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March 14, 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RECEIVED

MAR 16 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Comments on Letter of Notification of PPL Electric Utilities Corporation, Filed pursuant to 52 Pa. Code Chapter 57 Subchapter G, with respect to the Tobyhanna #1 and #2 138/69kv Tap Line to service the United States Army Depot in Coolbaugh Township, Monroe County – Docket No. A-2011-2230589

Dear Secretary Chiavetta:

I am an out **of state landowner/taxpayer of 33 plus acres** affected by the construction of the 2.8 mile #1 and #2 138/69kv Tap Line to service the United States Army Depot. As a layman to this type of process, I have done my best to digest the documentation and provide my observations and concerns on receiving a copy of the Document issued to your Commission from:

John H, Isom of Post & Schell Attorneys at Law
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601

I am also forwarding a copy of this to Mr. Isom of Post & Schell Attorneys at Law via Email:
JIsom@PostSchell.com

My property is #7 on the Aerial Exhibit and is accessed from Leonard Lane (wrongly marked Lakeside Drive). A triangular shape property with the Tobyhanna Creek and the East Branch Creek as two of the three property lines, I want to keep this property as a natural resource and a safe zone for wildlife, vegetation and none evasive recreational use. Eventually I would see this land used as walking trails and possibly handicapped fishing. The existing PP&L power line cuts a path through the middle of this property. My father and grandmother told me one could stand on the knoll of this property and see the steeple of St. Ann's Church and see the trains pulling out of the station. This all changed in 1956 when the power line was constructed. Since then we had let the fields turn into woodlands to hide the 52 foot poles. PP&L and Federal Government **are not paying the Taxes** on our land thus I am voicing my concerns.

Summary Issues:

I understand and agree with the need for the Tobyhanna #1 and #2 138/69kv Tap Line to service the United States Army Depot. It is my opinion that due diligence was not done with the "Letter of Notification" and I would like to see expanded details on the following.

- What are the Pros and Cons to a Letter of Notification verses a Full Application?
- Missing is an Attachment Section for the existing right-of-way agreements. In my opinion this is not considered maintenance of the existing Line but a new line.
- Would like to see Attachment Section for the detailed Environmental Assessment addressing potential adverse impacts to wetlands, watercourses and glacial stone bed. There are no topics addressing erosion and sedimentation.
- Inclusions of Protection Plan for the Home Owners water source, all are on private Wells.
- Changing my right-of-way agreement putting the center line to at the new Tap Line, eliminating the concerns of setting precedence for future development on the 60 feet to the other side of the new Tap Line.
- An Attachment and Section is needed for flood plain and wet lands Maps.
- Attachment-3, Section D. NATURAL FEATURES requires a detailed Action Plan addressing destruction and replacement of the scenic and horticultural features.
- Magnetic Field Management, it is not clear as to what is going to be done, this seems to be important if the new line is allowed to be located 20 feet off Row center and is 53% higher and 400% hotter.
- Why is underground Utility not a consideration for the 2.8 miles of Tap Line, removing the **possible vulnerability to the United States Army Depot** in Coolbaugh Township to the possibility of weather, vandalism, terrorism and Acts of God and eliminates the Magnetic Field Management problem.
- Missing is the Transportation/Delivery Plan/Route of new power poles to installation site. Assumption is the poles would be over 100 foot in length
- Impact home owners on **Leonard Lane** (a private road, mistakenly marked "Lakeside Drive" on the Aerial Exhibit) that are not on the power-line right of way.
- If Leonard lane is to be used for construction traffic then it would be reasonable to expect the road and bridge be upgraded to township standards.
- Alternate Route indicated but not defined, is the nature trail that loops at the end of Leonard lane following the East Branch and Tobyhanna Creeks access road back to Leonard lane then that is a discussion that has not happened.
- Coolbaugh Township Town meeting with proper prior notification be held with all affected parties to hear the concerns such as mine.
- Breakdown of the estimated Cost is 3.5 million dollars to be paid entirely by the United States Army as to township infrastructure, Road Maintenance, environmental protection and enhancement.
- Concern with 20 foot offset and missing original right-of-way agreements setting precedence to allow implementation in the future of another set of tap lines 20 foot to the other side of the row or worse, erection of communication or other towers.
- Missing definition of alternate access routes in the engineers drawings leading to assumption is the route is the nature trail that loops at the end of Leonard lane following the East Branch and Tobyhanna Creeks.
- No mention the other wild life, turkey, bear, deer, owls, and waterfowl to many to mention not only located on property numbers 7, 3, 2 and 1 on the Tobyhanna and East Branch Creeks.

End of Issues Summary: Following is the expanded details referencing the page and line numbers of issues in the "Letter of Notification".

Details on Issues:

I understand and agree with the need for the Tobyhanna #1 and #2 138/69kv Tap Line to service the United States Army Depot. The key points I see missing and lacking detail in the document are listed in no specific order of priority to me as a landowner because they are all a priority.

1. Why a Letter of Notification and not a full Application is being filed with the commission?
What are the Pros and Cons to a Letter of Notification verses a Full Application?
2. Missing is an Attachment for the existing right-of-way agreements, the agreements I have from my Great Uncle Fred Gleogger and Grandmother, Anna Leonard is to build and Maintain a 69kv power line on a 100 foot right of way with a 50 foot no building on either side of the row. In the "Letter of Notification to the Pennsylvania Public Utility Commission", the second sentence clearly defines replacing the 68kv tap with a double 138/69kv line. This new line is clearly quadrupling the Power Line size and towering 80 feet (53% higher and 400% hotter) than the current 52 foot poles. Attachment 2, Page 8, indicates the new Line will be located 20 feet off of the Row center line.
 - If the existing 69kv line required a 100 foot row with 50 foot easement on either side of the row, then why is this new Tap Line 4 times the size (totaling 278kv) allowed to be 20 off center?
 - In my opinion this is not considered maintenance of the existing Line and *I suggest changing my portion of the right-of-way agreement putting the center line to at the new Tap Line*, eliminating the concerns of setting precedence for future construction development on the 60+ feet to the other side of the new Tap Line.
 - For the 2.8 miles of Tap Line, why is an underground utility not a consideration? An underground utility removals of **possible vulnerability to the United States Army Depot** in Coolbaugh Township to Lightning strikes, bad weather, vandalism, terrorism and Acts of God to this section of the power line and eliminates the Magnetic Field Management problem as does the devaluation to the Taxpayers property.
3. Missing is the full detailed Environmental Assessment, the descriptions given is brief and does not adequately address some issues such as potential adverse impacts to wetlands, watercourses and glacial stone bed. No mention of erosion and sedimentation control (especially on steep slope areas) or extent of ground disturbance for construction.
4. Inclusions of Protection Plan for the Home Owners water source as all are on private Wells.

5. In Attachment 2, Page 4, Paragraph B. "Magnetic Field Management" the verbiage indicates "reverse phasing where feasible" and "implementation of additional modifications will be considered".
 - What is not clear to me is anything going to be done about Magnetic Field? This seems important because the new Tap Line will be located 20 feet of the Row center and is four times the size (totaling 278kv) of the combined lines. I suggest changing my portion of the right-of-way agreement putting the center line to at the new Tap Line, eliminating the off center of the new Tap Line.
6. The brief and barely noticeable discussion on access for construction is not acceptable. I assume the poles would be over 100 foot in length (No drawing indicates total **length or Weight of Pole**). How will these poles be delivered to the power-line and as it will impact home owners on **Leonard Lane** (*a private road, mistakenly marked "Lakeside Drive" on the Aerial Exhibit*) that are not on the power-line right of way? Leonard Lane, as a private road does not currently meet Township specification and has a one lane wooden decked bridge crossing the Tobyhanna Creek. Attachment 3 Page 2, Land Use: The last Paragraph discusses existing access roads and refers to Section E. Threatened and endangered Species: refers to identified alternate routes to access work areas but does not define them.
 - If Leonard lane is to be used for construction traffic then it would be reasonable to expect the road and bridge be upgraded to township standards.
 - If the Alternate Route indicated is the nature trail that loops at the end of Leonard lane following the East Branch and Tobyhanna Creeks access road back to Leonard lane then that is a discussion that **NEEDS TO HAPPEN**.
7. Page 11 of "Letter of Notification to the Pennsylvania Public Utility Commission" #41. Talks about the Osprey nest. It does not mention the turkey, bear, deer, owls, other wild life, and waterfowl, to many to mention, not only located on my property but again referring to property number 3, 2 and 1 on the Aerial Exhibit you see a wide snaking area of the East Branch Creek.
8. The Estimated Cost is 3.5 million dollars to be paid entirely by the United States Army. I would like to see a breakdown of that cost. Is money being spent on township infrastructure, road maintenance, environmental protection and enhancement? Is the money being spent in a wise and frugal manner?
9. Page 11 of "Letter of Notification to the Pennsylvania Public Utility Commission" #40. Discusses alternate access routes that will be included in the engineers drawings and indicates coordination with appropriate agencies for approvals.
 - Not given any details my assumption is the Alternate Route is the nature trail that loops at the end of Leonard lane following the East Branch and Tobyhanna Creeks access road back to Leonard lane then that is a **discussion that has not happened** and sounds pivotal to this section of the letter.

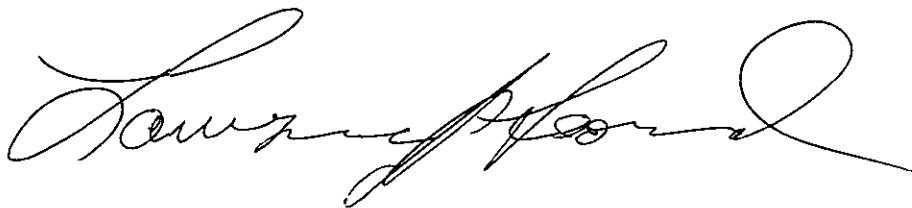
10. Page 4 of "Letter of Notification to the Pennsylvania Public Utility Commission" #10. States the Tap Line will have minimal incremental land use impacts, repeated on page 9, paragraph 36 "will not affect any unique geological, scenic, or natural areas". In Attachment-3, Section D. NATURAL FEATURES, page 3, there is no mention of the wetlands, watercourses and glacial stone bed or a mention of the blueberry, huckleberry, blackberry and raspberry bushes with over 50 years of maturity. About 1/3 of my 33+ acreage is flood plain and wet lands as noted on the national flood plain maps

- I would like to see the preservation plans for the wetlands, watercourses and glacial stone bed, blueberry, huckleberry, blackberry and raspberry bushes to be addressed in Attachment-3, Section D. NATURAL FEATURES.
- In Attachment-3 but on page 3 indicates the use of Herbicides, this is highly unacceptable during the construction or maintenance of this Tap Line for the obvious reasons mentioned above in addition to the possible contamination of the water table as all Home Owners on Lenard Lane are on private Wells.
- If you look at the Aerial Exhibit you can plainly see the pole placement and access road of the Blooming Grove-Jackson Line and the affect it has had on the State Game Lands, with each pole visible, as compared to the wooden poles running on the tap line, if it was not outlined you would not see the line because of the natural and scenic resources mentioned.

11. Attachment 3 Page 1, A. INTRODUCTION: and Page 11 of "Letter of Notification to the Pennsylvania Public Utility Commission" #42. Indicates Coolbaugh Township and Monroe County did not object to the Project, but no documentation is supplied. To the Residents, Home and Property owners located on Leonard Lane this is the first details, so not sure what Coolbaugh Township signed off on (the Skate Board Park maybe)?

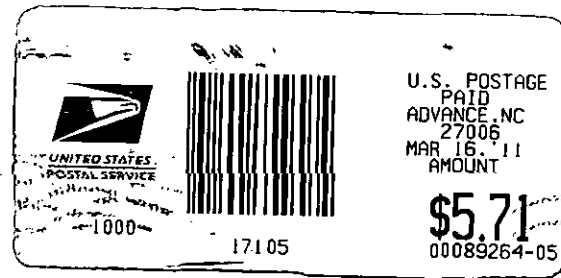
- My expectation is that a Town meeting with proper prior notification be held with all affected parties to hear the concerns such as mine.

Thank you for your time and consideration.



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