

• American Rivers • Coalition of National Park Service Retirees • Energy Conservation Council of Pennsylvania • Environment America • Environment New Jersey • Environment Virginia • National Parks Conservation Association • PennEnvironment • Piedmont Environmental Council • Sierra Club • Sugarloaf Conservancy • Stop PATH WV • The Wilderness Society • West Virginia Citizens Against PATH •

March 12, 2010

DEWA PPL EIS
Planning Team, Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225-0287

Re: Notice of intent to prepare an Environmental Impact Statement (EIS) for a construction and right-of-way permit requested from Delaware Water Gap National Recreation Area, Middle Delaware National Scenic and Recreational River, and Appalachian National Scenic Trail, in connection with the Susquehanna to Roseland 500kV Transmission Line.

Dear Superintendent Donahue:

On behalf of our millions of members, the Coalition of National Park Service Retirees, Environment America, Environment New Jersey, Environment Virginia, PennEnvironment, Piedmont Environmental Council, The Wilderness Society, American Rivers, Sugarloaf Conservancy, Stop Path WV, West Virginia Citizens Against PATH, Energy Conservation Council of Pennsylvania, Sierra Club, and the National Parks Conservation Association submit the following comments regarding the application for issuance of a construction and right-of-way permit to PPL Electric Utilities Corporation (or simply PPL) and PSE&G to construct a 500 kV powerline from Susquehanna Power Station (Berwick, Pennsylvania) to Roseland, New Jersey, through Delaware Water Gap National Recreation Area, Middle Delaware National Scenic and Recreational River, and the Appalachian National Scenic Trail.

We care deeply about the preservation of America’s national parks and ensuring that these shared national treasures are protected for our children and grandchildren. We believe strongly in the mission of the National Park Service (NPS)

“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.”¹

The proposal by PPL and PSE&G to construct a 20-story-high (or 200-foot-tall) 500 kV powerline through the National Park System’s eighth most-visited national park unit represents

¹ National Park Service Organic Act, 16 U.S.C.1

the greatest threat to the regions stunning wildlife, history, and scenery since the defeat of the Tocks Dam proposal in 1975. The proposal is an incompatible use within park boundaries, since the powerline would mar the very scenery the NPS and the other park units at risk were created to preserve.

We understand that the applicants currently have limited pre-existing rights to operate an 80-foot-tall powerline that predates the park's establishment in 1965. However, as with all parks, the NPS is obligated to restore natural conditions whenever possible, not to allow existing impacts to worsen.

Please consider our comments on the PSE&G and PPL proposal, and make them a part of the record in the development of the Environmental Impact Statement.

I. Delaware Water Gap National Recreation Area, Middle Delaware National Scenic and Recreational River, and Appalachian National Scenic Trail are spectacular national treasures that introduce millions of urban and culturally diverse Americans to the opportunity for enjoyment and learning encompassed by the NPS mission.

Welcoming more than 5.2 million visitors per year, Delaware Water Gap National Recreation Area is one of the most cherished units of the National Park System. Conveniently located just an hour and a half from the New York City and Philadelphia metropolitan areas, Delaware Water Gap National Recreation Area provides a special opportunity for park visitors to learn about the role of the National Park Service in preserving America's shared natural and cultural heritage. Besides providing exceptional recreational opportunities for boaters and anglers who enjoy the free-flowing waters of the Delaware River, visitors head to the park to photograph and otherwise enjoy the park's spellbinding waterfalls and diverse wildlife, which include the bald eagle, peregrine falcon, and black bear.

The park also serves as an inspiring outdoor classroom, library, and laboratory for school children in the region. In fact, almost 30,000 students visited the park in 2009. During the summer, the park welcomes children attending nearby camps including the No-Be-Bo-Sco Boy Scouts of America camp, the Ralph Mason YMCA camp, and the Happiness is Camping Camp for children with cancer. Approximately 24,000 people visit the Pocono Environmental Education Center in the park every year.

In developing the EIS, the NPS should closely examine how educational opportunities and the interpretation of park resources would be affected by construction activities and the presence of massive new transmission infrastructure.

The NPS also needs to consider how the project may impact overall visitation. According to a 2004 study by the University of North Carolina—Asheville Department of Economics, visitation to national parks is affected by the quality of scenic vistas. The study was conducted with the cooperation of the Park Service-managed Blue Ridge Parkway unit, and found that respondents "indicated that the scenic quality along the Parkway is an important reason for their visitation.

They indicated they would take fewer trips if scenic quality declines, and would make more trips with scenic quality improvements.”²

II. The NPS must abide by the legal and policy framework established to preserve the three national park units and their outstanding resources.

We appreciate the NPS making its October 2009 “Internal Scoping Meeting Report: Susquehanna to Roseland Transmission Line Proposal and Right-of-Way Request Environmental Impact Statement” available to the public. This document illustrates that the NPS is judiciously examining the many statutes and policies that must be considered. The following applicable policies are especially important in evaluating the appropriateness of issuing a construction and right-of-way permit to PSE&G and PPL.

- a. Since Congress de-authorized the Tocks Island Dam and Reservoir, the argument that the purpose of the Delaware Water Gap National Recreation Area included energy transmission is nullified and void.

Congress established the Delaware Water Gap National Recreation Area in 1965 as part of the Tocks Island Dam and Reservoir, a project that was never implemented and was later de-authorized by Congress. As such, the language in the law dealing with Tocks Island Dam and Reservoir regarding energy production is null and void. However, the intent of Congress to further the “preservation of the scenic, scientific and historic features contributing to public enjoyment of such lands and waters” remains unchanged.³

- b. NPS Management Policies call on superintendents to prevent impairment and to restore the integrity of park resources.

In developing a range of alternatives for the EIS, we encourage the NPS to keep in mind the following guidance provided by the 2006 NPS Management Policies.

- **1.4.3 The NPS obligation to conserve and provide for enjoyment of park resources and values**
“NPS managers *must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values.* However, the laws do give the Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values.”
- **1.4.7.2 Improving resource conditions within the parks**

² University of North Carolina-Asheville. Blue Ridge Parkway Scenic Experience Project Results Synthesis: Phase I Southwest Virginia and Phase II Northern North Carolina. April 2004.

³ Public Law 89-158

“The Service will also strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today. In particular, *the Service will strive to restore the integrity of park resources that have been damaged or compromised in the past.*”

- **1.5 Appropriate use of the parks**

“In its role as steward of park resources, the National Park Service must ensure that park uses that are allowed would not cause impairment of, or unacceptable impacts on, park resources and values. *When proposed park uses and the protection of park resources and values come into conflict, the protection of resources and values must be predominant.* A new form of park use may be allowed within a park only after a determination has been made in the professional judgment of the superintendent that it will not result in unacceptable impacts. The National Park Service will always consider allowing activities that are appropriate to the parks, although conditions may preclude certain activities or require that limitations be placed on them. Park superintendents must continually monitor all park uses to prevent unanticipated and unacceptable impacts. *If unanticipated and unacceptable impacts emerge, the superintendent must engage in a thoughtful, deliberate process to further manage or constrain the use, or discontinue it.*”

- c. The NPS must preserve the outstanding remarkable values of the Middle Delaware Scenic and Recreational River by undertaking a comprehensive analysis of the impacts of the proposed project on the river’s remarkable values.

The Wild and Scenic Rivers Act was enacted not only to keep rivers in their free flowing condition, but also to preserve the surrounding landscape for the “benefit and enjoyment” of present and future generations. According to Section 10 of the Act

“Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its esthetic, scenic, historic, archaeologic, and scientific features.”⁴

According to the “Wild and Scenic River Management Responsibilities,” a technical report of the Interagency Wild and Scenic Rivers Coordinating Council released in 2002, in situations of conflict between laws and regulations governing park units and wildlife refuges and the Act, managers are to apply the most restrictive (i.e., the most protective) regulations. Section 10 authorizes the NPS to use their general statutory authorities to protect Wild and Scenic River values.

⁴ Wild and Scenic Rivers Act. 16 U.S.C. 1271

Furthermore, Section 1.2 of the NPS Management Policies states

“It should be noted that, in accordance with provisions of the Wild and Scenic Rivers Act, any component of the National Wild and Scenic Rivers System that is administered by the Park Service is automatically a part of the national park system. Although there is no analogous provision in the National Trails System Act, several national trails managed by the Service have been included in the national park system. These national rivers and trails that are part of the national park system are subject to the policies contained herein, as well as to any other requirements specified in the Wild and Scenic Rivers Act or the National Trails System Act.”

The NPS Management Policies go on to state in Section 4.3

“The Park Service recognizes that special designations apply to parts or all of some parks to highlight the additional management considerations that those designated areas warrant. These designations include research natural area, experimental research area, wilderness area, national wild and scenic river, national natural landmark, biosphere reserve, and world heritage listing. These designations do not reduce the Service’s authority for managing the parks, although in some cases they may create additional management requirements or considerations.”

In sum, the NPS must perform a rigorous analysis of how the proposed project will affect this Wild and Scenic River’s outstandingly remarkable values, and the NPS’ ability to enhance those values in the future.

III. The NPS must prevent impairment of natural and cultural resources.

PSE&G’s and PPL’s proposal to construct massive transmission towers nearly 200-foot-tall and having a 350-foot-wide right-of-way constitutes a serious degradation to the preservation of both natural and cultural resources. While the current 80-foot-tall transmission towers already rise above the tree canopy and degrade the viewshed and contribute to the fragmentation of the landscape, they are far less obtrusive than the proposal in question would be. Since the impact on scenery and the experience of park visitors is one of the greatest threats posed by the proposal, the NPS should perform a comprehensive viewshed analysis that incorporates all of the major viewpoints along the Appalachian National Scenic Trail and other popular hiking, picnic areas, and historic structures.

The construction of massive transmission infrastructure through the three parks presents a myriad of impacts on wildlife. While it is clear that noise from construction machinery and maintenance vehicles will negatively impact wildlife communication, habitat utilization, and reproductive success, less may be known regarding the possible harm created by crackling powerline corona.

Other direct and indirect negative impacts to wildlife may result. Species at special risk include the bald eagle, northern goshawk, peregrine falcon, red-shouldered hawk, cerulean warbler, winter wren. Furthermore, the

“Construction and presence of the power lines may affect migratory bird species. Bringing in large construction equipment would require road widening and clearing of trees along the roads, which would result in removal and alteration of wildlife habitat. The installation of taller towers with transmission lines above the current tree height could adversely affect migratory birds. Kittatinny Talus slope which is located just below the AT is within Kittatinny Mountains, a NJ Priority Natural Heritage Site. Individuals and organizations have petitioned the Secretary of the Interior to designate this area as the Kittatinny-Shawangunk National Raptor Migration Corridor.”⁵

The proposal also threatens a rich historical landscape containing 70 significant sites that have been or are being entered on the National Register of Historic Places. These include archaeological sites, sites used for interpretative history and are a fundamental resource for visitors to not only learn about, but experience the past. Some of the most threatened historic locations include Van Campens Glen, the Appalachian National Scenic Trail, Old Mine Road Historic District, Watergate, Delaware View, and Community Drive.

The NPS should also investigate how the proposal may wheel electricity from dirty coal-fired plants to a region of the country that already has poor air quality. Delaware Water Gap National Recreation Area resides in counties that are already in violation of the EPA’s primary ozone standards, which were designed to protect human health from overexposure. Coupled with increased mercury emissions from existing and new proposed coal-fired plants in Western Pennsylvania, NPS approval could contribute to serious health threats to both humans and park resources.

IV. Massive powerlines threaten park based tourism.

The construction of nearly 200-foot-tall powerlines could diminish the economic value that the three parks provide for the region. According to the NPS’s Money Generation Model Report for Delaware Water Gap National Recreation Area “visitors spent \$ 116 per party per day in the local area. Total visitor spending was \$ 108.38 million dollars in 2003.”

“The direct effects of the \$ 108.38 million spent by Delaware Water Gap NRA visitors were \$ 83.79 million in sales, \$ 30.93 million in personal income (wages and salaries), \$ 46.61 million in value added and 2,127 jobs. The largest direct effects were \$ 15.46 million in the hotel sector, \$ 26.51 million in food and drinking places, \$ 14.41 million in amusements and \$ 16.10 million in retail trade. As visitor spending circulates through the local economy, secondary effects created an additional \$ 13.29 million in personal income and 515 jobs.

⁵ NPS Internal Scoping Report: Susquehanna to Roseland Transmission Line Proposal And Right-of-Way Request Environmental Impact Statement. October 2009.

In sum, visitors to Delaware Water Gap NRA spent \$ 108.38 million dollars in 2003 which supported a total of \$ 120.52 million in sales, \$ 44.22 million in personal income, 2,643 jobs, and \$ 69.59 million in value added.”⁶

In November of 2006, the National Parks Conservation Association published an economic study titled, “The U.S. National Park System: An Economic Asset at Risk,” which found that national parks support an astounding \$13.3 billion of local private-sector economic activity and 267,000 private-sector jobs, providing on average a \$4 return to state and local economies for every federal dollar invested in park budgets.

In developing a range of alternatives, the NPS needs to carefully consider how they will impact visitation and the quality and services of the overall visitor experience and the financial impact on the local economy.

V. A full range of alternatives must be considered, including a focus on retiring the existing powerline and right-of-way, as well as the use of mitigating technologies such as underground superconductor and advanced cable technologies.

In approaching the issue of developing a range of alternatives, the NPS should acknowledge that the existing 80 foot powerline is already having a tremendous negative impact on the three parks and the resources they were established to preserve. As such, the NPS should focus on providing a range of alternatives that reduce or eliminate the current negative impacts. Beyond the development of a “No Action Alternative,” the NPS should thoughtfully consider the following:

- a. The NPS should develop an environmental alternative based on acquiring the easement from PSE&G and PPL and restore natural landscape.

As discussed in Section 1.4.7.2 of the 2006 Management Policies,

“The Service will also strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today. In particular, the Service will strive to restore the integrity of park resources that have been damaged or compromised in the past.”

The NPS should include an environmental alternative that calls for taking action to acquire the easement currently owned by PSE&G and PPL. At some point in the future, the companies may be willing to sell their easements. If authorized by the park’s enabling legislation, the NPS may also be able to condemn land as specified by Section 11.4 of Directors Order #25 Land Protection, which states that the “acquisition by condemnation will sometimes be necessary to establish just compensation, to clear title, or to prevent imminent or unacceptable damage or threats to park resources.”

- b. Careful consideration should be given to developing a buried powerline alternative.

⁶ NPS Money Generation Model. Economic Impacts of Visitor Spending by Parks: Delaware Water Gap NRA. 2003. <http://web4.canr.msu.edu/mgm2/>

Underground superconductor electricity pipelines are a proven technology that should be closely examined as an alternative. According to the American Superconductor company,

“Superconductor power cables have been developed and demonstrated numerous times over the past dozen years. These cable systems have been deployed in the commercial U.S. power grid several times in recent years and other cable projects are now ongoing globally in countries such as China, Japan and Korea... Given their location underground, Superconductor Electricity Pipelines are easier to site, are more secure and have no aesthetic impact on the surrounding land. They avoid significant permitting issues faced by ultra-high voltage overhead lines and require a right-of-way only 25 feet wide rather than hundreds of feet.”⁷

Due to challenges posed by topography, superconductor electricity pipelines might need to be sited above ground in certain areas as well.

c. An advanced cable technology alternative should also be examined.

Another alternative the NPS should examine is using advanced powerline technology to meet the transmission needs of PSE&G and PPL by using existing power transmission infrastructure already located in the park. According to the CTC Corporation’s factsheet titled “Utilizing ACCC™ Conductor to Reduce the Environmental Impacts of New Transmission Line Development,”

“Using carbon fiber composite technology to replace the heavy steel core of traditional transmission conductors, the ACCC™ conductor offers greater strength, lighter weight, and decreased thermal sag when compared to conventional conductors. This lighter weight composite core allows the inclusion of 28% more aluminum in the same diameter without increased weight, allowing the delivery of up to twice the power of a conventional conductor while also reducing line losses by 34% to 38% under equivalent load conditions.”

Utilizing ACCC’s or similar technology provides yet another alternative that the NPS should consider that may keep park resources and the experience of park visitors from being further degraded.

VI. Future enlargement of existing Metropolitan Edison Company powerline through Delaware Water Gap National Recreation Area, Middle Delaware National Scenic and Recreational River, and Appalachian National Scenic Trail, as well as the development of PSE&G’s and PPL’s “Alternative C” through the Appalachian National Scenic Trail must be considered.

The NPS’s range of alternatives and future record of decision needs to carefully consider how the agency’s decision on the PSE&G and PPL transmission line may impact potential future

⁷ American Superconductor. Superconductor Electricity Pipelines FAQs.
<http://www.amsc.com/products/applications/utilities/faq.html>

requests by Metropolitan Edison Company's (Met-Ed) that owns a separate easement further south within the park boundary. It is likely Met-Ed could raise issues of fairness if the NPS were to approve the PSE&G and PPL proposal and deny a future proposal by Met-Ed. As such, the NPS should consider the cumulative impacts from the potential development of both lines.

The NPS also must evaluate the potential cumulative impact of the development of PSE&G and PPL's "Alternative C." Currently, PSE&G and PPL already own nearly 70 percent of the right-of-way for this route, so there is a strong possibility that the companies may want to construct an additional powerline on this route in the future. While this route is south of Delaware Water Gap National Recreation Area, development of this route would further degrade scenery along the Appalachian National Scenic Trail.

Thus, it is incumbent upon the NPS to carefully evaluate the cumulative impacts of PSE&G's and PPL's current proposal, along with the possible expansion of the Met-Ed line and the development of PSE&G's and PPL's "Alternative C" route.

VIII. Conclusion

The threat posed by the PPL's and PSE&G's proposal to construct a 20-story-high (or 200-foot-tall) 500 kV powerline through the National Park System's eighth most-visited national park unit represents the greatest threat to the regions stunning wildlife, history, and scenery since the Tocks Dam proposal, which was defeated in 1975.

The NPS must thoughtfully consider a full range of alternatives and include a variety of proposals that will further park preservation, not allow further degradation. Retiring the existing powerline and right-of-way, as well as mitigating technologies such as underground superconductor and advanced cable technologies, are reasonable alternatives deserving close examination. The NPS's internal policies call on superintendents and park managers to

"Strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today. In particular, *the Service will strive to restore the integrity of park resources that have been damaged or compromised in the past.*"⁸

The United States has only one Delaware Water Gap, Delaware River, and Appalachian Trail. As a nation, we must not compromise our shared natural and cultural heritage. It will become even more precious to future generations. The NPS and the applicants must determine alternative ways to meet the corporations' goals that are compatible with park protection.

The threat posed by this proposal is not unique. Be it adjacent landfills, mining, logging, or dam construction, America's parks continually face threats that require diligence and effort by the American public to defeat. We hope that PPL and PSE&G will reconsider their current proposal.

Thank you for this opportunity to submit these comments.

⁸ NPS 2006 Management Policies. Section 1.4.7.2.

Sincerely,

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