From: "Kelly, Kate P" [Kate_Kelly@ios.doi.gov]
Sent: 10/06/2011 04:45 PM AST
To: David Barna
Cc: Adam Fetcher
Subject: susquehanna-roseland

Hey David - Please see below. We may start getting incoming on this... please let me know if you do.
I'm working on a response.

From: Wirth, Paul G <pgwirth@pplweb.com>
To: Wali, Sahar
Sent: Thu Oct 06 16:18:43 2011
Subject: Peer release and proposed response

As discussed, here is the release from the PEER website and a rough draft of some talking points being prepared by PPL and PSEG

Paul Wirth
610 774 5532
610 246 2752 c

Public Employees for Environmental Responsibility News Release (www.peer.org)
For Immediate Release: October 6, 2011
Contact: Kirsten Stade (202) 265-7337
POWER PLAY AT DELAWARE WATER GAP AND APPALACHIAN TRAIL — “Fast Track” Review Masks Pre-Selection of Most Damaging Transmission Route
Washington, DC — Top administration officials have pre-approved a humongous power transmission corridor across some of the most scenic portions of Delaware Water Gap National
Recreation Area and the Appalachian National Scenic Trail, according to Public Employees for Environmental Responsibility (PEER) which strongly condemned the move. Yesterday, the Obama administration announced a plan to “fast track” the Roseland Susquehanna Overland Transmission Project, along with six others — a move that PEER charges is a move to bypass proper environmental review designed to protect one of the most scenic areas of the entire national park system.

Announced as a “pilot project” and a boon to jobs, Interior Secretary Ken Salazar and other top officials vowed to slash “red tape” to move the transmission corridors rapidly forward on a fast track basis.

“We do not object to fast-tracking projects as long as political appointees follow the laws protecting parks and the environment— but that hasn’t happened here,” stated PEER executive Director Jeff Ruch. “Using jobs as a pretext is misplaced. More jobs can be created by protecting parks than by trashing them.”

PEER contends that Secretary Salazar, National Park Service Director Jon Jarvis and other Interior officials have met repeatedly with project proponents, PPL Electric Utilities of Allentown, Pennsylvania (PPL) and Public Service Electric and Gas Company of Newark, New Jersey (PSE&G), and have already approved a route for a new power line that will cut across the Delaware Water Gap National Recreation Area and the Appalachian National Scenic Trail. The power line will be strung on 200 foot-tall towers that will permanently impair the scenic values of one of the most beautiful areas in the crowded Northeastern Corridor of the United States.

For at least three years, the NPS has been developing an environmental impact statement (EIS) to consider the PPL/PSE&G proposal, following the National Environmental Policy Act (NEPA). The draft EIS is supposed to be announced to the public for comment before the end of 2011. The transmission line will bring power from PPL generating facilities at Berwick, Pennsylvania across the Delaware River and the Delaware Water Gap National Recreation Area and the Appalachian National Scenic Trail to northern New Jersey.

As part of the deal, the draft EIS will NOT consider at least two alternatives that would lessen impacts to the park’s scenery (#6 and #7) but will include at least one alternative (#2B) demanded by the companies that is untenable from a safety perspective. The Secretary and the Director have unofficially committed to the companies that the NPS will select Alternative 2, the alternative preferred by the companies but which is the most damaging to the resources and scenery of the parks. In return, the companies have reportedly agreed to pay $60 million for land acquisition and administration inside and near the NRA.

“This is not ‘fast track,’ it is a short circuit in which political appointees are putting their thumbs on the scale to skew the review process,” Ruch added. “It is one thing to select an alternative after the conclusion of the NEPA process, but is something else to decide on the alternative before public comment has even begun.”
Proposed company talking points

(SRtalkingpointsmitigationrev2.doc)
DRAFT of 10/6/11
Susquehanna-Roseland talking points on Mitigation

Background:
PPL Electric Utilities and PSE&G have been meeting with the National Park Service and Department of Interior officials regarding potential mitigation for impacts of the Susquehanna-Roseland power line on federal lands.

Talking points:

- Mitigation is a normal and routine part of the process.
- Mitigation is required by the National Park Service as part of an Environmental Impact Statement.
- The intent is to mitigate any impacts a project may have on federal lands.
- The Susquehanna-Roseland project will potentially impact three units of the National Park Service: The Delaware Water Gap National Recreation Area, the Middle Delaware National Scenic and Recreational River, and the Appalachian National Scenic Trail.
- PPL Electric Utilities and PSE&G have been discussing mitigation with the National Park Service for many months.
- Those discussions at all levels of the NPS and Interior will continue as part of the Environmental Impact Statement process. (Including today 10/6.)
- No final decisions have been made on mitigation. No agreement has been made.
- We are hopeful that we will be able to reach agreement on an appropriate mitigation package that will lead to getting this much-needed power line in service for the region’s electric customers by early 2015.
- We fully expect to have to meet a very high bar for mitigation if the NPS approves the power line through federal lands.

Q-A
What is your comment on the PEER statement?
It is incorrect. Our mitigation discussions with the National Park Service continue. As a matter of routine, we do not talk about the details of such discussions, but we fully expect the park service to set a high bar for mitigation if it approves this line, and we fully expect to meet that high bar.

How much to you expect mitigation to cost?
Mitigation will be determined as part of the EIS process, which is on-going, and will depend on the impact to federal lands, as determined by the EIS process.

Did we meet w the secretary?
Yes we met with the Secretary of the Interior. It's clear he is very determined to protect the park.

**Why is S-R on the list?**
Because it is very important to the region's reliability and the national electric grid and the administration recognizes that.

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