



KENTUCKY HEARTWOOD
Protecting the Beauty
and Well-being of
Kentucky's Public Forests

RECEIVED

JUN 15 2005

PUBLIC SERVICE
COMMISSION

June 15, 2005

Public Service Commission
Attn: Rowan-Cranston Transmission Line Permit
P.O. Box 615
Frankfort, KY 40602

Please accept the following Kentucky Heartwood comments on the Eastern Kentucky Power Cooperative's application for a permit from the Public Service Commission for the construction of the Rowan-Cranston Transmission Line project, case number 2005-00089.

The Daniel Boone National Forest is too valuable for clean water, wildlife habitat, and recreational values it provides to be chopped up for every company that wants to take advantage of our public resources. The Rowan-Cranston Transmission Line would cut through the heart of Big Perry Mountain, a recreational mecca for Morehead-area residents, an important wildlife refuge and the second largest chunk of intact national forest land on the north end of the Daniel Boone National Forest. Big Perry is also at the heart of the proposed Morehead Timber Sale, where the Forest Service wants to cut millions of board feet of healthy trees and build countless roads. On top of that, the Forest Service is also interested in having a road built through Rodburn Hollow on Big Perry, to connect US 60 to I-64. The habitat destruction & fragmentation, water degradation, and recreation disruption effects that these three projects would have on Big Perry are unacceptable. The Rowan-Cranston Transmission Line's impact on our national forest must be viewed within the context of all of these projects that are threatening the integrity of Big Perry Mountain.

EKPC's application for this permit is fraught with problems which should trigger the denial of their application. Among them:

- EKPC broke the law by failing to apply for a Certificate of Convenience and Necessity before requesting a permit from the U.S. Forest Service. This violation alone is enough to reject their permit request.
- The MSB Energy Associates report on the need for the transmission line, commissioned by the Public Service Commission, found that EKPC did not look at the full range of viable alternatives for the siting of this transmission line. In short, MSB found that EKPC has the option of routing their new transmission line along an existing powerline corridor (the modified Cranston Tap-KU line), without cutting through more intact national forest. EKPC should be compelled to use a lower-impact route such as this one if the option is available to them.

- The transmission line is not in the public interest because it will disrupt the peaceful wildlands recreation experience of countless Rowan Countians who hunt, camp, hike, backpack, birdwatch, horseback ride, and run on Big Perry. People come to Big Perry because it is a place to get out in the Big Woods, away from the sights and sounds of modern urban life. This power line would degrade the character of the area that attracts so many recreationists. This could have a negative effect on the local economy, reducing business for local outfitters, gas stations, motels, and restaraunteurs who sell goods and services to people using the area for recreation.
- Big Perry contains prime summer roosting habitat for the Endangered Indiana Bat. When added to the effects the Morehead Timber Sale and the Rodburn Connector Road, the Rowan-Cranston Transmission line would deal a devastating blow to the local Indiana Bat population by removing its roost trees and spraying herbicides in their feeding areas.
- This project would also harm native interior forest-dependent birds by creating more habitat fragmentation on Big Perry Mountain, inviting in nest parasites and predators such as cowbirds and raccoons who favor edge habitat and kill songbird nestlings.
- The regular addition of herbicides to the powerline right-of-way would contaminate area streams with dangerous chemicals. This fact is particularly troubling, since the Forest Service plans to create wetland ponds directly within the right-of-way, inviting in sensitive amphibians like frogs and salamanders, as well as other animals, who will then be sprayed with herbicides that will accumulate in the ponds.

Kentucky Heartwood requests that the Public Service Commission:

- find EKPC to be in violation of state laws regulating right-of-way permitting;
- find the Rowan-Cranston Transmission Line to be likely to inflict more harm than good on the public interest; and
- deny the permit requested by EKPC and recommend a route that does not inflict undue damage on the Daniel Boone National Forest.

Sincerely,


Perrin de Jong, *Coordinator*