

Ohio Environmental Protection Agency – Division of Surface Water
Attention: Permits Processing Unit
P.O.Box 1049
Columbus, Ohio 43216-1049

Subject: OHIO EPA PROJECT ID 093580 (Clean Water Act Section 401 Certification, Geauga County).

Gentlemen:

By this letter, I hereby state for the record my objection, in the strongest possible terms, to the issuance of a Clean Water Act Section 401 water quality certification for the overhead transmission line project, named the Geauga 138 kV Transmission Line Project, as applied for by Cleveland Electric Illuminating Company and American Transmission Systems, Incorporated. The Ohio EPA ID Number for this project is 093580.

The Public Notice admits that the applicant's preferred alternative route and minimal degradation alternative route both degrade the water quality in the Grand River Watershed. These are not acceptable alternatives in view of the fact that utility corridors presently exist could be used for the project with essentially no water degradation. The Ohio Department of Natural Resources states that, "*Insuring the natural heritage of the Grand River is not limited to protecting the immediate streamside environment. Land use activities within the watershed, such as urban and residential development may have a direct and adverse effect on the long-term protection and preservation of this important Ohio water resource. Without local support and cooperation from the development community it will become increasingly difficult to protect rivers of the beauty and magnitude of the Grand State Wild and Scenic River. The Grand River has the most aquatic diversity of any Ohio Lake Erie tributary.*" Issuance of a permit allowing the applicant to degrade such an irreplaceable water resource with an unsound project, when non-degrading alternatives using existing utility corridors exist, would be unconscionable.

The case record built before the Ohio Power Siting Board contains ample evidence that the project as proposed is unsound. Testimony from expert witnesses showed that non-impacting alternatives were available that would meet the needs of the project as well as, if not better, than the routes proposed by the applicant. The case record includes many hours of testimony at public hearings presenting fact-based arguments as to the damage that the proposed project would do to wetlands and water systems. The Ohio Power Siting Board ignored testimony presenting alternative locations for the project that result in essentially no water degradation.

PUCO received and docketed over five hundred comments opposing the Geauga 138 kV Transmission Line Project, many of which addressed wetland and water quality degradation.

Please review the case record, case 07-0171-EL-BTX, on the PUCO web site at <http://dis.puc.state.oh.us>.

As detailed in the Public Notice, I wish to (1) be on Ohio EPA's interested parties mailing list for this project, (2) request a public hearing located in the area affected by the proposed project, and (3) submit these written comments for Ohio EPA's consideration in reviewing the application.

I appreciate the opportunity to express my deep opposition to issuing a Clean Water Act Section 401 water quality certification for the Geauga 138 kV Transmission Line Project as proposed and applied for by Cleveland Electric Illuminating Company and American Transmission Systems, Incorporated.

Sincerely,

Signature		Date
Name (Please Print)		
Address		
City	State	Zip
Telephone	Email	