment ID: 257868 **Organization Type:** Unaffiliated Individual

Representative Quote: One thing that does concern me, however, is the discussion of mitigation. The proper sequence to consider when mitigating or when actually

considering a project is to avoid, minimize and then mitigate as Ms. Brummer said. Key word being avoid. You shown there are areas impacted that must be avoided within the Park, ecological communities that are unique to the Park and would be effected incredibly by this project. No final decision should be made regarding mitigation until the public has had the opportunity to thoroughly inspect and comment on a detailed mitigation plan.

Corr. ID: 2019 **Organization:** Association of New Jersey Environmental Commissions

Comment ID: 258744 **Organization Type:** Unaffiliated Individual

Representative Quote: So I think you are faced with an interesting issue here with regard to dealing with this mitigation offer. Either you can ignore it and continue with your findings, which I think is certainly justifiable, or you can engage in some supplemental EIS process, and additional public comment and public input. But without understanding exactly what is being proposed, who is to carry it out, where it's going to happen, what the impact on local government would be, and any number of other questions that would probably appear, considering this offer now at this point in time is really, and outside of the EIS, is improper.

Response:

Appendix F contains typical mitigation measures that would be applied to any alternative to reduce and minimize impacts. The DEIS identified as much mitigation as it could because NPS did not have a preferred alternative at the time. Now that the NPS has identified a preferred alternative, we are working with the applicant to identify a mitigation plan specific to the preferred alternative.

Concern ID:

37327

CONCERN STATEMENT:

Commenter suggested alternatives to the mitigation measures. Suggestions included using the amount of money proposed for mitigation for alternative energy development, the use of helicopters during the construction project, measures for forest stewardship, and the use of easements rather than land purchases.

Representative Quote(s): **Corr. ID:** 1559 **Organization:** Not Specified

Comment ID: 256284 **Organization Type:** Unaffiliated Individual

Representative Quote: As for the mitigation option suggested by the power companies, that is more of a "bribe" than a resolution. They should use the \$30 million and formulate alternatives for energy sources (ie - underground lines, running them along Route 80, smart grids, etc).

Corr. ID: 1698 **Organization:** Not Specified

Comment ID: 257367 **Organization Type:** Unaffiliated Individual

Representative Quote: 5. If any action alternative (including Alternative 2), other than the NO BUILD, is selected and still would traverse the NPS units then some or all of the following mitigations should be adopted and mandated:

5a. To preclude undue widening of existing access roads or constructing any new access roads to the existing (or new) RoW; use helicopters to insert RoW development crews. All deconstruction, installation of new footers and towers, RoW widening= tree/brush clearing, etc. should be accomplished by crews and materiel delivered and retrieved by aerial transportation. This style of vertical replenishment is standard procedure in military theaters and remote logging terrain. It can be done! \$30 million dollars might buy a lot of airlift time?

5b. This approach will presumably be used in another portion of the same SR RoW west of NPS units on other federal land.

5c. If mitigation 5a above is accepted for use on NPS properties; then the selection of which (of various) crossing routes could be made mainly on the least impactful set of resource values within the RoW itself; since ancillary roads and other incidental impacts will be effaced by such surgical construction methods.

5d. Failing adoption/acceptance of mitigations 5a & c above; then this mitigation should be adopted and mandated. Any temporary ancillary impacts from existing road widening, new road construction, staging areas, etc on NPS properties must be immediately restored to the pre-project conditions (status quo ante). This would leave only those long term impacts within the selected RoW crossing to be dealt with (if feasible via enhancement or restoration of similar or nearby habitats).

Corr. ID: 1919

Organization: *Not Specified*

Comment ID: 257524

Organization Type: Unaffiliated Individual

Representative Quote: Power companies involved have discussed using \$30,000,000 of ratepayers money for mitigation. Many people say that this project will create thousands of jobs. This is true, but are they for the right reason. This \$30,000,000 can go towards solar panels or wind turbines. This will not only create jobs, but the money will be going towards the conscientious decision of having more reliable energy. I calculated 1,875 homes can be powered with \$30,000,000 worth of solar panels. I used the following website which states that \$16,000 worth of solar panels is needed to power the average home.

<http://tlc.howstuffworks.com/home/question418.htm>

That is only the \$30,000,000. With the \$800,000,000 that the whole project would use, 50,000 homes can be powered. It would also spark up the clean energy industry.

Corr. ID: 1988

Organization: New Jersey Forestry Association

Comment ID: 257926

Organization Type: Conservation/Preservation

Representative Quote: The mitigation funds apparently could be substantial. And they could be applied in a number of different ways, but it sounds like outright purchase of additional lands is one of the bigger things discussed, and I would beg you not to buy anymore lands outright than you absolutely have to for some kind of strategic reasons. You can spread the available money, 50 percent further, 50 percent more acres, if you buy easements and you can accomplish almost everything that you want to do as far as view sheds, watershed protection and so forth that you can with outright purchasing. And the advantage, second advantage is that you leave the landowner in place to be the manager or to be the steward downstream. That way you do not have to hire more Park personnel or rangers or whatnot to have that property taken care of.

So what I'm leading to is that a lot of this mitigation money could be put towards forest stewardship, I think.

And mitigation money coming out of this project could forward the success of delivering forest stewardship, cutting edge forest science to the forest in and around the Park.

Corr. ID: 2134

Organization: New Jersey Forestry Association, Inc

Comment ID: 258214

Organization Type: Unaffiliated Individual

Representative Quote: Important legislation that greatly expands the benefits of the Farmland Assessment umbrella is the Forest Stewardship and Sustainability Act,

which was written by the NJ Forestry Association, passed in 2010 and received the award for the most outstanding forestry legislation in the nation that same year. This law will kick into practice as the rules are finalized in Trenton, but even now, as ten-year forest management plans are expiring, some are being replaced with stewardship plans that not only assure sustainable harvesting but also address all the ecosystem issues examined in your Environmental Impact Statements. Upgrading to Stewardship Plans is voluntary and your mitigation money could be very helpful in achieving the goal of 100% participation. The Stewardship and Sustainability Act contains the tools to enable NJ to become the first to achieve a statewide forest sustainability certification. The NPS can be very helpful in this neck of the woods. The NJ Forestry Assn will be pleased to assist you in any way we can.

Corr. ID: 2380 **Organization:** The Academy of Natural Sciences of Drexel University

Comment ID: 258566 **Organization Type:** Unaffiliated Individual

Representative Quote: The alternative routes for the ROW generate different local impacts. A regional approach to mitigation would apply to all the alternatives. Local mitigation activities, such as minimization of local impacts on streams, floodplains, wetlands, species of special concern, vistas, and cultural resources, will differ with the extent of disturbance by each route and by specific resources affected by each route (e.g., different species or habitats affected). It is expected that local mitigation activities like routing access roads, BMPs for construction, and habitat restoration, will minimize ecological impacts on the specific resources impacted by each route.

Corr. ID: 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259331 **Organization Type:** Business

Representative Quote: The DEIS discusses mitigation and compensation measures on pages 68-69, and in Appendix F. The Applicants support the best management practices and mitigation measures described in the DEIS, including those listed in Appendix F. The various practices and measures are presented in a topical or categorical manner in the DEIS, and not as detailed, site- or condition-specific requirements. The Applicants will work with the NPS to determine how the various measures presented in the DEIS would be applied to the particular circumstances of the proposed project, if approved by the NPS. The C&R Standards comments detail the Applicants' specific plans for Project construction and maintenance. In addition, the applicants propose to compensate for the unavoidable adverse impacts of the Project by creating and endowing a substantial fund to support acquisition and stewardship of lands and other resources in the DEWA region. The compensation fund is discussed in the second part of these comments on mitigation.

Corr. ID: 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259338 **Organization Type:** Business

Representative Quote: The Applicants recognize that, even after full implementation of all possible measures to avoid and minimize impacts, the proposed Project will cause some adverse impacts on resources under NPS jurisdiction. Accordingly, the Applicants are proposing compensatory mitigation pursuant to a methodology and on a scale that recognize the great public value of the national parklands adjacent to the Applicants' transmission corridor. The intent of the proposed methodology is to more than offset every potential unavoidable impact of the proposed Project.

Our methodology is described in detail in Exhibit 9. It is based on approaches used by the NPS and other agencies in other NEPA analyses, including the NPS's assessment of communications tower impacts in Yellowstone. It also draws from the approach used to identify and mitigate for impacts associated with the proposed Project where it crosses the Highlands area in New Jersey. The approach takes into account all categories of potential resource impacts identified by the NPS in the DEIS, including impacts on protected species, cultural landscapes and viewsheds.

The Applicants are proposing to consider and provide compensatory mitigation for resource impacts occurring in an area of approximately 38,000 acres, an area 9.6 times larger than the total area of view shed impacts, and 120 times larger than the area of incremental impacts, as calculated by the Applicants.

We have identified lands potentially for sale, most already on the market in some fashion, that offer great potential to benefit the public. If acquired for the public's benefit, these parcels could preserve natural viewsheds from future development, enhance NPS- and USFWS-managed areas, tie together now-isolated parcels of state or federal conservation areas, provide wildlife corridors, expand public hunting and fishing, secure key protected species habitat, or allow for restoration of previously developed areas

Corr. ID: 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259339

Organization Type: Business

Representative Quote: The methodology would result in compensatory mitigation on the order of \$30-\$40 million. It is important to note that our approach is defined by impacts, and the natural values of mitigation lands, not by the cost of acquiring those lands. If the NPS determines, based on the outcome of the public comment process or other analysis, that the potential impacts of the Project are different than what we understand them to be, or that other lands are more suitable for mitigation than those we have identified, the amount of compensatory mitigation will change to reflect the NPS analysis. We welcome the opportunity to present this approach to the NPS.

The total commitment of money by the Applicants to the Fund will need to reflect the NPS's final analysis of impacts potentially to be caused by the proposed Project. The Applicants understand that the analysis of potential impacts is subject to change and is likely to be revised to incorporate public comments on the DEIS received by the NPS. The Applicants recognize that resources under the jurisdiction of the NPS and USFWS are of enormous value in both a monetary and non-monetary sense to the American public and that the "cost" of any impacts on those resources is correspondingly high. The Applicants are prepared to commit funds in an amount that will fully recognize and show respect for the public value of the resources potentially affected by the Project. The Applicants submit that the methodology proposed in these comments, if accepted and applied, will ensure that there can be no basis for any reasonable party to conclude that the benefit to the resources at issue is anything other than substantially greater than the impacts of the Project.

Response:

Mitigation lessens the intensity of an impact on park resources. Using compensation money to research alternative energy sources would not mitigate impacts to park resources. Helicopter use is considered and evaluated in the DEIS. The NPS is considering compensation for lost values and use; some options that may include land acquisition and protection.

Concern ID:

37328

**CONCERN
STATEMENT:**

Commenters stated there is a need to alter the mitigation to include provisions to protect natural resources, cultural resources, recreational resources, and open access.

Representative Quote(s): **Corr. ID:** 1746 **Organization:** Middle Smithfield Historical Interest Group

Comment ID: 257340 **Organization Type:** Unaffiliated Individual

Representative Quote: When we take a look at the mission of the National Park Service we see that while they strongly and obviously embrace the environmental component, they also embrace a historical element.

So now when I hear of a mitigation package being put through or suggested that is almost 100 percent completely focused on the environmental aspect only, I'm saying to myself, perhaps there has been an oversight here, perhaps the proposed mitigation should also include that which we also cherish, and that would be resources to attend to any historical considerations that may arise in the project.

Corr. ID: 1829 **Organization:** New Jersey Audubon

Comment ID: 257438 **Organization Type:** Non-Governmental

Representative Quote: NJ Audubon would also like to offer what we believe are important guiding principles for determining the route of a line if it is determined that one will be built and for minimizing subsequent impacts to wildlife and habitat. These include the following:

1. A location should be selected that minimizes disturbance to natural areas and critical wildlife habitat across the entire route. The lowest overall impact would result from following existing power line right-of-ways (ROWs), avoiding sensitive natural areas (e.g. wetlands, floodplains, threatened and endangered species habitat, important bird areas), and minimizing negative impacts to habitat connectivity across the entire route.
2. Proper measures should be taken to avoid and minimize impacts to wildlife and habitat during construction, operation, and maintenance of power lines and ROWs. As noted in the DEIS, there are a number of measures that can and should be taken to avoid and minimize impacts to sensitive wildlife and habitat (e.g. avoidance of the use of heavy equipment when maintaining ROWs that cross wetlands; adherence to seasonal restrictions on activities to avoid direct impacts to wildlife during sensitive times; adherence to best management practices to avoid bird collisions and electrocution associated with power lines and towers).
3. Mitigation must be viewed and implemented as an opportunity to enhance the status quo. Because all of the lands under consideration for a new or upgraded line should be those with preexisting ROWs, there is a unique opportunity to attend to some of the lasting effects of the original disturbance through implementation of a mitigation plan that directly addresses them. The utilities should develop a management and mitigation plan that directly addresses natural resource concerns and sets a goal to improve upon the status quo of those resources which are currently impacted by the existing line and will be impacted additionally as a result of an upgrade. In other words, the plan should be founded on a net gain standard with measurable and transparent benchmarks.

Corr. ID: 1965 **Organization:** Water Resources Association of the Delaware River Basin (WRA)

Comment ID: 257727 **Organization Type:** Non-Governmental

Representative Quote: The proposed 500 kV line does have the potential to affect water quality in associated biota in the east and Delaware River and it's tributaries.

In this regard, WRA encourages the applicant, PPL Electric Utilities and PSE&G to develop a comprehensive conservation and mitigation strategy for consideration by the National Park Service. Such a strategy should be developed in collaboration with Federal, state and local jurisdictions and with nonprofits, to have land conservation, fishing, hunting and recreational interest and expertise, the strategy to look within and outside of our boundaries to maximize effectiveness.

Corr. ID: 1992 **Organization:** Frankford Township Citizen

Comment ID: 257944 **Organization Type:** Unaffiliated Individual

Representative Quote: One of the ways to offset those impacts is to conduct management programs by land, and protect other pieces of land in the form of mitigation.

So I say that mitigation should include purchase of additional land, but it should also improve wildlife habitat on existing properties. It should provide better public access.

We should conduct educational programs with mitigation money on natural resource management and the effects of things like power usage.

I already talked about boat access -- the habitat management I'm talking about is related to managing old farm fields and creating more shrub scrub habitat for migratory birds and resident birds. So I think there is an opportunity here to do some mitigation, and do it right.

Corr. ID: 2106 **Organization:** The Nature Conservancy

Comment ID: 258161 **Organization Type:** Non-Governmental

Representative Quote: We agree with the Service's outline on pp. 68-69 of an innovative approach to making mitigation an effective tool for conservation. We feel a comprehensive approach towards mitigating impacts within a broad, ecosystem context is needed to maximize the ability of the mitigation protocol to advance the conservation of natural systems. This approach suggests identifying ecological systems, such as large forests, wetland complexes, and watersheds, that not only are similar in type to those that have been impacted by the proposed activities, but due to their scale and condition, cost less to manage while being more likely to ensure ecosystem functions, foster biodiversity, and provide opportunities for linking to existing preserved habitats such as those in the Delaware Water Gap National Recreation Area and along the Appalachian Trail.

Federal agencies are also moving toward more comprehensive mitigation approaches. Such an approach is reflected in the Compensatory Mitigation Rule promulgated by the US Army Corp of Engineers and the U.S. EPA requiring use of a "watershed approach" to mitigating impacts governed by Section 404 of the Clean Water Act.

A comprehensive approach towards mitigation will support the conservation of ecological systems and not just satisfy regulatory requirements through piecemeal actions. This approach should take into account regional, state and Federal conservation plans such as the State Wildlife Action Plans and the Cherry Valley National Wildlife Refuge Feasibility Study.

Response:

NPS included many mitigation measures in appendix F of the DEIS. We will add any applicable mitigation measure to appendix F in the FEIS based on public

comments.

Concern ID: 37783

CONCERN STATEMENT: Commenters suggested several specific measures to protect threatened and endangered species as well as wildlife during construction and operation of the proposed transmission line. Measures included seasonal restrictions, biological surveys for certain species, and habitat restoration measures, among other suggestions.

Representative Quote(s): **Corr. ID:** 2401 **Organization:** USFWS New Jersey Field Office

Comment ID: 259474 **Organization Type:** Federal Government

Representative Quote: In addition to following the APLIC standards, we offer the following recommendations to avoid and minimize impacts to migratory birds within and around the project area.

1. Work with FWS to revise and finalize the draft Avian Protection Plan (APP) previously developed by PSE&G to minimize the risk of electrocution, collision, disturbance and habitat impacts for migratory birds. The APP should apply minimum standards along the length of the line, with enhanced protections in sensitive areas.
2. Report bird mortalities and injuries resulting from electrocutions or collisions on the Service's online Bird Fatality/Injury Reporting Program (6) (Bird Report program). The Bird Report program was designed, with significant industry input and feedback, to provide a user-friendly, easily-accessed, method of allowing members of the electric utility industry to voluntarily report bird mortalities and injuries resulting from electrocutions or collisions with electrical utility equipment. Collecting information about the locations and circumstances under which birds are killed or injured on power equipment serves the primary purpose of determining how to prevent future bird interactions. The database is intended for use by utilities to see which structures and equipment are hazardous to birds, and under what conditions, and assists in evaluating and enhancing the effectiveness of retrofitting.
3. Minimize land and vegetation disturbance and reduce habitat fragmentation during project design and construction, especially if habitat cannot be fully restored after construction. Where practicable, concentrate construction activities, infrastructure, and man-made structures (e.g., poles, roads) on lands already altered or cultivated, and away from areas of intact and healthy native habitats. Co-locate roads, staging areas, and other infrastructure in or immediately adjacent to already-disturbed areas (e.g., existing rights-of-way, agricultural fields). If co-location is not feasible, select fragmented or degraded habitats rather than relatively intact areas.

Corr. ID: 2401 **Organization:** USFWS New Jersey Field Office

Comment ID: 259475 **Organization Type:** Federal Government

Representative Quote: In addition to following the APLIC standards, we offer the following recommendations to avoid and minimize impacts to migratory birds within and around the project area.

4. Where disturbance is necessary, clear natural or semi-natural habitats (e.g., forests, woodlots, reverting fields, shrubby areas) between September 1 and March 14, which is outside the nesting season for most native bird species. Without undertaking specific analysis of breeding species and their respective nesting seasons on the project site, implementation of this seasonal restriction will avoid take of most breeding birds, their nests, and their young (i.e., eggs, hatchlings,

fledglings).

5. Avoid permanent habitat alterations in areas where birds are highly concentrated or where sizable prey bases exist. Avoid establishing sizable structures along known bird migration pathways or known daily movement flyways (e.g., between roosting and feeding areas). Examples of high concentration areas for birds are wetlands, State or Federal refuges, Audubon Important Bird Areas, private duck clubs, rookeries, roosts, and riparian areas.

6. Develop a habitat restoration plan for the proposed site that avoids or minimizes negative impacts on vulnerable wildlife. Use only plant species that are native to the local area for revegetation of the project area.

7. Work with FWS to include protective measures for migratory birds into the Vegetation Management Program for each State.

Response:

NPS included many mitigation measures in appendix F of the DEIS, including time of year restrictions, further surveys, and an NPS-approved vegetation maintenance plan that would enhance habitat in the parks. We will add any applicable mitigation measure to appendix G in the FEIS based on public comments.

PI1100 - Public Involvement Process

Concern ID: 37771

CONCERN STATEMENT:

Commenters expressed dissatisfaction with the EIS's public comment process for a variety of reasons, including a limited number of meeting locations and times, difficulty with ease of use of the public comment website and requested more time to review the EIS.

Representative Quote(s):

Corr. ID: 1485

Organization: *Not Specified*

Comment ID: 256144

Organization Type: Unaffiliated Individual

Representative Quote: Final note these public meetings are during hours that many individual citizens cannot attend do to working hours, distances so forth.

Corr. ID: 1843

Organization: Legalectric

Comment ID: 257011

Organization Type: Unaffiliated Individual

Representative Quote: p.s. it's hard to get to this comment page from the S-R project page. I couldn't find a link, and looked and looked, and finally found a direct link on the Stop the Lines page.

Corr. ID: 1859

Organization: Friends of the Earth

Comment ID: 258665

Organization Type: Unaffiliated Individual

Representative Quote: The Park Service has scheduled public hearings on this draft EIS only in the immediate locale of the Delaware Water Gap NRA, despite the fact that huge numbers of users of this area reside in the Philadelphia and New York City metropolitan areas. Clearly, there should be an opportunity for the users in these major urban areas to present their views.

Corr. ID: 2274

Organization: *Not Specified*

Comment ID: 258397 **Organization Type:** Unaffiliated Individual

Representative Quote: Please give us at least a three month extension for review and comment. Don't forget, we need to also read, comprehend on the hundred or so folks that took the time and patience to go to these meetings, prepare for them and give their reports.

Response:

NPS followed the National Park Service Director's Order 12, which identifies standard NPS public involvement procedures. The public involvement process provided several ways to provide comments through public meetings, the National Park Service Planning, Environment and Public Comment website site, and mailings. We scheduled public meetings near the largest populations of people who may be most affected by the project and the most affected areas of the parks. Please see the Consultation and Coordination section of chapter 5 on pages 717-720 for a description of the public involvement process and the various methods we used to involve interested and affected public in the environmental analysis process.

PN2000 - Purpose And Need: Park Purpose And Significance

Concern ID: 37290

CONCERN STATEMENT:

Commenters expressed their beliefs that the purpose of national parks are to protect resources and the construction of transmission lines through the parks would oppose this objective.

Representative Quote(s): **Corr. ID:** 1260 **Organization:** *Not Specified*

Comment ID: 255593 **Organization Type:** Unaffiliated Individual

Representative Quote: I am very much opposed to the proposed Susquehanna to Roseland 500-kV project. As a frequent user of the National Park Area of the Del Water Gap, it would be criminal in my opinion to make such an egregious violation of the purpose of the national park.

Corr. ID: 1599 **Organization:** *Not Specified*

Comment ID: 256381 **Organization Type:** Unaffiliated Individual

Representative Quote: I can not help but think how easy the decision is NOT to alter the untouched state of our National Parks.

The purpose of having a National Park Service is to PROTECT these areas in as much of their natural and original state--ecosystems, indigenous species, plants and trees, waterways and wetlands--as possible so that even though the population continues to grow and grow, there is a place to go for solace, reflection, open air, environmental education, to get away from the rigors of everyday life.

Response:

The NPS understands the concern with the impact on park purposes. NPS Management Policies 2006, Section 1.4.3 states, "NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values." This means that NPS managers must take reasonable, affirmative steps toward avoiding or minimizing adverse impacts, but it does not constrain the NPS's discretion to allow impacts when necessary. Analysis of the impact of the proposal on the NPS' ability to protect park resources will be the subject of the impairment analysis mandated by NPS policy to be released with the ROD.

Concern ID: 37387

CONCERN STATEMENT: A commenter believes that the EIS should describe the legislation responsible for creating DEWA. The commenter states that the law provides guidance for management of the park.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259343 **Organization Type:** Business

Representative Quote: The Applicants believe that the public's understanding of the decision currently before the NPS would be particularly enhanced if the DEIS were amended to describe more fully the circumstances surrounding authorization of DEWA. The Applicants recognize that public values and NPS priorities have evolved since DEWA was authorized by Congress as a NPS administered recreation area in 1965. But the law that authorized DEWA is unchanged. The relationship between the NPS and the Applicants, as owners and managers of adjacent property interests, is largely a product of the law that created DEWA. That legacy is directly relevant to today's decision.

The general philosophy guiding park and other public land management decisions has evolved with the times. But the law that established the recreation area still sets the rules for NPS management. The law is a product of decisions made by Congress in 1965. Congress gave the NPS responsibility for management of a landscape that was characterized by the Interior Department as having "natural endowments that are well above the ordinary in quality and recreation appeal, being of lesser significance than the unique scenic and historic elements of the National Park System, but affording a quality of recreation experience which transcends that normally associated with areas provided by State and local governments.⁴⁸ Congress was assured that management of the area would be appropriate for the area: "The National Parks themselves, the true national parks, are administered according to a very high set of standards. We have a different set of standards for National Seashores and National Recreation Areas." ⁴⁹

Response: DEWA was designated a national recreation area in 1965. While this law still provides guidance on management of the park, under the Redwood Act of 1978, all units of the national park system are of equal importance, no matter the designation. The applicant holds an easement through this land. We have conducted deed research, defining the applicant's property rights, information about which will be included in chapter 1 of the FEIS.

PN3000 - Purpose And Need: Scope Of The Analysis

Concern ID: 37296

CONCERN STATEMENT: Commenters are concerned that the cumulative impacts of the S-R Line project have not been adequately analyzed for areas outside the parks, including water resources in the New Jersey Highlands.

Representative Quote(s): **Corr. ID:** 1887 **Organization:** New Jersey Highlands Coalition

Comment ID: 257681 **Organization Type:** Non-Governmental

Representative Quote: Although the physiographic and legislative boundaries of the NJ Highlands are outside of the three National Park Service (NPS) components

that the Susquehanna to Roseland Transmission Line Project (S-R Project) would impact, they are hydrologically connected through overlapping basins within the Upper and Middle Delaware Watersheds. The alternative routes proposed in the NPS draft Environmental Impact Statement (DEIS) each more or less widen these overlaps. However, the incremental impacts of the S-R Project, when considered in combination with other linear utility projects that are currently underway or proposed, and with those that can be reasonably foreseen (and with even more certainty if the S-R Project is approved), impair the ecological functions of the Highlands watersheds to the extent that a 500 billion gallon/year water supply is permanently jeopardized.

The S-R Project is one of several linear utility projects under federal jurisdiction, whose cumulative effects upon a hugely valuable resource—the New Jersey Highlands—are significant and potentially devastating. There are three recently constructed or proposed natural gas pipeline projects: The completed Tennessee Gas Pipeline (TGP) 300-Line Project (FERC docket CP09-444); the proposed TGP Northeast Upgrade Project (FERC docket CP11-161) and Transco's proposed Northeast Supply Link Project (FERC docket CP12-30-000). All three pipeline projects are specifically for the purpose of transporting natural gas drilled from the Marcellus Shale formation in Pennsylvania to eastern distribution hubs. All four utility projects, which include the S-R Project, are routed through the core forests of the Highlands. Each project, viewed alone, has measurable impacts that impair the ecological functions of the Highlands forested watersheds, ultimately impacting the water supply to major population areas in New Jersey. The cumulative effect on this water supply, which is potentially huge, has not been assessed. In addition, if the drilling interests succeed in overcoming the regulatory constraints that reflect today's caution about hydro-fracturing of Marcellus Shale-derived gas and gas can be extracted at full potential, a need for additional pipeline routes through the Highlands is foreseeable. Recent comments at gas industry forums and trade publications discuss the need for pipeline infrastructure to transport gas derived from the Marcellus Shale region.(4)

Corr. ID: 1994 **Organization:** New Jersey Highlands Coalition

Comment ID: 258722 **Organization Type:** Unaffiliated Individual

Representative Quote: I request that you reconsider how the EIS assesses cumulative impacts of the Susquehanna to Roseland Transmission Project. NEPA policy requires that an EIS assess, "the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions, regardless of what agency undertakes such other actions."

According to NEPA, the range of actions that must be assessed must include not only the project proposal, but all connected and similar actions that could contribute to cumulative effects on a specific resource.

Response:

The scope of the cumulative impacts is done appropriately, and varies between the resources. The scope of cumulative analysis can be found under each resource. For a general methodology of the cumulative impacts analysis, please see page 342 of the DEIS. The New Jersey Highlands is outside our scope of analysis. NPS analyzed water resources and dismissed it as an impact topic on page 23 of the DEIS.

Concern ID:

37325

**CONCERN
STATEMENT:**

Commenters would like to see several topics analyzed in the EIS that were not present in the draft version, namely energy policies and impacts from coal burning

plants.

Representative Quote(s): **Corr. ID:** 1762 **Organization:** *Not Specified*

Comment ID: 258608 **Organization Type:** Unaffiliated Individual

Representative Quote: The last thing I would like to add with respect to scope and environmental review, I think it narrowly construed the energy policy impacts as an energy project, an energy infrastructure project, and as such the energy policies need to be evaluated and I agree with both the Pennsylvania Sierra Club and New Jersey Sierra Club and others who have criticized the energy justification for this project with respect to need in the region.

Corr. ID: 1936 **Organization:** Longwood Lake Cabin Owners Association

Comment ID: 258698 **Organization Type:** Non-Governmental

Representative Quote: We believe that the Draft EIS inappropriately confines its scope of analysis to the direct impacts of the proposed transmission lines project itself, instead of analyzing this project in its full context. The justification for this project is to bring additional energy from Pennsylvania into eastern New Jersey and beyond. Energy production in Pennsylvania is overwhelmingly fueled by coal. Even "clean" coal combustion is far dirtier than any other fossil fuel combustion. The effects of coal combustion travel far from its source. A report issued recently by the Biodiversity Research Institute, "Hidden Risk, Mercury in Terrestrial Ecosystems of the Northeast," focuses on just one of the threats to our area from coal, mercury. Prevailing winds bring coal pollution directly into the NPS property at issue here, and into our property as well. The environmental impact of the proposed project cannot be accurately assessed without including the impact of increased coal combustion in areas directly west of the subject NPS property. We urge NPS to withdraw the Draft EIS, and reissue it after taking account of the increased coal combustion that this project would cause.

Corr. ID: 2019 **Organization:** Association of New Jersey Environmental Commissions

Comment ID: 258743 **Organization Type:** Unaffiliated Individual

Representative Quote: I can understand exactly what you did in keeping your analysis to the land area under federal jurisdiction, but we certainly believe that the nature of this particular impact is such that you need to look at greenhouse gas emissions. You need to look at the whole impact of the line rather than just the impact in the Park.

Response: NPS did not violate NEPA by dismissing resources topics. CEQ's regulations implementing NEPA (40 CFR 1502.15) direct federal agencies to "succinctly describe the environment of the area(s) to be affected". The regulations further state that agencies "shall avoid useless bulk in statements and shall concentrate effort and attention on important issues". The basis for dismissal remains the same (see pages 21-25). We dismissed these resources topics because the impacts were no greater than minimal and comparatively similar for all action alternatives and would not drive the assessment of the alternatives.

Concern ID: 37353

CONCERN STATEMENT: Commenters believe that the analysis of the resources should not end at the boundaries of the park, but should extend to include connecting lands and other parks, protected areas, and open spaces, including cultural sites, Lackawanna Heritage Valley, Moosic Mountain Pine Barrens, Steamtown National Historic Site,

and Lehigh Valley.

Representative Quote(s): **Corr. ID:** 2391 **Organization:** Sierra Club, Northeastern Group, Pennsylvania Chapter

Comment ID: 259030 **Organization Type:** Non-Governmental

Representative Quote: As you know, Steamtown is a bona fide national park. Steamtown and the Delaware Water Gap National Recreational Area (DWGNRA) have equal status within the national park system. The selection of Alternatives 2 or 2b, and possibly other alternatives, would result in adverse effects to the Viewsheds of both the Steamtown and the DWGNRA national parks and have significant negative effects on visitor and resident experience. An evaluation of these adverse effects, whether direct, indirect or cumulative effects, is necessary to satisfy requirements under NEPA. Under the Alternative 2 and 2b schemes, and possibly other alternatives, in this area and in other areas, the Project is a connected action, an action that would literally be connected by actual, physical lines. NEPA does not support the notion that NPS needs to evaluate effects only in what otherwise is its own area of specific responsibility or only in areas where NPS permits are required. In this instance and in other instances, NPS has a responsibility to evaluate effects and to compare them with and choose from among other alternatives.

Under NEPA, NPS cannot credibly dispute that the Project is a connected action vis-à-vis Alternatives 2 and 2b, and possibly other alternatives, neither can it credibly dispute that Steamtown and LHVA share significant and vast areas in the larger viewshed within Lackawanna County. In fact, the October 14, 2010 -- NPS Reply to the September 14, 2010 comment letter from Natalie Gelb Solfanelli, Executive Director, Lackawanna Heritage Valley Authority from NPS Superintendents Donahue and Underhill clearly indicates NPS understanding that indeed the LHVA region appears to be within the Scope of the Project, and it is evident given the workload NPS assigned to LHVA

In contrast however, as explained above, although the Federal action in this instance may be dependent on permits in certain park units, it is yet a connected action under NEPA, and NPS is required to study the LHVA area, much as it began to do when it wrote its October 14, 2010 letter to LHVA requesting detailed information.

Corr. ID: 2391 **Organization:** Sierra Club, Northeastern Group, Pennsylvania Chapter

Comment ID: 259152 **Organization Type:** Non-Governmental

Representative Quote: Based on strong community interest and support, and including \$500,000 of funding from the U.S. Department of Transportation, the Nature Conservancy purchased 2,250 acres in the Moosic Mountain Barrens as part of plan that already includes over 5,000 acres of protected land. The Nature Conservancy has plans to expand its holdings. Moreover, the Moosic Mountain Barrens is home to three rare plant communities and a Heath Barrens plant community that is described as the largest in North America and the only one in Pennsylvania. It is home to over twelve animal species categorized by the state as S1 or S2, categorized as most rare. Primarily, these include Lepidoptera species (moths and butterflies). The ecosystem also includes many other special flora and fauna.

Recent estimates place the Barrens as greater than 10,000 acres in size and naturally arranged as a complex, unified ecosystem. Fragmentation is the greatest threat to the Barrens. It is estimated that as many as five acres may be lost for each acre that

is developed due to invasive species and other factors. Estimates based on mapping and language from the Project plan on the PP&L website indicate this is the only PP&L quadrant where it would need to buy significant new right of way. Several miles of Barrens property would be needed in the lower reaches of Moosic Mountain where as many as fifty acres of Barrens may be directly impacted and as many as 250 acres impacted adversely due to fragmentation. That would be in addition to the widening of the Project along the existing power line pathway as it crosses a central area of the Barrens where a widened pathway would further weaken one of the most fragile places in the Barrens that has been weakened by previous fragmentation. It is believed by most familiar and knowledgeable with Barrens ecology that the Project would effectively divide the currently unified Barrens into two separate ecosystems.

Corr. ID: 2391 **Organization:** Sierra Club, Northeastern Group, Pennsylvania Chapter

Comment ID: 259032 **Organization Type:** Non-Governmental

Representative Quote: In the same December 2, 2010 NPS Reply letter to Elena Saxonhouse, NPS characterizes LHVA as a municipal authority without explanation, seeming to suggest this was part of the reason for eliminating a detailed evaluation the LHVA region. Under NEPA, federal, non-federal government and private entities are subject to NEPA review when connected actions impact their areas. In this instance, LHVA is neither an applicant for the Project, nor as a municipal authority is it subject to the Clean Water Act which devolves NEPA obligations to the States as in the case of municipal authorities such as local wastewater treatment plants. Rather, the LHVA region contains natural and recreational resource areas wherein the Secretary of the Interior has specific responsibilities for giving priority to actions that conserve the historical and natural resource values of its region. By including the LHVA region as part of the NPS EIS detailed evaluation of the Project the Secretary would qualify as meeting his obligation to give priority to actions that would to the extent available under NEPA conserve the natural resource values of the LHVA region. The Moosic Mountain Barrens (Barrens). The LHVH MAP was based in part on the Lackawanna and Luzerne Counties Open Space, Greenways & Outdoor Recreation Master Plan (Open Space Plan). NE Sierra Club incorporates by reference the Open Space Plan, available at www.lackawannacounty.org, and the LHVA MAP available at www.lhva.org.

The Bi-County Open Space Plan identified the Moosic Mountain Barrens as: "a top priority NAI [Natural Areas Inventory] area representing one of the most unique areas in the state...with protection efforts underway." The Moosic Mountain Barrens and the surrounding Moosic Mountain Highlands are listed as "short term priorities" with "Preferred Management Entities" including: "Public/Private Partnership; NPS; USF&W; U.S. Dept of the Interior; PA Game Commission; DCNR; PennDot; LHVA; and the County of Lackawanna."

Response: NPS recognizes that there would be direct effects to parcels outside the park; however, analyzing impacts outside of the parks is not in the scope of this EIS.

Concern ID: 37388

CONCERN STATEMENT: A commenter believes the reasoning used to develop the scope of analysis for each resource should be made clear.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259344 **Organization Type:** Business

Representative Quote: Objectives (pp ii-iv): This section should be revised to disclose the geographic scope of consideration given to each objective, the reason for that choice of scope, and the relevance of the evaluation to the choice facing the decision-maker. It should be made clear whether the consideration of objectives is intended to mimic the geographic scope of the siting evaluations performed by the utility regulatory authorities in Pennsylvania and New Jersey, or if the scope is tied to resources and places under the NPS's jurisdiction.

Response:

Our objectives in taking action are described for each resource in chapter 1 of the DEIS on pages 14-16. The geographic study area for each resource is defined in chapter 4.

PN4000 - Purpose And Need: Park Legislation/Authority

Concern ID: 37338

CONCERN STATEMENT:

A commenter is concerned that the NPS did not follow DO-12 guidance in its decision to not include a preferred alternative in the DEIS.

Representative Quote(s): **Corr. ID:** 1737 **Organization:** PEER

Comment ID: 257330 **Organization Type:** Non-Governmental

Representative Quote: THE DEIS CLAIMS THAT THE NPS HAS NO PREFERRED ALTERNATIVE

The DEIS contains no alternative that the NPS designates as the agency preferred alternative. This violates NPS own Reference Manual-12 (RM-12).

You may identify the preferred alternative in an explanatory cover letter to the draft EIS or in the text of the EIS. All final EISs must identify the preferred alternative. Therefore, if no preferred alternative exists at the time the draft EIS is released, you must identify it in the final EIS. For all externally initiated (i.e., non-NPS) proposals, you must identify the NPS preferred alternative in the draft (and final) EIS (516 DM, 4.10 (2))." Emphasis added.

PPL and PSE&G initiated the proposal to issue a right-of-way for a new power line. It is indisputably an "externally initiated proposal." The DEIS completely ignores the last sentence of page 51, RM-12 and fails to identify the NPS preferred alternative. Further, the DEIS gives no explanation why the NPS chose to ignore its own guidance.

Response:

The NPS implements NEPA through the Department of the Interior (DOI) NEPA regulations (43 CFR Part 46, 2008) and NPS Director's Order #12 and accompanying DO-12 Handbook (2001). The requirement to identify a NPS preferred alternative in a DEIS for externally-initiated proposals cites back to a requirement from the DOI's Departmental Manual (DM) that formerly contained DOI guidance for implementing NEPA. In 2008, all NEPA guidance from the DM was converted to NEPA regulations at 43 CFR Part 46, superseding the previous NEPA guidance contained in the DM. The requirement to identify a bureau-preferred alternative in a DEIS was not carried forward into the 2008 NEPA regulations; therefore, the requirement no longer exists. The DO-12 Handbook predates the Department's conversion of DM guidance to NEPA regulations and has not yet been updated to reflect this change. The fact that the outdated requirement

still appears in the 2001 DO-12 Handbook does not create an independent requirement because the Handbook is third-tier guidance and does not create NPS NEPA policy or requirements that cannot be cited to a higher underlying law or policy, such as a NPS Management Policies 2006, a NPS Director's Order, or the DOI NEPA regulations.

Concern ID: 37389

**CONCERN
STATEMENT:**

A commenter indicated that the current powerline and ROW pre-date the park, and rights given from this easement allow for construction within the ROW, and for access rights. The commenter disagrees with the terminology "controversial assumption" used in the EIS in regard to the practice of removing danger trees.

Representative Quote(s): **Corr. ID:** 2396

Organization: McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259323

Organization Type: Business

Representative Quote: The Applicants (or their predecessors in interest) acquired the various easements for the S-R Line in the late 1920's and constructed the S-R Line shortly thereafter. The language in these easements is very broad and gives the Applicants the right to construct or install transmission lines and include access rights for the purpose of exercising the rights to construct transmission lines.

The Applicants' pre-existing rights related to the corridor are substantial legal rights, and include the right to replace the towers, foundations and conductors, clear vegetation threatening the lines or towers or roads, and otherwise take reasonable actions needed to keep the line in service (including the right to build, use and maintain access roads) and in compliance with all legal and regulatory requirements that apply to electric transmission service. The typical language in each of these ROWs is: "The right to construct, operate, and maintain, and from time to time, to reconstruct its electric lines, including such poles, towers, wires, fixtures and apparatus, as may be from time to time necessary for the convenient transaction of the [Companies]."

The DEIS states that Alternative 2b is based upon the "controversial assumption" that the Applicants have the right to clear danger trees outside of the deeded ROW (p. vi 55). The area of concern to the NPS is the 100 foot ROW held by PPL. The DEIS should be revised to eliminate the assertion that danger tree removal is controversial as PPL has the right to remove danger trees consistent with the Stipulation and Order of Settlement referenced in I.J. See also Greg Smith letter to NPS dated December 7,2010 and located in Appendix D to the DEIS.

Response:

While NPS agrees that removal of danger trees is typically a part of vegetation maintenance for utility ROWs, it is not an open-door policy that would allow the applicant to widen the ROW. A portion of the existing ROW in Pennsylvania is 100-feet wide. We consulted with transmission line engineers for this project who determined that the minimum horizontal clearance to the edge of the ROW under high wind conditions to prevent conductor blowout was determined to be greater than 100 feet. NPS does not agree that the applicant has unlimited rights to remove danger trees outside the ROW.

PN8000 - Purpose And Need: Objectives In Taking Action

Concern ID: 37298

**CONCERN
STATEMENT:**

A commenter requested that the EIS reexamine the need for the transmission line given factors such as a decreased need for power and diminishing reliability concerns, given that other transmission line projects have been halted for these same reasons.

Representative Quote(s): **Corr. ID:** 2394 **Organization:** Earthjustice
Comment ID: 259044 **Organization Type:** Non-Governmental

Representative Quote: As NEPA requires, the Park Service has given detailed consideration to the impacts on the Parks of maintaining the status quo or the "no action" alternative. However, the DEIS provides no meaningful analysis to inform the ultimate question whether selection of the environmentally preferred no-action alternative is a viable proposition.

PJM has acknowledged that any reliability issues will be adequately addressed without the line until at least 2015.

Now, the Park Service should request that PJM address the question whether there is still a need for the line after 2015 in light of: (1) declining electricity demand; (2) diminishing reliability concerns; (3) increasing availability of demand response resources; (4) completed transmission upgrades; and (5) development of new generation that is currently in the transmission queue.

In short, the lower projections in the 2011 Load Forecast Report have led PJM to suspend construction of several west-to-east transmission projects that have been part of the RTEP process since 2007. This downward trend in load demand, which has helped to eliminate the need for the PATH and MAPP projects, has only become more pronounced since 2011.

The current forecast for 2012 peak demand is below the 2007 forecast for 2007. In 2007, there was no concern that a major new transmission line was needed to deliver electricity reliably to New Jersey. Moreover, the decrease in the forecast between 2010 and 2012 is likely greater than the incremental increase in transfer capability that the line would provide making previous analysis regarding the need for the line irrelevant.

Before taking any action that would adversely impact the Parks, the Park Service should request that PJM update its analysis using a 2015 base case that reflects current demand projections.

Increased availability of demand response resources is another key factor that should help to eliminate any need for the S-R Line (by further reducing the need to deliver electricity to load centers).

Since the S-R Line was first planned, many transmission projects have been completed and new generation facilities have been planned or built. These changes underscore the need for new analysis of need using a new base case that reflects the grid as it is now and how it is expected to be in 2015 when the S-R Line is purportedly needed.

Response:

NPS's purpose and need differs from the applicant's purpose and need. As stated in chapter 1 of the DEIS, the applicant's stated need is to upgrade the existing B-K Line. This federal action (the EIS) is needed because the applicant submitted an application to expand the size of the current ROW, to access the ROW through existing natural and cultural areas, to construct new and taller support towers, and to remove and replace the existing 230-kV B-K Line with an additional double 500-

kV power line in accordance with applicable regulations. Our purpose is to respond to this proposal in light of the purposes and resources of the affected units of the national park system, as expressed in statutes, regulations, and policies. We have tried to contact PJM Interconnection to verify the stated need for the project, but we have not gotten a response.

Concern ID: 37390

CONCERN STATEMENT: The objectives in taking action for the proposed line must include feasible alternatives. Alternatives 3, 4, and 5 are not feasible options to meet a reasonable timeframe for the need of the project.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259321 **Organization Type:** Business

Representative Quote: The NPS Director's Order #12 requires that alternatives considered in a NEPA review must be technologically feasible and make common sense. Alternatives 3, 4 and 5 pass the first part of the test in the very literal sense that towers could be built and wires could be strung, but do not pass the critical second part of the test involving common sense. The additional timeframe necessary to receive the amended approvals, design the line, conduct required environmental studies and secure the appropriate ROWs, permits and approvals for Alternatives 3,4 or 5 would double or triple the timeframe by which the Project could be reasonably expected to be completed. This result would leave the region increasingly vulnerable to electrical reliability risks which could lead to higher prices for the consumer, operational restrictions and possible implementation of curtailment plans and such a result would fail to serve the basic Project purpose and need.

Need for Action (p. i): This section should be amended to disclose the deadlines set by PJM for action by the Applicants to improve transmission capacity in the area and the financial burden currently borne by New Jersey electricity customers because of the lack of transmission capacity in the area. The second paragraph of this section should be amended to disclose with more precision the amount of acreage (4.6 acres) requested by the Applicants for additional right-of-way.

Response: NPS's purpose and need differs from the applicant's purpose and need. The alternatives presented are reasonable from the perspective of the NPS. PJM Interconnection and the applicant have stated that the alternatives are feasible. The timeframe of the project is tied into the grid process and does not account for the NEPA process. Industry standards for reaching a ROD are 3 to 5 years, with many extending well beyond this time period.

Concern ID: 37391

CONCERN STATEMENT: Commenters believe information in the EIS regarding the amount of widening needed for alternative 2 is misleading and that the disagreement on this issue between the NPS and the applicant should be disclosed. The commenters also noted that the need for the project and background of the project should be amended to reflect the deadlines proposed for action by PJM.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259345 **Organization Type:** Business

Representative Quote: Susquehanna to Roseland Transmission Line Location and Background (pp. 4-5): This section references the Applicants' request for additional

right-of-way. The discussion should be revised to disclose the dimensions of the existing transmission corridor where it crosses NPS lands and the amount of additional right-of-way requested by the Applicants. The text could leave the reader with the impression that the Applicants' are seeking to widen the entire corridor through NPS lands, while in fact Alternative 2 seeks only an approximate 4% increase in the ROW crossing the NPS Units and Alternative 2b seeks no additional right-of-way. The Applicants are seeking additional ROW equal to less than .007% of the area of DEWA.

This section offers a description of the physical features of the existing and proposed line. As presented, the description is incomplete. The text of this section should be amended to disclose the ownership and other beneficial interests held by the Applicants in the existing ROW where it crosses NPS lands. The companies and the NPS are neighboring property owners; each with rights to manage their own ownership interests, subject to certain reciprocal rights against interference or harm.

The decision-maker and reader would benefit in their understanding of the relationship of the current corridor and line to the NPS if the DEIS were amended to disclose that a dispute between PPL and the NPS over the rights of the company to maintain the ROW was resolved when the United States agreed that the company's property interests in the ROW were such that the NPS would "not require [PPL], pursuant to its existing easement rights, to apply for and obtain a special use or other form of permit or approval or authorization from the [NPS] as a condition to accessing its easements located in [DEWA] for conducting vegetation management work "

The final two sentences of the second paragraph of this section are inaccurate and misleading and should be revised. There is no formal or informal regulatory status applicable to the current or proposed line that is anything like what is suggested by the text in this paragraph. The existing line crossing NPS lands is "critical" to the grid, and the existing corridor is critical to the line. The proposed S-R Line would be "critical" to the grid, too. The new line would not transform the "critical" nature of the corridor or the line.

Response:

Our purpose and need differs from the applicant's purpose and need. The description of alternative 2 will change in the FEIS due to some modifications that have been suggested by the applicant during the comment period. The access road that cuts through Arnett Fen will be replaced with the access road presented for alternative 2b, which travels south of the fen, thus reducing impacts. Deadlines have changed during this project. PJM's 2007 RTEP report identified June 1, 2012 as the required in-service date; however, PJM's RTEP in Review (2011) states an in-service date of June 1, 2015 due to regulatory delays.

PO4000 - Park Operations: Impact Of Proposal And Alternatives

Concern ID: 37310

CONCERN STATEMENT:

Commenters believe the proposed transmission line would add additional work to park employees, who are overextended with current work.

Representative Quote(s):

Corr. ID: 1355

Organization: *Not Specified*

Comment ID: 255865

Organization Type: Unaffiliated Individual

Representative Quote: There is an additional consideration I do not remember seeing completely addressed in the DEIS. The park budget has been insufficient for the last few years to properly maintain the roads, historic buildings, streams and woodlands. Adding additional obligations for park employees to insure there is minimal damage from new construction and that proper mitigation is achieved will divert them from performing their current work.

Corr. ID: 1578 **Organization:** Appalachian Mountain Club

Comment ID: 257384 **Organization Type:** Non-Governmental

Representative Quote: The project would likely affect law enforcement and resource management by creating additional tasks for monitoring construction-related activities, diverting time and resources from other park responsibilities

Response: NPS understands that there will be impacts to park employees from the implementation of the proposed project. These impacts are discussed in the DEIS on pages 649-656.

Concern ID: 37392

CONCERN STATEMENT: One commenter indicated that if NPS denies the proposed permit for the construction of the proposed transmission line along the already existing powerline along alternative 2, it would constitute a taking, as the applicants own the line, which may raise concerns for park budget.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259324 **Organization Type:** Business

Representative Quote: Additionally, a portion of the existing transmission line is located on land within DEWA owned in fee simple by PPL. The existence of fee title ownership of a portion of the existing line is further evidence of the strong property rights owned by the Applicants. If the NPS chooses any Alternative other than 2 or 2b then it would likely constitute a taking and the NPS should consider the costs associated with such a taking as it analyzes the operational impacts of Alternatives 3, 4 and 5 not allowing the use of Alternative 2 or 2b.

Response: Alternatives 3, 4, and 5 are based on the applicant voluntarily surrendering their existing easement to the NPS and in return, the NPS would grant a new easement in the new location. Under these conditions, there would be no taking and no associated operational costs.

RU4000 - Rare and Unique Communities: Impact of Proposal and Alternatives

Concern ID: 37785

CONCERN STATEMENT: There will be impacts from blasting to the hydrology of two rare and unique communities, the Arnott Fen and Hogback Ridge. These impacts should be further discussed in the EIS.

Representative Quote(s): **Corr. ID:** 2397 **Organization:** USEPA - Region 2

Comment ID: 259445 **Organization Type:** Federal Government

Representative Quote: EPA also notes that Arnott Fen, within the ROW for Alternatives 2 and 2b, is considered a rare and unique wetland community, due in part to the underlying limestone bedrock. The hydrology of the Arnott Fen influences the array of species living in this rare community and includes numerous special-status wetland plant species that are not found anywhere else in the study area. In addition, Hogback Ridge also contains woodlands and a wetland considered a rare and unique community as it supports endangered species habitat and wetland plant species that are not found anywhere else in the study area, and is based on limestone bedrock. As stated above, any blasting may impact the hydrology and reduce the values of these exceptional wetlands, and should be discussed fully in the Final EIS.

Response:

For the installation of the tower foundations, NPS has decided to limit the applicant to drilling. We will remove all references to blasting and the impacts that would occur from blasting from the FEIS. We would require any alternative design options, structure types, and construction methods proposed by the applicant to meet all restrictions detailed in the EIS. These restrictions are put in place to avoid and minimize impacts to park resources.

RU5000 - Rare and Unique Communities: Cumulative Impacts

Concern ID: 37312

CONCERN STATEMENT: One commenter expressed concern about permanent and irreversible damage to rare and unique communities.

Representative Quote(s): **Corr. ID:** 1696 **Organization:** New Jersey Highlands Coalition
Comment ID: 257241 **Organization Type:** Unaffiliated Individual

Representative Quote: In the present Susquehanna-Roseland Line construction project, number one item in my mind is the irreversible impact such a large endeavor will have on the extremely sensitive natural areas it traverses that will not be of a temporary "nature" but long lasting and far reaching into the future. Thus the NO BUILD alternative 1 gets my vote.

Response:

NPS agrees that rare and unique communities both inside and outside of the study area would be impacted by the proposed project. The impacts outside the study area would be similar to those identified inside the study area, as stated on page 484 of the DEIS. Appendix C of the DEIS identifies the rare and unique communities that could be affected by the project outside the study area.

SE4000 - Socioeconomics: Impact Of Proposal And Alternatives

Concern ID: 37322

CONCERN STATEMENT: While some commenters described the benefits of construction jobs associated with building the transmission line, other commenters expressed concern that these jobs are temporary and that existing jobs in tourism and associated industries would be impacted.

Representative Quote(s): **Corr. ID:** 1815 **Organization:** Not Specified
Comment ID: 257376 **Organization Type:** Unaffiliated Individual

Representative Quote: This will most likely result in a loss of income, not just for the park but for the surrounding area.

Last, we heard from the electrical workers unions that they need work and want the power lines to be built so they can get to work. They are having economic woes, but so will others in surrounding areas if the power lines drastically reduce their property values because the lines run through the town or worse, right next to their schools. Any construction work will be short-lived and unsustainable employment. Rumor has it that workers will be brought in from out of state, so the local unions may not get jobs anyway!

Corr. ID: 1969 **Organization:** *Not Specified*

Comment ID: 257808 **Organization Type:** Unaffiliated Individual

Representative Quote: The expansion of reliable service will strengthen our regional economy and provide the region with a competitive advantage in attracting new industry. More than 20,000 residents of Monroe County and a significant proportion of the working population in Pike County, as well as the Lehigh Valley, travel to New Jersey or New York for work. We do not see this trend abating in the near term, even as we work to grow new jobs in the State of Pennsylvania, but a strong vibrant economy to our east helps sustain our well-being and creates opportunities for our people and businesses.

The economic viability of our region will be enhanced not only by increasing efficiency in transmission of power provided by the proposed Roseland line but also via the mitigation strategy that will help the Poconos remain the No. 1 positively rated vacation destination in the Commonwealth of Pennsylvania.

Corr. ID: 1983 **Organization:** *Not Specified*

Comment ID: 257883 **Organization Type:** Unaffiliated Individual

Representative Quote: The one thing I wanted to make sure that the park had and was able to review was the Longwood International 2010 Pocono Mountains Visitation Report that was submitted to the Pocono Mountain Vacation Bureau.

22.6 million people come to the Pocono Mountains every year and spend \$1.2 billion in vacation dollars; and of the majority of those people come to the Poconos because of the natural and scenic beauty. That's twice as many, 11 percent of those visitors, that's twice as many that seek out natural beauty nationwide. So we have a real magnet here and so by putting the tall towers there you're taking away one of the key reasons that people come to the National Park Recreation Area.

Corr. ID: 2002 **Organization:** IBEW Local 102

Comment ID: 257970 **Organization Type:** Business

Representative Quote: We are here tonight in support of this project because it creates jobs that our members so desperately need. A recent study put out by Rutgers states this project will create 2,600 direct and indirect jobs lasting at least a year. And these are not minimum wage jobs, but these are jobs that will pay a living wage and medical benefits. All we ask is that you consider your friends and neighbors that work in the construction industry when discussing this project, and realize the number of families whose lives you can change by creating these jobs.

Corr. ID: 2008 **Organization:** *Not Specified*

Comment ID: 258734 **Organization Type:** Unaffiliated Individual

Representative Quote: I think that we have heard some rationale to support it, and perhaps the most persuasive, if you will, are the jobs that would be created, given the economy. Again, while I empathize with that, 2,600 jobs over the course of one year I think needs to be balanced against the jobs there already with the people who are the outfitters, the restaurateurs, the small businesses whose business may very well be impacted by people who no longer feel that this is the pristine place they can come to escape.

Response: NPS agrees that construction of the line would result in some temporary jobs. We also agree that other jobs may be affected by the proposed changes. These and other potential impacts to socioeconomics are described in the DEIS, see pages 536 - 541.

Concern ID: 37323

CONCERN STATEMENT: [One commenter is concerned that the new transmission line would negatively impact property values.](#)

Representative Quote(s): **Corr. ID:** 1689 **Organization:** *Not Specified*

Comment ID: 257232 **Organization Type:** Unaffiliated Individual

Representative Quote: This project will have a devastating impact on the property values of properties that adjoin this power line, and other properties from which the new towers and lines will be visible. Although PSE&G has a right of way on my property I have to look for the lines and one tower in order to see them. They are under the tops of the trees and are not readily visible. The new towers and lines will loom over my property and will be an omnipresence. This diminution in property values will result in thousands of property tax appeals. This will create a higher tax burden on the other property owners in the affected towns. This financial impact will not be temporary. This will be a permanent effect.

Every town along this route will suffer irreparable financial harm-not just the adjoining property owners. The line may help certain labor unions for a year or two but their impact on the towns and residents will be permanent.

Response: NPS recognizes that the construction of the proposed transmission line could impact real estate values, as acknowledged in the DEIS, see pages 536 - 541; however, a more detailed analysis of impacts to property values on specific parcels would require valuation of many parcels at high cost, without yielding data that would meaningfully help guide a decision, as impacts on values are likely to be similar across all alternatives. By reference to 40 C.F.R. 1502.22 -this is information not essential to a reasoned choice among alternatives.

Concern ID: 37393

CONCERN STATEMENT: [According to one commenter, residential displacements would occur only where residences have physically encroached in the ROW.](#)

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259352 **Organization Type:** Business

Representative Quote: The DEIS states there will be residential displacements in Lehman, Hardwick and Stillwater townships (p. 539). No residential displacements will occur except for the few instances where a residence has physically encroached on the ROW.

Response: NPS reviewed the analysis and agree that displacements would occur along the proposed ROW for all action alternatives.

SS4000 - Soundscapes: Impact of Proposal and Alternatives

Concern ID: 37321

CONCERN STATEMENT: A commenter believes the analysis should discuss seasonal variance in impacts to resources from noise during construction and maintenance activities.

Representative Quote(s): **Corr. ID:** 2394 **Organization:** Earthjustice

Comment ID: 259068 **Organization Type:** Non-Governmental

Representative Quote: The EIS does not fully consider noise impacts that may vary seasonally. Under all of the analyzed alternatives, deconstruction/construction is likely to last as long as eight months, and continued maintenance will continue throughout the study period and beyond. For this reason, the EIS should consider the impacts of sound at different times of the year. Although the Parks may see more frequent visitors in during the summer months, sound from construction may be dampened by vegetation. However, in the winter, when most trees have lost their leaves, sounds may travel further or be more intense. Thus, the EIS should consider the impacts of sound relative to the time of year that deconstruction/construction or maintenance is occurring.

Response: Although there may be some seasonal variability in impacts from noise associated with construction and maintenance, this variability would be the same for all routes. Because all of the routes would experience the same seasonal variation, this information would not help guide a decision.

TE3000 - Threatened And Endangered Species: Study Area

Concern ID: 37784

CONCERN STATEMENT: Commenters cited the need for an analysis of impacts of the project on aquatic species along the proposed ROWs in areas that are outside of the study area defined in the EIS.

Representative Quote(s): **Corr. ID:** 2399 **Organization:** New Jersey Department of Environmental Protection

Comment ID: 259483 **Organization Type:** State Government

Representative Quote: Freshwater Mussels, Page 105

- Crossings of the S-R line identified outside of Alternatives 2 and 2b have potential to impact listed freshwater mussels. Areas of concern include the Paulins Kill and Musconetcong River in the Delaware River Basin, and the South Branch Raritan and Lamington rivers in the Raritan River Basin. These waterways support populations of listed mussels, with the Paulins Kill providing habitat to the federally endangered dwarf wedgemussel (only one of four known New Jersey populations). Every effort should be made to avoid known listed and SC freshwater mussel occurrences in these waterways. Surveys will be needed at all potential stream crossings with suitable habitat present. Surveys should be coordinated with

the ENSP and the USFWS, and should encompass an area 100 meters upstream and 300 meters downstream of the crossing.

Response:

The analysis does not include waters outside the study area. However, according to the applicant's proposal, sediment and erosion controls and other BMPs would be used during construction.

TE4000 - Threatened And Endangered Species: Impact Of Proposal And Alternatives

Concern ID: 37317

**CONCERN
STATEMENT:**

Commenters expressed concern about impacts to protected species from construction of the proposed transmission lines through degradation or destruction of habitat, spread of invasive species, increased edge effects, and disruption of avian migration, especially those birds that migrate at night.

Representative Quote(s): **Corr. ID:** 1430 **Organization:** *Not Specified*

Comment ID: 256031 **Organization Type:** Unaffiliated Individual

Representative Quote: This northwest area of New Jersey is the last stronghold of several species of breeding neotropical warblers in the state. Many of these species, including Cerulean Warbler, Black-throated Blue Warbler, and Blackburnian Warbler, are declining at an unsustainable rate and have been recognized as species of special concern by the Cornell Laboratory of Ornithology.

The proposed power-line construction would negatively impact these species by destroying or degrading their breeding habitat. The proposed power-line would also negatively impact many other species of animal and plants.

Corr. ID: 2048 **Organization:** *Not Specified*

Comment ID: 257980 **Organization Type:** Unaffiliated Individual

Representative Quote: there will be irreversible impacts to endangered species and the Park visitors' experience will be ever damaged along with the forest and the scenic vistas that we currently enjoy.

Corr. ID: 2390 **Organization:** New Jersey Conservation Foundation

Comment ID: 259024 **Organization Type:** Non-Governmental

Representative Quote: The Draft EIS fails to determine if any species of concern are likely entirely to occur in the area of the proposed actions. It fails to identify the Rare species of migratory birds, including Special Concern, Threatened and Endangered species, that migrate along the Kittatinny Ridge through the DEWA at night. These are the specific species that would be most endangered by the significantly increased height of the transmission towers and the increased number of wires strung between them. These species have been identified by New Jersey Conservation Foundation Ecologist Dr. Emile DeVito, a member of the New Jersey Department of Environmental Protection's Endangered and Nongame Species Advisory Committee.

The State of New Jersey has designated Endangered, Threatened and Species of Special Concern, of which 33 are rare night migrant birds. Of the 33 rare night migrant species, about 24 breed in the DEWA. The species include:

- American Bittern
- Barn Owl
- Blackburnian Warbler
- Black-throated Blue Warbler
- Black-throated Green Warbler
- Blue-headed Vireo
- Bobolink
- Brown Thrasher
- Canada Warbler
- Cerulean Warbler
- Common Moorhen
- Common Nighthawk
- Eastern Meadowlark
- Golden-winged Warbler
- Grasshopper Sparrow
- Gray-cheeked Thrush
- Hooded Warbler
- Horned Lark
- King Rail
- Least Bittern
- Least Flycatcher
- Nashville Warbler
- Northern Parula
- Pied-billed Grebe
- Sora
- Spotted Sandpiper
- Veery
- Virginia Rail
- Whip-poor-will
- Winter Wren
- Wood Thrush
- Worm-eating Warbler
- Yellow-breasted Chat

(Source: NJ Endangered and Nongame Species Program: Special Concern ' Species Listing Oct. 2008)

Response: NPS has analyzed the impacts to special-status species and believe our analysis as a whole is adequate. The degradation of special-status species habitat was analyzed using best available data. The discussions of edge effects and nocturnal migration have been expanded in chapter 4 in the Vegetation and Landscape Connectivity, Wildlife Habitat, and Wildlife sections, respectively, in the FEIS. In addition, the special-status species have been identified in the species lists in appendix G.

Concern ID: 37318

CONCERN STATEMENT: A commenter noted that ROWs can provide beneficial habitat to protected scrub shrub species and this benefit should be considered in the EIS.

Representative Quote(s): **Corr. ID:** 1976 **Organization:** New Jersey Audubon Society

Comment ID: 257835 **Organization Type:** Non-Governmental

Representative Quote: Many scrub-shrub bird species have experienced significant population decline and some have been identified as threatened and endangered or species of conservation concern. These right-of-ways, including in New Jersey Highlands, support breeding habitat to golden-winged warblers. So any type of mitigation strategies should consider the benefits of the right-of-ways.

Response: NPS agrees. The DEIS discusses beneficial impacts for birds, mammals, and invertebrates. A ROW maintained as scrub shrub habitat maintains nesting habitat as well as a migration or movement corridor for wildlife.

Concern ID: 37319

CONCERN STATEMENT: One commenter was concerned that bat species not currently listed should be because of White Nose Syndrome (WNS), and expressed the concern about the cumulative impacts of WNS and the transmission line project.

Representative Quote(s): **Corr. ID:** 2033 **Organization:** Longwood Lake Cabin Owners Association, Inc.

Comment ID: 257948 **Organization Type:** Unaffiliated Individual

Representative Quote: Bats are addressed as one of the species threatened in the EIS. However, the EIS addresses as endangered only the Indiana Bat, and maybe one other species. But as mentioned in the EIS, the White Nose Syndrome has decimated the Little Brown Bat and basically every cave dwelling bat in New Jersey and Pennsylvania. These aren't listed as endangered yet, but that's because the listing process takes time. But as a practical matter, these species are threatened with extinction.

Response: Species that are not state or federally listed as special-status species cannot be analyzed as such in the EIS. However, the impacts on small-footed bat, northern Myotis, and Indiana bat were fully analyzed in the DEIS in the Special-Status Species section of chapter 4, and the impacts to other bat species would be similar.

Concern ID: 37394

CONCERN STATEMENT: One commenter questioned the impact analysis for listed species and believed that mitigation plans presented by the applicant would avoid adverse impacts to bog turtles, Indiana bats, and bald eagles.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259330 **Organization Type:** Business

Representative Quote: Endangered Special Status Species: The DEIS does not fully reflect the extensive work that has been performed by the Applicants to avoid impacts to endangered, threatened or special status species.

1. Bog Turtles

One of the known species of greatest concern during construction of the S-R Line is the bog turtle. The Applicants have had extensive discussions with the USFWS and, as a result of this informal consultation, the USFWS has determined that no adverse effect would occur to bog turtles if the Applicants' proposed access road around the Arnott Fen were used and if certain other protective measures were taken, such as time of year restrictions. Therefore, the DEIS assertion that a Biological Assessment might be required for bog turtles is incorrect.

2. Indiana Bats

Potential impacts to the Indiana Bat were analyzed during the Applicants' planning process. The Applicants conducted Indiana Bat mist net surveys along the length of the existing ROW and proposed access road locations and no Indiana Bats were found. As a result, the USFWS issued a letter dated January 27, 2010 concluding that there was not likely to be an adverse effect for the Indiana Bat. This letter would apply to Alternatives 2 and 2B and this finding was not mentioned in the

DEIS.

3. Eagles/Other Birds

The Applicants intend to follow the Avian Protection Plan standards set out by the Avian Power Line Interaction Committee (APLIC) and do not anticipate any adverse impacts to eagles or other birds. No eagle nests were found along the routes of Alternative 2 or 2B and the distance between the conductor is over 60 inches and is thus greater than the wingspan of all bird species.

Response:

While NPS is aware of discussion between the applicant and the USFWS that states there will be no effects or no likely effects on bog turtle, Indian bat, and bald eagle, only consultation between agencies (NPS and USFWS) can be considered formal consultation. NPS is consulting with the USFWS, presenting the impacts on special-status species under the preferred alternative. This consultation will be added to chapter 5 of the FEIS. Since the DEIS was printed, two bald eagle nests have been discovered in close proximity to alternative 2. While the route is outside of the required nest buffer, this information will be added to the Special-status Species section of the FEIS because collision of the fledglings with the proposed transmission lines is a concern.

VE4000 - Visitor Experience: Impact Of Proposal And Alternatives

Concern ID: 37299

CONCERN STATEMENT:

One commenter did not think that presence of the proposed power line in the parks would diminish the visitor experience in the parks.

Representative Quote(s): **Corr. ID:** 1516 **Organization:** AMC

Comment ID: 256204 **Organization Type:** Unaffiliated Individual

Representative Quote: Being an active hiker, familiar with the terrain in question, I believe that the environmental impact of the proposed power line is exaggerated. Merely seeing a transmission tower does not diminish my enjoyment of the outdoors.

Response:

While impacts to visitor experience are subjective based on the user, the analysis used standard protocols for determining impacts developed by the Federal Highway Administration. The analysis, described in the DEIS on pages 552 to 556, was designed to reduce subjectivity and allow for a more objective assessment of visual effects.

Concern ID: 37301

CONCERN STATEMENT:

Commenters cited that they were concerned about degradation of the visitor experience at the parks, particularly for those recreating along the Delaware River, and the Appalachian Trail. Concerns addressed potential visual and sound impacts, as well as impacts on the historical sites, natural areas, and other resources available at the parks, and some commenters noted that they would not visit the parks if the proposed project is undertaken in the parks.

Representative Quote(s): **Corr. ID:** 520 **Organization:** Not Specified

Comment ID: 254378 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed transmission line route serves to destroy a viewscape that would otherwise allow Park visitors to immerse themselves in the

raw world of 1757

Corr. ID: 1383 **Organization:** *Not Specified*

Comment ID: 255906 **Organization Type:** Unaffiliated Individual

Representative Quote: As an avid hiker, backpacker, paddler, fisherman and mountain biker I have seen far to often the negative impact along the Appalachian Trail and other parks and forests that power generation/delivery companies have caused and it should not be allowed to continue.

Corr. ID: 1578 **Organization:** Appalachian Mountain Club

Comment ID: 257385 **Organization Type:** Non-Governmental

Representative Quote: Other impacts to recreational park users include temporary closures of access points, which would eliminate outdoor recreation opportunities for hikers and paddlers.

Corr. ID: 1777 **Organization:** Celebrating the Delaware

Comment ID: 258612 **Organization Type:** Unaffiliated Individual

Representative Quote: Imagine: Twelve towers, each unpleasantly humming, crackling and hissing (particularly in times of humidity and rain), each twenty stories high, each surrounded by a wasteland of downed timber and scrub brush. Each will immeasurably degrade hiking and being-in-nature experiences. These ugly bastions of steel and wire will be visible for miles and miles and miles, impacting severely on the Scenic and Wild Delaware River. They will be visible up and down the lush historic valley, and from many points along the scenic, venerable Appalachian Trail.

These towers will wipe out numerous sylvan camping sites and seriously degrade others, both long treasured by canoeists on the River. They will destroy serene, awesome and unique vistas, kill long-treasured hiking trails, picnic sites, fishing sites, degrade hunting, destroy habitat for endangered and protected species and break a supposedly indissoluble compact which was made between the US government and US citizens. This and so much more.

Corr. ID: 1973 **Organization:** Delaware Riverkeeper Network

Comment ID: 257819 **Organization Type:** Unaffiliated Individual

Representative Quote: Constructing a double 500 kV transmission line that dissects the heart of this protected outdoor recreational area or even the linear AT where hikers will see the lines from 20 miles away, will detract and disrupt that outdoor natural experience

In the EIS of 2010 river study, clearly illustrates that expanded power lines will impact the experience, stating 64 percent of park users indicated that power line expansion would detract from their park experience.

Response:

NPS recognizes and agree with the commenters that there will be impacts to visitor use and experience from construction and presence of the transmission lines and towers. We will work with the applicant to avoid, minimize, and compensate for impacts.

Concern ID:

37395

**CONCERN
STATEMENT:**

A commenter expressed concern with the impact analysis for visitor experience, stating that the analysis ignores that the current transmission lines were in place

prior to the designation of DEWA and the presence of this line has not degraded visitor experience since the area was designated an NPS Unit.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259349 **Organization Type:** Business

Representative Quote: The DEIS analysis of adverse impacts to visitor use (pp. 625-642) fails to recognize that existing transmission line has been in place in the NPS Units from the moment of their creation and the presence of this line has not limited visitor enjoyment of the NPS Units as evidenced by the amount of visitor use in the NPS Units and as discussed in Section I.J. on the background of DEWA. The incremental impact of the construction of the S-R Line should not change this dynamic and the only direct impacts to visitor use that are substantially different to what exists now would occur during construction when there will be more physical activity within the ROW. However, as this construction will be limited to winter months, the amount of visitors likely to be impacted is much lower than in the months of higher visitor use.

Response: The existing conditions to which the alternatives were compared include the presence of the 230-kV transmission line. The impacts presented for the alternatives are compared to existing conditions, not desired conditions.

VQ3000 - Visual Quality: Study Area

Concern ID: 37396

CONCERN STATEMENT: One commenter stated the study area and parameters used to analyze visual impacts in the EIS are not consistent and requested the impacts and study area for visual resources be revised.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259340 **Organization Type:** Business

Representative Quote: The Visual Resources Study used a bare earth analysis despite the heavily wooded character of DEWA, thus greatly overstating the visibility of the towers. The DEIS itself describes the landscape character of DEWA as heavily wooded and this should be taken into account in the modeling in the Final EIS to avoid an unrealistic depiction of the potential visual impacts. The existing vegetation provides significant screening capabilities for the S-R Line and this is not reflected in the DEIS. The Applicants suggest that the USGS Survey 2006 Land Cover Dataset accurately reflects the vegetated nature of the study area and should be used to more accurately depict the visual impacts.

Figures 77-86 of the DEIS show existing structures only within a short distance of the NPS Units, but show potential structures 20 miles from each NPS Unit. This is a comparison of apples to oranges and the only way to have an accurate comparison of the visual impacts is to use the same distances when analyzing the visibility of the structures.

Page 259 of the DEIS contains a statement regarding the air quality and visibility at DEWA that is misleading as it implies that visibility at DEWA is only affected by haze and that this effect only occurs on average 14 days out of each year and only

during the summer months. In fact, there are other factors affecting visibility that should also be mentioned, such as weather patterns and moisture that can limit visibility in DEWA at any time of the year and for many more days than just 14 days.

The DEIS visual simulations in Appendix K were not prepared using the correct information as to ROW width, pole coloring or size and coloring of conduit. The biggest problem with Appendix K is that it assumes a 350 foot ROW for Alternative 2. For example, figures K -17 through K-19 show trees being cut along the Watergate Recreation Area - but these trees are not going to be removed because the ROW is not going to be as wide as the DEIS assumes. Figure K-12 near the Pioneer Trail is another good example of the overstatement of effects found within the NPS visual simulation exhibits. This figure shows a complete clearing, when in fact only a very limited amount of trees will be removed in this area.

Response: NPS reviewed the analysis and do not believe that a revision is warranted. Our analysis uses bare earth modeling which is a standard methodology for analyzing impacts to visual resources (DEIS pages 552-553, also 554 and 555). Impacts to scenic resources extend beyond the boundaries of the parks. Standard visual impact analyses extend beyond the resources affected (see pages 556 in DEIS).

VQ4000 - Visual Quality: Impact of Proposal and Alternatives

Concern ID: 37291

**CONCERN
STATEMENT:**

Commenters stated that the increased height of the proposed towers would degrade the scenic quality of DEWA, the Trail, Delaware River, other open spaces, surrounding communities, and the night sky. The larger towers are deemed by the commenters to be more obtrusive because they would not be camouflaged by the trees. Conversely, one commenter believes the proposed monopoles shown in the visual simulations would be an improvement over the existing towers.

Representative Quote(s): **Corr. ID:** 1578 **Organization:** Appalachian Mountain Club
Comment ID: 257389 **Organization Type:** Non-Governmental

Representative Quote: Specific impacts vary with each alternative route, but all would mar the iconic viewshed currently enjoyed by millions of park visitors. Potential routes would impact views from the Appalachian Trail, Old Mine Road, McDade Trail, Van Campens Glen, Mohican Outdoor Center, and the Delaware Water Gap National Recreation Area.

The current right-of-way is located about two and a half miles north of AMC's Mohican Outdoors Center. Visitors to Mohican would be able to see the new 200-foot-high towers from the well-known and popular look-out on Rattlesnake Ridge. As such the transmission lines will have a large potential impact on visitors to AMC's Mohican Outdoors Center.

Every potential route would cross the Delaware, and several routes would cross where it is federally-designated under the Wild and Scenic Rivers Act. The proposed project would disrupt the viewshed currently enjoyed by hikers, paddlers, and anglers.

Corr. ID: 1698 **Organization:** *Not Specified*

Comment ID: 257365 **Organization Type:** Unaffiliated Individual

Representative Quote: A permanent impairment of the "scenic" qualities of the NPS units will result from the very tall towers that are proposed. These visual impacts cannot be mitigated in my view, unless there are camouflage techniques for the upper extension of the towers above tree line. Hiding or softening the visual effect for humans (if technically feasible) may then harm avifauna that also depend on visual cues when flying or navigating open air spaces. More NPS unit visitors will be affected by the new permanently altered visual fields/vistas, than now with the status quo towers reaching to or just above treetop levels.

Corr. ID: 1882 **Organization:** Rock the Earth

Comment ID: 257786 **Organization Type:** Non-Governmental

Representative Quote: The transmission and generation components of the Project will also adversely impact on the visual and scenic resources, including the daytime viewsheds and the incomparable nighttime darkness currently available in the area. The flares from gas and coal plants, cooling towers from coal plants, and night-time beacons on tensioning towers would alter the current character of the lands where the transmission and generation infrastructure would be built. We have serious concerns that development of industrial-scale transmission lines in this area would not be compatible with respect to viewshed and scenic resources.

Nighttime views of the transmission lines, which may bear several red strobe lights, flashing at frequencies of at least 20 times per minute, will severely impact on an otherwise dark landscape.

Corr. ID: 1961 **Organization:** *Not Specified*

Comment ID: 258706 **Organization Type:** Unaffiliated Individual

Representative Quote: In my opinion, what I see on the maps on the projected impact of what those lines are going to look like up here, and it looks better than what's there now -- whatever it is -- those metal, old towers are, I think it would be an improvement over what we're looking at now.

Response:

The NPS agrees that the height of the towers would have great visual impacts on the parks. However, according to NERC Standards this is the height required for the size of the transmission line. There is no way to avoid or minimize the tower height because it is required. The DEIS acknowledges there will be very large impacts to scenic qualities. We are working with the applicant on a mitigation plan for the preferred alternative and part of the mitigation plan will be to consider compensation that may be appropriate for the impacts to scenic resources.

Concern ID:

37292

**CONCERN
STATEMENT:**

One commenter expressed concern with including visual impacts as an impact topic in the EIS and believes the visual impacts from the transmission line towers are not an environmental concern.

Representative Quote(s): **Corr. ID:** 1504 **Organization:** New York-New Jersey Trail Conference

Comment ID: 257359 **Organization Type:** Unaffiliated Individual

Representative Quote: The article treats the ugliness of the transmission towers as if it is an environmental disaster. There is all sorts of terminology ("viewshed analysis") and data, including some sophisticated GIS maps, to make their points seem thoughtful and important. However "visual impact" is not an environmental

concern at all.

Response: Scenic resources are important components of the Organic Act, the park's enabling legislation and NPS policy. Visual resources encompasses and includes analysis of landform, water, vegetation, and human development (including cultural resources) (see methodology in DEIS, pages 552-553).

Concern ID: 37293

CONCERN STATEMENT: Commenters do not believe that the visual analysis is adequate to determine the full impact of the proposed towers on the scenic resources of the parks and request panoramic, 360-degree visual simulations and seasonal simulations. Additional view shed analysis has been performed by commenters.

Representative Quote(s): **Corr. ID:** 1878 **Organization:** Appalachian Trail Conservancy
Comment ID: 257639 **Organization Type:** Non-Governmental

Representative Quote: With generally only two pictures at each "key observation point" or KOP (existing and proposed), the ATC is struck with the need to have more comprehensive analyses of visual impacts, mindful of our mission to thoroughly analyze potential visual and scenic impacts to protect these visually significant ANST lands in perpetuity. The visual simulations are limited in that they depict only one perspective at each individual KOP along each alternative, and, further, that those views are along the axis of the power line. Panoramic, 360-degree visual simulations are needed at each KOP to adequately assess impacts to hikers and other visitors.

The DEIS suggests that opening a wider ROW corridor may increase the "frame of the view" (page 595) and that negative impact would be "offset somewhat by the increased cleared ROW providing a wider view opportunity of the surrounding landscape which is scenic and memorable." It is our belief that the ANST affords visitors superb viewing opportunities along the existing natural rock outcrops, open areas, and leaf-off seasonal viewings that occur naturally along the Trail's entire length. The legislation enacting the ANST requires trail managers to protect and ensure scenic views that are not marred by 195-foot-tall utility poles and conductors.

Given the major, new, foreground visual effects of the new lines, for towers approaching 200 feet tall, this additional resource information must be coupled with refined viewshed analyses. Despite measurements from one or two "key observation points" or KOPs (all that is provided in Appendix K), there will be almost constant exposure to the offending view particularly in leaf-off seasons as park visitors approach the proposed crossing itself

Corr. ID: 2007 **Organization:** NYNJ Trail Conference

Comment ID: 257840 **Organization Type:** Unaffiliated Individual

Representative Quote: We have done extensive view shed analysis on this. I will send a link as part of my written comments, but it's posted on NYNJTC.org, and the route increases the visibility significantly of the power lines.

Let me just give you a few examples. Our view shed analysis was based on a ten-mile visibility, which sometimes it's better than that, but that's certainly a clear day. Currently, about 388,000 acres -- these power lines are visible for about 388,000 acres. In the new scenario they will be visible from 460,000 acres. So there will be an extra 70,000 acres where you will be viewing the power lines, sometimes viewing as many as 90 at the same time, particularly from the Delaware Water Gap

where we have the unobstructed, east-facing views, which is, of course, where the Appalachian National Scenic Trail runs. It goes along the crest there.

Corr. ID: 2394 **Organization:** Earthjustice

Comment ID: 259067 **Organization Type:** Non-Governmental

Representative Quote: The S-R Line will have significant impacts on the visual resources within the Parks as well as more geographically distant locations. The DEIS's visual simulation of impacts within the park is very useful. However, the EIS should also consider impacts on visual resources relative to the time of year, and what the impacts would be if lattice towers rather than monopoles were used.

Response: Due to the strict timing constraints, NPS did not have enough time to conduct a full analysis that covered all of the seasons, the analysis was completed with the best available data. Key observation points were merely a sample of the potential impacts (see DEIS, pages 554-555).

Concern ID: 37397

CONCERN STATEMENT: One commenter believes that impacts to the viewshed and analysis of the viewshed should be reconsidered only in light of topography and vegetation.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259341 **Organization Type:** Business

Representative Quote: Furthermore, the Applicants recently performed a viewshed analysis as part of required historic architecture surveys, a copy of which is attached as Exhibit 11 together with the DEIS bare earth figure to show the contrast. The intent of this analysis was to assess potential impacts of the project on historic architecture within the vicinity of the DEWA and other NPS units. The area of potential effects (APE) for the historic architecture survey, proposed and authorized by the NPS on April 21, 2011, consisted of areas within DEWA that are within an 8-mile radius from the centerline of the existing transmission right-of-way. The viewshed analysis was conducted both 1) to consider only the effects of topography on visibility, similar to that in the DEIS; and 2) in a manner that would allow for the consideration of the potential effects of intervening vegetation on the project's visibility.

Response: NPS reviewed the analysis and do not believe that a revision is warranted. Our analysis uses bare earth modeling, which is a standard methodology for analyzing impacts to visual resources (DEIS, pages 552-553, also 554 and 555). Vegetation blocking should not be assumed because stochastic or management events may occur, changing views of the lines and towers. Section 106 also takes into account impacts to visual resources and must be analyzed.

VR4000 - Vegetation And Riparian Areas: Impact Of Proposal And Alternatives

Concern ID: 37287

CONCERN STATEMENT: Most commenters believe the construction of the S-R Line and associated access roads would result in permanent and irreversible damage to the vegetation of the parks and wildlife habitat by increasing erosion and sedimentation, the spread of invasives, and fragmentation. Other commenters believe the opportunity exists to

improve the biodiversity of the habitats through mitigation.

Representative Quote(s): **Corr. ID:** 1329 **Organization:** Sierra Club

Comment ID: 255728 **Organization Type:** Unaffiliated Individual

Representative Quote: It will be impossible to restore surrounding woodlands to their current pristine condition after countless construction vehicles cut their way through to construction sites. The proposal also calls for a significant widening of the transmission line right-of-way. This would effectively bisect the Park and create a huge, unsightly scar in the heart of the DWGNRA. The section of the over 2000 mile long Appalachian Trail that passes through this area would also suffer from this intrusion.

Corr. ID: 1398 **Organization:** Unitarian Universalist Fellowship of Sussex County

Comment ID: 255927 **Organization Type:** Churches, Religious Groups

Representative Quote: The proposed transmission project will have permanent adverse impacts to the environment and destroy the beauty of our natural lands and our communities. This project will result in a vast removal of trees and vegetation, destroying acres of wildlife habitat and causing erosion and sedimentation in areas of streams that play an important role in New Jersey's drinking water supply. Increased amounts of sediment in these streams will cause contamination, resulting in dangerous public health effects.

Corr. ID: 1981 **Organization:** Northern Region of the New Jersey State Federation of Sportsmen's Club

Comment ID: 257869 **Organization Type:** Unaffiliated Individual

Representative Quote: Most of you, I believe, in this room are well aware that the eastern deciduous forest has been stripped bare at least twice since the arrival of Columbus by early settlers and later on in the early late 1800s, early 1900s, bare, hard pressed to find a tree. You want to talk about permanent, irreversible harm. Look at the forest we enjoy today. I don't believe there's such a thing as permanent and irreversible harm. Resource managers, foresters fishery people, biologists, we have the knowledge, we have the means to mitigate, and not just repair, but actually produce healthier and more diverse habitats than what exists today. I don't think that we should look at this as a problem but rather as a solution and maybe the possibility of improving ecosystems and habitats.

Corr. ID: 2108 **Organization:** Green Sanctuary Committe Unitarian Universalist Fellowship of Sussex Country

Comment ID: 258166 **Organization Type:** Churches, Religious Groups

Representative Quote: Access roads required to complete the project are located on hiking trails and logging roads that must be widened and graded. This will result in loss of canopy cover and forest connectivity, increasing the "edge effects" on the core forest. Edge effects include more deer browsing and the encroachment of invasive species populations.

Response:

NPS recognizes that there will be permanent impacts to vegetation and thus, wildlife habitat, as demonstrated by the impact analysis in the DEIS (pages 338 to 433). We will require the applicant to follow an NPS-approved vegetation maintenance plan, which will include measures such as increasing biodiversity, controlling invasive species, and maintaining scrub shrub vegetation in the ROW as shelter, foraging, and breeding habitat for wildlife.

Concern ID: 37398

CONCERN STATEMENT: A commenter noted that the proposed project would not alter vegetation management or have impacts on vegetation management practices within the parks.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259322 **Organization Type:** Business

Representative Quote: There is nothing about the structural differences between the existing 230 kV transmission line and the proposed S-R Line that would change applicable vegetation maintenance standards, emergency response times or other maintenance standards with which the Applicants must comply. The federal rules governing vegetation management along transmission lines, and reliability in general, stand entirely apart from the permitting decision now before the NPS. The proposed S-R Line would not result in additional or more frequent maintenance and emergency repairs. The construction of the S-R Line will not significantly affect the intensity or other aspects of the Applicants' activities in the existing ROW. Simply put, the construction of the S-R Line would not result in a net increase in impacts to the NPS Units from a vegetation management or operational perspective.

Response: NPS based the impacts described in the EIS on the existing conditions observed during field surveys in the summer of 2010, which was prior to the vegetation maintenance in the ROW for alternatives 1, 2, and 2b. Vegetation maintenance outside of the parks has resulted in a ROW that has been clear-cut. The current vegetation maintenance plan prevents the applicant from clear-cutting the ROW inside the parks. If a permit is granted, we will require the applicant to follow an NPS-approved vegetation maintenance plan, which will focus on retaining habitat within the constraints of the NERC guidelines and controlling invasive species.

WH3000 - Wildlife And Wildlife Habitat: Study Area

Concern ID: 37284

CONCERN STATEMENT: One commenter stated that the study area used to analyze wildlife and wildlife habitat is not broad enough to realize the full impacts of the proposed project, and to determine the most desirable alternative. The commenter suggested a regional study area should be used in the impact analysis.

Representative Quote(s): **Corr. ID:** 1829 **Organization:** New Jersey Audubon

Comment ID: 258634 **Organization Type:** Non-Governmental

Representative Quote: Decisions regarding a new or upgraded bi-state transmission line must therefore also consider broader, regional implications to wildlife and their habitats. The information and analysis provided in the DEIS focus, understandably so, on NPS lands. As a result, however, the full impacts associated with any of the alternatives are unclear and it is difficult to identify which option would most effectively minimize disturbance to natural areas and critical wildlife habitat across the region if the upgrade is needed. The NPS would benefit from an approach that more specifically considers impacts to the surrounding region and NJ Audubon strongly encourages the NPS to apply a regional perspective in reviewing the alternatives and considering mitigation needs if necessary.

Response: Because NPS cannot dictate where the ROW is placed outside of the parks, we cannot analyze impacts in these areas. The study area is defined on page 404 of the DEIS.

WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives

Concern ID: 37280

CONCERN STATEMENT: Concerns were identified by commenters about impacts to wildlife as a result of the construction and operation of the new line. Commenters noted concerns regarding habitat fragmentation and edge effects, impacts on migratory species, the potential for effects from EMFs and noise on wildlife, and herbicide use concerns.

Representative Quote(s): **Corr. ID:** 1713 **Organization:** *Not Specified*

Comment ID: 257281 **Organization Type:** Unaffiliated Individual

Representative Quote: There will still be blasting in geologically sensitive areas with impacts also on wildlife and its habitat

Death of birds, both large raptors such as endangered eagles, that feed and nest along the Delaware River, and neotropical songbirds that migrate along the Kittatinny Ridge, such as warblers, orioles, and thrushes, by collision with 200' high power lines, cannot be mitigated.

Corr. ID: 1875 **Organization:** *Not Specified*

Comment ID: 257588 **Organization Type:** Unaffiliated Individual

Representative Quote: This world famous raptor migration flight-line is also being proposed for designation by the U. S. Dept. of the Interior as the nation's and world's first NATIONAL raptor migration corridor.

The proposed powerline expansion likely will cause significant environmental and wildlife damage including increased raptor and other bird- and bat-strike hazards with powerlines and their support structures.

Corr. ID: 1882 **Organization:** Rock the Earth

Comment ID: 257785 **Organization Type:** Non-Governmental

Representative Quote: The construction of massive transmission infrastructure through the three parks presents a myriad of impacts on wildlife and certain impacts to the resources listed above. Even if minimized, it is clear that construction and maintenance will negatively impact wildlife communication, habitat utilization, and reproductive success.

Corr. ID: 2023 **Organization:** *Not Specified*

Comment ID: 257936 **Organization Type:** Unaffiliated Individual

Representative Quote: While there may have been no studies conducted on the effects of this high EMF radiation on forest areas, one can be fairly certain that the equivalent biological disarray will also happen to the animals, trees, and plants in our National Park if the power line passes through our forest.

Corr. ID: 2228 **Organization:** National Parks Conservation Association

Comment ID: 258774 **Organization Type:** Unaffiliated Individual

Representative Quote: Please give thorough analyses in the FEIS in regards to what this significant fragmentation of habitat would mean for all species inhabiting, visiting, or barely hanging on in Susquahenna and Appalachian region.

Also, I call for the FEIS to include a thorough analysis of herbicides and formulations which would be used to assist clearing and vegetation management in the vicinity of the transmission lines and construction access points. Which formulations of which herbicides to target which plants, and which amphibians, mammals, birds, etc. will be most impacted.

Corr. ID: 2394 **Organization:** Earthjustice

Comment ID: 259069 **Organization Type:** Non-Governmental

Representative Quote: Further, the EIS should include consideration of the short- and long-term impacts of increased noise on rare bats, migratory birds, and other sensitive wildlife. The DEIS leaves unanswered questions about how the project's noise disturbances interfere with, or otherwise adversely affect, the displays, mating, foraging, communication, and other behavior of migratory birds and mammals.

Response:

NPS recognizes that the proposed project would result in impacts to wildlife (see pages 388-433 in the DEIS). All mitigation measures, including best management practices such as following the avian protection plan, listed in appendix F of the DEIS would be followed during construction and operation of the S-R Line. We conducted further literature research on the effects of electromagnetic fields and operational noise on wildlife and the information will be included in the landscape connectivity, wildlife habitat, and wildlife section of the FEIS.

Concern ID:

37282

CONCERN STATEMENT:

Commenters stated they did not think the proposed transmission line would have impacts on wildlife, particularly detrimental impacts.

Representative Quote(s):

Corr. ID: 2006 **Organization:** Not Specified

Comment ID: 258733 **Organization Type:** Unaffiliated Individual

Representative Quote: Again, I would like to emphasize, high voltage transmission lines are not dangerous. I worked on them. It doesn't kill the birds. It didn't make the animals -- it doesn't drive the animals crazy.

Corr. ID: 2185 **Organization:** National Parks Conservation Association

Comment ID: 258768 **Organization Type:** Unaffiliated Individual

Representative Quote: I doubt the birds and bunnies will even notice the lines..well the birds might, they can use it as a perch..and the bunnies can build nests at the base of the towers.

Response:

NPS reviewed the analysis and have determined that impacts on wildlife are inevitable. Please see the impacts analysis in the DEIS (pages 402-433).

Concern ID:

37399

**CONCERN
STATEMENT:**

A commenter expressed concern with the impact analysis within Hogback Ridge, stating that the analysis ignores the existing conditions and overstates the impacts.

Representative Quote(s): **Corr. ID:** 2396 **Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G

Comment ID: 259348 **Organization Type:** Business

Representative Quote: The DEIS states that the proposed ROW and continual vegetation maintenance would completely bisect the habitat in the Hogback Ridge Woodlands, creating two sections of Woodlands and reducing interior forest habitat (p. 491). This statement is presented as if there is no existing ROW. Simply put, the existing ROW already bisects this habitat and existing required vegetation maintenance already impacts this habitat, therefore there would be no changes that reduce interior habitat or cause a "bisection" of this habitat area.

Response:

NPS based the impacts described in the EIS on the existing conditions observed during field surveys in the summer of 2010, which was prior to the vegetation maintenance in the ROW for alternatives 1, 2, and 2b. Please see the impacts analysis for alternative 1 in the rare and unique communities on page 486. The proposed project would widen the ROW through Hogback Ridge, thus reducing interior habitat and creating new edge habitat.

WH5000 - Wildlife And Wildlife Habitat: Cumulative Impacts

Concern ID: 37277

**CONCERN
STATEMENT:**

One commenter was concerned about the increased cumulative impacts on wildlife from habitat fragmentation and increased air pollution.

Representative Quote(s): **Corr. ID:** 1678 **Organization:** Not Specified

Comment ID: 257183 **Organization Type:** Unaffiliated Individual

Representative Quote: Of particular concern to the NPS should be the cumulative impacts to biological species of the increased habitat fragmentation added to the increased air pollution from coal fired power plants sourcing the electricity for the S-R line.

Response:

The impacts on wildlife from habitat fragmentation are detailed in the DEIS on pages 402-433. NPS dismissed air quality as an impact topic (pages 21 and 22 of the DEIS). We do not expect air quality or climate change to increase the intensity of the impacts to wildlife.

WS3000 - Wild and Scenic Rivers: Study Area

Concern ID: 37276

**CONCERN
STATEMENT:**

One commenter expressed concern with the impacts of the transmission lines on wild and scenic rivers outside of park boundaries and suggests these be included in the EIS.

Representative Quote(s): **Corr. ID:** 2394 **Organization:** Earthjustice

Comment ID: 259070 **Organization Type:** Non-Governmental

Representative Quote: The DEIS analysis of impacts on Wild and Scenic Rivers focuses exclusively on the designated segment of the Middle Delaware. However, the Project will have impacts on other Wild and Scenic Rivers outside of the Parks, and these rivers must be considered as well.

Response: The proposed project would not impact the Lower Delaware River where it is designated as wild and scenic. NPS realizes that the proposed project could have impacts on the Musconetcong River in New Jersey; however, the study area is limited to those resources inside NPS boundaries. The study area is defined on page 644 of the DEIS.

WS4000 - Wild and Scenic Rivers: Impact of Proposal and Alternatives

Concern ID: 37352

CONCERN STATEMENT: One commenter stated that it is illegal for any power lines to cross the Delaware River, as it is designated as wild and scenic.

Representative Quote(s): **Corr. ID:** 1397 **Organization:** Green Cambridge and the Sierra Club

Comment ID: 255925 **Organization Type:** Unaffiliated Individual

Representative Quote: The Delaware Water Gap and the Delaware River are pristine examples of beautiful American waterways. The Delaware River, including the Water Gap, are designated wild and scenic, national treasures, act of congress, signed by the President. It is illegal for any power lines to cross the river. It is unconscionable that any one would ever consider such an idea. Leave this American beauty alone!

Response: The impacts of replacing the existing transmission lines with the proposed transmission lines are discussed in the DEIS on pages 643-648. NPS recognizes that the proposed project would cause impacts to the Middle Delaware National Scenic and Recreational River. In reviewing the Wild and Scenic Rivers guidelines on pages 329-331 of the DEIS, we conclude that the action is not illegal, as it is not a "water resource project" within the meaning of the Wild and Scenic Rivers Act.

WT4000 - Wetlands: Impact of Proposal and Alternatives

Concern ID: 37268

CONCERN STATEMENT: A commenter deemed the analysis of impacts to wetlands to be incomplete, lacking information on the effects of blasting and the use of herbicides, as well as an analysis of wetland conversion.

Representative Quote(s): **Corr. ID:** 2394 **Organization:** Earthjustice

Comment ID: 259064 **Organization Type:** Non-Governmental

Representative Quote: The Final EIS must fill in gaps in the DEIS's analysis of impacts to wetlands. The Park Service has not disclosed the impacts of blasting activities along Routes 2 and 2b on wetlands and proper wetlands functioning. This deficiency must be addressed, and a blasting and post-blasting monitoring plan should be provided by the applicant and made available for public review. In addition, while we are pleased that the use of herbicides in wetlands areas in the

Parks is not currently contemplated, the Park Service should assess the impacts of potential use of herbicides that may occur in the future and disclose what the impacts would be on wetlands.

Response:

NPS has decided to limit the applicant to drilling for installation of the tower foundations. We will remove all references to blasting and the impacts that would occur from blasting from the FEIS. As stated in the DEIS, all herbicides would be approved by the NPS prior to use. We reviewed the impact analysis of wetlands (pages 363-388 of the DEIS), and believe it to be a thorough explanation of the impacts, as it includes acres of impacted wetlands, the type of wetlands impacted, and the acres of wetland conversion.

Concern ID:

37400

CONCERN STATEMENT:

A commenter disagrees with the amount of wetlands that would be converted along alternative 2 because, according to the commenters, this area is already maintained for the current transmission line.

Representative Quote(s):**Corr. ID:** 2396**Organization:** McGuireWoods, LLP and SNR Denton for PPL and PSE&G**Comment ID:** 259350**Organization Type:** Business

Representative Quote: The DEIS states that 23.94 acres of forested wetlands would be converted to shrub or emergent wetlands during ROW clearing (p. 381). This is inaccurate because, as previously discussed, the majority of the ROW is already cleared of vegetation and the NPS has overstated the amount of new clearing that would be necessary.

Response:

NPS based the impacts described in the EIS on the existing conditions observed during vegetation surveys in the summer of 2010. Vegetation maintenance conducted between the surveys and now are not considered as existing conditions for the EIS.

FEDERAL AGENCY LETTERS



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
NORTHEAST REGION
55 Great Republic Drive
Gloucester, MA 01930-2276

JAN 31 2012

John J. Donahue, Superintendent
Delaware Water Gap National Recreation Area &
Middle Delaware National Scenic and Recreational River
HQ River Road
Bushkill, PA 18324

Pamela Underhill, Superintendent
Appalachian National Scenic Trail
P.O. Box 50
Harpers Ferry, WV 25425

Dear Mr. Donohue and Ms. Underhill:

We have reviewed the Susquehanna to Roseland 500-kv Transmission Line Right-of-Way and Special Use Permit Draft Environmental Impact Statement (DEIS) prepared for the National Park Service (NPS), the lead action agency, to address potential impacts that would occur in the Delaware Water Gap National Recreation Area (DEWA), Appalachian National Scenic Trail (APPA), and Middle Delaware National Scenic and Recreational River (MDSR) in Pennsylvania and New Jersey. The DEIS describes the proposal of PPL Electric Utilities Corporation (PPL) and Public Service Electric and Gas Company (PSE&G), jointly known as the applicant, to construct a portion of the Susquehanna to Roseland 500-kv transmission line (S-R Line) and reconstruct an existing 230-kv line along their current ROW through the parks. The DEIS describes the six alternatives for the route of the transmission line, the resources that would be affected by the alternatives, and the environmental consequences of each alternative.

General Comments

The DEIS analyzes the impacts of the alternatives in detail for geologic resources (including topography and paleontology); floodplains; wetlands; vegetation; landscape connectivity, wildlife habitat, and wildlife; special-status species; rare and unique communities; archeological resources; historic structures; cultural landscapes; socioeconomics; infrastructure, access, and circulation; visitor use and experience; visual resources; soundscapes; wild and scenic rivers; park operations; and health and safety.

As submitted, the DEIS has addressed many of the concerns, formerly expressed in our prior letter, dated May 13, 2010, regarding NOAA trust resources. Moreover, the individual, cumulative, direct and indirect impacts that would be derived from the proposed activity have been discussed fully throughout the document.



Specific Comments

As a steward of our nation's living marine resources, our focus involves the evaluation of potential impacts to NOAA trust resources and establishing protections regarding their conservation and enhancement. Consequently, we have an obligation and a legal mandate to consult with federal agencies that fund, authorize or undertake actions that may affect living marine resources and their habitats. The MSA, FWCA and other mandates require that we provide advice and recommendations, to federal action agencies which serve to avoid, minimize and mitigate for impacts to living marine resources and their habitats.

The Delaware River and its tributaries provide a variety of commercial and recreational fishing including offering a migratory pathway and spawning, nursery, and forage habitat for a number of anadromous and catadromous fishes including American shad (*Alosa sapidissima*), alewife (*Alosa pseudoharengus*), blueback herring (*Alosa aestivalis*), American eel (*Anguilla rostrata*), and striped bass (*Morone saxatilis*). Parts of the watershed are subject to tidal influence the upper limit of which is located at RM 134 in Trenton, NJ. Upstream beyond this point to its origin source, the River is completely freshwater.

The federally endangered shortnose sturgeon (*Acipenser brevirostrum*) and the federal candidate species Atlantic sturgeon (*Acipenser oxyrinchus*), which has been proposed for listing, are known to transit through the project area at certain times of the year. The “shad run,” the annual migration of spawning American shad up the Delaware also passes through DEWA in May and June (NPS 2010).

We have previously consulted with the NPS and advised its technical consultants on essential fish habitat, federally protected species and other NOAA trust resources that are known to occur in the project area and could be impacted by the proposed project. Our Essential Fish Habitat (EFH) letter regarding the project dated May 13, 2010, noted that there are American shad between the Delaware Water Gap and the New York border; and additionally, there may be also be shad in the Philadelphia reach of the river. Given that a more detailed discussion of potential impacts to trust resources and that further information regarding the transmission line crossing of the River was included in the DEIS, additional EFH consultation with HCD by the federal action agency will not be required as part of the federal permit process.

In a letter dated July 22, 2010, it was determined that shortnose sturgeon (*Acipenser brevirostrum*), a federally listed endangered fish species, is the only species known to be present in the project vicinity. NOAA Fisheries further noted that the shortnose sturgeon is present in the Delaware River below Lambertville, New Jersey, more than 90 river miles below DEWA. PRD concluded that because there were no federally listed species within the project area, no further consultation with NOAA Fisheries would be necessary unless project plans or new information became available.

Recommendations

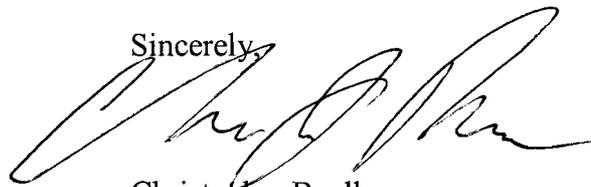
The project is located in the non-tidal mainstem reach of the Delaware River and thus is well upstream of the Delaware Estuary mixing zone and outside the area designated as Essential Fish Habitat. Consequently, EFH Conservation Recommendations are not applicable. However, planned upland construction activities consisting of the installation of stream crossing structures associated with the access roads, the placement of heavy equipment and proposed vegetation management practices including clearing in wetland areas and the removal of foliage along the streambanks conducted in the project area upstream of critical aquatic habitat could potentially present both local and downstream consequences to federally-managed species.

We recommend the use of best management practices so as to minimize turbidity, reduce adverse environmental impacts to downstream water quality, and control the discharge of materials into the Delaware River and adjacent project area wetlands. Additionally, so as to minimize direct, indirect, and cumulative impacts to migrating and anadromous fish species we further encourage staging operational activities in upland areas, where practicable, restoring any and all disturbed areas, otherwise supplementary compensatory mitigation measures to restore those disturbed and degraded areas currently supporting anadromous and catadromous fish may be required.

Conclusion

We would like to thank you again for the opportunity to comment on the Susquehanna to Roseland 500-kv Transmission Line Right-of-Way and Special Use Permit Draft Environmental Impact Statement and look forward to continued coordination with the National Park Service on the proposed project and anticipate the release of the Final EIS for agency review. If you have any questions regarding the subject matter contained within this letter or need additional details please contact Brian May at (732) 872-3116.

Sincerely,



Christopher Boelke
Mid-Atlantic Field Office Supervisor

References

U.S. Department of the Interior. National Park Service. 2010. Plan Your Visit. Available [online]: <http://www.nps.gov/dewa/planyourvisit/index.htm> (accessed January 4, 2012)

U.S. Fish and Wildlife Service. 2010. The Delaware River Coordinator's Office. Available at: <http://www.fws.gov/delawariver/>. (accessed January 4, 2012).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JAN 3 1 2012

Mr. John J. Donahue
Superintendent
Delaware Water Gap National Recreation Area &
Middle Delaware National Scenic and Recreational River
HQ River Road, off Rt. 209
Bushkill, PA 18324

Dear Superintendent Donahue:

The Environmental Protection Agency's (EPA) Regions 2 and 3 have reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (EIS) for the Susquehanna to Roseland 500-kV Transmission Line Right-of-Way and Special Use Permit, in accordance with our authorities under Section 309 of the Clean Air Act, as amended (42 U.S.C 7609, PL 91-604 12 (a), 84 Stat. 1709), and the National Environmental Policy Act (NEPA).

PPL Electric Utilities Corporation and Public Service Electric and Gas Company (the applicant) owns and operates an existing 230-kV line with a right-of-way (ROW) ranging from 100 to 380 feet wide through the Delaware Water Gap National Recreation Area, Appalachian National Scenic Trail and Middle Delaware National Scenic and Recreational River in Pennsylvania and New Jersey. The applicant is seeking to increase its transmission capabilities by adding a 500-kV line to the existing 230-kV line. The Draft EIS addresses that portion of the Susquehanna to Roseland transmission line that passes through the National Park system. Accordingly, the Draft EIS's evaluation is limited to the applicant's request to construct a double 500-kV power line across three units of the National Park system and examines how the proposed project would affect the purposes and resources of the Park units. EPA notes that the upgrade of the existing line does not initiate another federal action that would require an environmental impact statement on the entire transmission line.

The applicant's final construction plan proposes to utilize the existing ROW, access the ROW through existing natural and cultural areas, construct new and taller power line towers and remove and replace the existing 230-kV line, with an additional 500-kV power line. The Draft EIS evaluates six alternatives, including a no-action alternative. The Draft EIS indicates that Alternative 2 (the applicant's proposed route), Alternative 2b (the applicants alternate proposal in that route) and Alternative 3 would likely result in significant adverse impacts to wetlands and water quality. In addition, there is limited information presented concerning mitigation measures that would either minimize or compensate for those adverse impacts. EPA is also concerned that Alternative 3 may include significant impacts to the Worthington State Forest, which are not included in the Draft EIS.

As NPS has not identified a preferred alternative, it is EPA's practice to rate the environmental impacts of all alternatives. Based primarily on potential impacts to wetlands and water quality, we have rated Alternatives 2, 2b, and 3 as "Environmental Objections" (EO). Alternatives 4 and 5 would have fewer impacts, and are rated as "Environmental Concerns" (EC), and Alternative 1 ("No-Action") is rated as "Lack of Objections" (LO). With regard to the adequacy of the analysis, we have rated the DEIS as "Insufficient Information" - (2). While the Draft EIS provides useful information and analyses, we have identified several areas where the Final EIS can improve the analysis of the predicted impacts of each alternative.

Finally, EPA is aware that the applicant will be proposing to offer mitigation through the purchase and ceding of additional lands to the National Park. This mitigation should be fully discussed in the Final EIS including the amount of land being considered, the ecological and recreational value of these areas, and the ability to replace or offset lost function and values of threatened resources. Methods to further avoid and minimize impacts to resources should be evaluated through the assessment process.

EPA recognizes the importance of land designated as a national park as an area protected and preserved for its ecological, historic, and recreational values. EPA looks forward to working closely with NPS in anticipation of publication of the Final EIS on these matters, and we are available to discuss our comments and recommendations included in our attached detailed comments. If you have any questions regarding our comments, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely yours,



Judy-Ann Mitchell, Chief
Strategic Planning & Multi-Media Programs Branch

Enclosure

EPA DETAILED COMMENTS**NATIONAL PARK SERVICE DRAFT EIS
SUSQUEHANNA TO ROSELAND 500-KV TRANSMISSION LINE
RIGHT-OF-WAY AND SPECIAL USE PERMIT****Alternative 1**

Alternative 1 (“No Action”) involves the denial of the applicant’s ROW permit and the existing lines would continue to remain in place. However, should the transmission line be routed around the Park, adverse environmental impacts, which are not being evaluated under a NEPA process, could occur outside the National Park.

Alternatives 2 and 2b:

Water Quality: The Draft EIS states that the blasting needed for placement of the tower foundations may impact underground water flow paths due to enlargement from fracturing, as well as the likelihood of the formation of conduits and sinkholes and the risk that surface streams and wetlands may lose water to the subsurface. The actual extent and intensity of vibrations caused by blasting depends on several factors, including rock type and blasting techniques. In addition, groundwater withdrawal and diversion of surface water may cause aboveground and underground hydrologic systems to be eliminated, and drilling and blasting also create the possibility of groundwater contamination.

While EPA understands that NPS will require a geologic survey and a blasting plan prior to any construction along the proposed ROW, EPA recommends that additional data and appropriate modeling be included in the Final EIS to improve the analysis of impacts to groundwater and surface waters. This additional information is particularly important in the case of the limestone subsurface in the ROW of Alternatives 2 and 2b, as the Van Campens Brook and wetland complex has documented high resource values. EPA also notes that Van Campens Brook is a Category One stream under the New Jersey Department of Environmental Protection’s water quality classification system in recognition of its exceptional ecological significance, including its value to native brook trout. We are concerned that an increase in total suspended solids (TSS) and/or a loss of flow will adversely affect not only native brook trout, but all species.

Wetlands: We understand that preliminary scoping and coordination has occurred with the U.S. Army Corps of Engineers, Philadelphia District (Corps), with respect to possible impacts to wetlands and waters of the United States, and that the Corps has made a preliminary determination that either a Nationwide Permit or SPGP-3 would apply to this project. We encourage NPS and the applicant to continue coordination with the Corps and other resource agencies, including EPA, Pennsylvania Department of Environmental Protection and New Jersey Department of Environmental Protection regarding permitting requirements. While the Draft EIS states that direct impacts to wetlands from fill are small, the indirect impacts to wetlands from blasting (discussed above) and conversion (vegetation removal) should both be quantified.

In addition, EPA does not believe the mitigation plan included in Appendix F provides sufficient information to determine whether impacts to wetlands are being fully mitigated; EPA recommends additional agency coordination to ensure a more comprehensive evaluation of wetland and stream impacts. Moreover, EPA recommends that practices used to minimize impacts to streams and wetlands be specified in the Final EIS, including all wetlands mitigation plans.

EPA also notes that Arnott Fen, within the ROW for Alternatives 2 and 2b, is considered a rare and unique wetland community, due in part to the underlying limestone bedrock. The hydrology of the Arnott Fen influences the array of species living in this rare community and includes numerous special-status wetland plant species that are not found anywhere else in the study area. In addition, Hogback Ridge also contains woodlands and a wetland considered a rare and unique community as it supports endangered species habitat and wetland plant species that are not found anywhere else in the study area, and is based on limestone bedrock. As stated above, any blasting may impact the hydrology and reduce the values of these exceptional wetlands, and should be discussed fully in the Final EIS.

EPA is concerned about the disagreement discussed in the Draft EIS between NPS and the applicant regarding the existing ROW agreement as to how the applicant would identify and remove “danger trees” and whether those actions, if permitted, might in effect increase the ROW beyond that defined in Alternative 2B. EPA recommends that before the Final EIS is released, the applicant’s existing ROW property rights be clarified.

Alternative 3:

Water Quality: Most of the slopes along the Alternative 3 corridor range from 10 percent to 30 percent; there are relatively few areas with a slope less than 10 percent. In addition, a few areas with a slope of 40 percent to 50 percent occur along the proposed transmission line route. As more than 25 of the towers required for Alternative 3 would be constructed in areas with a slope of greater than 10 percent, blasting and excavation impacts to water quality must be evaluated. EPA recommends that modeling of possible landslides and erosion be included in the DEIS.

EPA is also concerned that the direct, indirect and cumulative impacts to all resources within the Worthington State Forest are not included in the DEIS. As the NPS, in Alternative 3, suggests placement of the line within the national park boundaries, and crossing into Worthington State Forest, it appears appropriate for the study to identify and analyze all environmental impacts to that area and include them in the Final EIS. We recommend that the Final EIS include an analysis of the potential impacts, and that NPS work with the New Jersey Department of Environmental Protection to ensure that the impacts are properly characterized.

Information Needs

Air Quality: The Draft EIS states that all alternatives will have similar air quality impacts, however, no data is included to support this statement, nor does the Draft EIS discuss emissions mitigation (such as diesel particulate filters) from the diesel engines required to

construct and maintain the transmission line. EPA recommends that the Final EIS provide information on the levels of emissions and impacts to air quality. In addition, please note that Warren and Sussex Counties in New Jersey are designated as non-attainment for ozone, and that a General Conformity Applicability Analysis for each alternative in these counties will be necessary if a permit is approved.

Water Quality: The Draft EIS uses the U.S. Forest Service's Water Erosion Prediction Project (WEPP) model to estimate increased TSS concentrations. As the WEPP model did not detect differences between the alternatives, the topic of surface water and water quality was not carried forward in this Draft EIS. However, the Environmental Consequences section of the document states that "The increase of sediment loads and total suspended solids due to soil erosion from the construction and use of access roads and crane pads would also contribute to adverse impacts. An increase in sediment loads and turbidity could adversely affect the habitat, reproduction, respiration, and survival of fish and benthic macroinvertebrates and could bury or smother aquatic vegetation". EPA recommends that the WEPP model and its conclusions for all alternatives be included in an Appendix of the Draft EIS to allow for a more complete review of the model's conclusions.

Environmental Justice: EPA recommends that the Final EIS include the documentation by which the NPS determined that there would be no impact to minority or low-income populations. The environmental justice evaluation should identify any potentially at-risk communities that are inside the study area, identify the demographics of the communities, discuss census tract and census block group information, any minority or low-income populations within those tracts or block groups, and a discussion of activities, such as blasting, that might pose adverse risks or impacts to environmental justice populations.

Cumulative Impacts: While the Draft EIS discusses the cumulative impacts to individual resource types, we recommend that more detailed information be provided in the Final EIS, including an analysis of impacts to areas immediately outside the National Park units. The Draft EIS accurately indicates that an overall adverse cumulative impact can be expected from the upgrade of the line. It is unfortunate that the impacts of the complete Susquehanna Roseland transmission line will not be evaluated, and therefore the full degree of adverse cumulative impacts will not be identified, including those impacts that will occur from the generation of power being transmitted over the proposed upgraded line.

Endangered Species: As Alternative 2 and 2b, as well as other build alternatives will affect several the foraging and/or breeding areas of federally listed endangered species (e.g., Indiana Bat, bog turtle) and several state-listed species, we recommend that the Final EIS include more information on the potential impacts to endangered and threatened species, including the status of consultations with the U.S. Fish and Wildlife Service (FWS). If possible, EPA recommends that the FWS Biological Opinion be included in the Final EIS.

Climate Change and Greenhouse Gas Emissions: EPA recommends that the Final EIS provide quantitative information on the extent to which removal of mature forests associated with each alternative would impact the ability of the Park units to provide carbon sequestration benefits.

The NPS states that the park is a carbon sink, but the issues of the contribution of the alternatives to climate change through greenhouse gas emissions was dismissed from further analysis. However, forest preservation maintains carbon storage and forest management that increases carbon sequestration can augment forests' natural carbon storage capacity. (Perschel et al., 2003) Each alternative removes many acres of trees and vegetation that will affect the sequestration of carbon and should be discussed and differentiated in the Draft EIS in those terms.

Landslides and Erosion: EPA recommends that modeling of possible landslides and erosion are included in the Final EIS.

Impacts to Worthington State Forest (New Jersey): The direct, indirect and cumulative impacts to resources within the Worthington State Forest are not included in the Draft EIS.



United States Department of the Interior

FISH AND WILDLIFE SERVICE



In Reply Refer To:

2008-I-0319

New Jersey Field Office
Ecological Services
927 North Main Street, Building D
Pleasantville, New Jersey 08232

Tel: 609/646 9310

Fax: 609/646 0352

<http://www.fws.gov/northeast/njfieldoffice/>

JAN 31 2012

Mr. John J. Donahue, Superintendent
Delaware Water Gap National Recreation Area and
Middle Delaware National Scenic and Recreational River
Bushkill, Pennsylvania 18324

Ms. Pamela Underhill, Superintendent
Appalachian Trail Park Office
P.O. Box 50
Harpers Ferry, West Virginia 25425

Dear Mr. Donahue and Ms. Underhill:

As a cooperating agency for the National Park Service's (NPS) Susquehanna to Roseland 500 kV Transmission Line (SRLINE) Environmental Impact Statement (EIS), the U.S. Fish and Wildlife Service (FWS) has reviewed the December 2011 Draft EIS (DEIS). The FWS Pennsylvania and New Jersey Field Offices (PAFO and NJFO, respectively) provide the following comments pursuant to the National Environmental Policy Act of 1969 as amended (83 Stat. 852; 42 U.S.C. 4321 *et seq.*) (NEPA); Section 7 the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) (ESA); the Bald and Golden Eagle Protection Act (54 Stat. 250; 16 U.S.C. 668-668d) (Eagle Act); and the Migratory Bird Treaty Act (40 Stat. 755; 16 U.S.C. 703-712) (MBTA).

The project proponents, PSE&G and PPL Electric (jointly, the applicant), have applied to NPS to construct a portion of the Susquehanna to Roseland 500kV transmission line and reconstruct an existing 230-kV line along their current Right of Way through three NPS units: the Appalachian National Scenic Trail, the Delaware Water Gap National Recreation Area (DWGNRA), and the Middle Delaware National Scenic and Recreational River. FWS is committed to assisting NPS in meeting its EIS schedule and fulfilling its responsibilities under Federal wildlife laws.

ALTERNATIVES

The FWS appreciates the cooperation of NPS in considering impacts to Cherry Valley National Wildlife Refuge (NWR) in its evaluation of alternatives. Alternative 6/7 has been dropped, in part, to avoid impacts to the NWR. FWS staff will continue to assist NPS and the companies to evaluate alternatives and select a feasible alternative with the least impact on fish and wildlife.

FEDERALLY LISTED SPECIES

Bog Turtle (DEIS page 183)

Within NPS Units

Alternatives 2 and 2b: In a letter dated January 27, 2010, PAFO provided comments on impacts to the federally listed (threatened) bog turtle (*Clemmys [Glyptemys] muhlenbergii*). These comments pertained to Alternatives 2 and 2b and were based on information that had been provided to FWS at that time. As discussed in that letter, there is one known bog turtle site on NPS lands that may be affected by Alternatives 2 and 2b, depending on the specific access route chosen in this area. As indicated in that letter, if the southern route option is used for access, impacts can be avoided and minimized by using a time of year restriction or having a recognized, qualified bog turtle surveyor on-site during construction. Therefore, the January 27, 2010 letter recommended that the southern route be used to minimize impacts to this species. On the other hand, if the northern route is used for access, direct impacts to the bog turtle could occur and formal consultation through Section 7 of the ESA would likely be necessary.

The NJFO addressed the bog turtle via letter dated October 21, 2010. The NJFO subsequently reviewed bog turtle survey reports for NPS lands along Alternatives 2 and 2b. Via comments transmitted July 12, 2010, NJFO concurred with the June 17, 2010 Bog Turtle Habitat Assessment for Wetlands NPS 025A, 025B, and 010, and with the September 10, 2010 Phase 2 Bog Turtle Survey Report. No bog turtles were found. However, if Alternative 2 or 2b is selected, FWS will work with NPS and the applicant to determine if any Conservation Measures are necessary in this area based on proximity to a known bog turtle occurrence and the specific project activities proposed in and near suitable habitat.

No further bog turtle surveys are recommended within NPS units along Alternatives 2 or 2b. If additional information about possible impacts of Alternatives 2 and 2b (e.g., blasting) has become available since our previous review, FWS may reconsider our previous recommendations and/or determinations.

Alternatives 3-5: FWS understands that NPS is undertaking Phase 1 bog turtle surveys along Alternatives 3, 4, and 5 within NPS units. All wetlands within 300 feet of these various alignments should be surveyed by a recognized, qualified surveyor following FWS survey guidelines.¹ The Phase 1 survey reports should be evaluated by the agencies before initiating any presence/absence (Phase 2) surveys. Phase 2 surveys need to be conducted between April 15 and June 15, with at least 2 surveys occurring in May.

If properly implemented species surveys are negative, then the project activities along these routes within NPS units would be considered "not likely to adversely affect" the bog turtle. If surveys reveal presence of this species, then FWS will work with the NPS and applicant to develop Conservation Measures to avoid impacts (e.g., move tower locations). If impacts cannot be fully avoided, formal consultation may be necessary; in this case, FWS would work to expedite issuance of a BO in recognition of NPS' firm schedule to complete the NEPA process.

¹ <http://www.fws.gov/northeast/njfieldoffice/pdf/bogturtlesurvey.pdf>

Outside NPS Units

Alternatives 2 and 2b: Bog turtle survey work along Alternatives 2 and 2b has conducted been by the applicant, and Conservation Measures have been developed with FWS input. Outside NPS units, the FWS does not anticipate adverse effects to the bog turtle from Alternatives 2 or 2b; however, our analysis of this route is not yet complete (*e.g.*, there are a few outstanding survey reports, Conservation Measures need to be finalized, and blasting has not yet been considered).

Alternatives 3-5: If Alternative 3, 4 or 5 is selected, Phase 1 bog turtle surveys should be conducted for any wetlands within 300 feet of the proposed project route in New Jersey, and in Monroe and Northampton Counties, Pennsylvania, for all portions of the selected route that were not already covered by surveys for Alternative 2 and 2b. FWS and NPS are currently working out a process by which impacts to federally listed species outside NPS units can be evaluated.

Indiana bat (DEIS page 186)

Within NPS Units

Alternatives 2 and 2b: Comments regarding the federally listed (endangered) Indiana (*Myotis sodalis*) bat were included in PAFO's January 27, 2010 letter and NJFO's October 21, 2010 letter. For Alternatives 2 and 2b, surveys for this species were carried out between May 27 and August 12, 2009 in accordance with the FWS Indiana bat mist-net survey guidelines. No Indiana bats were found. Portal searches in these areas, conducted between May 5 and May 9, 2009, also revealed no Indiana bats. Consequently, Alternatives 2 and 2b would not be likely to adversely affect Indiana bats within NPS units.

No further Indiana bat surveys are recommended within NPS units along Alternatives 2 or 2b. If additional information about possible impacts of Alternatives 2 and 2b (*e.g.*, blasting) has become available since our previous review, FWS may reconsider our previous recommendations and/or determinations.

Alternatives 3-5: FWS understands that NPS is undertaking Indiana bat habitat assessments along Alternatives 3, 4, and 5 within NPS units. Results of the habitat assessments should be evaluated by the agencies prior to initiating presence/absence surveys. FWS will likely recommend mist-net surveys and portal searches, to be carried out by a recognized, qualified Indiana bat surveyor for all areas of suitable habitat not covered by the previous surveys. Mist-net surveys should be carried out in forested portions of these alternatives, while portal searches should be carried out along the entire length (if not previously surveyed). Mist-net surveys for this species need to be carried out between May 15 and August 15.²

If properly implemented species surveys are negative, then the project activities along these routes within NPS units would be considered "not likely to adversely affect" the Indiana bat. If surveys reveal presence of this species, then FWS will work with the NPS and applicant to

² <http://www.fws.gov/northeast/njfieldoffice/pdf/lbatsurvey.pdf>
<http://www.fws.gov/northeast/njfieldoffice/pdf/lbattlemetryNJ.pdf>

develop Conservation Measures to avoid impacts (e.g., move tower locations). If impacts cannot be fully avoided, formal consultation may be necessary; in this case, FWS would work to expedite issuance of a BO in recognition of NPS' firm schedule to complete the NEPA process.

Outside NPS Units

Alternatives 2 and 2b: Indiana bat survey work along Alternatives 2 and 2b has been conducted by the applicant and Conservation Measures developed with FWS input. Outside NPS units, the FWS does not anticipate adverse effects to the Indiana bat from Alternatives 2 or 2b; however, our analysis of this route is not yet complete (e.g., there are a few outstanding survey reports, Conservation Measures need to be finalized, and blasting has not yet been considered).

Alternatives 3-5: If Alternative 3, 4 or 5 is selected, mist-net surveys and portal searches should be conducted by a recognized, qualified Indiana bat surveyor for all areas of suitable habitat not covered by the previous surveys. FWS and NPS are currently working out a process by which impacts to federally listed species outside NPS units can be evaluated.

BALD EAGLE

As described in the DEIS, several alternatives under consideration have the potential to impact nesting and/or wintering bald eagles (*Haliaeetus leucocephalus*). The Kittanny Ridge and an important eagle wintering area along the Delaware River are of particular concern. As noted in the DEIS, FWS recommends adherence to the National Bald Eagle Management Guidelines³ to minimize impacts to this species, and ensure compliance with the Eagle Act. The FWS is working with NPS to evaluate the need for any permit(s) under the Eagle Act for the various alternatives under consideration.

OTHER MIGRATORY BIRDS

The FWS is the principal Federal agency charged with protecting and enhancing populations and habitat of migratory bird species. The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. While the MBTA has no provision for authorizing incidental take, the Service recognizes that some birds may be killed even if all reasonable measures to avoid take are implemented. Unless the take is authorized, it is not possible to absolve individuals, companies or agencies from liability even if they implement avian mortality avoidance or similar conservation measures. However, the Office of Law Enforcement focuses enforcement action on those individuals, companies, or agencies that take migratory birds with disregard for their actions and the law.

As discussed in the DEIS, the potential exists for avian mortality from electrocutions or collisions with power lines as well as direct impacts from habitat loss for wintering, migrating, and breeding migratory birds and indirect impacts from fragmentation, site avoidance, and disturbance of birds within the project boundaries. Electrocutions from power lines are of particular concern to raptors, as their size, hunting strategy, and nesting preferences make them

³ <http://www.fws.gov/migratorybirds/CurrentBirdIssues/BaldEagle/NationalBaldEagleManagementGuidelines.pdf>

particularly vulnerable. Other species, such as corvids (crows and ravens) and cormorants also show an affinity for nesting on power lines. Collisions are most common at night, or under low visibility conditions, because migratory birds and land birds either cannot see the utility lines, or they lack the ability to negotiate obstacles quickly enough to avoid them. Site-specific factors that should be considered in project siting to avoid and minimize the risk to birds include avian abundance; the quality, quantity, and type of habitat; geographic location; type and extent of bird use (*e.g.*, breeding, foraging, migrating); and landscape features.

The Avian Power Line Interaction Committee (APLIC⁴) and the Service⁵ have developed guidelines for power lines to minimize impacts from existing facilities and in the construction of new utility and energy systems and associated infrastructure. According to the DEIS, any “build” alternative selected by NPS would be constructed according to APLIC standards, and the best available deterrence technology would be used.

In addition to following the APLIC standards, we offer the following recommendations to avoid and minimize impacts to migratory birds within and around the project area.

1. Work with FWS to revise and finalize the draft Avian Protection Plan (APP) previously developed by PSE&G to minimize the risk of electrocution, collision, disturbance and habitat impacts for migratory birds. The APP should apply minimum standards along the length of the line, with enhanced protections in sensitive areas.
2. Report bird mortalities and injuries resulting from electrocutions or collisions on the Service’s online Bird Fatality/Injury Reporting Program⁶ (Bird Report program). The Bird Report program was designed, with significant industry input and feedback, to provide a user-friendly, easily-accessed, method of allowing members of the electric utility industry to voluntarily report bird mortalities and injuries resulting from electrocutions or collisions with electrical utility equipment. Collecting information about the locations and circumstances under which birds are killed or injured on power equipment serves the primary purpose of determining how to prevent future bird interactions. The database is intended for use by utilities to see which structures and equipment are hazardous to birds, and under what conditions, and assists in evaluating and enhancing the effectiveness of retrofitting.
3. Minimize land and vegetation disturbance and reduce habitat fragmentation during project design and construction, especially if habitat cannot be fully restored after construction. Where practicable, concentrate construction activities, infrastructure, and man-made structures (*e.g.*, poles, roads) on lands already altered or cultivated, and away from areas of intact and healthy native habitats. Co-locate roads, staging areas, and other infrastructure in or immediately adjacent to already-disturbed areas (*e.g.*, existing rights-of-way, agricultural fields). If co-location is not feasible, select fragmented or degraded habitats rather than relatively intact areas.

⁴ www.aplic.org

⁵ <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/BirdHazards.html>

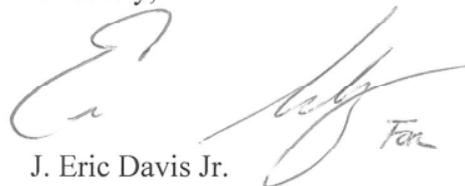
⁶ <https://birdreport.fws.gov/>

4. Where disturbance is necessary, clear natural or semi-natural habitats (*e.g.*, forests, woodlots, reverting fields, shrubby areas) between September 1 and March 14, which is outside the nesting season for most native bird species. Without undertaking specific analysis of breeding species and their respective nesting seasons on the project site, implementation of this seasonal restriction will avoid take of most breeding birds, their nests, and their young (*i.e.*, eggs, hatchlings, fledglings).
5. Avoid permanent habitat alterations in areas where birds are highly concentrated or where sizable prey bases exist. Avoid establishing sizable structures along known bird migration pathways or known daily movement flyways (*e.g.*, between roosting and feeding areas). Examples of high concentration areas for birds are wetlands, State or Federal refuges, Audubon Important Bird Areas, private duck clubs, rookeries, roosts, and riparian areas.
6. Develop a habitat restoration plan for the proposed site that avoids or minimizes negative impacts on vulnerable wildlife. Use only plant species that are native to the local area for revegetation of the project area.
7. Work with FWS to include protective measures for migratory birds into the Vegetation Management Program for each State.

CONCLUSION

The FWS appreciates the opportunity to review the DEIS. FWS will continue working cooperatively with NPS through finalization of the EIS and completion of consultation under Section 7 of the ESA. Please contact Wendy Walsh at (609) 383-3938, extension 48, if you have any questions about the above comments, or require further assistance regarding federally listed threatened or endangered species.

Sincerely,



The image shows a handwritten signature in black ink, which appears to be "J. Eric Davis Jr.". The signature is written in a cursive style and is positioned to the right of the typed name.

J. Eric Davis Jr.
Field Supervisor

Enclosure: Specific comments on language in the DEIS

cc: RO, Alex Hoar, Glenn Smith, Paul Phifer, Scott Kahan
PAFO, Pam Shellenberger, Clint Riley
Wallkill NWR, Mike Horne

Amanda J. Stein, Biologist/Project Manager
Delaware Water Gap National Recreation Area
1 River Road
Bushkill, Pennsylvania 18324-9999

National Park Service Denver Service Center – TIC
Attn: SRLINE EIS
12795 W. Alameda Parkway
Denver, Colorado 80225-0287

**Susquehanna to Roseland Transmission Line EIS – DEWA Internal Review Comment Form
Draft EIS (November 21, 2011 to January 31, 2012)**

Reviewer's Name (Initials) :

	Initials	Page #	Section, paragraph, line #	Your Comment / Proposed Revision	For Consultant's Response / Resolution
1.	wlw	181	Golden-winged warbler	Please change this statement, "The species is federally listed as a species of special concern..." to read, "USFWS is conducting a status review of the golden-winged warbler in response to a petition to list this species under the ESA...."	
2.	wlw	186	small-footed bat	Please change this statement, "The species is federally listed as a species of special concern..." to read, "USFWS is conducting a status review of the small-footed bat in response to a petition to list this species under the ESA...."	
3.	wlw	187	Northern myotis	Please to read, "USFWS is conducting a status review of the Northern myotis in response to a petition to list this species under the ESA. This species is also listed as a species of special concern in Pennsylvania."	
4.	wlw	436	Consultation	NPS is currently preparing a BA for this project, consistent with policy that requires a BA for all "major construction activities" that "may affect" listed species. Please revise this section in the FEIS to reflect the current status of the consultation at that time.	
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United States
Department of
Agriculture

Forest
Service

Grey Towers National
Historic Landmark

151 Grey Towers Drive
PO Box 188
Milford, PA 18337

File Code: 1930

Date: January 30, 2012

United States Department of Interior
National Park Service
Denver Service Center – M. Elmer, Planning
DEWA SR Line ROW EIS
12795 W. Alameda Parkway
P.O. Box 25287
Denver, CO 80225-9901

Subject: Susquehanna to Roseland 500 kV Transmission Line ROW, Special Use Permit Environmental Impact Statement

RE: Scoping Period Comment for Development of Final Environmental Impact Statement (EIS)

Dear Superintendents Donahue & Pamela Underhill,

The USDA Forest Service at Grey Towers National Historic Site (GTNHS) is providing these comments and opinions for the current final report EIS for the 500kV transmission line through the lands managed by Delaware Water Gap National Recreation Area (DEWA), the Appalachian Trail (APPA), and the Middle Delaware Scenic River (MDSR). I have reviewed the draft EIS reports and have considered the potential impacts of the proposed 500 kilovolt transmission lines through both units of the National Park System.

I have considered the impacts of the proposed action which might be expected for each of the five (5) alternatives to Grey Towers National Historic Site, the Pinchot Greenway and the historic and regional context where both reside. GTNHS supports Alternative 1 (the "No Build" alternative) as the "NPS preferred alternative" for the Susquehanna-Roseland 500 KV transmission line because it provides the least impact to the visual quality, cultural and natural resources of the region.

If the NPS determines that impacts can be mitigated for one of the remaining alternatives, the Forest Service at GTNHS supports the selection of Alternative #5 as the Park's alternative for the ROW permit. The location of this alternative near the DEWA southwestern boundary appears to have the least impacts to the natural, cultural, and scenic resources protected within the Park lands and waters in that ROW.

Thank you for the opportunity to comment on the draft EIS report for this project. Conservation and use of the nation's historic, cultural, scenic and natural resources is also the mission of the USDA Forest Service, and we appreciate the opportunity to work with our neighboring land management agency partners.

Sincerely,

Allison Stewart
Director, Grey Towers National Historic Site
151 Grey Towers Drive
Milford, PA 18337
(570) 296-9630

"Where conflicting interests must be reconciled, the question shall always be answered from the standpoint of the greatest good of the greatest number in the long run". Quote from Gifford Pinchot, first Chief of the US Forest Service and lead conservationist in America.



Correspondence (16)

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Author Information

Keep Private: Yes
Name: James Rousseau
Organization: United States Coast Guard District 5 (dpb)
Organization Type: F - Federal Government
Address: 431 Crawford Street Portsmouth VA 23704-5004
 Portsmouth, WA 23323
 USA
E-mail: James.L.Rousseau2@uscg.mil

Correspondence Information

Status: New **Park Correspondence Log:**
Date Sent: 12/27/2011 **Date Received:** 12/27/2011 12:00 AM
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

The Coast Guard does not permit aerial power transmission lines unless they are interal features of a bridge and are used in its construction, maintenance, operation or removal or they are affixed to the bridge and affect the clearances provided by the bridge. 33 CFR 322.5 (i) Special Policies Corps of Engineers, Dept of the Army DoD covers Power transmission lines crossing navigable waters of the United States with minimum additional clearance above clearance required for bridges in the area listed by a table in the CFR. The Delaware River past Calhoun Street Trenton NJ is not subject to ebb and flow of the tide for Coast Guard jurisdiction under the General Bridge Act 33 USC5 25 and Ammendment in 1983 Coast Guard Authorization Act. If more information is required from the Coast Guard after a location has been selected for this project please submit a letter to Bridge Program Manager, 5th District Mr. Waverly Gregory U.S. Coast Guard 431 Crawford Street, Portsmouth VA 23704-5004.

TRIBAL GOVERNMENT LETTERS

Correspondence (11)

[Enter More](#) [Edit](#) [Print](#) [Back To List](#) 

Author Information

Keep Private: No
Name: Kim Jumper
Organization: Shawnee Tribe
Organization Type: Q - Tribal Government
Address: 29 S. Highway 69A
 Miami, OK 74354
 USA
E-mail: kjumper_shawneetribes@hotmail.com

Correspondence Information

Status: New **Park Correspondence Log:**
Date Sent: 12/05/2011 **Date Received:** 12/05/2011 12:00 AM
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

The Shawnee Tribe's Tribal Historic Preservation Department concurs that no known historic properties will be negatively impacted by this project. We have no issues or concerns at this time, but in the event that archaeological materials are encountered during construction, use, or maintenance of this location, please re-notify us at that time as we would like to resume consultation under such a circumstance.

Thank you for giving us the opportunity to comment on this project.

Sincerely,
 Kim Jumper, THPO
 Shawnee Trib^

STATE GOVERNMENT LETTERS

**State of New Jersey****CHRIS CHRISTIE**
*Governor***DEPARTMENT OF ENVIRONMENTAL PROTECTION**
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Telephone Number (609) 292-3600
FAX NUMBER (609) 633-2102**BOB MARTIN**
*Commissioner***KIM GUADAGNO**
Lt. Governor

January 24, 2012

Mr. John J. Donahue
Superintendent
Delaware Water Gap National Recreation Area &
Middle Delaware National Scenic and Recreational River
HQ River Road
Bushkill, PA 18324

National Park Service
Denver Service Center - Planning Division
Attn: Morgan Elmer
12795 W. Alameda Parkway
P.O. Box 25287
Denver, CO 80225-0287

**RE: Susquehanna to Roseland (S-R) 500kV Transmission Line Right-of-Way
and Special Use Permit Draft Environmental Impact Statement**

Dear Superintendent Donahue and Mr. Elmer:

The New Jersey Department of Environmental Protection (Department) has completed its review of the Susquehanna to Roseland (S-R) 500kV Transmission Line Right-of-Way and Special Use Permit Draft Environmental Impact Statement (EIS) dated December, 2011. The EIS has reviewed impacts associated with various alternative routes within and proximate to the boundaries of the Delaware Water Gap National Recreation Area and Middle Delaware National and Scenic and Recreational River.

Although the alternatives that were explored have varying impacts within the Park, resource impacts outside of the Park within New Jersey will be increased by implementing any of the alternatives except Alternative 2 (the applicant's preferred route following the existing right-of-way) and Alternative 2b (the applicant's alternate route which would also include widening the existing right-of-way route of Alternative 2). Some of the increased and unacceptable impacts from alternatives other than an expansion of the existing ROW have been identified and expressed to the National Park

Service in prior communication from this Office dated October 5, 2011 which is attached hereto.

Therefore, as previously expressed, the Department will require this project to remain in the existing Right of Way (ROW) for its entire length in New Jersey and rejects any alternatives other than Alternative 2 or 2b.

Within the context of the above statement, the Department's Office of Permit Coordination and Environmental Review (PCER) distributed the Draft EIS for technical review and comment to numerous elements within the Department. On behalf of the Department, we offer the attached technical comments regarding cultural resources, the Green Acres Program, air quality, fish and wildlife, and land use regulations regarding environmental impacts. Nothing herein shall be construed to offer any support for any alternative other than Alternative 2 and/or Alternative 2b.

Thank you for giving the Department the opportunity to comment on the Susquehanna to Roseland 500kV Transmission Line Right-of-Way and Special Use Permit Draft Environmental Impact Statement.

Sincerely,



Scott Brubaker, Director
Office of Permit Coordination
and Environmental Review

Attachment

- C: Bob Martin, Commissioner w/o attachment
- Pamela Underhill, Superintendent, Appalachian National Scenic Trail with attach.
- Donna Mahon, NJDEP – Natural and Historic Resources; with attachment
- Angela Skowronek, NJDEP – BAQP; with attachment
- Kelly Davis, NJDEP – NJDFW; with attachment
- Daniel Saunders, NJDEP- SHPO; with attachment
- Lou Cattuna, NJDEP – DLUR; with attachment
- John Heiferty, NJDEP – DLUR; with attachment
- Judeth Yeany, NJDEP – Green Acres; with attachment
- Ken Koschek, NJDEP – PCER; with attachment

TECHNICAL COMMENTS

1/24/2012

NJDEP Comments on the Susquehanna to Roseland 500kV Transmission Line Right-of-Way and Special Use Permit Draft Environmental Impact Statement.

CULTURAL RESOURCES

The Department's Historic Preservation Office (HPO) has been in consultation with the National Park Service (NPS) and Public Service Electric and Gas (PSE&G) regarding this project pursuant to Section 106 of the National Historic Preservation Act. As discussed in the EIS, the project has the potential to affect historic properties, archaeological sites and cultural landscapes depending on the alternative selected. Cultural resource surveys are on-going. If historic, archaeological and cultural properties will be adversely affected by the project, the NPS, through consultation, shall work to avoid, minimize, and/or mitigate those effects on historic properties pursuant to Section 106 of the National Historic Preservation Act.

GREEN ACRES PROGRAM

Alternative 3 through 7 will increase impacts to State lands. Any State or local owned lands within the proposed project that have Green Acres restricted uses of conservation and recreation use would require approval of the Commissioner and the State House Commission to divert lands from conservation and recreation restrictions.

AIR QUALITY

The Department's Bureau of Air Quality Planning (BAQP) has the following comments.

Laws, Regulations, and Policies Relevant To This EIS

The EIS includes Table 1, Federal Laws, Regulations, Executive Orders, and Secretarial Orders Potentially Applicable to the S-R Line. Table 1, however, does not include the Clean Air Act's Federal General Conformity Regulation at 40 CFR Part 93 Determine Conformity of Federal Actions To State or Federal Implementation Plans. This regulation should be included in Table 1.

Air Quality Issues

The EIS states, "Section 118 of the 1963 Clean Air Act (42 USC 7401 et seq.) requires all park units to meet Federal, state and local air pollution standards." And, "Impacts on air quality would be the same across all action alternatives inside and outside the study area.

The amount of criteria pollutants emitted as a result of the action alternatives would include trace amounts of particulate matter, nitrogen oxides, and carbon monoxide and impacts on air quality would be no greater than minimal. On a regional level, the amount of criteria pollutants emitted would not be substantial and the impacts on air quality would be the same for all action alternatives. Therefore, this resource topic is dismissed from further analysis."

The BAQP notes that in order to meet the requirements of the Federal General Conformity regulation, the direct and indirect air emissions from the entire project must be considered. Please provide a quantitative discussion for the direct and indirect air emissions associated with the project activities. Since the project is located in the New York-New Jersey-Long Island 8-hour Ozone Nonattainment Area, the applicable General Conformity de minimis threshold is 100 tons per year for NOx. The EIS should demonstrate that project emissions are less than 100 tons per year of NOx in order for the project to be exempt from the mitigation and other requirements of the Federal General Conformity regulation.

Appendix I includes an August 3, 2010 letter from Frank J. Cianfrani, Chief, Regulatory Branch of the Army Corps of Engineers to the John J. Donahue, Superintendent United States Department of the Interior. This letter states "Preliminarily the District has determined that regulated work may qualify for authorization through applicable Department of the Army (DA) nationwide permits, or Pennsylvania State Programmatic General Permit 3. Both of these are DA general permit processes where an applicable NEPA document has already been prepared, and do not require the Corps to prepare a project specific NEPA document." Based upon this statement, it appears that another NEPA document applies to the project. The United States Environmental Protection Agency's (USEPA's General Conformity Guidance: Questions and Answers (July 13, 1994) addresses segmentation of a project. The guidance states that a project cannot be segmented and that "all reasonably foreseeable emissions must be included for the project as a whole in determining applicability." If the Army Corps of Engineers will be issuing a permit or permits for work in New Jersey's New York- New Jersey-Long Island (NY-NJ-CT) 8-hour Ozone Nonattainment Area, then the direct and indirect air emissions associated with the permitted work should be included in an Applicability Analysis and Conformity Determination for the portion of the project in the nonattainment area. The project can not be segmented into air emissions from work inside the National Park units and air emissions from work outside the National Park units.

FISH AND WILDLIFE

The Department's New Jersey Division of Fish & Wildlife (NJDFW) offers the following comments.

General

In “ACRONYMS AND ABBREVIATIONS,” New Jersey Division of Fish and Wildlife should be NJDFW.

Freshwater Fisheries

The NJDFW’s Bureau of Freshwater Fisheries would concur with the conclusion, on Page 23, that the “likelihood of 100% failure of erosion and sedimentation controls is remote so it is unlikely that impacts to surface water quality would be detectable,” however, any failures and clean up would be the responsibility of the applicant.

In Table 12, the New Jersey status for listed fish would be Eastern Mudminnow – Stable (S), Ironcolor shiner – N, Bridle shiner – Regional Priority (RP), Banded sunfish – Regional Priority (RP). New Jersey would also consider Brook trout, American Brook lamprey and Slimy sculpin to be special status species in this area.

Volume 1

General Comments:

- Any alternative that would require blasting through or otherwise destroy or alter the natural features of the Kittatinny Ridge (i.e., outcrops, talus, fissures) is a concern. The ridge contains timber rattlesnake and northern copperhead dens and gestation and birthing sites. Dens are long-lived elements of rattlesnake habitat and once established it is extremely rare for timber rattlesnakes to change or “switch” dens, with some dens existing for hundreds or thousands of years. The NJDFW’s Endangered and NonGame Species Program (ENSP), and the NPS continue to locate previously undocumented dens and gestation/birthing habitats as more surveys are conducted. Destruction or alteration of a den could lead to the demise of that local population as the snakes would likely freeze to death, should the alteration cause changes in microclimate or the complete eviction from the den. Eliminating a local den not only means the loss of that population but may also create a gap in the connectivity between den populations, decreasing genetic exchange which could eventually weaken the populations (e.g., weaker immune systems, inbreeding mutations, etc.).
- There is concern about any alternatives that will further fragment public or otherwise conserved lands (e.g., Alternative 5 cutting through Allamuchy State Forest). Fragmentation of contiguous forested habitat could have detrimental impacts to forest-dwelling species. Not only does it create an open space that slow-moving, terrestrial bound animals (reptiles and amphibians) would have to cross, increasing their risk of predation, but it has been documented that the creation of edge habitat often increases the presence of scavengers (such as raccoons) and decreases the presence of nesting forest songbirds proximate to the edge, in some cases as much as 300 feet into the adjacent forest.
- PSE&G should be required to limit the construction and activity on the ground (e.g., fly the towers in and minimize on-the-ground mechanical work; i.e., the use of large

equipment) without widening the right-of-way when practicable. This would minimize the damage to the landscape and potential impacts to reptiles and amphibians.

- Depending on the precise locations of the proposed towers, winter construction *may* also help alleviate direct harm to the wildlife; this would need to be coordinated with the NPS and the NJDFW.
- The NJDFW recommends that PSE&G adopt BMP's for ROW maintenance that meet the approval of the NJDEP and the NPS.
- For songbirds, PSE&G should allow for low woody vegetation and ROW maintenance outside of the breeding season for songbird species as part of the mitigation. Low woody vegetation is critical to provide habitat for breeding golden-winged warblers and other shrub birds.
- If managed appropriately, allowing low woody vegetation to persist in the ROW will also prevent the ROW from being a forest break and be more of a canopy-gap for forest species such as cerulean warblers and black-throated green warblers. If all woody vegetation is removed from the Bushkill to Kittatinny Line (B-K line) in perpetuity then it can no longer be considered habitat for many bird species and the B-K line within the DEWA will no longer be a birder's hotspot. There are ways in which woody vegetation can be maintained within each span along a ROW where it will not be a threat to the wires, such as within wetlands where vegetation growth will be slower, outside the wire zone, and even within the wire zone when in close proximity (100-200 feet) to the towers, depending on topography.
- Alternative 2 and 2b will have no likely impact to known bog turtle or long-tailed salamander populations.

Chapter 3: Affected Environment

Freshwater Mussels, Page 105

- Crossings of the S-R line identified outside of Alternatives 2 and 2b have potential to impact listed freshwater mussels. Areas of concern include the Paulins Kill and Musconetcong River in the Delaware River Basin, and the South Branch Raritan and Lamington rivers in the Raritan River Basin. These waterways support populations of listed mussels, with the Paulins Kill providing habitat to the federally endangered dwarf wedgemussel (only one of four known New Jersey populations). Every effort should be made to avoid known listed and SC freshwater mussel occurrences in these waterways. Surveys will be needed at all potential stream crossings with suitable habitat present. Surveys should be coordinated with the ENSP and the USFWS, and should encompass an area 100 meters upstream and 300 meters downstream of the crossing.

Odonates, Page 159

- The NJDFW's Endangered and Non Game Species Program (ENSP) has not seen results of the invertebrate survey cited in the EIS, however, all data should be reviewed for the presence of soon-to-be listed Odonata species.

Freshwater Fish, Page 174

- The NJDFW's Bureau of Freshwater Fisheries should review the EIS for potential impacts to the bridge shiner, eastern mudminnow, wild trout, and other appropriate fish species.

Timber Rattlesnake (*Crotalus horridus horridus*), Page 184

- The northeastern timber rattlesnake is no longer identified as a subspecies. Both northeastern timber rattlesnakes and "canebrake" rattlesnakes are identified, taxonomically, as *Crotalus horridus*.
- "The timber rattlesnake's pattern of movement through the summer range ... gradually covering a territory of approximately 1 mile from the den and returning to the den in the fall."
 - This is not accurate. Timber rattlesnakes' home ranges vary significantly. Adult males can travel over 2 miles from dens in northern New Jersey although it seems, through telemetry, that most move within 1 ½ miles of their dens. Whether this is an outcome of a lack of receptive females during the breeding season within the males' core ranges has not been determined.
- "For hibernation, northern New Jersey populations of timber rattlesnake use communal den sites in rock outcroppings and talus slope areas associated with major ridges."
 - This is not accurate. Studies using transmitter-implanted timber rattlesnakes have revealed a variety of habitat characteristics surrounding dens, including but not limited to dens found in the [frequently documented] talus, fissures and ridgelines, but also within the forest (i.e., under the forest canopy) among boulder fields and small clusters of rocks. While surveyors commonly target major ridges for surveys, we have found populations using areas associated with interior forest hills rather than what is commonly identified as a "ridge". This has only increased ENSP's concern that undocumented (and less characteristic) dens may be overlooked during crucial surveys prior to construction activities.
- "Mature and juvenile individuals then follow scent trails back to their dens, which may be shared by several species (EcolSciences 2009b, 4, 5)."
 - This statement should be reviewed and a literature search conducted. The literature that ENSP's timber rattlesnake biologist has reviewed on various snake species has only ever discussed conspecific scent trailing, not shared trails across species. It is on this basis that makes it imperative that [late-summer] post-partum

timber rattlesnakes and northern copperheads be permitted to travel freely from the birthing areas to their dens (i.e., not be lifted or moved) as neonatal snakes must use their scent trail to locate a suitable den.

Golden-winged Warbler Page, 181

- Golden-winged warblers have been documented breeding along the B-K line within the DEWA within the last 5 years. Also, over 60% of New Jersey's golden-winged warbler breeding population occurs on ROWs, so it is important to maintain woody vegetation within the spans.

Chapter 4: Environmental Consequences Special-status Species (Aquatic and Terrestrial)

Impacts of Alternatives on Special-status Species

Alternative 2, Aquatic Species, Page 419

- Alternative 2 has potential to impact listed and SC freshwater mussels, as well as other aquatic species, via water quality degradation and habitat alterations.

Special-status Aquatic Species, Page 4437

- The ENSP does not support preconstruction relocation of freshwater mussels. There is often mortality associated with relocation efforts, and any such endeavor would require several years of monitoring to determine effects. Every effort should be made to avoid known freshwater mussel populations. Relocation should be looked upon as a last resort, only after 1) avoidance is deemed structurally unfeasible and 2) adherence to BMPs will not necessarily eliminate the potential for harm or mortality to the extant population. If it is absolutely necessary to relocate mussels, a monitoring protocol must be developed and submitted to the ENSP for approval.

Alternative 1: No Action

Special-status Aquatic Species, Page 439

Vol. 2

APPENDIX F-1: MITIGATION MEASURES

LANDSCAPE CONNECTIVITY, WILDLIFE HABITAT, AND WILDLIFE (Pages F-8 and F-9)

- The ENSP recommends the NPS implement seasonal restrictions on maintenance within 200 meters of any documented timber rattlesnake and/or northern copperhead dens during emergence (April 1 – May 31) and ingress (including neonatal movements, September 15 – October 31) when snakes will congregate in the area and within 50 meters of any documented gestation and/or birthing areas (July 1 – September 15).

- The ENSP recommends the NPS require the installation of devices that will prohibit raptors from nesting on the towers.
- The dates of March 15 – July 31 to refrain from vegetation maintenance for migratory birds are not specific to individual state-listed birds breeding along the ROW. The ENSP has a document of no-harm management guidelines for vegetation maintenance along utility ROWs. Based on this document, the ENSP recommends refraining from vegetation removal from March 1 through Aug 31 to avoid impacts on raptors, shrub birds, and forest birds.

SPECIAL STATUS SPECIES (Pages F-9 - F-13)

- Page F-10: The use of “construction monitors” must include NJ ENSP-approved venomous snake monitors and turtle monitors. Monitors would be required to implement NJ ENSP and NPS-approved monitor protocol and permit conditions.
- Page F-11: “In areas with known snake dens, blasting activities are recommended to occur between April and September, after special-status snake species have left overwintering dens.”
 - The ENSP requests revising this statement. Blasting should be limited to occur only between June 1 – September 14 in areas where *no* timber rattlesnake and/or northern copperhead dens have been documented to avoid trapping snakes in currently undocumented dens. However, no blasting should occur within 100 meters of documented dens without coordination with NPS and should also avoid documented transient/“staging” basking habitat (typically found within 200 meters of dens) and when possible, documented gestation and birthing habitats.
 - The ENSP recommends that clearing of downed vegetation be restricted to the reptiles’ inactive season (November 1 – March 31), but when possible allow debris piles and downed vegetation to remain as potential foraging habitat and shelter.
 - The ENSP recommends the NPS require PSE&G to implement NPS-approved rights-of-way best management practices outlined by the ENSP.
- Page F-11: Seasonal restrictions should also include no in-stream work during glochidial release and spawning times for listed freshwater mussels. Times would be determined based on the species shown to be present, either through new surveys or existing records in Biotics.

LAND USE REGULATIONS

The Department’s Division of Land Use Regulations (DLUR) has determined that the project will require a Freshwater Wetlands Individual Permit and a Flood Hazard Area Individual Permit. Both of these Individual Permits require an environmental review, which will examine an alternative analysis to insure that impacts to all regulated areas

within New Jersey are minimized and mitigated. The EIS thoroughly reviews impacts within the boundaries of the Park and although the alternatives that were explored may reduce resource impacts on the Park, resource impacts outside of the Park within New Jersey will be increased in all alternatives except alternatives 2 and 2b. It should be noted that the DLUR will, of course, review any forthcoming permit applications as required to insure compliance with all applicable State regulations concerning all resources under the jurisdiction of the DLUR.

It should be noted that these comments are based on limited information provided and are thus preliminary in nature and not a NJDEP decision or approval and should not be construed as such now or during any future permit applications or submissions. Should you have any questions regarding this memo, please contact Lou Cattuna of the DLUR at (609) 984-2071.

**State of New Jersey****CHRIS CHRISTIE**
*Governor***DEPARTMENT OF ENVIRONMENTAL PROTECTION**
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Telephone Number (609) 292-3600
FAX NUMBER (609) 633-2102**BOB MARTIN**
*Commissioner***KIM GUADAGNO**
Lt. Governor

October 5, 2011

Superintendent John J. Donohue
Superintendent
Delaware Water Gap National Recreation Area
1 River Road
Bushkill, Pennsylvania 18324

Superintendent Pamela Underhill
Appalachian National Scenic Trail
National Park Service
P.O. Box 50
Harpers Ferry, West Virginia 25425

Re: PSE&G Susquehanna –Roseland transmission line upgrade NEPA comment

Dear Superintendents Underhill and Donahue:

As you know, the New Jersey Department of Environmental Protection Department (NJDEP or Department) has a strong interest in this project. Accordingly, the Department has examined the various alternatives proposed through the National Park Service (NPS) National Environmental Policy Act (NEPA) process to construct the above project.¹ As you also know, the Department has requested, via letter dated April 21, 2011 that Alternative # 3 be removed from consideration due to the identified impacts to New Jersey State forests, the Delaware River, and the Appalachian Trail in New Jersey. As you may also know, New Jersey policy opposes the expansion or construction of linear development outside of an existing similar Right of Way (ROW) if one exists, which does (your Alternatives # 2 or 2b, PSE&G's Alternative B) in this case.

¹ PSE&G and National Park Service have each proposed alternative routes for this project, some are the same route, just labeled differently, some overlap for part of their route, some are different. PSEG originally proposed 3 alternatives A, B, and C. NPS as part of their NEPA process has proposed alternatives # 1-7, with PSE&G recently adding # 8, which only affects the project within the existing ROW in the NPS. PSEG alternative A is not related to any of the NPS alternatives. (Alternative A would require 24 miles of new ROW corridor in NJ (according to PSE&G's consultant Louis Berger Group) so DEP does not consider it a viable alternative due to increased impacts). PSE&G's Alternative B is the existing Susquehanna – Roseland line and PSE&G's preferred alternative, NPS's Alternative # 2. Alternative C is related to NPS alternatives # 6 & 7. NPS alternatives # 6 & 7 follow the same alignment in NJ, they diverge on the PA side of the river to become two alternatives. PSEG alternative C crosses the Delaware River downstream of NPS Alternatives # 6 & 7, then alternative C and alternatives # 6 & 7 join up in Mansfield Township, Warren County just south of Hackettstown and then follow the same alignment eastward to Roseland, so Alternative C and Alternatives # 6 and 7 are the same route for much of New Jersey and any deviation does not affect the Department's determination that Alternative # 2 is the least environmentally impactful. NPS has additionally proposed Alternatives # 4 and # 5, discussed herein. Alternative # 1 is the no-build alternative.

Alternative # 4 runs approximately 20 miles along the Old Main Delaware Lackawanna and Western Railroad Cutoff Historic District of New Jersey near Andover. This would require clearing of a new ROW adjacent to an undeveloped railroad ROW.³

Alternative # 4 would traverse 10 more miles of the New Jersey Highlands than Alternative # 2.

Alternative # 5 adjacent to Route 80 ranks the worst in terms of impacts to the Highlands Resources, and the Highlands Council has stated in a September 9, 2010 letter to the National Park Service that they would find it "highly problematic" in finding this route consistent with the goals and purposes of the Highlands Act;

Alternatives # 6 would require an additional transmission line across the Delaware River; Alternatives # 6 and # 7 would cross 11 more miles of the Highlands Region and 1.9 more miles of local parks in New Jersey than Alternative # 2; this occurs on ROWs that require expanded widths.

Thank you for your consideration of the Department's request.

Sincerely,



Scott Brubaker, Director
NJ DEP Office of Permit Coordination
and Environmental Review

- c. Bob Martin, Commissioner, NJDEP
- Amy Cradic, Assistant Commissioner NJDEP NHRG
- Eileen Swan, Highlands Council
- DEWA PPL EIS Planning Team

³ We are aware of a possible reactivation of this Lackawanna Cutoff line by NJ Transit to restore passenger rail service, which could be affected by the development of this alternative.

Correspondence (1234)

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Correspondence Information

Status: New **Park Correspondence Log:**
Date Sent: 01/09/2012 **Date Received:** 01/09/2012 12:00 AM
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

The Pennsylvania Fish and Boat Commission (PFBC) is committed to protecting the aquatic resources in the Commonwealth of Pennsylvania, and recognizes that several aspects of sensitive aquatic resources exist in the project area. Specifically, the project area contains aspects of state threatened species, endangered species and species of special concern that fall under the jurisdiction of the PFBC and/or its cooperative agencies.

The PFBC concurs with Alternative 1 that will have no adverse affects on the aquatic resources present, and would support this no-build alternative if Pennsylvania Power and Light Electric Utilities Corporation (PPL) determines that this alternative is viable. All other proposed alternatives in the Environmental Impact Statement (EIS) for the Susquehanna-Roseland transmission line will adversely impact the aquatic resources present in the Delaware Water Gap National Recreation Area in some manner as determined in the EIS. Thus, it is important to select an alternative that avoids, minimizes and mitigates for the proposed impacts in the most comprehensive manner. In the event that Alternative 1 is not viable, the PFBC concurs with Alternative 2b, where the existing right-of-way (ROW) is utilized since 1) constructing the transmission line in other nearby locations would most likely result in impacts to endangered, threatened or species of concern or their habitat anyway, 2) the footprint for the existing line is already established, and 3) aquatic disturbances can either be contained within the existing ROW or minimized if outside of the existing ROW. Nonetheless, the PFBC feels that aquatic disturbances associated with Alternative 2b could be further reduced in ecologically sensitive aquatic areas (i.e., wetlands, river crossings, endangered species habitat, etc.) in order to minimize aquatic habitat degradation and direct mortality to endangered, threatened or species of special concern from associated construction activities. If an alternative other than Alternative 1 is selected and a waterway encroachment application is submitted to the Pennsylvania Department of Environmental Protection (DEP), the applicant would need to further coordinate with DEP, PFBC and other environmental regulation agencies to achieve the appropriate avoidance, minimization and mitigation measures.

Correspondence (12)

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Correspondence Text

Thank you for the opportunity to review this DEIS. PennDOT has no comments on the project.

TOWN AND COUNTY GOVERNMENT LETTERS

Correspondence (2387)

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Status: Reviewed **Park Correspondence Log:**

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Contains Request(s): No **Type:** Letter

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Correspondence Text

Re: Delaware Water Gap National Recreation Area and Middle Delaware National Scenic River Park
Susquehanna to Roseland 500kV Electric Transmission Line project
Susquehanna to Roseland 500-kV Transmission Line Right-of-Way and Special use Permit Draft
Environmental Impact Statement ' DEIS document

Dear Mr. Elmer:

Our planning commission is the county and regional planning commission serving Lehigh and Northampton counties. The Commission discussed issues concerning the Susquehanna-Roseland transmission line at its monthly meeting on January 26, 2012. Following is our position on the Proposed location of this power line.

The Lehigh Valley Planning Commission previously commented on the location of this power line in letters addressed to PPL in 2008 and 2010. It is our understanding that the Pennsylvania Public Utilities Commission (PUC) and the New Jersey Bureau of Public Utilities have approved a location for this power line that crosses National Park Service property in Monroe County. It is our further understanding that PPL has offered funds to mitigate its impact on the National Park by acquiring land in other parts of the region.

We are aware of the many difficulties involved in siting power lines and other infrastructure related to public utilities. Based on the options proposed in earlier studies of this power line and the action taken by the PUC and the New Jersey Bureau of Public Utilities, we believe the proposed location of the utility line is the most viable location for this power line. We support the decision of PPL and the public utility commissions in the location of the power lines on an expanded right-of-way in the National Park.

Yours truly,

Michael N. Kaiser, AICP
Executive Director

Correspondence (1626)

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On behalf of the East Hanover Environmental Commission, and the people of East Hanover, I would like to comment on The Susquehanna-Roseland 500kV Transmission Line:

- (1) East Hanover supports the NO BUILD alternative (Alt. 1) as the "NPS-preferred Alternative."
- (2) This project will impair the scenic and cultural landscapes these park units were created to preserve.
- (3) All action alternatives will result in an impairment of Park resources, including but not limited to visual pollution, wildlife and ecosystems destruction, impacts on endangered species, scenic vistas, forests, and visitor experience, and noise pollution from the construction of the stanchions or poles; the mitigation plan does not go far enough to prevent the impairment of these Park resources.
- (4) Impairment would not be "temporary." Construction of access roads, staging areas, widening of rights-of-way and the destruction of acres of forests will result in permanent destruction of park resources, especially core forests and landscape connectivity values.
- (5) Additional alternatives need to be examined in the final EIS including non-transmission alternatives, which I have discussed below.
- (6) Demand response programs, energy efficiency and conservation, and renewable local energy generation can obviate the need for this line, and do not require the use of ratepayer money to construct obsolete infrastructure projects. Energy demand in New Jersey has dropped over the past three years in part due to such programs and this project has not been updated to reflect that change in energy usage.
- (7) The Regional Greenhouse Gas Initiative (RGGI) is the first mandatory, market-based effort in the United States to reduce greenhouse gas emissions. Ten Northeastern and Mid-Atlantic states will cap

and then reduce CO2 emissions from the power sector 10% by 2018 (<http://www.rggi.org/home>). Coal fired power plants of Pennsylvania emit high levels of carbon dioxide, a greenhouse gas, which contributes to global warming. Why extend this extension cord from these plants, when the Northeast and Mid-Atlantic needs to reduce these CO2 emissions? What happened to researching and construction of Renewable Sources, i.e., solar and wind turbine farms? We are supposed to be correcting errors of the past, not creating new ones. Instead of investing the millions of dollars on upgrading this conduit from the coal plants of Pennsylvania, why not invest those same dollars in Green Technologies within New Jersey?

(8) Wind, Solar and biomass are currently available as renewable resources. Wind, found at the shore and in the highlands, have sustained winds of 11 mph. Solar would have distributed generation and supply the grid. Biomass is also being used and includes LFG, wastewater treatment, wood residue, food waste and aggregation of resources.

(9) Per NJ Clean Energy, as of October 31, 2011, NJ has more than 490 MW of solar, with over 12,000 installs, 31 MW Biomass, 8 MW Wind and 1.5 MW of Fuel Cells. And, as of November 30, 2011, over 12, 896 homes and business have installed a solar electric system.

(10) Tomorrow, and the future, NJ's Clean Energy Program anticipates more than 4,430 MW solar, more than 1,100 MW Offshore Wind, 200 MW Onshore Wind, and 900 MW Biomass. So you can see the future holds renewable energy instead of old coal fired plants. There is currently a Renewable Energy Incentive Program (REIP) available through NJ Clean Energy. (See: <http://www.njcleanenergy.com/renewable-energy/home/home>)

(11) This project is goes against the New Jersey Energy Master Plan. Why do we have Master Plans, if they are not going to be used for planning purposes? Towns and state governments spent money on creating and updating these master plans, not with the intention of ignoring them.

(12) Why is PSE&G planning to string two sets of cables capable of carrying 500kV each? The original plan was for keeping the original 250 kV cable and stringing a new 500 kV line. If you string two cables capable of carrying 500 kV each, that is what they are going to do. They are not going to string a 500 kV cable and only run 250 kV through it. The magnitude of 1000 kV (or even 750 kV) will have its disastrous results (see below).

(13) East Hanover has six (6) recorded cases of brain tumors from residents along the current 250kV line, and numerous other mortal cancers. To increase the kV lines from 250 to an additional 500kV, in the magnitude of 300%, will exponentially increase the incidence of brain tumors and other cancers. Is the "supposed" reliability of electricity (to be discussed later) more important than human lives? Do these towers really need to be erected in such a highly populated area, instead of less populated areas?

Remember Love Canal. Remember Pacific Gas and Electric Company litigation (PG&E) in 1993. Remember Toms River, NJ and their cancer cluster. We as residents and concerned citizens of East Hanover do not want to get on the map as a cancer cluster and in all the media for something that could have been prevented had thorough research and development been conducted.

(14) To argue that this project will support job creating is putting jobs over environmental and health concerns of the wildlife and ecosystems within the Park, as well as the integrity of the same. The Park will suffer irreparable and permanent damage if this project is allowed to move forward.

(15) Protection of the functions and values provided by upland forests and wetlands in combating flooding, providing habitat to threatened and endangered species, and allowing for groundwater recharge provide a greater public benefit than the Susquehanna-Roseland project.

Thank you for the opportunity to comment on the Susquehanna-Roseland 500 kV Transmission line. The East Hanover Environmental Commission strongly supports the NPS to select the "No Build

Alternative" as the "NPS-preferred Alternative" and will continue to work with the Township council's effort opposing this project.

Sincerely,

Christopher Manak
Chairman
East Hanover Environmental Commission

Correspondence (1721)

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Correspondence Text

Recommendation against the construction of the Susquehanna-Roseland power line project
The Blairstown Environmental Commission
January 29, 2012

The Blairstown Environmental Commission urges you to support the fight against the Susquehanna-Roseland power line project in its current form. We support the organizations that continue to combat a plan whereby power companies will look to build a 500-kilovolt power line using 200 foot tall towers between the Berwick, Pa., area and Roseland, Essex County. This plan appears to be completely out of step with responsible energy planning and will have a detrimental effect on the both the human and the natural environment.

The Environmental Commission is not alone in its concerns about the plan. The Eastern Environmental Law Center recently filed an appeal of the New Jersey Board of Public Utilities' (BPU) approval of the proposed Susquehanna-Roseland line expansion on behalf of the Sierra Club, Environment New Jersey, the Highlands Coalition and New Jersey Environmental Federation. "Stop The Lines," a local opposition group, has also filed an appeal in the Appellate Division of NJ Superior Court challenging the BPU decision to allow Public Service Electric & Gas (PSE&G) to build a massive power line.

While it's true that power lines exist all over the state and run currently through the area proposed for the new lines, what makes these different is the size of the towers. The current towers are about 80 feet tall and the new towers will be 200 feet tall. To many people this project does not make sense environmentally, technologically, or economically. There are numerous reasons to question the need for the new towers.

According to data on the NJ State Energy Data Center website (<http://www.njenergydatacenter.org/>)

electric use in New Jersey has decreased the last few years and is only expected to rise by about 1.5% in 2010 according to PSE&G. Meanwhile, the new proposed power lines are capable of carrying 700% more energy based on Stop the Lines data. Given the decrease in energy consumption and excessive added capacity, we find this to be unsustainable use of resources.

New Jersey ratepayers would have to pay the cost of this project. The cost estimate runs from \$900 million to \$1.3 billion. This money could be better invested in renewable energy sources for our state, including solar panels, or fuel cells, or other alternate energy projects.

Has there really been enough creative thought about what a billion dollar investment in clean energy technology might look like? Based upon an estimated \$5 per watt installation cost, a \$1 billion investment would result in 200,000 kW installed capacity, which is equal to 246 million kW-hours per year. Assuming the average home uses 5,000 kW-h per year, that investment could power about 50,000 homes. Those 50,000 homes could also be supplying electricity to the grid during peak usage times when the electricity is most needed.

Ironically, New Jersey has actually been lauded for its photovoltaic (PV) installations, yet our government now asks us to pay money to benefit another state for energy that could be generated here. Given the cost and questionable necessity, we find this is an unsustainable use of our money.

The rationale for the lines – to prevent overloading during peak loads – is regarded by the commissioners as a "business as usual" approach, which is contrary to stated goals of the New Jersey Energy Master Plan. The plan calls for maximizing energy conservation and efficiency, reducing peak electricity demand, and investing in innovative clean energy technologies. PV panels are an energy source capable of reducing peak demand since most of their energy is produced during those times. Wind and fuel cells are other alternate energy sources worth greater consideration. Other states have had successes with these sources of energy and our state should pursue this further. Transmitting energy over long power lines is known to be a wasteful mode of transmission. Given that the state's goals are not supported by this project, we find this is an unsustainable way to supply New Jersey's energy.

Three more significant reasons to question the tower plan include:

1. Health: while no causal link has been established with regard to the effects of EMF on human health and safety, there is enough anecdotal evidence to warrant caution.
2. Safety: there has been no precedent to establish the safety of towers of these heights. There are real concerns with many houses in the vicinity of a 200-foot tower standing in a 150-foot right of way.
3. Environmental: Blairstown residents and Delaware Water Gap visitors share an unspoiled, natural setting. If approved, this project would indelibly scar the scenic beauty of the area. Construction requires new roads and land clearing that will have adverse effects on streams, lakes, erosion, and sensitive park habitat.

Please reject the Susquehanna-Roseland power line project.

