



Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350
E-mail: secretary@dps.ny.gov

April 21, 2015

RE: Case 13-E-0488 and Case 13-T-0454

Dear Public Service Commission, Judge Phillips and Judge Prestemon:

On behalf of the Otsego County Conservation Association, Inc., (OCCA) thank you for the opportunity to review and comment on North America Transmission's proposed Edic to Fraser Alternating Current (AC) Transmission Line Project and to participate as an intervenor in Case 13-E-0488 and Case 13-T-0454. As such, OCCA is representing the interests of its membership and an informal coalition of environmental groups based in Otsego County, including the Otsego Land Trust, Otsego 2000, Inc., the Butternut Valley Alliance, and the Delaware-Otsego Audubon Society. We also worked closely with a municipal committee comprised of representatives of the Towns of Richfield, Exeter, Burlington, New Lisbon, Laurens, Oneonta, and Otego, and with the Otsego County Planning Department.

Following extensive research, multiple meetings and correspondence with the conservation and municipal committees, and two meetings with representatives of North America Transmission (NAT), we submit the attached comments, figures, and appendices.

While NAT's account of expected environmental impacts and suggested mitigations in its submissions to the Public Service Commission (PSC) is extensive, OCCA believes the environmental analysis is incomplete and may not fully comply with the requirements of 16 NYCRR Part 86.

In our opinion, based on the information in NAT's Part A filings, the potential adverse environmental and socioeconomic impacts associated with the proposed Edic to Fraser project outweigh the project's reported benefits. In summation:

- the siting of Edic to Fraser alongside the existing Marcy South corridor simply does not appear to meet Governor Cuomo's request for "smart projects" that do not require the acquisition of new right of way;

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- the land-use data analyzed focuses solely on zoning, floodplain mapping, and land cover classification, and does not represent an adequate metric to evaluate land-use compatibility;
- the anticipated climate benefits of this project are entirely contingent upon the full realization of the policy goals of the “Reforming the Energy Vision” and therefore can be neither confirmed nor guaranteed;
- expanding the existing ROW through Otsego County would compound the previous impacts from the Marcy South ROW and adversely affect previously implemented mitigation measures;
- potential impacts to wildlife, the potential loss of vegetative cover, and the related valued uses of property including agriculture, forestry, and recreational pursuits were not sufficiently discussed;
- potential impacts to water and soil resources were not sufficiently discussed;
- noise and EMF impacts were not sufficiently discussed;
- NAT did not consult local resources and experts for its historic, cultural and archaeological review and, in fact, consultation of local resources and experts in general is lacking;
- the data as presented do not provide the PSC staff the ability to fully understand the visual characteristics of Otsego County or to assess the project’s cumulative visual impacts;
- the lack of discussion associated with impacts to conserved lands and/or the land resources of private property owners along the affected route is a glaring oversight;
- the current scope of the application is insufficient to address concerns with regard to traffic and transportation or emergency services;
- NAT’s Part A filings represent a complete lack of understanding as to how this project would impact the community character of the affected towns; and
- as per the Part A filings, OCCA believes that NAT does not fully understand how the proposed Edic to Fraser project would impact Otsego County’s vibrant rural, scenic, and historic landscape and its associated communities.

Finally, NAT’s Part A submittals indicate that much of the analysis was completed without the benefit of refined siting based on field survey data. The PSC’s December 16 Order asks that such techniques be applied as applicable. OCCA requests that complete mapping and field surveys be completed as part of this process. Deferral of actual field surveys to the permitting stage denies the Parties and the public the information necessary to properly assess project impacts and proposed mitigation, and will require the PSC to make decisions without the benefit of complete and relevant facts.

Based on the above deficiencies and the extensive research and public comments which bear them out, OCCA believes that the data as presented do not provide the PSC staff the information

necessary to fully understand the impacts of this project. As such, we ask that this project not be selected to proceed to Part B.

Sincerely,

A handwritten signature in black ink, appearing to read "Vicky M. Lentz". The signature is fluid and cursive, with the first name "Vicky" being more prominent than the last name "Lentz".

Vicky M. Lentz,
President

cc:

Robert M. Palladine

Douglas H. Zamelis, Esq.