



**Environmental Design & Research,**  
Landscape Architecture, Engineering & Environmental Services, D.P.C.

217 Montgomery Street, Suite 1000, Syracuse, New York 13202  
P. 315.471.0688 • F. 315.471.1061 • www.edrdpc.com

February 12, 2016

Hon Rebecca Martin Seaman, Chair  
Pleasant Valley Planning Board  
1554 Main Street  
Pleasant Valley, NY 12569

**RE: Central Hudson G Line North Electric Transmission Line Rebuild Site Plan  
Response to Morris Associates Comments  
EDR Project No. 14075**

Dear Chairperson Seaman:

This letter and the attached documentation serve as a formal response to the project review letter prepared by Morris Associates (MA) for the above referenced project dated December 2, 2015. To facilitate your review, we have numerically listed the items identified in the December 2, 2015 letter and have included responses (*in italics*) below each item. For certain items, additional documentation (e.g., maps, photos, graphics) has been prepared and is attached to this letter.

As you may recall, representatives from Central Hudson, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR) and MA held a conference call on December 21, 2015 to review the MA comments and discuss the proposed responses. We feel this was a very positive discussion and the parties were in general agreement with the proposed approaches to resolving the comments. As discussed during this call, EDR will incorporate requested revisions from MA, as well as comments from the consultants representing the Town of LaGrange Planning Board into one set of final drawings. By doing so, we hope to minimize the "moving pieces" and provide the same information to representatives from both Towns. While many of the proposed revisions are detailed in this letter, the final set of drawings will be provided under separate cover. We anticipate, however, that the responses provided below will provide adequate information regarding the manner and methods for addressing the comments provided by MA.

**Comments from Morris Associates Comment Letter dated December 2, 2015.**

1. Based on the following comments, the plans should be revised to clearly show existing conditions; and reflect the proposed extent of disturbance; improvements; stabilization; and mitigation measures to support the responses in the Full EAF Part 1 and statements in Attachment B; Project Description of Impact Summary.

**Response:** *As discussed during a December 21, 2015 conference call with MA, the Applicant has agreed to prepare and submit a revised final set of Plan & Profile drawings containing the requested information. Since the project is located within two towns, the Applicant is in the process of developing one comprehensive set of updated drawings to reflect the relevant comments by MA as well as the Town of LaGrange consultants. These drawings will be provided under separate cover.*

2. In order to consider site conditions; properly assess impacts; and consider whether proposed mitigation is sufficient, we recommend the following plan changes:

- a. The location of floodplain and floodway limits should be indicated on the plans, especially in the vicinity of Creek Road and O'Halloran Circle.

**Response:** *The Plan and Profile Drawings will be updated to show the floodplain and floodway limits along the Right-of way (ROW). Two portions of the Project Site occur within a FEMA designated 100-year floodplain. The area between proposed poles G 78 and G 79 is mapped as a FEMA 100-year floodplain; however, no work is proposed in this area. The second area is surrounding Wappinger Creek and encompasses delineated Wetlands R and Q. Two poles are proposed in this area (106 and 107). However, these poles are required to replace two existing poles. The new poles 106 and 107 will be located at similar locations as the existing poles to maintain required clearances. No new fill is proposed within the floodplain. Also, no work is proposed within the mapped floodway. Therefore, no adverse impacts to floodplain capacity is anticipated.*

- b. Add USGS topographic contours to the drawings.

**Response:** *We agree to provide additional information, but suggest keeping the Plan & Profile drawings in their current format and adding additional planimetric data or notes regarding specific MA concerns such as erosion and sediment control or matting. See detailed response to item "d" below. The use of the Plan & Profile drawings is widely accepted practice for this type of linear rebuild project because they present substantial amounts of information in a very clear manner. The Plan & Profile drawings provided with the Site Plan Application include a detailed profile (top of each sheet) of the proposed poles and existing topography. The inclusion of additional grading shown within the plan view would actually clutter the drawing and impair its clarity. Given the amount of information presented in these drawings, this is a concern. Since the nature of the project is individual pole installations (and removals) at specific locations (typically 300-400 feet apart), and no site grading or changes in topography are proposed, we propose to provide the additional planimetric data or notes regarding specific MA concerns such as erosion and sediment control or matting in separate drawings.*

- c. A limit of disturbance (LOD) line should be added to the plans.

**Response:** *All work will be conducted within the ROW, therefore the ROW is the LOD line. Access to the ROW will primarily occur at road crossings. The few off-ROW access points are indicated on the submitted Plan & Profile drawings as thick dashed lines. Efforts have been made to identify off-ROW access points which consist of graded driveways or woods roads, thus limiting the need for additional work (grading, clearing) off-ROW.*

- d. Show construction fence, where appropriate, where improvements are close to sensitive features such as wetlands or streams.

**Response:** *To be sure that sensitive features are protected, all resources will be flagged in advance of construction. Erosion and sediment control measures (i.e., silt fence) will be installed to protect these areas as required. Due to the size of the Project and scale of the Plan & Profile Drawings, references to erosion and sediment control have been indicated through notation and details. This method has been recently used on a similar transmission line rebuild project in the area (A&C Lines). It is not intended to install "construction" fence as this may inhibit access.*

*There are a range of measures for inspection and maintenance, as outlined in the Project Stormwater Pollution Prevention Plan (SWPPP), which will direct the installation and maintenance of these systems. However, the Applicant will update the plans to include additional planimetric information regarding sediment control practices (i.e., silt fence barriers near wetlands) and further notations and/or details to prescribe methods of installation and maintenance of the erosion and sediment control practices for this unique rebuild project.*

- e. Provide map insets of areas requiring special treatment, at a scale of at least 1"=50' on separate sheets. We would be happy to work with the applicant to identify these areas. As an example, provide insets where disturbance requires grading; is in or near wetlands and/or streams; where wetland/stream matting and/or erosion and sediment control measures are proposed.

**Response:** As was discussed at our conference call, construction of the rebuild will be relatively isolated to new pole installation and pole removal. Installation work consists of boring of holes approximately 7-9-feet deep and 24-36-inch diameter. No significant earthwork, grading, excavation or foundations are proposed. As such, the level of detail included in the Plan & Profile drawings provides appropriate level of detail to assess environmental impacts while providing some level of flexibility for the Applicant to work efficiently within the disturbed ROW.

The temporary crossing of wetlands and streams is associated with the limited activities of moving construction equipment and delivery of materials. This will be completed using the construction matting as shown on the plans provided in the site plan application. The wetland boundaries will be re-flagged and demarcated prior to construction and the placement of matting, which will assure proper placement.

- f. Clarify, using map insets, proposed disturbance and improvements, etc., at the following locations:
- i. Access to proposed Pole G64 and removal of nearby existing pole, including any easement over the existing driveway;  
**Response:** The thick dotted line shown on the provided Plan & Profile drawings denotes a general route of travel along the ROW. Direct access to the poles to be removed will stem from this general travel route. If needed, matting will be installed at wetland and stream crossings as needed to avoid temporary disturbances. Revisions are being made to the Plan & Profile drawings denoting this.
  - ii. Access to the pole to be removed from Wetland G  
**Response:** See response to item 2.f.i above.
  - iii. Show any easement over the existing driveway for access to proposed Pole G65 and removal of the nearby existing pole;  
**Response:** See response to item 2.f.i above.
  - iv. Proposed Poles G68 and G69 and removal of nearby existing poles near and in Wetland and Stream H;  
**Response:** See response to item 2.f.i above.
  - v. Proposed Pole G83 and removal of nearby existing poles at Wetland L;  
**Response:** See response to item 2.f.i above.
  - vi. Proposed Pole G98 at Wetland and Stream O;  
**Response:** See response to item 2.f.i above.
  - vii. Access to Proposed Poles G87-90 from a public roadway;

**Response:** See response to item 2.f.i above.

- viii. Access to Proposed Poles G99-102 and G111

**Response:** See response to item 2.f.i above.

- g. Show existing and proposed topography in map insets at a minimum contour interval of 2 feet to allow review of proposed erosion and sediment control practice placement, stormwater conveyance systems and overland flow paths.

**Response:** See previous response to comment 2.b, d and e.

- h. Provide details and specifications for pole removal with notation or a separate detail for removal in or near wetlands and/or streams; and agricultural lands. Refer to the *Impact on Agricultural Resources* section of EAF Attachment B.

**Response:** EDR is providing additional notations on the project plans with regards to Central Hudson's proposed protocols for pole removal which include the following:

- Steel and wood poles will be fully removed and the holes will be filled to grade.
  - Three lattice towers will be removed from the ROW to an off-site location where they will be cut into pieces and prepared for proper disposal. Concrete foundations for the lattice towers will be jack-hammered to a depth of 12" – 24" below final grade and the holes will be filled.
  - Matting will be used as needed for access to poles within wetlands areas.
- i. A note should be added to the plans indicating that only the Temporary Stream Crossings indicated on the approved plan set are to be constructed and no others are to be constructed without Town and NYSDEC approval.

**Response:** So Noted. This note will be added to the updated Plan & Profile drawings.

- j. Add notation to specify that "all required tree clearing will be scheduled to take place within the USFWS approved winter cutting period of October 31 to March 31" in regard to endangered and threatened bat species, as described in the *Impact on Plants and Animals* section of EAF Attachment B.

**Response:** As indicated in the Impact Summary, the existing ROW is maintained by the Applicant in accordance with their New York Public Service Commission (PSC) approved Long Range Vegetation Management Plan. As part of this plan, and in accordance with PSC requirements, the Applicant performs routine vegetation clearing on the ROW as well as clearing/removal of danger trees along the edge of the ROW.

*If additional clearing is required for trees that interfere with construction of the G Line North rebuild, the additional project specific clearing will be scheduled to be conducted in the winter cutting period to avoid impacts to potential sensitive bat habitat. Additional notations reflecting this matter will be added to the updated Plan & Profile drawings.*

- k. Add notation to specify the presence of a qualified monitor prior to and during construction for Blanding's turtle habitat including language setting forth the monitor's responsibilities. Refer to the *Impact on Plants and Animals* section of EAF Attachment B.

**Response:** The Plan & Profile Drawings will be updated to include additional notations for Blanding's turtle monitoring as outlined in the Impact Summary and based on Central Hudson's recent successful monitoring with A&C Line construction.

- I. Add notation about traffic control and safety; dust and noise control. Refer to the *Impact on Transportation*; and *Noise and Odor Impact* sections of EAF Attachment B.

**Response:** So noted. This will be added to the updated Plan & Profile drawings.

- m. Show the limited areas of grading and excavation described in the *Noise and Odor Impact* section of EAF Attachment B.

**Response:** The only site grading for the G-Line rebuild is associated with the Todd Hill Substation expansion in the Town of LaGrange. No grading is proposed in the Town of Pleasant Valley.

3. The Town Highway Superintendent should be contacted regarding the need for temporary access permits at each access point.

**Response:** Central Hudson anticipates a few shoulder and/or single lane closures, of short duration, during construction to allow for deliveries of material and removal/construction of poles. See the attached Road Crossing Table which outlines which roads will be used for access. Closures and flagging will be conducted in accordance with New York State Department of Transportation (NYSDOT) Maintenance and Protection of Traffic (MPT) standard details under Section 619. Highway work permit applications will be submitted to the Town of Pleasant Valley and Dutchess County prior to construction.

4. On Sheet 9 of 11, the use of an existing forest road outside the CHGE ROW is indicated. An easement from the property owner allowing the use of the forest road must be provided in a form acceptable to the Planning Board Attorney prior to site plan approval.

**Response:** Central Hudson acknowledges that appropriate easements or licenses are necessary to cross another's property. For this and other similar construction projects, Central Hudson negotiates privately with property owners as needed to facilitate construction activities and access. These agreements may consist of formal property easements or simple letters of permission (known as "licenses."). Some owners prefer that the permissions not be publicly disclosed. These are agreements between private land owners and do not require municipal approval prior to being finalized.

5. Unless the Applicant provides a written request to the Planning Board to waive various elements required on a site plan, the plans should be updated in accordance with the zoning sections, which set forth application and plan requirements for site plans:

- a. Site plan submission requirements (98-80); and

**Response:** Given the unique, linear nature of this rebuild Project, the Applicant will request under separate cover a formal waiver from the site plan submission requirements listed under Section 80 of the Town Zoning Code. While many of the required items are shown on the Plan & Profile drawings, some of these required items are more applicable to single property site plan review projects and are not applicable to this project.

- b. Site plan standards (98-81).

**Response:** See response to comment 5.a.

6. Additionally, revise the drawings as per the Stormwater Management and Erosion/Sediment Control Comments, below.

**Response:** The Plan & Profile drawings will be revised per our conversation with MA on December 21, 2015.

## SEQR Review & Full EAF

7. The EAF should be revised as follows:

- a. Depending on the location of floodplains, to be added to the plans, a Floodplain development permit may be required. Revise the response to EAF question B.d. as needed.

**Response:** *We do not believe a Floodplain development permit is required. Two portions of the Project Site occur within a FEMA designated 100-year floodplain. The area between proposed poles G 78 and G 79 is mapped as a FEMA 100-year floodplain; however, no work is proposed in this area. The second area is surrounding Wappinger Creek and encompasses delineated Wetlands R and Q. Two poles are proposed in this area (106 and 107). However, these poles are required to replace two existing poles. The new poles 106 and 107 will be located at similar locations as the existing poles to maintain required clearances. No new fill is proposed within the floodplain. Also, no work is proposed within the mapped floodway. Therefore, no adverse impacts to floodplain capacity is anticipated*

- b. In reference to EAF question B.g, it is suggested that the review of the Agricultural Data Statement be considered as part of SEQR and site plan review.

**Response:** *Agreed. Impacts on farmlands and agriculture are considered under the Agricultural Data Statement relating to any applications for permits. Such potential impacts are also a relevant area of environmental concern under SEQR.*

- c. An LOD line is needed on the plans to support the response to D.1.b.

**Response:** *See response for item 2.c.*

- d. The response to D.2.b.i refers to the Impact Summary. Revise the Impact on Water section of Attachment B as follows:

- i. Add pole removal to Tables 1 and 2 regarding impacts to wetlands and streams.

**Response:** *Tables 1 and 2 will be updated and included with the amended drawing set.*

- ii. Explain how the need for "construction matting at temporary crossings, if required" will be determined in the field; and how the Town would be consulted or notified. Consider plan notation to direct such determinations

**Response:** *The logistics of this were discussed during our conference call in December. The location of proposed construction matting is shown on the provided Plan & Profile drawings. As discussed in the Impact Summary, construction matting will be installed at all temporary crossings unless suitable soil conditions exist (i.e., as a result of seasonal conditions or winter construction) such that no visible rutting or alteration of the hydrology of the wetland would result. In such cases, crossing the wetland may occur with rubber-tired vehicles or low impact tracked equipment. Should visible rutting occur, the affected access route(s) will be upgraded to include construction matting. As discussed during the December 21, 2015 conference call, Central Hudson will have on-site SWPPP inspections conducted up to twice per week during active construction and can coordinate with the Town of Pleasant Valley as needed to inform the Town of progress, field changes, etc.*

- e. Reconsider the response to D.2.b.iii and iv given pole removal and installation in wetlands.

**Response:** No direct work or impacts are proposed within a waterbody; therefore, the proposed action will not result in the destruction or removal of aquatic vegetation.

- f. Provide a response to D.2.e.i regarding impervious area or explain.

**Response:** In the Town of Pleasant Valley, the Project consists of new pole installation and removal of the old poles. No new impervious surface is proposed within the Town of Pleasant Valley. The only area of new impervious surface is associated with the Todd Hill Substation which is located in the Town of LaGrange.

- g. Clarify that no other lighting is proposed, if appropriate, in response to D.2.n.i.

**Response:** No other lighting is proposed in the Town of Pleasant Valley.

- h. Estimate solid waste during construction in response to D.2.r.i.

**Response:** There will be limited solid waste removal from this work. Central Hudson is anticipating that the removed existing metal poles will be returned to stock for future re-use. Other materials, such as conductors and insulators will be recycled to the extent possible. Wooden poles and/or lattice towers will be removed and disposed of in accordance with applicable regulations.

- i. The range of depth to rock and water (response to E.2. a & d) should be from 0'

**Response:** See revised page 11 of the EAF.

8. Clarify the following in the Wetland Delineation Report:

- a. Provide narrative and illustrations, as appropriate, to describe the conditions found at the location of mapped NYS Department of Environmental Conservation (NYSDEC) wetland PV-59 within the ROW.

**Response:** In the delineation report provided with the application, Table 2 Note 3 indicates that "NYSDEC Freshwater Wetland PV-59 was not physically identified within the ROW at its mapped location". Per our wetland delineation field work conducted in the summer of 2014, this portion of the ROW consists of upland, old field habitat dominated by Canada golden rod (*Solidago altissima*). The wetland corresponding to the NYSDEC Freshwater Wetland PV-59 is located further west and appears situated at a lower elevation.

- b. Consultation with the NYSDEC is recommended. Provide a copy of any correspondence to and from the NYSDEC.

**Response:** The Applicant will coordinate this work with the NYSDEC through an existing Maintenance General Permit (Permit No. 0-0000-01151-00010) under Articles 15 and 24.

9. The submitted Phase 1 Cultural Resources Survey (Phase 1 CRS) appears to have been completed using accepted methodology; and concludes that: the project "will not affect any significant archeological resources"; and no further investigation should be required. Please confirm that a copy of the Phase 1 CRS was sent to the NYS Office of Parks, Recreation and Historic Places (OPRHP). Provide a copy of the response from NYS OPRHP.

**Response:** The OPRHP has reviewed the Phase 1 Cultural Resources Report and has concluded that the "Project will have no impact upon cultural resources in or eligible for inclusion in the National Registers of Historic Places". See attached letter from OPRHP dated December 18, 2015.

10. EAF Part 2 is the responsibility of the Lead Agency prior to making a SEQR determination. It is suggested that Part 2 be prepared by the Town of LaGrange Planning Board for consideration by both the Pleasant Valley and LaGrange Planning Boards. Pleasant Valley would then provide comments to the LaGrange Board.

**Response:** *Comment noted. The Town of LaGrange Planning Board has been designated as Lead Agency and the SEQR regulations govern the conduct of the environmental review.*

#### Stormwater Management and Erosion/Sediment Control Comments

11. Appendix B of GP-0-15-002 indicates that overhead electric transmission line projects that do not include construction of permanent access roads or parking areas surfaced with impervious cover require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that ONLY includes erosion and sediment controls. The portion of this project located within the Town of Pleasant Valley appears to meet these requirements and therefore a SWPPP that only includes erosion and sediment controls has been submitted based on the above criteria.

**Response:** *Noted.*

12. A detailed review of the proposed erosion and sediment control practices will be performed upon receipt of plans indicating the site topography.

**Response:** *See response to comment 2.d above.*

13. It appears that a Stabilized Construction Entrance should be provided at the end of the access route at O'Halloran Circle.

**Response:** *Central Hudson will install a stabilized entrance at O'Halloran Circle and this will be shown on the updated Plan & Profile drawings.*

14. Staging and stockpile locations should be illustrated on the plans. Notes and details for concrete washout areas as well as construction road stabilization should also be added to the plans.

**Response:** *Staging and stockpile locations are illustrated on the plans as laydown areas. The use of concrete is not anticipated for this project since the poles will be installed directly embedded. Therefore, concrete washout areas are not needed. These are required at the Todd Hill Substation in the Town of LaGrange and are shown on the appropriate substation site plans. The techniques for construction road stabilization are shown on pages 10 – 11 of the Plan & Profile Drawings and other sediment control measures are included on the Todd Hill Substation Expansion Plans.*

15. Temporary and permanent soil stabilization requirements should be noted on the plans for use during construction. References to the NYSDEC Standards and Specifications for Erosion and Sediment Control are correct, but should be supplemented with the actual requirements.

**Response:** *See response to comment 2.d above*

16. Specifications for and NYSDEC approval of the proposed Construction Matting to be used for wetland and stream crossings should be provided.

**Response:** *A construction detail for the proposed construction matting is provided on Sheet 11 of the Plan & Profile Drawings. The use of construction matting is allowed under the Applicant's Maintenance General Permit.*

17. The SWPPP should be revised to include the Construction Phasing Plan described in Section 6.2a that will describe the total area of disturbance proposed and the area of disturbance proposed within each phase of construction. Provide specific information on existing pole removals.

**Response:** *The SWPPP has been updated to include the total area of disturbance proposed and a breakdown of proposed disturbance during each phase of construction and will be submitted with the revised Plan & Profiles drawings.*

18. We recommend that on-site oil storage be prohibited. Consider plan notation prohibiting oil storage; specifying measures for storage of chemicals and other hazardous substances; and notification requirements for spills, including notification to the corresponding municipality.

**Response:** *Fuel handling and storage facilities will comply with applicable federal and state regulations. Above-ground bulk storage, with the exception of mobile tank trucks, will have secondary containment or be adequately bermed with impervious material to contain a potential loss from complete tank failure. Fuels used in the construction process will be stored at specified equipment marshalling yards. Where practical, refueling will be conducted at the marshalling yards. If refueling along the ROW is required, fuel will be trucked in using appropriate equipment and appropriate environmental precautions taken as outlined below:*

1. *Fuel tanks of such equipment will be initially filled in an upland location greater than 100 feet from wetlands or streams in order to minimize the amount of refueling within these sensitive areas.*
2. *Absorbent pads or portable basins will be deployed under the refueling operation. In addition, the fuel nozzle will be wrapped in an absorbent pad and the nozzle will be placed in a secondary containment vessel (e.g., bucket) when moving the nozzle from the fuel truck to the equipment to be refueled.*
3. *Crews will have sufficient spill containment equipment on hand at the secondary containment location to provide prompt control and cleanup in the event of a release.*

*The handling, transportation, storage and disposal of oil, fuels, used oils, and (if any) hazardous wastes will be conducted in an environmentally safe manner. Any hazardous substances will be transported, stored, and handled as recommended by the suppliers and/or manufacturers and in compliance with all applicable federal or state regulations. The Applicant will keep local fire and emergency management teams apprised of on-site hazardous chemicals and waste, and will implement all requirements of NYS hazardous waste regulations.*

*The applicant will notify NYS DEC of spills in accordance with DEC regulations. Also, please note that CH maintains contracts with Emergency Spill Response contractors who are available to respond and clean up spills. The applicant will comply with town code requirements for notifications, as required. Construction staging and laydown areas will have an adequate supply of suitable absorbent material and any other supplies and equipment necessary to immediately clean-up inadvertent waste or fuel spills. Spill kits are expected to be kept in construction vehicles and at marshalling yards where equipment is stored.*

*Appropriate notes will be added to the Plan & Profile drawings.*

19. A general location map should be added to the SWPPP. The soil maps included in Appendix C do not provide a clear indication of the overall project location.

**Response:** *A general location map will be provided in the updated SWPPP.*

20. The cover page on the SWPPP should be revised to indicate the correct Town(s) and County.

**Response:** *This typographical error has been resolved and will be included in the updated SWPPP submittal with the revised Plan & Profile drawings.*

21. Please provide documentation indicating that this project will not have an impact on historic properties in accordance with Part I. F. 8 of GP-0-15-002.

**Response:** See response to comment #9.

22. Review of the NOI will be performed at a later date when the plans and SWPPP have been further developed.

**Response:** Noted.

23. The construction sequence should be more detailed regarding construction methods for removal of the existing poles and lines.

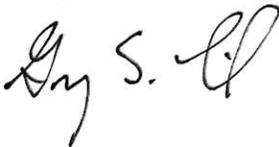
**Response:** Noted. Section 6.2b of the SWPPP has been updated to include more detail regarding the removal of existing poles and lines as documented in response to item 2.h. This will be included in the updated SWPPP to be sent with the revised Plan & Profile drawings.

24. In closing, the applicants have provided a significant amount of information; and the initial submission documents the general intent of the work. However, it is my opinion that several critical areas by wetlands and stream areas, identified above, need more specific details regarding erosion control and protection of features in order to properly assess SEQR impacts. In addition, the existing wood poles and lines will be removed, and there is not enough information on the construction methods that will likely cause additional disturbance of wetlands. This needs to be clarified and documented to properly assess wetlands impacts.

**Response:** During the December 21<sup>st</sup> conference call, it became apparent that upon first review of the project documents, MA had an impression that the work involved significant grading, excavation, foundations, etc. which would lead to the conclusion of more substantial impacts. During the discussion, it was clarified by EDR and CH that the limited scope and installation methodology of the work (i.e., installing poles in drilled holes) presents much less impact to sensitive resources than first assumed. This is noted in responses to several of the above comments.

We trust these comments address your concerns. Please call with any questions.

Sincerely,



Gregory Liberman  
Project Manager

cc: Stacy Olhya, P.E., Town of LaGrange Planning Board  
Gary Cassaro, P.E., Central Hudson Gas & Electric  
Wayne Mancroni, Central Hudson Gas & Electric  
Jennifer Van Tuyl, Cuddy & Feder

List of Attachments (related to responses for Items 3, 5, 7b, 7i, 9):

- Road Crossing Table
- SHPO No Effect Letter dated 12/18/16
- Page 11 of the EAF



**Environmental Design & Research,**  
 Landscape Architecture, Engineering & Environmental Services, D.P.C.  
 217 Montgomery Street, Suite 1000, Syracuse, New York 13202  
 P. 315.471.0688 • F. 315.471.1061 • www.edrdpc.com

attachment

**Project:** G Line North Rebuild **EDR Project No:** 14075  
**Date:** February 2016

**Comments:**

The following table identifies potential road access requirements for the G Line North Rebuild

Municipality	Roadway	Type of Work <sup>1</sup>	Potential Type of Closure	Drawings Sheet No.
New York State	Freedom Plains Road (State Route 55)	1	Shoulder	2
Town of LaGrange	Vervalen Drive	1	Shoulder	2
Town of LaGrange	Cramer Road	1	Shoulder	2
Town of LaGrange	Frost Hill Road	1	Shoulder	3
Town of LaGrange	Frost Hill Road	1,2	Lane	3
Dutchess County	Freedom Road (County Route 47)	1	Shoulder	3
Town of Pleasant Valley	Drake Road	1	Shoulder	7
Town of Pleasant Valley	Pleasantview Road	1,2	Lane	8
Town of Pleasant Valley	Pine Hill Road	1	Shoulder	9
Town of Pleasant Valley	Creek Road	1	Shoulder	9

<sup>1</sup>Work activities include the following actions: (1) construction entrance/access, (2) wire pulling

<sup>2</sup>Additional NYSDOT MPT Section 619 procedures and details (such as signage and barriers) included in Attachment H may be applicable at each closures and will be implemented as needed.



# Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

December 18, 2015

Mr. Patrick Heaton  
Environmental Design and Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: SEQRA  
Central Hudson Gas & Electric G Transmission Line  
Towns of Pleasant Valley and La Grange, NY  
14PR04633

Dear Mr. Heaton:

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the project in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the OPRHP and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Based upon this review, it is the New York State Office of Parks, Recreation and Historic Preservation's opinion that your project will have no impact on archaeological and/or historic resources listed in or eligible for the New York State and National Registers of Historic Places.

If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

Ruth L. Pierpont

Deputy Commissioner for Historic Preservation

v. Is the project site subject to an institutional control limiting property uses?  Yes  No

- If yes, DEC site ID number: \_\_\_\_\_
- Describe the type of institutional control (e.g., deed restriction or easement): \_\_\_\_\_
- Describe any use limitations: \_\_\_\_\_
- Describe any engineering controls: \_\_\_\_\_
- Will the project affect the institutional or engineering controls in place?  Yes  No
- Explain: \_\_\_\_\_

---

**E.2. Natural Resources On or Near Project Site**

a. What is the average depth to bedrock on the project site? \_\_\_\_\_ 0 - 6.5 feet

b. Are there bedrock outcroppings on the project site?  Yes  No  
 If Yes, what proportion of the site is comprised of bedrock outcroppings? \_\_\_\_\_ <10 %

c. Predominant soil type(s) present on project site:

Nassau-Cardigan complex, hilly, very rocky	_____	33.5 %
Nassau-Cardigan complex, rolling, very rocky	_____	16.2 %
Dutchess-Cardigan complex, rolling, rocky	_____	14.5 %

d. What is the average depth to the water table on the project site? Average: \_\_\_\_\_ 0 - 6.5 feet

e. Drainage status of project site soils:

<input checked="" type="checkbox"/> Well Drained:	_____	80 % of site
<input checked="" type="checkbox"/> Moderately Well Drained:	_____	10 % of site
<input checked="" type="checkbox"/> Poorly Drained	_____	10 % of site

f. Approximate proportion of proposed action site with slopes:

<input checked="" type="checkbox"/> 0-10%:	_____	50 % of site
<input checked="" type="checkbox"/> 10-15%:	_____	15 % of site
<input checked="" type="checkbox"/> 15% or greater:	_____	35 % of site

g. Are there any unique geologic features on the project site?  Yes  No  
 If Yes, describe: \_\_\_\_\_

---

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)?  Yes  No

ii. Do any wetlands or other waterbodies adjoin the project site?  Yes  No  
 If Yes to either *i* or *ii*, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency?  Yes  No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name 857-41, 857-44, 862-291.1 Classification B, B(t), B
- Lakes or Ponds: Name \_\_\_\_\_ Classification \_\_\_\_\_
- Wetlands: Name Federal Waters Approximate Size See Attachment D
- Wetland No. (if regulated by DEC) PV-10, PV-59, PV-35 See Attachment D

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies?  Yes  No  
 If yes, name of impaired water body/bodies and basis for listing as impaired: \_\_\_\_\_

---

i. Is the project site in a designated Floodway?  Yes  No

j. Is the project site in the 100 year Floodplain?  Yes  No

k. Is the project site in the 500 year Floodplain?  Yes  No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer?  Yes  No  
 If Yes:

i. Name of aquifer: Primary Aquifer - USGS Open-File Report 82-81