



## Pennsylvania Fish & Boat Commission

### Division of Environmental Services

450 Robinson Lane  
Bellefonte, PA 16823  
Phone: 814-359-5140  
Email: daniryan@pa.gov

June 29, 2016

Brian Mills  
Office of Electricity Delivery and Energy Reliability (OE-20)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585  
E-mail: Brian.Mills@hq.doe.gov  
ATTN: LEC Draft EA Comments

Dear Mr. Mills:

This letter is in response to the a request dated June 3, 2016, from the Department of Energy in Washington, DC, in regards to the Lake Erie Connector Project Draft Environmental Assessment (EA). The Pennsylvania Fish and Boat Commission (PFBC) appreciates the opportunity to comment on the draft EA. The PFBC has had the opportunity to review the EA, and offers the following comments to quantify and clarify the impacts associated with the proposed project:

- Section 2.4.5.1, Aquatic Transmission Cable Installation in Lake Erie Segment, Horizontal Directional Drilling Method: This section references a Drilling Fluid Management Plan (DFMP). The DFMP should be provided and elaborated upon in the Environmental Assessment in order to minimize any impacts of inadvertent returns. In addition, the DFMP should include contacting the appropriate authorities should a release occur, specifically, PFBC law enforcement at 814-337-0444.
- Section 5.1.4.1, Effects of Construction, Fish: This section mentions the side-casting of rock associated with blasting and/or excavation, and that this material may provide an increase in spawning habitat area after construction activities cease. Please elaborate upon the configuration, size, and location of this material in order to show its benefit to fishes, in lieu of simply side-casting this material beside the excavated trench. The PFBC suggests that this material be utilized to create fish habitat by configuring suitable sized debris in piles to create an array of suitable topography as habitat for fishes.
- Section 5.1.4.1, Effects of Construction, Fish: The PFBC agrees that the applicant has proposed several efforts to avoid and minimize impacts to fish habitat, however, it appears that the project construction schedule cannot avoid in-water construction in sensitive habitats and timeframes. In particular, the proposed project intends to blast and trench in potential fish spawning habitats (generally, waters < 20 feet deep) during spawning timeframes of major Lake Erie gamefishes such as yellow perch, smallmouth bass and walleye (generally, April through July). The PFBC suggests that the size of the proposed trench in waters less than 20 feet deep, as well as the area impacted by side-casted material in waters less than 20 feet deep, be calculated and added to the EA as permanent impacts to fish spawning habitat.
- Section 5.1.4.1, Effects of Construction, Fish: The PFBC agrees that the applicant has proposed several efforts to avoid and minimize impacts to fish by underwater blasting, and that scientific literature

### Our Mission:

[www.fish.state.pa.us](http://www.fish.state.pa.us)

*To protect, conserve and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities.*



## Pennsylvania Fish & Boat Commission

---

*established 1866*

suggests fish mortality as a result of underwater blasting is highly variable. The PFBC recommends that anticipated fish mortality be investigated and included as part of the EA. The PFBC suggests that hydroacoustics and/or sonar be utilized to determine seasonal fish density in proximity of the proposed time and locations of blasting, and to estimate threshold distances of expected fish mortality. The resulting numbers should be used to predict fish mortality within the proposed blasting area and the EA should be amended to include this information.

- **Section 5.1.5.1, Effects of Construction, Eastern Sand Darter:** The information presented in the EA related to eastern sand darter impacts is not currently approved by the PFBC as the applicant is still in consultation with the PFBC about the proposed impacts. The EA presented average eastern sand darter abundance and assumed that the available trawl data across years and localities is representative of the eastern sand darter population at the site of construction. In addition, the average eastern sand darter abundance presented does not address bias inherent with the survey design or gear type or the potential for an abundant year class to be present during the construction period was also not considered. The PFBC suggests that any reference to numbers or abundance of eastern sand darters in the project area be removed from the EA until consultation with the PFBC regarding eastern sand darter abundance within the project area is finalized.
- **Section 5.1.4.3, Effects of Operations, Maintenance and Emergency Repairs:** Various fisheries management agencies have tagged, and are currently monitoring, movements of various Lake Erie fishes through hydroacoustic transmitter and receiver equipment submerged in Lake Erie. More information about these telemetry projects can be found at the following website: <http://data.glos.us/glatos/>. The PFBC recommends that the applicant contact Chuck Murray of the PFBC at 814-474-1515 to determine the location of the proposed electrical lines in relation to hydroacoustic monitoring equipment and any associated interference(s) to telemetry studies by the proposed project. The EA should be updated to include any foreseen impacts to these telemetry studies as a result of the project.
- **Section 5.1.4.3, Effects of Operations, Maintenance, and Emergency Repairs:** This section indicates that some aquatic species may be sensitive to electromagnetic fields (EMFs). Please indicate which species of fishes would be most sensitive to electric fields, including salmonids and sturgeons, and discuss if scientific literature suggests EMF thresholds for these species. Please compare detectability thresholds for EMFs for each species indicated above and the proposed EMF levels that will be emitted by the project, and any potential adverse impacts to these fishes. Please indicate and further elaborate on avoidance and minimization practices (i.e., proximity to sensitive aquatic resources, burial, cable shielding, etc.) being implemented for the project to avoid and minimize any potential adverse impacts of EMFs to fishes.
- **Section 5.1.12.1, Effects of Construction:** The applicant should contact WCO Tom Burrell of the PFBC at 717-705-7838 to determine if an Aids-to-Navigation (ATON) plan is warranted for this project. In addition, and in order to compensate for temporary losses in boating and angling opportunities due to the proposed exclusion zone around construction activities, elaborate upon ways to mark the locations of the habitat described in *Section 5.1.4.1, Effects of Construction, Fish* above (i.e., the second bullet point from the top discussing side casted material) so anglers can utilize this man-made habitat to target gamefishes.

### Our Mission:

[www.fish.state.pa.us](http://www.fish.state.pa.us)

*To protect, conserve and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities.*



## Pennsylvania Fish & Boat Commission

---

The PFBC thanks you for the opportunity to comment on draft EA. Should you have any questions, feel free to contact me at the number listed above.

Sincerely,

Daniel Ryan  
Fisheries Biologist, PFBC  
Watershed Analysis Section  
Division of Environmental Services