

February 18, 2013

Western Pocono Chapter

Trout Unlimited

67 West Butler Drive

Drums, PA 18222

Rosemary Chiavetta, Esq. Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, Pa. 17105-3265

A-2012-2340872

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2013 FEB 27 AM 10:55
PA.P.U.C.
SECRETARY'S BUREAU

Dear Secretary Chiavetta,

On behalf of the Western Pocono Chapter of Trout Unlimited we are writing to oppose the proposed PPL power line in the Thornhurst area known as the PPL Northeast/Reliability Project and express our support for the alternative Citizen's Route. As currently proposed the 230 kV PPL line would destroy hundreds of acres of pristine forest and wetlands and traverse at least ten exceptional value (EV) wild trout tributaries of the Lehigh River. At least one of these tributaries is classified as Class A Wild Trout Waters.

We believe the Citizen's Route would be much less invasive to wildlife and trout habitat and also to private property. In previous letters to public officials (see attached) WPCTU presented in detail the many possible detrimental effects to trout in particular and the environment in general. These adverse impacts include but are not limited to:

THERMAL POLLUTION – Due to loss of tree canopy there could be an increase in water temperature. Brook Trout survive best at temperatures below 68 degrees Fahrenheit.

EROSION AND SEDIMENTATION – Removal of trees and shrubs may cause runoff and inhibit natural reproduction of trout and the aquatic insect life that sustains them.

HERBICIDES – Use of chemicals to control streamside vegetation may also have negative impacts on trout and aquatic life.

Although WPCTU recognizes PPL's need to provide low cost, efficient energy we feel the alternative Citizen's Route would meet PPL's goals and still maintain the integrity of this unique environment.

The residents of the Poconos have long valued their environment and the quality of life it provides. They have always shared their natural resources with non-residents i.e. recreationists, sportsmen, fishermen etc. forming a unique cultural and economic relationship. WPCTU would like to express its support for property owners in the affected areas and urge the Public Utilities Commission to hold local hearings and consider the alternative Citizen's Route for the benefit of the people and environment of the Poconos. Thank you.

Sincerely Yours,



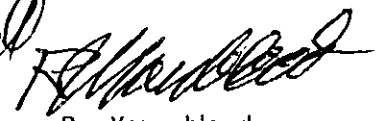
George Hludzik

President WPCTU



Michael M. Gondell

Conservation Committee



Ray Youngblood

Conservation Committee

4-5-12

TROUT UNLIMITED
WESTERN POCONO CHAPTER
P.O. Box 414
Albrightsville, PA 18210

RECEIVED
2013 FEB 27 AM 10:56
PA.P.U.C. BUREAU
SECRETARY'S BUREAU

Rosemary Chiavetta, Esq., Secretary
Pennsylvania Public Utility Commission
P.O.Box 3265
Harrisburg, PA 17105-3265

Dear Secretary Chiavetta,

The Western Pocono Chapter of Trout Unlimited would like to take this opportunity to convey our concern about the distinct potential for environmental degradation resulting from the Pennsylvania Power and Light Company's construction of a 230 kilovolt power line in the northern Pocono region. We remain unconvinced of the need for this initiative, but if it must proceed then we would suggest an alternative route - one that would minimize adverse environmental impacts.

As an organization dedicated to the preservation and improvement of water quality and trout populations, we are chiefly troubled by the fact that the proposed route for the line will traverse at least twelve identified wild trout streams of which ten are classified as exceptional value (EV) by the Pennsylvania Dept. of Environmental Protection. This is indeed a lofty classification; the highest afforded any waterway in the state. One of these streams is classified as Class A Wild Trout Water. At least two other streams in the Bear Creek sub-watershed, while not classified as EV, are well known as supporting natural reproduction of both native Brook Trout and Brown Trout. Degradation of these uniquely valuable resources could, and probably will, result if the line is established in its current location.

The likely adverse impacts would include the following:

THERMAL POLLUTION - It is well known that all species of trout have exacting temperature requirements. Brook Trout, which predominate in these streams, are especially vulnerable to elevated water temperatures. Brook trout populations are generally most successful in streams with water temperatures of less than 68 degrees fahrenheit. Closed canopy forest cover is the key to maintaining water temperatures acceptable to the survival of healthy brook trout populations. The project under consideration will involve removal of a 150 ft. swath of canopy, resulting in an inevitable increase in water temperatures in these streams as well as the main Lehigh River, to which these are all tributaries. However slight this increase might be, it is likely to have a depressive effect on native trout populations. The Lehigh River is already thermally borderline and any increase in temperature could adversely impact its habitability for trout.

EROSION AND SEDIMENTATION - Successful trout reproduction depends on the availability of a relatively clean stream bottom. By virtue of the activity involved in the construction of this line,


surface disturbance will increase the possibility of erosion. This in turn will contribute to sedimentation to the streams it crosses and affect the natural reproduction of trout. Habitat for aquatic macroinvertebrates, which are the principal food source for wild trout, will also be diminished. Further aggravating this condition is the fact that no matter how rigorously access is controlled the line will become a magnet for illegal off road activity thereby increasing the likelihood of erosion.


CHEMICAL POLLUTION - PPL acknowledges that their maintenance plan includes routine application of herbicides. There is little doubt that these materials will leach into the streams cut across by the power lines. These compounds will enter the streams possibly causing adverse impacts on trout populations, aquatic macroinvertebrates, and terrestrial insects which are a secondary food source for trout.

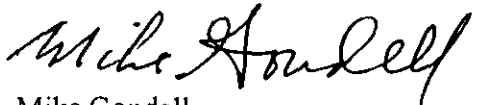
While Trout Unlimited's objectives are more or less confined to water quality issues, we feel compelled to briefly mention some other more general impacts of this project. These would include alteration of habitat that is home to a number of uncommon and sensitive plant species and disruption of a large tract prized by many for its current pristine and trackless state. Owing chiefly to the unspoiled character of the vast tract (some 90,000 acres of public land) that will be traversed by the powerline, it is home to an impressive diversity of wildlife. The fragmentation attending construction of the powerline would surely degrade this superb habitat. Lastly, the project will deprive a large segment of the public of the kind of natural outdoor experience that is becoming increasingly elusive.

We are grateful for the opportunity to present our viewpoint and hopeful that our thoughts on the matter will be considered in the decision making process.

Sincerely Yours


Paul Raubertas
President

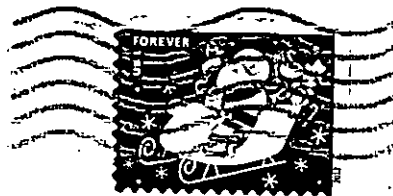

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