



April 5, 2006

Dejay Branch
Upper Delaware Preservation Coalition
P.O. Box 252
Narrowsburg, NY 12764

Office of Electricity Delivery and
Energy Reliability
OE-20
Attn: EPACT 1221 Comments
U.S. Department of Energy
Forehall Building, Room 6H-050
1000 Independence Avenue, SW
Washington, DC 20585

Re: Considerations for Transmission Congestion Study and Designation of
National Interest Electric Transmission Corridors

Request for Early Designation of Constrained Area as National Interest
Electric Transmission Corridor

Dear Sirs:

We are writing to strongly oppose the New York Regional Interconnects request for the early designation of a NIETC, a transmission corridor, in New York State from the Edic substation in Marcy, Oneida County to the Rock Tavern substation in New Windsor, Orange County. We are referring to the attached filing request submitted by the NYRI on March 06, 2006 and the NYRI Project Overview publicly available on their website (specifically the map on page 3).

The area they are requesting to have designated as an NIETC is not an appropriate area for consideration of a power transmission corridor for many reasons. To begin, the negative visual impact of the power lines along the Upper Delaware River Valley will

destroy the scenic beauty of the river for generations to come. The Upper Delaware River Corridor is protected by the Wild and Scenic Rivers Act enacted by Congress in 1968 (annexed by the Carter administration in 1978), which clearly states:

“It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations.”

We feel that designation of a NIETC along the proposed river route constitutes a clear violation of The Wild and Scenic Rivers Act.

Alternate routes to those presented should be considered including but not limited to existing highway rights of way. There are existing corridors and rights of way in the region where transmission lines and towers are already present and could be engineered to handle additional circuits. Studies must be conducted to determine the impact of the NYRI project on the environment, local economy and health before allowing any project of this magnitude to be undertaken.

It is felt that construction of power lines along the railroad rights of way next to the Delaware River should not be allowed without considerable improvements to the railway infrastructure. The number of train derailments, including one as recent as the fall of 2005, suggests that such a large-scale project could further destabilize the railway bed, jeopardizing the public safety in a high-use recreational area.

In addition we believe that such a project, which clearly states its impact on the security of our nation, must disclose all funding sources and active involvement of all individuals in the project to assure the people of this nation that the project does not include the interests or involvement of any person who may negatively affect our national and regional security.

The Upper Delaware Valley relies on tourism as its primary industry and the proposed NIETC will severely hurt the local economy.

The rights of way needed for a project of this size would fully encompass several historic river towns, landmarks and archeological resources of significant importance.

The NYRI route impacts views from scenic byways located adjacently to the proposed corridor. The use of these byways would be negatively impacted further harming our local economy. Route 97 is one of the northeast's most beautiful scenic routes and the proposed transmission corridor is in direct view of its scenic overlooks.

If this designation of this corridor is granted, hundreds of small businesses up and down the river valley who rely on the visual qualities of the region for their livelihood will face economic hardship due to lower property values and lost business.

NYRIs proposed routes along the Wild and Scenic Delaware River, through our National Park and along our Scenic Byways is not only insensitive to this nation's valuable recreational, scenic and historic resources but completely inappropriate.

We encourage you to hold public hearings on any proposed route being presented by a private company so the impact of such corridors can be fully investigated before causing irreparable harm to our valuable historic and recreational resources.

We ask that you reject the NYRI request for early designation of a transmission corridor along the proposed routes in the Upper Delaware River Valley Region.

Sincerely,

Dejay Branch
Upper Delaware Preservation Coalition

Attached: USDOE Full Filing Document Submitted by NYRI.
NYRI Project Overview

cc: The River Reporter, Upper Delaware Council, Business Owners of Lackawaxen Township, Barryville Chamber of Commerce, Pike County Visitor's Bureau, National Park Service, American Canoe Association, National Canoe Safety Patrol, Delaware River Keeper, Sierra Club, Environmental Advocates of New York