

DEP Hearing
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I'd like to thank the DEP for holding this hearing so we can express our concerns about the proposed wind turbine project on Broad Mountain in Packer Township.

I am the president of Save Our Allegheny Ridges – a non-profit run by volunteers who strongly believe that forested mountains are not suitable locations for industrial development such as wind turbine projects. I was contacted by Packer Township residents in January, 2019, asking for help, since the community was not familiar with the procedures and regulations regarding industrial wind development.

On Sept. 19, 2019, we conducted a file review at the DEP office in Wilkes-Barre. DEP staff were very helpful as there were hundreds of pages in the application. Thank you for helping us review the material.

One item in the file review was a letter from Liberty Power, (Broad Mountain Wind), accusing Save Our Allegheny Ridges of being anti-renewable. As I already explained, our focus is to protect forested mountains. We are not against industrial wind projects if they are sited correctly. Liberty Power stated in their letter that this hearing is unnecessary and that requesting this hearing was a delay tactic. Liberty Power also requested that you do not grant the hearing because, among other reasons, "impacts from the proposed project will be minor and that the water quality, rate, and volume are not affected by the project."

Liberty Power is correct in only one aspect, SOAR is against this wind project – not because we are anti-renewable, but because of the ecological damage this project will do to the high-quality and exceptional value watersheds, the resulting forest fragmentation, bird and bat kills, habitat loss, as well as all the negative impacts to the human community.

As a result of the file review, we have the following concerns and questions:

1. We are concerned about the 25 seeps or springs, as well as the numerous wetlands that will be impacted during construction. These surface water resources are very important habitats for wildlife and wetlands act as buffers to slow stormwater runoff. Liberty Power's consultant stated that unwanted water "will be pumped." If these aquatic resources are lost, how will the pumped water be controlled so no sediment reaches the headwater tributaries and streams that, by law, may not be degraded?
2. Surprisingly, we could not find any information regarding construction of the wind turbine foundations, other than their diameter. Tall structure like wind turbines need a tremendous amount of steel and concrete below ground, but where are the details regarding the depth to bedrock, or dewatering the turbine foundations?
3. Regarding stormwater discharge, we could not find the flow path of discharge to surface waters, as well as erodibility factors and vegetative cover. Where is the documentation that the proposed volume and rate discharging to the flow path does not exceed the pre-construction volume and rate?
4. Does Broad Mountain Wind have the legal authority to discharge stormwater runoff onto off-site areas?

5. We feel the 291 acres is a significant amount of disturbance in a forested area where the groundwater is close to the surface. The vastly increased amount of impervious surface area will create a lot of runoff that must be controlled by Best Management Practices (BMPs). We feel the proposed BMPs are **inadequate** to keep sediment or other pollutants from receiving streams. Since most of the cleared areas will be impervious, we do not think that infiltration berms are adequate. Furthermore, was any testing conducted to determine infiltration rate?
6. Broad Mountain Wind has determined the acreage of disturbance for each watershed. While it appears to be a small percentage of the entire watershed, we feel it is very significant because the construction will take place in the headwater areas of high-quality cold water streams and in headwaters of exceptional value streams.

In our file review we found details on the disturbance within watersheds:

HQ-CW, MF:

Quakake Creek: 112.8 acres

Oberson Run: 15.7 acres

Still Creek: 58.4 acres

EV, MF:

Deep Run: 3 acres

Broad Run: 36.8 acres

Bear Creek: 11.5 acres

Dennison Run: 37.1 acres

Grassy Meadow Run: 15.7 acres

With a construction project like this, spanning a distance of almost 7 miles along the top of Broad Mountain, we know the potential exists for pollution to degrade the integrity of the receiving streams. How can such an extensive area of impermeable surfaces creating a huge increase in stormwater runoff be adequately controlled?

In conclusion, I'd like to thank DEP for reviewing this project to ensure that these 8 watersheds will not be degraded by stormwater runoff.