

Exhibit 1

FIRST PDEIS ROUNDTABLE MEETING

**DELAWARE WATER GAP NATIONAL RECREATION AREA
MIDDLE DELAWARE NATIONAL SCENIC AND RECREATIONAL RIVER
APPALACHIAN NATIONAL SCENIC TRAIL**

**THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED SUSQUEHANNA TO ROSELAND 500kV
TRANSMISSION LINE**

JULY 21, 2011 – JULY 22, 2011

THURSDAY JULY 21, 2011

MEETING ATTENDEES:

Steve Culver – NPS, Denver Service Center
Morgan Elmer – NPS, Denver Service Center
Pamela Underhill – NPS, Appalachian Trail
Brent Allan – NPS, Appalachian Trail
John Donahue – NPS, Delaware Water Gap
Amanda Stein – NPS, Delaware Water Gap
Kara Deutsch – NPS, Delaware Water Gap
Leslie Morlock – NPS, Delaware Water Gap
Brinnen Carter – NPS, Delaware Water Gap
Jeff Shreiner – NPS, Delaware Water Gap
Larry Hilaire – NPS, Delaware Water Gap
Bob Karotko – NPS, Delaware Water Gap
Al Ambler – NPS, Delaware Water Gap
Carla Beasley – NPS, Delaware Water Gap
Jennifer McConaghie – NPS, Northeast Region
Jacki Katzmire – NPS, Northeast Region
Andrew Tittler – DOI
Michael Horne – USFWS, Cherry Valley NWR
Suzie Boltz – EA Engineering
Anita Struzinski – EA Engineering

PHONE-IN ATTENDEES:

June McMillan – NPS, Denver Service Center
Wendy Walsh – USFWS, NJ Field Office
Patti Steinholtz – DEA
Bill Byrne – DEA
Brynn Reimann – DEA
Jon Gage – DEA

1. General Comments

The superintendents appreciate all of the work that the team has been doing to move the EIS, which is approximately halfway done. There is a new schedule prepared by DSC to preserve the October 2012 ROD date. The August 30 DEIS deadline will not change.

The environmentally preferred alternative is the no action alternative and the preferred alternative is alternative 4. Alternatives 6 and 7 will be dismissed. The preferred and environmentally preferred

alternatives will not be announced until the draft EIS and associated newsletter (not to be confused with the upcoming newsletter, which will update the recipients on the progress of the project/EIS). NPS is preparing text on the preferred and environmentally preferred alternatives and dismissal language for alternatives 6 and 7. Alternative 4 should include a second set of VSLs between the Bushkill substation and the western boundary of the park.

2. Preparing Document for Public Review

The document needs to provide enough detail to be legally sufficient and still be a sound document for the public. There is a fine line between too much detail and readable for the public.

Areas that need to be focused on –

- make the parks and the park resources the focus
- have precise and accurate definitions of the alternatives
- be more precise about what happens to the existing 230 kV line
- how will we deal with the need for the line (socioeconomics)
- missing information from the purpose and need statement – applicants' interest in the land (they already have rights there) is not adequately explained
- DO 53 language would be valuable to this document
- make sure what is discussed is relevant
- too scientific in some places – needs to be more concise and readable

The EIS needs to key in on resource topics that help make the decision. By the time the reader gets to “important” resources, the reader is lost. There needs to be general editing – in trying to be thorough, the document has become redundant. If there are fewer topics to address, the edits can be more thorough. Many comments asked for inclusion of more information, which could confuse things more. After analysis, the decision is to dismiss several topics because they do not help present the case. All recaps of the alternatives and the affected environment should be removed. The NPS Team would like a complete rewrite to make it more readable and concise.

The key point is that the reader needs to be able to understand what he/she is reading. The information is there, it just is not completely coherent. The next version will have figures embedded and will be edited to DSC editing standards. The number of headings will be reduced and they will not be numbered. Wordiness will be addressed.

3. Nomenclature

The existing 230 kV line cannot be called the existing S-R Line. There is not actually a line that currently runs from Susquehanna to Roseland. The Team needs to come to a decision on a name for the portion that runs through DEWA. The line connects the Lake Wallenpaupack, Bushkill, and Kittatinny substations. The Team decided on the Bushkill to Kittatinny Line (B-K Line). The structures between the Bushkill substation and the eastern boundary of DEWA would be removed for all action alternatives. The proposal is to replace the existing 230 kV line and add the S-R Line.

Alternative 8 will be renamed alternative 2b.

The document needs to clearly state what will happen to the other existing lines along the action alternatives other than alternatives 2 and 8. The new S-R Line and the ROW for the existing lines that belong to other utilities companies could overlap or be adjacent to each other. The applicants would need to work out the agreement with the other utilities. This needs to be clarified. This would explain the range in the width of the action alternatives. The S-R Line is identified as a line of national importance by PJM and FERC.

The replacement of the B-K Line – for alternatives 5, a double circuit would be constructed along the entire alternative. The existing 230 kV line would remain for up to 5 years until the second line would be energized at 500 kV. As long as it is energized at 230 kV, it needs to run through Bushkill Substation. After this, the B-K Line would be removed.

Study area – VSL is introduced in chapter 2 to define the boundaries of the study area. After chapter 2, study area will be used and will be defined for each resource.

Delaware Water Gap – There is confusion between the park, the borough, and the geologic feature. The park will be “DEWA,” the feature will be “the Delaware Water Gap,” and the borough will be “Delaware Water Gap borough.”

4. Mitigation

Removal of the B-K Line will remain as part of action alternatives 3 through 5. The removal of the B-K Line was written as a part of action alternatives 3 through 5. The question arose as to whether the removal is part of the alternatives or mitigation. Mitigation can be written into the alternative. If the mitigation is intrinsic to the proposal, it is better to write it in as part of the alternatives. As part of the alternative, it is stronger for the parks. The alternatives were approved last June with the mitigation included.

Much of the mitigation is not specific because studies would have to be done prior to construction once the route is selected. Many of the mitigation measures include qualifiers such as “possibly.” Mitigation written into the ROD is not optional. Mitigation measures are those that could definitely be implemented. There will be monitoring of the mitigation to ensure that the actions are reaching the goal. Time of year restrictions could have the potential of limiting construction to approximately 2 weeks in November, which is not feasible. The EIS needs to identify critical mitigation measures.

DEWA staff inquired if there were options to some actions, such as an alternative to blasting during construction. The EIS discusses relocating tower locations instead of looking for an alternative to blasting. The team concurred that blasting cannot be avoided based on information provided.

Intrinsic mitigation should be included in the alternative and the impacts described as part of the impacts associated with the alternative. All mitigation presented in the EIS at this point is considered intrinsic mitigation. Additional mitigation may be added between the DEIS and FEIS. The conservation strategy is being developed with the applicants and would be common to all alternatives, once complete. The NPS Team expects that the mitigation plan would apply to the preferred alternative as well. A brief statement about the Conservation strategy will be added to “Common to All” so the public understands that a mitigation plan is being developed. It is not specific enough at this time to include in the impacts analysis.

Potential mitigation for APPA, if alternative 2 is chosen, another crossing could be required to be removed or moved and collocated to an another existing ROW. At this time, alternative 4 is identified as the preferred alternative. This will not be included in the public draft but could be included in the final. Other mitigation could be more effective to improve visitor experience, such as the incidentally acquired structures.

Mitigation for soil compaction needs to be addressed.

5. Permit Length

DO-53 suggests a 10-year period, but the applicants state that the life of the line is 45 years. Andrew suggests issuing a permit for the life of the line, so as not to have to conduct another environmental review in a relatively short amount of time. However, this is a policy decision. Currently the period

of analysis is 15-20 years. If the period were changed to 45 years, the analysis would change significantly, especially for natural resources and economics. If the ROW permit was renewed every 15 years, the mitigation, vegetation management, etc. could be evaluated, and the permit could be renewed through a categorical exclusion. The decision was made to recommend a 15-year permit, NPS will work to have this approved by Washington.

6. Inside and Outside the Study Area

Any part of the alternative outside of the VSL but inside the park was analyzed the same as inside the study area. Areas outside the study area cannot be analyzed in the same manner because the route outside cannot be dictated by NPS. Once the applicants are aware of the preferred alternative, the team needs to find out the applicants plan to build. The applicants have indicated that they will not give up on the S-R Line route outside NPS boundaries. NPS could issue the permit not knowing if the applicants are planning on accepting it or taking NPS to court over the decision. Based on public comments, the NPS could change the preferred alternative; therefore, trying to find out the applicants plans may be moot. Consultation would be an on-going process. Because of the confusion for alternatives 3 and 4, which include sections outside the VSL yet inside the park, the decision was made to add an additional set of VSLs to include any park land.

7. Baseline

There is confusion on what baseline is. Baseline (affected environment) was set on conditions at the time of the Notice of Intent. The first set of field surveys for the EIS occurred before vegetation maintenance was conducted on the 100-foot ROW sections in Pennsylvania during August 2010. Since that point, different levels of vegetation maintenance has occurred in these sections, ranging from clearing to selective maintenance.

Currently, as it is written in the dEIS, the No-Action assumes worst-case scenario of clearing vegetation from ROW edge to edge. NPS is trying to work with the applicants to prepare a vegetation maintenance plan specific to the park. The applicants claim that clearing edge to edge, along with the removal of danger trees on NPS land, is their deeded right. The B-K Line is the only line that is being cleared to the new standards, but even there they are not clearing edge to edge. The applicants have not provided rationale for why and how they clear/trim vegetation.

Under no action, it appears that baseline is going to change. The applicants claim that more clearing will occur in the winter of 2011. The impacts of no action should be based on the applicants' vegetation maintenance plan. To make it clear to the public, give the history of the vegetation maintenance and that it is currently in flux. The no action alternative should assume bare minimum of NERC standards. Disclose that NPS does not know what the applicants will do and state what they can legally do. The acreages of impacts may have to be removed due to the unknown. The EIS could present a range of impacts, but clearly state why there is a range. The clearing on the NJ side is tied to the NERC standards. In May 2011 meetings, a utility representative (ASPLUNDH or PPL) made the comment that they typically clear 150 ft for 230 kV lines, this is similar to what PSEG did on the NJ side several years back. (This 150 ft width clearing width for a 230kV was verified in Table 1 of the PPL vegetation Clearing and Maintenance Specification Report LA 79827-7)

Use the current ROW clearing, maximum of 150' (except for the 100 foot ROW segments)

8. Special Status Species (SSS)Comments

USFWS, New Jersey: Regardless of alternative, several surveys would be needed such as bog turtle and Indiana bat before implementation of any action alternative. FWS and NPS discussed the need for consultation for areas outside the study area. The EIS will state clearly that consultation for areas

outside the study is not complete and is the applicants' responsibility. NPS needs to complete their Section 7 requirements for federal lands prior to signing the ROD (DO-12 Handbook). The RTE surveys for alternatives 3, 4, and 5 on NPS land should be done in the spring of 2012 so the information can be used in the FEIS and ROD.

NPS: Special status raptors – on Kittatinny ridge, the impacts should be about the same for all of the action alternatives. Bald eagle nesting surveys would be needed every year to determine if nesting is occurring. Surveys would not be needed prior to the FEIS, instead they would need to be done prior to construction. A nest found close to the crossing could cause selection of another alternative; this decision would be up to USFWS. Construction of a tower close to a nest could be considered harassment under BGEPA. Loss of habitat is considered take under ESA, but bald eagles are not covered under ESA. The bald eagle winter roost is immediately adjacent to the B-K Line. The B-K Line is three lines at tree canopy level and the birds fly over the lines when leaving. The new towers would have up to 20 lines and would be significantly higher than the canopy thus creating a fence for the birds flying out of the roosting area. This flight obstruction could create a take (electrocution) for every year the lines are in existence. The guidelines state not siting lines directly adjacent to a roost. Alternatives 2 and 2b are not consistent with the guidelines. If the preferred alternative changes from 4 to 2 or 2b, this impact is significant and would require further consultation. Mitigation measures recommend by APLIC includes making the lines very visible, which would increase visual impacts.

NPS would like to see a large matrix table being boiled down to a concise color-coded table. This table is a challenge, especially outside the study area where there is a range of impacts.

Clarify that the term "population" in thresholds refers to park populations. For the section 7 determination for SSS, the adverse effects should be analyzed at the individual level. This is not the same for NEPA analysis. NEPA intensities should not be molded to section 7 determination. The determination of effect will be pulled from the NEPA analysis. A minor NEPA impact could be a larger effect under ESA. The two analyses do not always correspond. NOTE – it was later decided to delete impact thresholds so the above discussion was resolved.

Having an access road near bog turtle habitat could create an attractive nuisance. The access road could increase human intrusion into bog turtle habitat, resulting in people disturbing the turtles, impacting habitat, and potentially collecting turtles.

Small-footed and long-eared bats have been proposed for listing in the federal register. They could be listed, not eligible or candidate for emergency listing. The USFWS is also working on status of the little brown bat. The small-footed and long-eared bats and golden-winged warbler should be added to the analysis (comments 554). NPS has on-going bat echolocation surveys that could be of use. DEWA is the first NPS unit to document white nose syndrome.

There are a large number of migratory birds that are on the conservation list. This should be covered under migratory birds, not in the SSS section. If they go into SSS, each species would have to be discussed individually.

9. Removal of Impact Thresholds?

Intensity, context, duration

The requirement is to use intensity to describe the impacts. The thresholds define the impact level. The impacts to the resource have to be described in detail – what happens to the resource when the actions are completed? Removing the thresholds could remove arbitrary or subjective numbers and would allow more basic comparisons and improve precision. The definitions are taking away from

thorough impact analyses. However, close attention must be given to maintaining consistency in defining intensity across the alternatives now that the blanket threshold definitions will be removed. Without the thresholds, the impacts would need to be sufficiently explained on a case-by-case basis.

Dropping the threshold definitions could resolve conflicts between NEPA analysis and Section 7 or Section 106 determination. The decision was made to remove impact thresholds.

10. Cooperating Agency – Housekeeping

A conference call will be scheduled between NPS and FWS to discuss this due to lack of time at the meeting. Mandi Stein will contact USFWS.

11. Visual Resources

NPS has concerns with the analysis for alternatives 2 and 3. NPS considers the baseline for alternatives 2 and 3 approximately the same. The baseline for alternative 3 in the analysis is “better” than that for alternative 2. The ranking for alternatives differ because of the types of structures and the width of the ROWs. The analysis indicates that the difference in current and proposed for alternative 2 is not that different and the difference for alternative 3 is greater. NPS believes the change is just as bad for both of the alternatives. This is an instance where the impacts for DEWA and APPA are different.

The KOPs are a snapshot in time during one season. The viewshed will look different depending on the season or the direction the visitor is traveling. Overall impact descriptions completely dependent on the KOPs are not completely accurate. KOPs are only representations. The lines would be seen from other areas within the parks. The methodologies need to describe clearly the limitations and weaknesses of the KOPs and additional information on gross visual impacts should be added. The visibility maps in the technical reports are based on bare earth, and do not include vegetation height. DEA will map acreages of potential visibility using bare-earth data included for the alternatives in the visual technical report. DEA will map the acreage results and present them in a table for comparing the alternatives to the baseline. This modeling will include a map of the existing visibility of the 230 kV line. The cleared corridors are more visible than the towers from a distance. The current analysis does not take into account acreages. DEA would have to think about how to include this information in the analysis. These acreages impacted are extremely important for the compensation discussions. DEA will revisit the analysis so it is not based primarily on KOPs. DEA will work to revise the analysis to include KOP, area from which towers are visible, and a holistic assessment of impact (more than one visual perspective).

APLIC measures: APLIC diversion devices will be used but the type is not determined by the EIS. The diversion devices are included in the modeling of visual resources over the river, but not over Kittatinny Ridge. The devices can be added to the simulations but they would not be visible in all of the simulations. The technical report states whether the devices would be visible or not, but the EIS does not include this language. Not knowing what kind of device would be used is a weakness in the impact analysis. Nonetheless, the EIS will use a device that is currently APLIC accepted for the analysis, but the kind of device could change at the time of construction.

The visual simulations were completed with the assumption that the existing lines along alternatives 3 through 5 would be obsolete. However, the NPS is not comfortable with that assumption. The existing lines will be added to the simulations, assuming that replacement lines would be similar to existing lines along these alternatives. The exact locations of the towers cannot be determined at this time and this unknown needs to be acknowledged in the methodologies. For alternatives 3 through 5, the beneficial effect of removing the B-K Line needs to be added to the analysis.

12. Visitor Use and Experience

In some cases, beneficial impacts from monopole versus the lattice structures: The beneficial impacts result in reduction of visual clutter. There would be adverse impacts from the widening of the ROW and increasing the height of the towers. Currently, the conclusions indicate that the beneficial impacts would outweigh the adverse impacts. At one specific KOP for alternative 2 along APPA, the beneficial does outweigh the adverse due to the altitude of the KOP location. This section will be revisited to take on a linear and more-encompassing aspect.

The section was based on observational (and somewhat subjective) data and made conclusions that certain areas are not well used. Again, the observational data were a snapshot in time and what was observed may be very different depending upon time of day, day of week, season, location. This should be clearly stated in methodologies. NPS has survey data available, including the river users survey from 2010. There were several comments that state certain locations are popular for visitors and DEA needs citations for these statements.

The impact of closures on visitor use and experience is not fully discussed. This would include closures from construction activities as well as permanent closures of several campsites. At some point, each section of the alignment would have to be closed – including the river, roads, and trails. DEA should reference the health and safety section to determine what will be closed. Any closure is a lost use to visitors.

The intensity of visitor experience is important to characterize. Their experience at the park is qualitatively different from their everyday life. Visitors have a heightened sensitivity – the more the park changes to look like the visitor's neighborhood or work environment, the less credible the visitor experience. This is important in distinguishing the impact on visitors from the impact to visual resources; there is an additional emotional factor that comes into play when they perceive a diminished resource. The challenge is to balance adding emotional relevance without coming across too subjective. Steven F. Austin University and Southern Illinois University are doing studies on this topic. Also, check www.Interp.net for information. Tie the impacts back to the enabling legislation and GMP. Lost use compensation could be included in the final version, but this information is not available now.

If a visitor comes to the park and cannot float the river or cannot get to a portion of the park, how does this affect visitor experience? The weekend visitor's experience would be differently impacted than the visitor who visits the park once in a lifetime. APPA is more vulnerable to getting to a tipping point where the visitors give up and go to another trail. APPA wants to make sure the iconic nature of the trail is captured and reflected in the impacts on its users.

13. Socioeconomics

Liveries data is sent to NPS on a yearly basis and should be added to the EIS. DEA contacted all of the liveries while in the process of writing the DEIS, but most were closed for the season and data could not be obtained. NPS will provide information for the liveries after DEA submits a request, so NPS understands what DEA needs.

FRIDAY, JULY 22, 2011

MEETING ATTENDEES:

Steve Culver – NPS, Denver Service Center
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PHONE-IN ATTENDEES:

Wendy Walsh – USFWS, NJ Field Office
Patti Steinholtz – DEA
Mara Krinke – DEA
Maggie Buckley – DEA
Bill Byrne – DEA
Jane Jacobs – JMA
Bob Kingsley – JMA
Rick Meyer – JMA

1. Natural Resource Comments

Wetlands: Wetlands are not exempt from vegetation maintenance. Scrub shrub wetlands should not be maintained because the vegetation is compatible. Scrub shrub wetlands will succeed to wooded wetlands in the period of analysis (red maple) without some type of interference (beavers, park maintenance). Maintenance through bog turtle habitat is scheduled by PPL in the winter of 2011, if a permit is issued for the ROW clearance (which isn't the case because it is part of the routine maintenance of their ROW), the park has section 7 obligation, if there is no permit the responsibility sits with the applicants. USFWS has an agreement with PSE&G that they will send to NPS to use as a model. NPS can state in the EIS that an approved vegetation maintenance plan would be required mitigation.

APLIC Requirements and Avian Protection Plan: APP is a service initiative, however, NPS will prepare a park specific APP as part of the NEPA process. Any time there is replacement or upgrade

of transmission lines, creating an APP is encouraged. USFWS would develop an APP with help from the migratory birds section. Applicants have the choice of consultation or developing an APP. NEPA process would keep NPS in the discussion of protection of migratory birds. Language in the EIS should be stronger for what NPS wants to use as visual markers. Conservation strategy would include an APP and consultation with USFWS would be included in the process. USFWS is more concerned about collisions more so than electrocution. Nighttime migrants would be more susceptible to collisions than raptors on Kittatinny Ridge. The towers would not be tall enough to require lights. (Additional concern about collisions for gliders – put FAA and glider clubs on the distribution list.) The birds proposed for listing should be addressed under migratory bird protection act. Birds of conservation concern should be addressed in the APP. NPS needs to consider a non-purposeful take permit under the Bald Eagle Act alternatives 2 and 2b. The EIS should state that these alternatives would require that the NPS consult with USFWS. The construction would likely not change the location of the roost, but the lines would threaten the eagles year to year. NPS believes alternatives 2 and 2b would take at least one eagle per year. This is an incidental take. There are separate applications for nests and roosts. Any reduction in survivorship would require a permit.

The summary table that is used in Rare and Unique Communities could be used as an example for the other resource topics.

Field survey data were used a lot for observation of wildlife and aquatic species. These data are a snapshot and do not tell the whole story, but it is the only locational data that is available. The decision was made that we should refer to the field surveys as cursory surveys to make clear that they are not comprehensive. Potentially place this wildlife information in common to all. Any species that is specific to a certain habitat along a specific alternative should be included. In SSS tables, species observed are in bold while those that could occur should be identified.

Include impacts to cold water streams in wildlife and wildlife habitat.

Soils: Compaction is not covered adequately. Only erosion is addressed, but it could also affect hydrology and vegetation regrowth. Compaction should be addressed in vegetation. NRCS website has information about compaction and other factors. Soil compaction can be a large issue to certain resources when looking at the park as a whole. The EIS should compare the critical soils, not all of them. Wording needs to be reworked – after construction, the area would be restored to natural contours or as close as possible, using BMPs. The results of the impacts to soils (loss of forest regeneration, fostering invasive species) are more important than the impacts to the soils themselves. The EIS should identify important soils (easily compactable or erodible) and present percentage of those along each alternative. Tables should round up to nearest pound per acre and not show percent difference because it skews the data.

NOTE: it was later decided to dismiss soils and discuss compaction under wetlands, and in dismissal language.

Restoration: NPS would like an approved restoration plan with invasive species monitoring.

Geology: Paleontological Resource Protection Act needs to be included (recent within the past two years).

The formations where blasting could cause fracturing and possibly landslides need to be focused on.

A paleontological survey of the preferred alternative will be required prior to construction.

Landscape Connectivity: The term needs to be defined better in regards to the geographic range. NPS is uncomfortable with how the park was isolated from other lands outside the park. This section needs to include language on the work that the parks have been doing with other agencies outside NPS lands and the efforts to move infrastructure to the margins. The corridors exist, but they are not protected. Wildlife movement is being hindered by infrastructure and this is not addressed. The discussion of contiguous habitat is important but it is not the whole story.

The section being labeled as landscape connectivity is confusing and should be labeled under Wildlife Habitat. The overall landscape impacts would be better discussed in cumulative impacts. When habitat is altered, it helps some and hinders others. The difference is between the park taking action to aid some species and an outside entity making the change for consumptive use. A utility ROW is not part of park mission. While there are beneficial impacts, it does not reduce the adverse impacts for other species.

2. Wild and Scenic River

NPS is rewriting the section on Wild and Scenic River. DEWA has unique legislation that lacks clarity. In the next year, DEWA is identifying outstandingly remarkable values (ORVs). The values identified in the GMP are a substitute for the ORVs typically developed in a comprehensive river management plan. Al Ambler is going to provide new language for chapters 3 and 4 that will reflect the legislation and will have it by the end of next week.

3. Visitor Use and Experience

NPS does not agree with the sections regarding hunting and sound effects. Hunters are also looking for quiet and solitude. DEA will work directly with Larry Hilaire.

The EIS states that impacts will affect an activity, but will not affect visitation. DEA was trying to describe the impact to the experience and the use. This is actually an unknown. The statement that the lines would not affect visitation needs to be less emphatic. The EIS needs to make judgment calls even though there is no concrete evidence. "This could diminish the attractiveness of this area and could affect visitation." Acknowledge that there is no available data and base the conclusion on park knowledge that visitation could be affected. When the draft is available to the public, NPS could utilize PEPC as a mechanism to ask the public to comment on visitor experience or other topics.

Language on the McDade trail states that impacts would be major but it would not affect visitation and that impacts in the rest of the park are negligible. This analysis relies on the KOPs too heavily; the KOPs were limited in number, are only taken in one direction, in one season, and on a weekday as opposed to a weekend. The existing line could not be seen from very many spots on the McDade Trail, but the new line would be seen from many more areas. The impacts need to be discussed even if they are not included in the KOPs. A narrative on the methodology needs to be added.

APPA feels that most of the visitor use section was a rehash of soundscapes and visual. The visitor use discussion needs to be more holistic, focusing on the emotional impact experienced by visitors. The document does not distinguish between visitor use and visual resources well enough. Visual resources should be an inventory and should address what is being lost, more like a commodity, not the human reaction to the visual impact. Vistas could be ranked. Visual should focus on separate points, while visitor use should encompass larger areas. In this manner, APPA would know what is being lost and can use this for mitigation and compensation. For visual resources, even if no one sees the impacts, it still diminishes the value of the trail/park.

Creative mitigation could be included in the compensation package.

For visitor use, the discussion could include several letters or pictures from visitors to show how strongly users feel about the parks.

Often the text jumps from a site, to the study area, to the entire park. The facts did not seem to support the statements. The text needs to be clarified and is reflected in the comments for the visitor use.

4. Socioeconomics Comments

The need for the line will be discussed but not analyzed. Because the preferred is an action alternative, there is an acknowledged need for the line. NPS does not want to second-guess PJM, but the EIS could discuss what would happen if the line were not built. This is a relevant factor and needs to be included, but any doubts the NPS has could be added into the discussion. Recognize the probability that other technologies could lessen the need for the line, but based on PJM's conclusions, an action alternative is chosen. The PUCs have backed the need for power, but NPS has doubts. NPS does not have confidence in PJM's model (as represented by the PATH project). This is more of a policy discussion, it was decided to place this discussion in chapter 1– background of the grid. This section would need review and approval from NPS and will be sent to the team in the next week.

Lost use analysis has not been completed yet. This would be used to develop the compensation package. Lost use would include closures, impacted visual resources. Damages are the money side and are not needed in this document. The impact to visitor experience is worse than the impact to socioeconomics. In common to all alternatives, the EIS will state that visitation to units of the national park service contribute to the tourism industry and local economies. This would be good introductory material. There are numbers of visitors that visit the parks and the resources will be affected. State that we do not know whether the lines will change the visitation rates. The analysis of impacts for socioeconomics will only include one analysis for all action alternatives to reduce redundancy; the impacts would be approximately the same if action is taken.

Dismiss or reduce? The impacts would not vary much among alternatives and would not help make the decision. Include in the common to all alternatives to avoid repetition. Carry this resource through to try to elicit comments from the applicants and the public. There are subtle differences in the alternatives that cross the river inside the study area.

Customers of the applicants will experience an increase in rates. The rate increases would include the entire line, not the NPS decision. If cost of construction is included in this section, we would also need to include the cost of not building the line.

5. Land Use and Gateway Communities Comments

It was decided to dismiss land use and gateway communities from the DEIS.

Environmental justice is currently discussed in chapter 3, but this is not necessary. It can be dismissed in chapter 1. There are impacts, but they are not disproportionate for any one group of people.

6. General Comments

For all figures, label the access roads as “proposed access roads”

Add towers to figures for alternatives 2 and 2b. Locational data was not used in the analysis in order to keep the analysis of alternatives consistent. The towers would be displayed but not analyzed further.

The scale is too large to see the detail for some of the maps.

There are small impacts to floodplains, but we are not sure if there is enough to need an SOF. EA needs to check the proposed locations of the towers with the floodplain boundaries.

7. Cultural Resource Comments

NPS concern is that the three sections were not set up the same way. Methodologies for archeology and historic structures do not have the same level of detail as cultural landscapes. An assessment of effect conclusion for Section 106 is needed. Since this is a combined document, this needs to be stated in chapter 1. NPS disagrees with minor impacts described under NEPA described as not adverse under Section 106. If negligible or less would be no adverse effect under Section 106.

A table of historic structures would be helpful to identify the structure and the impact level. There was not a description on the 50-year versus those that are eligible for listing.

For archeology, no showstoppers are expected along alternative 4. Additional surveys will need to be done before construction begins, but it is not necessary for the EIS. Because the tower locations along alternative 4 are unknown, the entire line would need to be surveyed. Having the survey data might help in weighing alternative 2/2b against alternative 4. JMA will put together a cost estimate for the Phase I b survey along alternative 4. EA will check the Berger report to see if the Bushkill section was completed.

8. Additional Comments

Topics to be dismissed: There will be impacts to all resources, but not all of these impacts will drive the decision. All mitigation for dismissed topics needs to be included.

Water resources – For aquatic resources, the impacts would be to the ecosystems and could be rolled into wildlife habitat. Water quality issues are not driving enough to show a difference among the alternatives.

Soils – Can be dismissed as a topic but impacts need to be discussed in other sections.

Gateway Communities

Land Use

Environmental Justice

Cumulative Impacts: A different geographic scope is relevant for different topics, especially along APPA. For visitor use, visual resources, and migratory birds a much larger boundary is necessary. For APPA, the entire trail would be used for the thru-hiker and approximately a 20-mile area would be used for the day hiker, 10 miles north of the most northern route, and 10 miles south of the most southern route. There are other types of users that fall in between thru hikers and day hikers as well.

Different sets of projects are used per alternative per resource. The variance might be reduced now that alternatives 6 and 7 have been dismissed.

Cumulative projects in cultural are not characterized correctly and this is reflected in the comments.

Add the I-80 road projects to wildlife (bears) and the I-80 rockfall project (visual). May need to revisit the floodplains projects if this topic stays in the analysis.

Impact thresholds: CEQ does not require or discuss impact thresholds, this is an NPS practice. CEQ requires that the effects and their significance must be disclosed. Explain the impacts in the context of the parks. One eagle to North America is a much smaller impact than one eagle to DEWA.

RM-12 states that impacts must be quantified as much as possible and interpreted in terms of duration. Identifying objective thresholds is easy for some resources but nearly impossible for others. Andrew suggests using parameters when explicit parameters are available. Three cases – define thresholds up front, explain rationale in the impact analysis, or explain after the fact. When the thresholds are defined up front, the rationale is implied throughout the resource analysis. If it is not defined up front, all of the rationale is included in the text of the effects. The impact analysis becomes the definition in this case. This allows the definitions to be more flexible from resource to resource, but consistent across the alternatives. For example, 0.25 acre of wetland impacts along an alternative where high-quality habitats exist are more impactful than 0.25 acre of lower-quality wetlands along another alternative. NPS is given some discretion as resource specialists to make professional judgment, as long as there is rationale to back up the conclusion. Not defining the thresholds up front will help sections such as visitor experience. For cultural resources, the NEPA impact levels need to be distinct from Section 106 because adverse effect under Section 106 could be anywhere from minor to major.

Without strict definitions, the impacts need to be consistent across the alternatives. If death of an eagle is moderate for alternative 2, then death of an eagle needs to be moderate for the other alternatives. Currently, the impact analysis tried to mold the discussions into the constraints of the definitions. Not defining the thresholds gives some freedom to explain the actual impacts.

****Need to make sure that in the discussion of the impacts, intensity, context, and duration are addressed.****

A memo to file with the rationale as for why this document is going against common practice needs to be written.

Short-term vs. long-term: Short-term is 6 months after construction concludes. However, 6 months could be short-term for some resources and long-term for others. For this project, there are construction impacts and maintenance impacts. Currently, the analysis is written within the bounds of the thresholds. The team has decided to move away from use of short and long-term and instead disclose the actual duration.

Mitigation: The voice and consistency of the section needs to be edited. Add “not limited to” to the introduction to make clear that additional mitigation measures might be added. The following mitigation measures should be included:

- Geology –a Paleontological survey based on the new act
- Soils – mitigation for compaction

Amend use of herbicides to state only NPS-approved (through the NPS IPM) program herbicides would be used.

Remove socioeconomics and soundscapes mitigation – it cannot be enforced by NPS. Mitigation that is not enforceable by NPS should be discussed in the analysis. This appendix should include mitigation measures that will conditions of the permit.

Conservation strategy and compensation will be used to address impacts to visitor use and visual resources.

Add language about a mitigation monitoring plan to chapter 2. If the applicants fail to do required mitigation, it is a violation of the permit.

Appendix vs. Admin Record: Complete analysis for dismissed topics and alternatives considered but dismissed will go into the admin record. Any information taken out of the sections that is considered extraneous will go into an appendix.

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DECISIONS

The environmentally preferred alternative is the no action alternative.

The preferred alternative is alternative 4.

Alternatives 6 and 7 will be dismissed.

Moving forward, the following nomenclature changes will be made:

- The existing 230 kV line along alternative 2 will be called the Bushkill Kittatinny Line (B-K Line)
- Alternative 8 will be alternative 2b
- The park will be “DEWA,” the geologic feature will be “the Delaware Water Gap,” and the borough will be “Delaware Water Gap borough.”

The permit length will be 15 years.

The following topics will be dismissed: soil, water resources, environmental justice, land use, gateway communities.

The segment between Bushkill Substation and the western boundary of DEWA will be included within the study area as secondary VSLs for alternatives 3 and 4.

The no action alternative should assume bare minimum of NERC standards (150’) except where the ROW is only 100’.

The impact thresholds will be removed, as well as the terms long-term and short-term.

TASK LIST

Readability: For the most part, the information is present in the document, it just needs to be edited to be more readable. Reduce redundancy. Present data in an easily understandable way.

Impact topics to be dismissed: Topics dismissed and any available analysis will be compiled in another document – not in an appendix, but in the admin record.

Bushkill Substation: Make clear the use of Bushkill Substation for alternatives 2, 2b, 3, and 4. Also make clear the use of Bushkill Substation under alternative 5.

Study Area: be consistent with use of the terms study area only, remove other terms (geographic study area, area of effect, etc). VSLs are introduced in chapter 2 to define the boundaries of the study area. After chapter 2, study area will be used and will be defined for each resource. Include Bushkill Substation and west into study area of alternative 4 to include all park lands within the VSLs.

Removal of B-K Line: more clearly state the impacts that would result from removal of the B-K Line. It is glossed over currently.

Mitigation: The EIS needs to identify critical mitigation measures. Add that the applicants will produce an approved restoration plan.

Geology: Add the Paleontological Resource Protection Act to chapter 1. The focus needs to be on the formations where blasting could cause fracturing and possibly landslides.

Soils: Soil compaction and mitigation for soil compaction needs to be addressed under topics where compaction is applicable (vegetation & wetlands).

Floodplains: The EA Team will discuss the floodplains impacts with the resource specialist to determine if the topic can be dismissed.

SSS: Add impacts from having an access road so close to bog turtle habitat (attractive nuisance); add small-footed and long-eared bats and golden-winged warbler (comment 554); DEWA is the first NPS unit to document white nose syndrome.

Migratory birds: Add the birds that are on the conservation list to the discussion. NPS needs to consider a non-purposeful take permit under the Bald Eagle Act alternatives 2 and 2b. The EIS should state that these alternatives would require that the NPS consult with USFWS.

Cultural Resources: A conference call will be scheduled for next week to go over cultural resources concerns.

Appendix vs. Admin Record: Complete analysis for dismissed topics and alternatives considered but dismissed will go into the admin record. Any information taken out of the sections that is considered extraneous will go into an appendix.

Other Utilities: The applicants would need to work out the agreement with the other utilities. This needs to be clarified.

Cooperating Agency & Housekeeping: A conference call will be scheduled to discuss this due to lack of time at the meeting.

Visual Resources: Edit the impacts to consider the full impact of the action through all seasons, instead of relying so heavily on the simulations that are a snapshot in time. Describe the limitations and weaknesses of the simulations in the methodologies section. Include visibility maps with acreages, as in the technical report. Include the use of APLIC diverters over Kittatinny Ridge in the analysis. The absence of the second parallel lines for alternatives 3, 4, and 5 in the simulations need to be addressed.

Visitor Use and Experience: Edit this section so that the discussion is not just a rehash of visual and sound – make it more holistic. Incorporate the 2010 river users survey information. Citations are needed throughout the section (chapter 4). Discuss lost use due to closures in detail. Incorporate studies from Steven F. Austin University, Southern Illinois University, and Interp.net. Tie the impacts back to the enabling legislation and GMP. In areas with no data, acknowledge that there is no available data and base the conclusion on park knowledge that visitation could be affected. Do not rely on KOPs so heavily in the impacts analysis. Make changes to the sections about hunting/sound effects. DEA will provide a list of information needed to help augment the visitor use section, and NPS will provide information/letters from visitors on their impressions and importance of park.

Wetlands: Edit impacts section to include maintenance of wetlands where vegetation would not be compatible (as defined in the vegetation maintenance plan).

APP: Birds of conservation concern should be addressed in the APP. A NPS-approved APP needs to be developed.

Wildlife: Move observations from field surveys to common to all and describe that the observations were incidental, not from a full wildlife survey. Include impacts to cold water streams since water resources as a topic has been dismissed.

Landscape Connectivity: The term needs to be defined better in regards to the geographic range or potentially the term needs to be removed. It may be better addressed as habitat contiguity or protecting large, contiguous habitat blocks. This section needs to include language on the work that the parks have been doing with other agencies outside of NPS – this would provide an overarching context and would tie efforts that the NPS is taking protect and preserve landscape scale connectivity. Need to discuss the efforts to move infrastructure to the margins. The corridors exist, but they are not protected. Wildlife

movement is being hindered by infrastructure and this is not addressed. The discussion of contiguous habitat is important but it is not the whole story.

Socioeconomics: Discuss, but do not analyze, the need for the line. State that we do not know whether the lines will change the visitation rates. Disclose in common to all that the effect on the residences and businesses in the surrounding areas is unknown. In the common to all section, the EIS will address the concern over loss in property values; this should be cited if possible, or the EIS should state that NPS received comments from the public in that regard.

Figures: For all figures, label the access roads as “proposed access roads.” Add towers for alternatives 2 and 2b. (The towers would be displayed but not analyzed further.) The scale is too large to see the detail for some of the maps.

Cultural Resources: Edit these sections to include a comparable amount of detail. Add an assessment of effect conclusion for Section 106. Add a description on the 50-year versus those that are eligible for listing. Edit characterization of the cumulative projects (details are in the comments).

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