

U.S. Department of Transportation  
Federal Highway Administration

Finding of No Significant Impact

Interstate 0080 Section 17M  
I-80 Reconstruction Project  
Stroud Township, Borough of Stroudsburg,  
and Borough of East Stroudsburg,  
Monroe County, Pennsylvania

*January 30, 2020*

U.S. Department of Transportation  
Federal Highway Administration

## Finding of No Significant Impact

Interstate 0080 Section 17M, I-80 Reconstruction Project,  
Stroud Township, Borough of Stroudsburg, and Borough of East Stroudsburg,  
Monroe County, Pennsylvania

The Federal Highway Administration (FHWA) has determined that the Interstate 0080 Section 17M, I-80 Reconstruction Project (I-80 Section 17M Project) Build Alternative 2D will have no significant impact on the human environment. This determination has been made based on the *Interstate 0080 Section 17M I-80 Reconstruction Environmental Assessment* (EA) (October 2019), the supporting technical reports (as listed in this Finding of No Significant Impact [FONSI]), review of the comments received during the EA availability period, the responses to those comments (**Attachment A**), and the mitigation commitments included in the EA, which are summarized in this FONSI.

### PURPOSE AND NEED

The purpose of the I-80 Section 17M Project is to provide a safe and efficient transportation system on this National Highway System component for both local and regional connections in the area by reducing future congestion on I-80 in the 2045 design year to Level of Service (LOS) E or better, improving safety, and bringing the I-80 roadway and structures up to current design standards with no or minimal design exceptions.

The project needs, as discussed in the EA and the *I-80 Reconstruction Purpose and Need* (February 2014) include safety, congestion, and mobility issues, specifically:

#### Safety

Crash data (2008-2012) showing rates above the statewide average indicate a high percentage of rear-end, side swipe, and hit-fixed-object crashes, which can be attributed to congestion and the geometric deficiencies in this portion of I-80, which is currently designated as a highway safety corridor. Geometric deficiencies include:

- The acceleration and deceleration lane lengths for 9 of the 14 existing movements within the project limits are below the Pennsylvania Department of Transportation (PennDOT) and American Association of State Highway Transportation Officials (AASHTO) design criteria. Lack of sufficient length contributes to safety issues throughout the corridor, as indicated by the collision types and numbers.
- The westbound I-80 to US 209 ramp at Interchange 304 and the West Main Street to westbound I-80 ramp at Interchange 305 also have an entrance/exit weave which requires a total of 2,000 feet based on PennDOT/AASHTO criteria. The available length is 1,000

feet. This contributes to the high number of rear-end and hit-fixed-object collisions in this roadway section.

- I-80 has varying inside and outside shoulder widths below minimum design criteria. Existing inside shoulders range from 1' - 9', with 12' minimum required. Outside shoulders also vary between 6' - 12', where 12' is required. This results in reduced access for emergency vehicles during incidents, as well as the potential for disabled vehicles to impact the travel lanes.
- Deteriorated roadway and bridge components cause hazardous conditions under normal use as well as requiring frequent lane closures for ongoing maintenance issues. The I-80 corridor in the project area was constructed in the 1950s and early 1960s. The roadway pavement has reached the end of its useful life and is in poor condition.

### **Congestion**

Existing and projected future high traffic volumes, as well as the geometric deficiencies detailed above, contribute to congestion in the project area.

- Current volumes on I-80 average approximately 47,300 to 70,500 vehicles per day (2013) with 12% heavy vehicles (trucks). Both overall and truck volumes increased from approximately Interchange 305 eastward; overall, truck volumes tend to be heavier eastbound. Design year projections (2045) show volumes of approximately 89,200 to 132,800 vehicles per day. The additional future traffic would increase congestion, with the entire mainline from Interchange 304 to Interchange 307 and most ramps operating at LOS F in the No-Build scenario. This would also then increase the potential for conflicts at the interchange acceleration and deceleration ramps, as congested conditions make movements more difficult.
- Lack of sufficient length for acceleration and deceleration lanes also contributes to the congestion throughout the corridor.

### **Mobility**

- System continuity is lacking. PennDOT and AASHTO design requirements for interstate systems call for all traffic movements to be available at each interchange. In addition, drivers generally expect full movement availability. Interchanges 303, 304, and 306 provide only some of the connections available, which contributes to congestion and safety issues in the region, such as the illegal left-hand turns made on PA 611 at Interchange 303 by exiting eastbound traffic.
- The project corridor services both local and through traffic, creating conflicts between the types of traffic and deviating from the intent of the interstate system to facilitate long range travel. A significant portion of project study area traffic is local use that both enters and exits I-80 within the project area. For example, 48% of the traffic entering at Interchange 307 westbound exits at Interchanges 306, 305, or 304.
- Four lanes of traffic, two in each direction, must be maintained on I-80 at all times during construction, except for short-term closures necessary for the safe execution of specific construction activities.

- The Strategic Highway Network (STRAHNET) system is the system of roads deemed necessary to support the Department of Defense's operations. As a component of this system, I-80 should include minimum vertical clearances of 16'0", particularly to facilitate freight mobility. PennDOT requires an additional 6 inches of vertical clearance to accommodate future pavement overlay. The existing Interchange 303 ramp bridge over I-80 provides 16'0" vertical clearance, the existing Interchange 304 ramp bridge over I-80 provides 16'4", and the existing PA 191/Broad Street structure over I-80 provides only 15'0" vertical clearance.

## **SELECTED ALTERNATIVE**

Two alternatives were carried into detailed analysis: Build Alternative 2B and Build Alternative 2D. Both alternatives would meet the project purpose and need by addressing deteriorated roadway and bridge components, existing and future safety concerns, and mobility and system continuity by improving interchange connections and providing all traffic movements on I-80. However, the interchange design of Build Alternative 2D would result in fewer impacts to traffic on local roads and better performance during incidents on I-80. Specifically, the proposed changes to the interchange configurations, particularly the provisions for all traffic movements, fewer ramps to access I-80, and more ramp connections to auxiliary lanes, would reduce impacts to traffic on local roads and provide a better opportunity for PennDOT to implement improved incident management strategies and minimize traffic diversions to the local roadway network during incidents on I-80. In addition, Build Alternative 2D would provide longer lane lengths between acceleration and deceleration ramps than Build Alternative 2B, thereby providing for better traffic operations and improved safety along I-80.

In addition, Build Alternative 2D would have fewer impacts on the natural and built environment, including fewer full property acquisitions and fewer residential and business displacements; smaller decrease in property tax revenue; less impact on woodlands; fewer noise impacts; and, less stream, floodway, and floodplain impacts. Build Alternative 2D was identified in the EA as the Preferred Alternative based on these factors.

Based on the public feedback during the preliminary engineering phase of the project, property impacts tended to be the main concern amongst residents, business owners, public officials, and other project stakeholders. As a result, additional design refinements were incorporated into the Preferred Alternative (and were assumed could also be incorporated into Alternative 2B) and discussed in the EA. The Preferred Alternative with design refinements improves safety, improves constructability, reduces property impacts, and further minimizes environmental impacts. Based on better meeting the needs while reducing impacts, Alternative 2D is the Selected Alternative.

## **Mitigation Measures**

The following summarizes how adverse impacts will be avoided, minimized, and mitigated for the Selected Alternative:

- General - As final design progresses, efforts will be made to further minimize impacts to natural, cultural, and socioeconomic features.



- **Emergency Management Services** - A project specific safety plan will be developed for construction. Appropriate safety elements will be evaluated and designed, existing incident management plans will be modified, coordination will be conducted with local law enforcement and emergency service providers, and operational protocols and procedures will be developed to ensure there is no significant impact to emergency response times or services.
- **Stroud Township Yard Waste Compost Facility** - Design refinements will continue to be assessed and incorporated to minimize impacts to the facility. Allowing Township use of a portion of the property will be considered based on continued coordination with the Township.
- **Properties** - Design refinements will continue to be assessed and incorporated to minimize property (residential, commercial, and undeveloped land) impacts. PennDOT will coordinate with individual property owners regarding means to minimize and mitigate property acquisitions and displacements. Mitigation for the displacement impacts will be provided through PennDOT's Relocation Assistance Program and authority provided by Chapter 9 of the Eminent Domain Code, 26 Pa.C.S. Sections 901-907 (Special Damages for Displacement); the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. Section 4601; and federal regulations entitled Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs, 49 C.F.R. Part 24.
- **Noise and Vibration** - A detailed noise analysis will be conducted during final design. This may require adding a new noise study area to assess the Hemlock Lane residential area. Community input for feasible and reasonable noise barriers will be incorporated into the decision-making process, and all feasible and reasonable barriers will be constructed based on results of the analysis. Construction work will be conducted in a responsible manner, to limit annoyance to the occupants of nearby properties. Appropriate noise reduction measures will be developed to minimize construction-related noise impacts – balancing residential needs during overnight hours and daytime noise/vibration levels that may affect adjacent business operations. This may involve sequencing of work, muffling of construction equipment, and specific construction methods that will reduce excessive noise/vibration levels. Specific methods of minimizing construction-related noise impacts will be determined in final design and incorporated into the construction plans and specifications in accordance with Publication 408, which contains current construction specifications for PennDOT projects.  
  
If blasting will be conducted, an exterior and interior pre- and post-blast survey will be conducted on all structures, buildings, or utilities in the vicinity of the blasting site. In addition, vibration monitoring will be conducted during blasting events.
- **Levee System** - Alterations of the Levee System will be coordinated with the United States Army Corps of Engineers (USACE) to obtain a Section 408 Permit at PA 191/Broad Street over McMichael Creek and I-80 over Brodhead Creek bridge replacement work areas. The contract will include a special provision for sheeting or other measures to protect the Levee System berm. Permanent and temporary impacts will be minimized and temporary impact areas will be restored to preconstruction conditions to the greatest extent possible.

- **Archaeology** - An archaeological survey will be conducted in the southeast quadrant of the I-80 and US 209 interchange once the hazardous materials contamination has been remediated. Mitigation, if required, will be developed during final design in consultation with the State Historic Preservation Officer (SHPO) and consulting parties.
- **Hazardous Waste** - A Waste Management Plan (WMP), site-specific Health and Safety Plan (HASP), and a project-specific HASP will be developed and implemented to address soil and groundwater management, environmental health, and worker safety during project construction activities. Surveys for asbestos containing materials (ACM) and lead based paint (LBP) will be conducted for any bridges or other structures that will be impacted by the project. If intrusive activities will be conducted in the vicinity of the I-80 Bridge over Brodhead Creek, a soil and sediment management work plan will be prepared. The Pennsylvania Department of Environmental Protection (PADEP) will be contacted prior to any intrusive activities to determine if any new information for the Brodhead Creek National Priorities List (NPL) Site is available.
- **Wetlands and Streams** - Water resource functions and values as well as temporary, permanent, direct, indirect, and cumulative impacts to wetlands and waterways will continue to be analyzed and detailed during the Chapter 105/Section 404 permitting phase of the project. Wetland and stream mitigation plans will be developed in coordination with PADEP/USACE during final design. Mitigation will be performed in accordance with the existing laws, regulations, policies, and guidance documents, including the USACE 2008 Mitigation Rule (33 CFR Part 332 Compensatory Mitigation for Losses of Aquatic Resources) and the PADEP's Design Criteria – Wetlands Replacement/Monitoring (Document Number: 363-0300-001). PennDOT will continue to look for suitable mitigation sites within the impacted subwatersheds first, then expand the search area if suitable areas cannot be found, which is in accordance with USACE and PADEP regulatory requirements. Impacts to water resources' functions and values will be mitigated in accordance with these regulations.

The PennDOT design team will utilize the Watershed Resources Registry as recommended by the United States Environmental Protection Agency and will coordinate with federal, state, and local agencies and watershed organizations to research potential candidate mitigation sites for further investigation. In addition, construction plans will ensure recreational navigability is maintained where applicable.

- **Floodways and Floodplains**- A complete hydrology and hydraulics (H&H) analysis will be conducted in final design. If necessary, a Conditional Letter of Map Revision will be obtained from the Federal Emergency Management Agency (FEMA).
- **Trout Streams** – All streams are naturally reproducing trout streams. The majority of streams are also stocked trout streams and Class A wild trout streams. No instream work will occur within the seasonal restriction dates:
  - March 1 - June 15 for stocked trout.
  - October 1 - December 31 for naturally reproducing trout.
  - October 1 - April 1 for Class A trout.

In summary, instream work is permitted June 16 - September 30.

- **Threatened and Endangered Species** - Tree clearing will be conducted between November 1 and March 31 while Indiana and northern long-eared bats are hibernating. PennDOT will continue to update the Pennsylvania Natural Diversity Inventory (PNDI) search and coordinate with the United States Fish and Wildlife (USFWS) throughout final design and construction.
- **Rotary Creek and Ann Street Parks** - Context sensitive treatments will be used on the Broad Street Bridge and a planting plan will be developed in final design in coordination with local officials. The gravel access drive entrance to the park will be regraded and paved. Refer to Attachment G of the EA for complete details.
- **Pollinators** - Vegetative BMPs will be included in final design to provide foraging habitat; places to breed, nest, and overwinter; and to act as corridors to link patches of fragmented habitat for pollinators. Native plants will be used for revegetation purposes. Plantings and/or seed mixes will include a diverse mix of plants, including grasses, sedges, and wildflowers that bloom at different times from spring to fall. Coordination will occur with the District maintenance department to identify long-term maintenance strategies that minimize mowing and herbicide use and/or other Integrated Roadside Vegetation Management practices.
- **Invasive Species Management** - Measures will be taken to minimize the spread of invasive species within and outside of the project area. The project's limits of disturbance will be minimized to the greatest extent practicable. Disturbed areas will be revegetated and stabilized with native species as soon as possible; seed mixes will omit invasive and nonnative species. In addition, any mulch or hay used will be weed-free. Any fill, soil, topsoil, rip-rap, and gravel brought onsite will not be from sites where invasive species are known to occur. Likewise, any material excavated onsite is assumed to contain invasive plant material and will only be reused within the project limits. If excavated material cannot be reused onsite, then the material will be stockpiled on an impervious surface until viable plant material is destroyed. Prior to moving equipment offsite, all equipment, machinery, and hand tools will be cleaned of all visible soil and plant material.

The contractor will adhere to best management practices and will comply with the latest Pennsylvania Department of Agriculture, United States Department of Agriculture, and Penn State Extension guidance in order to minimize the spread of the spotted lanternfly.

- **Wildlife** - The use of wildlife fencing or structures designed to promote the safe passage of wildlife to minimize wildlife-vehicle interactions will be evaluated in final design.
- **Air Quality** - Standard temporary BMPs will be utilized to minimize air quality impacts during construction. For instance, the Maintenance and Protection of Traffic Plan will identify regular motor vehicle traffic patterns during construction to minimize interference with construction activities. Specific methods of minimizing construction-related air quality impacts will be determined in final design and will be incorporated into the construction plans and specifications in accordance with Publication 408, which contains current construction specifications for PennDOT projects.
- **Signage** - During final design, the need for speed limit signs with flashers and orange object marker signs will be considered.

- Stormwater – PennDOT will follow all federal and state requirements for handling construction and post-construction stormwater discharges and will coordinate closely with the Monroe County Conservation District, PADEP, and municipalities to ensure there is no degradation to water quality, to manage stormwater runoff volumes and rates to water resources, and to provide sufficient controls to eliminate impacts to the municipal stormwater systems. The proposed project does not and will not include stormwater management facilities that negatively impact watercourses or wetlands.

Green Stormwater Infrastructure and Low Impact Development practices are commonly used by PennDOT and will be incorporated into the stormwater management design as appropriate and where possible in accordance with Pennsylvania's antidegradation laws and federal National Pollutant Discharge Elimination System (NPDES) requirements.

The contractor will implement standard BMPs in accordance with PennDOT Publication 408 to minimize potential construction impacts due to inadvertent releases of fuel or other materials from concrete batch plants and similar facilities into the project area watercourses. The contractor will follow all PADEP regulations regarding Pollution Prevention Control plans and procedures.

### **Environmental Assessment and Technical Reports**

The EA was approved for public availability and released to the public by the FHWA Pennsylvania Division on October 25, 2019. The public comment period on the EA began on October 25, 2019 and ended on November 29, 2019. A public hearing with a plans display was held on November 13, 2019 at the Monroe County Control Center. Advertisements regarding the public hearing and the availability of the EA were placed in the Pocono Record on October 25, 2019 (Friday) and again on November 6, 2019 (Wednesday) and on the project website on October 25, 2019 (**Attachment B**).

Hard copies of the EA were distributed throughout the project area and region for review during the comment period at the following public locations (**Attachment B**):

- Eastern Monroe Public Library – 1002 North Ninth Street, Stroudsburg, PA
- Monroe County Planning Commission – One Quaker Plaza, Room 106, Stroudsburg, PA
- Northeastern Pennsylvania Alliance – 1151 Oak Street, Pittston, PA
- Federal Highway Administration – 228 Walnut Street, 5th Floor, Harrisburg, PA
- PennDOT District 5-0 – 1002 Hamilton Street, Allentown, PA
- Senator Mario Scavella – 2398 Route 611, Suite 201, Scotrun, PA
- Representative Maureen Madden – 18 S. 9th Street, Stroudsburg, PA

Additionally, the EA and supporting technical documents were available for review and download through the project website (<http://www.i80project.com/>). Supporting technical documents include:

- Phase I Alternatives Analysis, 2014

- Purpose and Need, 2014
- Conceptual Point of Access Study, 2015
- Water Resources Delineation Reports, 2015; 2018; 2019
- Phase I Bog Turtle Habitat Assessments, 2014; 2018; 2019
- Phase II Bog Turtle Survey Reports, 2014; 2018
- Hazardous Waste
  - Phase I Environmental Site Assessments, 2017; 2019
  - Phase III Environmental Site Assessment Field Sampling Plans, 2017; 2018
  - Phase III Environmental Site Assessment Report, 2019
- Cultural Resources
  - Phase IA Archaeological Predictive Model, 2014
  - Area of Potential Effect Description, 2014
  - Historic Structures Survey & Determination of Eligibility Report, 2016
  - Phase IB/II Archaeological Identification and Evaluation Surveys and Negative Survey Form, 2017; 2018
  - Determination of No Adverse Effect Memorandum, 2018
- Hydrology and Hydraulic Alternatives Analyses, 2015; 2019
- Preliminary Noise Analyses, 2016; 2019
- Final Air Quality Technical Report, 2016
- Environmental Justice Technical Memorandum, 2018
- Conceptual Stage Relocation Report, 2018
- Visual Resources Technical Memorandum, 2019

Letters were sent to the federal, state, and local resource agencies informing them of the availability of the EA and technical documents for review.

The public had the opportunity to provide public or private testimony in addition to written comments at the public hearing and to provide written comments throughout the comment period. All comments provided were reviewed and addressed. Comments and responses are included in the *Environmental Assessment Response to Comments Report* (January 2020) (**Attachment A**).

#### **Finding of No Significant Impact (FONSI)**

This FONSI is based on the project record including:

- *Interstate 0080 Section 17M I-80 Reconstruction Environmental Assessment* (October 2019) and associated documents and studies referenced in this document

- *Environmental Assessment Response to Comments Report* (January 2020)  
(Attachment A)

These documents and supporting documentation find that there is no practicable alternative to construction of the Proposed Action, and the Proposed Action includes all practicable measures to minimize harm to natural, cultural, and socioeconomic resources which may result from the proposed project.

The EA and *Response to Comments Report* have been independently evaluated by the FHWA and determined to discuss adequately and accurately the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. They provide sufficient evidence and analysis for determining that an Environmental Impact Statement (EIS) is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the EA and associated documentation.

Pursuant to:

42 U.S.C. 4231-4347

40 CFR 1500-1508

23 CFR 771

36 CFR 800

49 U.S.C. 303(c)

23 CFR 774

16 U.S.C. 1531-1544


33 U.S.C. §1251 et seq. (1972)

Executive Order 11988

Executive Order 11990

Executive Order 12898

1/30/2020  
DATE

  
\_\_\_\_\_  
Keith Lynch, Deputy Division Administrator  
Federal Highway Administration Pennsylvania Division

#### ATTACHMENTS

- A. Environmental Assessment Response to Comments Report, January 2020
- B. Environmental Assessment Advertisements

# **ATTACHMENT A**

## **Environmental Assessment Response to Comments Report, January 2020**

## I-80 Reconstruction Project Environmental Assessment Response to Comments Report, January 2020

This comment response document provides responses to comments received on the Environmental Assessment (EA) which was provided to the public for their review and comment October 25, 2019 – November 29, 2019. Hard copies of the EA were distributed throughout the project area and region for review during the comment period at the following public locations:

- Eastern Monroe Public Library – 1002 North Ninth Street, Stroudsburg, PA
- Monroe County Planning Commission – One Quaker Plaza, Room 106, Stroudsburg, PA
- Northeastern Pennsylvania Alliance – 1151 Oak Street, Pittston, PA
- Federal Highway Administration – 228 Walnut Street, 5th Floor, Harrisburg, PA
- PennDOT District 5-0 – 1002 Hamilton Street, Allentown, PA
- Senator Mario Scavella – 2398 Route 611, Suite 201, Scotrun, PA
- Representative Maureen Madden – 18 S. 9th Street, Stroudsburg, PA

Additionally, the EA and supporting technical documents were available for review and download through the project website (<http://www.i80project.com/>). A public hearing with a plans display was held on November 13, 2019 at the Monroe County Control Center.

This Response to Comments Report consists of the following:

1. Copies of the comments received on the EA during the comment period. These are organized by public testimony, private testimony, public citizen comments, county and local organization comments, and federal agency comments. Please note the public and private testimonies contain the entire public hearing transcript. Each comment/issue identified is categorized by a code in the right margin. These codes correspond to the response(s). The table below shows the codes used to identify topics of the comments and responses.

| Code | Comment Category                           |
|------|--|
| AQ   | Air Quality                                |
| ALT  | Alternatives                               |
| ECON | Economic                                   |
| EJ   | Environmental Justice                      |
| HAZ  | Hazardous and Residual Waste               |
| NEPA | National Environmental Policy Act Document |
| NO   | Noise                                      |
| PI   | Public Involvement                         |
| ROW  | Right-of-Way                               |
| SFTY | Safety                                     |
| STRM | Stormwater Management                      |
| T&E  | Threatened and Endangered Species          |
| TRAF | Traffic                                    |
| WR   | Water Resources                            |
| MISC | Other/Miscellaneous                        |

2. Response to comments. Responses to comments are grouped together according to topic, and a singular response was provided if the same or very similar comments were received.



## Comments Received During the Comment Period (October 25, 2019 – November 29, 2019)

## Public Testimony

- - -

In Re: **INTERSTATE 80 SECTION 17M PROJECT**

- - -

Transcript of PUBLIC HEARING held in the  
above-captioned matter at the Monroe County Control Center,  
100 Gypsum Road, Stroudsburg, PA on Wednesday,  
November 13, 2018, commencing at 5:02 PM.

- - -

CHRISTOPHER KUFRO,  
PennDOT Engineering District 5  
CAMILLE OTTO, FHWA  
MARIAN HULL, AECOM

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DONNA KENDERDINE REPORTING  
P.O. BOX 509  
STROUDSBURG, PA 18360  
(570) 992-7766

## INDEX OF SPEAKERS

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Speaker's NamePage No.

1. Tarah Probst

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2. Bob Heil

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3. Kristen Battle

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4. Abigail Jones

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5. Mark Connors

23

6. Bill Parkinson

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## P R O C E E D I N G S

Wednesday, November 13, 2019

- - -

MR. KUFRO: Good evening, everybody. My name is Christopher Kufro and I am the Assistant District Executive for Design for PennDOT Engineering District 5. I will be doing an overview of the planned event tonight and introduce our FHWA representative, Camille Otto, who will describe FHWA's role and oversight of the project and then we'll be turning over to Marian Hull from our design team, AECOM. Marian Hull will be serving as your public hearing administrator this evening.

Please note that this is a public hearing for the Interstate 80 17M project only and does not address any other projects in the area.

I would like to start by welcoming everyone and thank you for taking time out of your evening to share your thoughts on the Interstate 80 Section 17M project with us.

I respectfully ask that you turn off or silence any personal electronic devices for the remainder of this hearing.

Please be advised that as a public hearing, no audio or video recording or photography is permitted.

1                   As reflected in the Environmental  
2                   Assessment document, this project involves the full  
3                   roadway reconstruction, widening, and interchange  
4                   reconfiguration along 3.5 miles of Interstate 80 in  
5                   Stroud Township, Borough of Stroudsburg, and Borough  
6                   of East Stroudsburg. The affected interchanges  
7                   include Exit 303, which is North Ninth Street,  
8                   Exit 304, which is US 209, Exit 305, which is West  
9                   Main Street, and Exit 306, which is Dreher Avenue,  
10                  and Exit 307, PA 611 and 191.

11                  The project improvements are based on the  
12                  project's approved purpose and need, including  
13                  improving safety, providing a safe and efficient  
14                  transportation system on a national highway system  
15                  component for both local and regional connections in  
16                  the area by reducing future congestion in the 2045  
17                  design year to a Level of Service E or better,  
18                  and by bringing the I-80 roadway and structures up  
19                  to current design standards with no or minimal  
20                  design exceptions.

21                  So, with that, I would like to now  
22                  introduce Camille Otto from our Federal Highway  
23                  Administration. She will provide an overview on  
24                  FHWA's role in this project. Thank you.

25                  MS. OTTO: Thanks, Chris.

1           My name is Camille Otto and I am the  
2   Environmental Program manager at the Federal Highway  
3   Administration.

4           The Federal Highway Administration, or  
5   FHWA, is an agency within the U.S. Department of  
6   Transportation that supports state and local  
7   governments in the design, construction, and  
8   maintenance of our nation's highways.

9           The Federal Highway is providing federal  
10   funds for this project and, therefore, we are the  
11   lead federal agency.

12          Consequently, we will be taking certain  
13   approval actions over the course of project  
14   development, including review and approval of the  
15   environmental documentation.

16          An Environmental Assessment, or EA, as you  
17   will hear us call it, has been prepared for the  
18   Federal Highway Administration by PennDOT to fulfill  
19   requirements set forth in the National Environmental  
20   Policy Act of 1969. You hear us refer to that as  
21   NEPA.

22          The Environmental Assessment documents are  
23   analysis of the purpose and need for the project,  
24   development of various alternatives, the impacts to  
25   both the natural, cultural, and socioeconomic

1 environment, and mitigation commitments associated  
2 to offset those impacts, both agency and public  
3 outreach efforts completed to date, and the  
4 identification of a preferred alternative.

5           Environmental resources were considered  
6 throughout the alternatives development and the  
7 feasibility phase of the project. The preferred  
8 alternative was assessed to determine the impacts to  
9 such features as both Brodhead, Little Pocono, and  
10 McMichaels Creek, as well as their flood plains,  
11 wetlands, threatened and endangered species,  
12 agricultural resources, historic structures and  
13 historic districts, residences and businesses,  
14 community facilities including things like  
15 Stroudsburg Cemetery and both the Brodhead and  
16 McMichael Creek levies, parks and recreational  
17 facilities and those include Ann Street and Rotary  
18 Creek parks, pedestrian and bicycle access, noise  
19 sensitive areas, and potential hazardous waste  
20 sites.

21           The preferred alternatives impacts on  
22 these resources and any mitigation measures  
23 necessary to offset those impacts are all included  
24 in the EA.

25           I do want to point out that the Department



1 is not acquiring any properties currently. The  
2 project is currently in the preliminary engineering  
3 phase and we're identifying potential impacts on the  
4 environment.

5 Once an alternative is selected the  
6 project will progress into final design and a  
7 right-of-way plan will be developed identifying and  
8 authorizing acquisitions of the necessary properties  
9 that are affected.

10 These affected parcels or properties  
11 necessary for the project will be acquired in  
12 accordance with the Federal Uniform Relocation  
13 Assistance and Real Property Acquisition Act of  
14 1970, the Eminent Domain Code of Pennsylvania,  
15 and the Relocation Assistance Programs of both FHWA  
16 and PennDOT.

17 More details about the right-of-way  
18 process can be found in the document titled When  
19 Your Land is Needed for Transportation Purposes  
20 which is located on the project website and PennDOT  
21 has copies here today, if you're interested.

22 With that, I would like to introduce  
23 Marian Hull from AECOM and she will serve as the  
24 administrator for today's public hearing.

25 Thank you.

1 MS. HULL: Thank you, Camille.

2 Owing to the heightened interest in this project,  
3 PennDOT and FHWA has convened this public hearing to receive  
4 and consider comments regarding the project which the  
5 official name is Interstate 80 Section 17M Project.

6 Notices for this hearing were advertised in the  
7 Pocono Record on October the 25th and again on November the  
8 6th and on the project website as well on October the 25th.

9 The Environmental Assessment document detailing  
10 the anticipated impacts of the roadway widening and  
11 reconstruction project, some of which were summarized by  
12 Camille, has been available for public review since the 25th  
13 at the following locations: At the Montgomery [sic] County  
14 Planning Commission, at the Northeastern Pennsylvania  
15 Alliance, Senator Mario Scavello's office, Representative  
16 Maureen Madden's office, Eastern Monroe Public Library,  
17 the Federal Highway Administration, the project website  
18 itself, and i80project.com, and at PennDOT Engineering  
19 District 5, which is the PennDOT district which is  
20 overseeing this project.

21 So, the purpose of tonight's hearing is to learn  
22 about the project, review the preferred alternative that has  
23 been developed in preliminary engineering, and provide  
24 comments and input on the project.

25 Plans have been displayed in the lobby this

1 evening and you should have received a handout when you  
2 signed in to provide that project information.

3 The public hearing portion of the evening, which  
4 we're in the introduction phases on now, is what will enable  
5 participants to provide formal public comments on the  
6 project. So, these will go into the record of this project.

7 So, right now I'm just going to review the agenda  
8 for the format of tonight's hearing and then we'll move into  
9 hearing comment.

10 So, as you're aware, we began the program with an  
11 open house at 4 o'clock. I'll remind folks that that open  
12 house was, really, for informational purposes only and what  
13 I mean by that is if you shared information with the project  
14 team during that open house that's not necessarily something  
15 that's going to go into the official record of the project.  
16 So, if you want something to go into the official record of  
17 the project and you haven't signed up to speak yet please do  
18 fill out a card and do so this evening.

19 Following this introduction, we will begin that  
20 formal public comment period.

21 For comments to be considered as a part of the EA,  
22 like I said, they must be submitted either by providing  
23 testimony in the public session in this room, by providing  
24 testimony in private session in the room across the hall,  
25 or by submitting written comments and those written comments

1 can be submitted tonight -- there's a comment box by the  
2 sign-in sheet -- or any time by e-mail or postmarked by the  
3 November 29th deadline.

4 So, this public hearing is being recorded by a  
5 stenographer as is the private testimony room across the  
6 hall. We want to hear from all of you, so please take the  
7 time to provide your input either by filling out a comment  
8 form, speaking during the public session or providing  
9 written comment to the Department by the 29th of November.

10 We are also, as I mentioned, offering individuals  
11 the opportunity to give testimony to a second court reporter  
12 across the hall until 7 o'clock.

13 We ask that if you would like to give verbal  
14 comments you choose either the public or the private  
15 session, not both. Private and verbal [sic] comments are  
16 limited to 3 minutes so that everyone can have an  
17 opportunity to speak.

18 Unused time can't be donated to another speaker.  
19 If the length of your comments can't be covered in the 3  
20 minute time frame, please fill out a comment form or submit  
21 them in writing by November 29th.

22 As you signed in this evening, you were invited to  
23 fill out a card that looks like this with your name,  
24 address, and affiliation if you are speaking on behalf of a  
25 group in order to speak during the comment session.

1           If you haven't done so and wish to speak,  
2 please visit the sign-in desk and folks there can help you  
3 with a card and get it in here so that you have an  
4 opportunity to speak.

5           In adhering to public hearing rules, we will not  
6 be answering questions or responding to your comments during  
7 the public comment session. It is for us to hear from you,  
8 not for us to respond back to you this evening.

9           Our response to comments received both this  
10 evening and any time prior to the November 29th deadline  
11 will be provided in a comment response document to FHWA for  
12 consideration and inclusion in the final environmental  
13 documentation for the project.

14           We will then notify those who had comments that  
15 the document is available on the website and you'll be able  
16 to request a hard copy as well.

17           So, at this point we'll begin the formal public  
18 commenting session for the public hearing. I will announce  
19 each speaker one at a time using these cards as well as the  
20 speaker who will be next so that they can come up and sit in  
21 front here and be ready to approach the microphone.

22           Again, if you didn't fill out a comment card but  
23 wish the opportunity to speak, go out to the sign-in table  
24 and the attendants will be able to assist you in filling out  
25 a card.

1           If you have a written statement already prepared  
2       that you would like to provide to the Department, you can  
3       hand it in to me -- I'll be standing right here -- either  
4       before or after you speak.

5           As reminder, we are limiting comments to 3 minutes  
6       and to aid folks in adhering to that speed limit -- speed  
7       limit. Jesus. Time limit. Excuse me and my profanity  
8       there. We've set up a countdown timer on the monitor so  
9       you'll see how much time is passing. Once the 3 minutes has  
10      passed, I'll ask you to finish that thought and then we'll  
11      move on to the next speaker.

12          Again, just because you can't get it all said in  
13      3 minutes doesn't mean that we don't want to know about your  
14      thoughts and we will be reading all of the written comments  
15      that you submit. So, either at the comment box at the  
16      sign-in table or submitted to the Department by  
17      November 29th.

18          So, we'll start the comments this evening in order  
19      that folks signed in and filled out one of these cards.

20          The first name for this evening is Tarah Probst  
21      and the second person is Bob Heil. So, Bob, if you just  
22      want to come over and have a seat over here so that you're  
23      ready, you'll be next.

24          TARAH PROBST: Thank you. I really -- I think  
25      I'm going to direct this to Camille from the FHWA. Camille,

1 you see, like, an emptier room tonight? Where are you?  
2 Because we're beat down. I've been on this for four years.  
3 We've an I-80 task force. We had, last December, a public  
4 meeting which was a dog and pony show. People have just had  
5 it. We're -- you want to give up because it's so difficult.

6 But, we're here tonight on behalf of the Borough  
7 of Stroudsburg, I'm a private citizen of the Borough of  
8 Stroudsburg, and 90 percent of this project is wrong.

9 They call it Safe 80. It's making it unsafe 80. You cannot  
10 squeeze people from two lanes to three lanes to two lanes  
11 and expect it to be safe. What's next? Four lanes?

12 Five lanes? Are we just going to keep expanding it out  
13 until we don't have a town anymore?

14 We're a borough of 5600 people. Our taxes are  
15 already getting eaten up by county buildings taking over.

16 Now the Interstate 80 project. You're moving exits away  
17 from our town.

18 We are a historic town, we have a socioeconomic  
19 problem going on, everything you talked about, and, yet,  
20 they're taking away exits. So, when you get off Main Street  
21 they're moving it further west to go to the west end.  
22 Broad Street takes you to East Stroudsburg.

23 PennDOT is ruining our town. We need safer on  
24 and off ramps, no doubt, we need a breakdown lane, but to  
25 have an equivalent of 10 lanes of traffic, six travel,

SFTY-1,  
ALT-2

ROW-1

ECON-1

ECON-2

ALT-1

1 breakdown, on and off ramps is -- going into two lanes into  
2 New Jersey, which is a national recreation center,  
3 which isn't going to expand.

4 And if you're looking forward -- you're supposed  
5 to be looking at 2045 -- you should be looking at cars that  
6 drive themselves, tunnels, bypasses, not a Band-Aid  
7 approach.

ALT-1

8 This is a waste of our tax dollars. There are so  
9 many other things you could do to help our roads, help the  
10 way we get around Monroe County than just throwing money at  
11 this. And when we ask "Why are you doing this?" "Well,  
12 because we're building the lanes so we keep two lanes open  
13 during construction."

14 They're not thinking about our town, they're not  
15 thinking about our people. They do not listen. I'm sorry,  
16 but every time we've had these meetings you guys just give  
17 the same old same old and it's not good enough.

PI-1

18 It's not safe, it's not a good idea. We have  
19 public officials behind us. We have a town behind us.  
20 We have United States Congress people behind us. This is  
21 no joke and I feel like you're the only one that might take  
22 the chance to listen to our I-80 task force tonight to the  
23 business owners to the residents to the people that travel  
24 these roads every single day and you please might make

SFTY-1

25 PennDOT scale down this operation and put it towards use on

ALT-1



1 other existing roads that would relieve congestion off  
2 Interstate 80.

3           They don't listen, I'm disappointed, and,  
4 for once, please, please do the right thing for Stroudsburg  
5 Borough and all of Monroe County.

ALT-1

6           And my time's up. I could go on for another hour.  
7 Thank you.

8           MS. HULL: Bob, you're next and after Bob will be  
9 Kristen Battle.

10           BOB HEIL: Good evening. My name is Bob Heil.  
11 I'm the executive director of the Brodhead Watershed  
12 Association. The Brodhead Watershed Association is a  
13 non-profit organization that looks to protect the water  
14 quality and the natural resources throughout the eastern  
15 half of Monroe County. That's a 300-plus square mile area  
16 that we advocate for clean water and this entire Interstate  
17 80 project is in our watershed that we work to protect.

18           So, BWA will be submitting written technical  
19 comments on many aspects of this, but tonight I want to hit  
20 the highlights of what is important.

21           If you've looked at these documents, they're  
22 voluminous. There's pages and pages and tons of documents  
23 and I'm only looking at the water resource part myself,  
24 but despite the size of that document it doesn't go far  
25 enough.

1           This is an Environmental Assessment. There is a  
2 greater level of detail. That's called an Environmental  
3 Impact Statement and that is what is really needed in this  
4 project. This is one of the largest projects in Monroe  
5 County history. It deserves and demands a maximum  
6 environmental study.

NEPA-1

7           When I looked through this report, I focused on  
8 the water quality aspects of it. There's 4.6 miles of  
9 streams in this project area; not just the main stem  
10 McMichaels and Brodhead, but many small tributaries.

11           These tributaries are really where water begins  
12 and are crucial to the entire watershed. They are also high  
13 quality cold water fishery, according to the state  
14 designations, so they are basically the best -- some of the  
15 best water quality we have. They must be protected.

WR-1

16           When you look at buffer areas in addition to those  
17 4.6 miles of stream, that comes out to over 80 acres of  
18 impacted flood plain and active river area in our  
19 terminology.

20           Wetlands? We know every inch of wetlands is  
21 important. We have been protecting them on a state and  
22 federal level for a long time. That basically, in this  
23 project area, is 5.25 acres of wetlands. That's huge.

24           And what was particularly disturbing to me when I  
25 looked at stream and wetland mitigation, it said, "We are

1 looking to do mitigation elsewhere in the Delaware River  
2 Watershed." That's not acceptable. The taking of our  
3 natural resources cannot be offset by some downstream  
4 project in some other community. Any mitigation must be  
5 done right here in our watershed where it has the greatest  
6 impact.

WR-1

7 If you want to think about prior projects in  
8 Monroe County where an EIS was important, look at the  
9 Marshalls Creek bypass. In the 1990s a study there proved  
10 that there were two rare fishes, two different kinds of  
11 shiners, and, basically, because of that EIS we studied  
12 that, the project proceeded, but it proceeded in the correct  
13 fashion that those fish were not impacted.

NEPA-1

14 An EA is a book report that an 8th grader can do.  
15 We don't need an 8th grade book report, we need a college  
16 level EIS to really identify what's occurring here and  
17 protect our natural resources.

18 Thank you.

19 MS. HULL: Kristen, you're next, and Abigail Jones  
20 is after.

21 KRISTEN BATTLE: Hi. My name is Kristen Battle.  
22 I am the Communications Chair for the I-80 Project Impact  
23 AAA Task Force and a life-long resident of the Stroudsburg  
24 Borough.

25 We are a group of concerned citizens who answered

1 an ad in the paper to learn more about the proposed I-80  
2 project and its affect on the community as a whole. For the  
3 past two years, I have learned a lot about the particular  
4 project and am concerned that the project as a whole will  
5 create more problems than it will solve.

6 The highway system does need to be improved and I  
7 applaud all those who have worked on this plan to make it a  
8 safer highway system. Plans for the exit and entrance ramps  
9 and bridge heights being brought up to code is great.  
10 Plans for the creating of the 209 flyover is great.  
11 Creating a new exchange at 302 is great and fixing the  
12 crumbling infrastructure is great. But other items within  
13 this plan are very concerning.

14 As stated on Page 16 and 17 of the Environmental  
15 Assessment, for each build alternative the 2045 design near  
16 volumes on all freeway segments would operate at an LOS D  
17 during the AM peak periods and an LOS E during the PM peak  
18 areas. Between interchanges 302 and 303 the PM peak periods  
19 would exist at an LOS of an F due to the bottlenecking  
20 condition created by the project limits of three lanes  
21 existing to two lanes.

22 Additionally, West Main Street and Bridge Street  
23 will have higher volumes northbound and within the  
24 Stroudsburg Borough several intersections are expected to  
25 decline in LOS.

TRAF-1

1           If this 600 million dollar project is supposed to  
2 improve the highway and surrounding roads, then why is the  
3 LOS declining by their own admission? This has been one of  
4 the main oppositions of the project since it was first  
5 presented.

TRAF-1

6           Another safety concern is the closing of Dreher  
7 Avenue. Contrary to the assessment, Dreher Avenue and  
8 West Main Street do not act as a single interchange.  
9 They serve very different purposes within the community and  
10 serve different populations. Closing Dreher Avenue will  
11 create more traffic in a residential neighborhood on West  
12 Main Street geared towards families who walk to schools and  
13 will affect the emergency services of many aging communities  
14 within the county.

SFTY-2

15           I would like to make a correction to the  
16 assessment. The community did not ask for Route 611 to be  
17 changed only, it was to keep I-80 four lanes with a full  
18 shoulder through Stroudsburg, expand to six lanes from  
19 Bartonsville to Scotrun, and increase 611 from Bartonsville  
20 to Chipperfield Drive to four lanes.

ALT-2

21           611 should be a study for this I-80 project.  
22 All who travel it when the bottlenecking occurs when it goes  
23 from two lanes to one lane and back again, we all know what  
24 that effect is. The same effect, stated by staffers and  
25 proven in traffic models, will be the daily driving

1 experience on I-80 at the completion date of 2025. For how  
2 long is this 600 million dollar question.

ALT-2

3 Knowing that safety is top priority of PennDOT,  
4 how is knowing you are creating an LOS F situation safe?  
5 When a new highway system is being planned and reconstructed  
6 and that plan does not meet the criteria or cause the safety  
7 issues, are there methods in place to revisit this or is the  
8 affected community stuck in bottleneck limbo for the next  
9 20 years until there's a change in financing and more  
10 construction is started?

SFTY-1,  
ALT-2

11 Thank you.

12 MS. HULL: Abigail, you're next, and after Abigail  
13 Mark Connors.

14 ABIGAIL JONES: My name is Abby Jones and I am a  
15 senior attorney with PennFuture. We are a statewide  
16 environmental organization with an office in Mount Pocono  
17 dedicated to protecting the headwaters and special  
18 protection waters of the Delaware River Basin.

19 PennFuture is a founding member of the Our Pocono  
20 Waters campaign, a collaboration of organizations,  
21 businesses, and community members fighting to keep our clean  
22 streams clean and to correct the misinformation that we  
23 can't have clean streams and economic growth. We can and  
24 we should.

25 PennFuture will be submitting public comments on

1 the impact of the proposed I-80 reconstruction project to  
2 the water resource which exclusively contains the most  
3 protected waters in the state; that is, high quality and  
4 exceptional value streams and wetlands. In fact, some of  
5 those streams that will be impacted by the project are  
6 historically some of the best trout fishing streams in all  
7 of Pennsylvania.

8 As our comments will detail, we believe that the  
9 impacts of this project to these high quality waters and  
10 exceptional value wetlands will be significant warranting a  
11 full Environmental Impact Statement.

NEPA-1

12 However, I am here tonight with a simple yet  
13 critical request. You must extend the public comment period

NEPA-2

14 and offer additional public hearings. Your regulations  
15 allow for additional public comment for good cause. I can  
16 think of no better cause than to give the community a full,  
17 fair, and meaningful opportunity to express their concerns.

18 First off, each of the previous public hearings  
19 and open houses have been held at the Stroudsburg Area High  
20 School in Stroudsburg. That is where the impacts of the  
21 proposed project will be most strongly felt. It is  
22 important that the community impacted has the ability to  
23 easily attend the public hearing in order to allow for  
24 meaningful public presentation.

NEPA-3

25 While this facility is nice, I think we can see by

1 the turnout tonight that it is not acceptable and not easily  
2 accessible to many of the impacted community members.

NEPA-3

3 Consequently, you should offer an additional  
4 public hearing in the community that will be impacted as it  
5 was before at Stroudsburg High School.

6 Secondly, this Environmental Assessment has been  
7 over five years in the making and is almost a hundred pages  
8 long with hundreds more pages of highly technical  
9 appendices. The issues at hand include technical and  
10 scientific analyses of a wide variety of impacts to our  
11 community including, but not limited to, water, land use,  
12 noise, air, congestion, public health, environmental  
13 justice, and economics. The information in the EA is  
14 overwhelming to review and digest in just 30 days.

NEPA-2

15 What you've given us is not an opportunity for  
16 meaningful public comment, but appears to be nothing more  
17 than an agency wanting to rubber stamp a project without  
18 waiting around to hear the public's voice on a project that  
19 will significantly impact them.

PI-1

20 Please extend the public comment period for at  
21 least an additional 45 days with sufficient time for another

NEPA-2

22 public hearing in December in Stroudsburg. Both the letter  
23 and the spirit of NEPA dictate an opportunity for meaningful  
24 public participation and, frankly, you failed to give us  
25 that.

NEPA-3



1 This is the only chance for our community to  
2 comment on how this proposed project will impact our health,  
3 our environment, and our lives. Thank you.

PI-1

4 MS. HULL: Mark Connors is next and, then, after  
5 Mark is Bill Parkinson.

6 MARK CONNORS: I'm Mark Connors. I'm on the  
7 Stroudsburg Borough Council and Chair of the Stroudsburg  
8 Council's Route 80 task force.

9 I'm here to advocate for no to six travel lanes of  
10 this project, no to closing the Dreher Avenue interchange,  
11 and no to moving the West Main Street interchange. As Kris  
12 Battle had mentioned, we're all for -- borough council and  
13 many are all for the safety improvements that are essential,  
14 extending ramps, et cetera, but those three key points we  
15 are not in favor of.

ALT-1

ALT-3

16 In general, many parts of the study compare only  
17 preferred options 2B, 2D, and the no-build option. So,  
18 sometimes where there's no difference between the impacts of  
19 2B and 2D the study just says, "Therefore, no mitigation's  
20 necessary." The study is geared towards making a choice  
21 between those two, not to considering whether impacts of a  
22 combination of refined design portions would have a lesser  
23 impact.

NEPA-4

24 Yes, there's a refinement section of this study  
25 and that's the good part, but partial solutions are

ALT-4

1 dismissed because they don't solve all the problems. So,  
2 collectively, I think, partial solutions can add up to more  
3 than the sum of their parts.

4 I do thank the project team for reporting in this  
5 report on community concerns that we previously expressed,  
6 but, again, those are pulled apart and not taken as a whole.

7 So, for example, the suggestion that Route 611 be  
8 expanded, the response to this was it won't address the  
9 safety concerns on Route 80. Well, of course not, but it  
10 will address the congestion concerns on Route 80.

11 It responded that, "Well --" the report responds  
12 that the expansion of Route 611 will only address local  
13 traffic, not congestion on 80 or not through freight  
14 traffic, excuse me, but it does address congestion on 80 in  
15 that 47 percent of traffic on Route 80 is local. So,  
16 expansion of Route 611 to more lanes will have a positive  
17 impact there. Of course, it won't improve safety on Route  
18 611, but it will improve congestion.

19 With regard to closing the Dreher Avenue  
20 interchange, the report identifies that it's compensated by  
21 a collector road. Well, the only reason that a compensation  
22 is needed is because the Dreher Avenue exit is being closed.

23 There's no need to do that. There's plenty of separation  
24 according to PennDOT's own criteria between the  
25 interchanges.

ALT-4

ALT-3

ALT-6

1           West Main Street being moved entirely to the west  
2 goes against PennDOT's preferred arrangement that all  
3 choices be available at all intersections. That's the only  
4 intersection right now -- interchange now that has all  
5 options available. By splitting half of them further west  
6 it reduces community cohesion by splitting our town apart  
7 and by making our town less visible to travelers on the  
8 interstate and it doesn't provide full interchange.

ALT-3

9           We will be providing our written comments that can  
10 go into more detail because it is in the detail that this  
11 project could be an excellent project or this project could  
12 be a disaster.

13           So, thank you again for your time.

14           MS. HULL: Thank you, Mark. We have Bill  
15 Parkinson up next.

16           BILL PARKINSON: My name is Bill Parkinson and,  
17 unfortunately, I suffered from common sense and logic and I  
18 look at this project as overkill and a huge waste of  
19 taxpayers' money.

20           Pennsylvania has a highway crisis, frankly,  
21 from living here for over 30 years. Traffic is horrendous  
22 on 33, 78 is now jammed up all the time, 80 has gone nuts.

23           The truck traffic is unbelievable. So, you can make this  
24 20 lanes wide, I don't care. It still goes down to two  
25 lanes to go through the Water Gap.

ALT-2

1           So, as a business owner and very heavily invested  
2 in Stroudsburg, lots of money, lots of investment, the next  
3 10 years of my life, my economic earning capacity is going  
4 to be drastically affected by what's going to happen with  
5 this project because we're familiar here with what happens  
6 when 80 shuts down and the traffic comes to a halt and  
7 business stops in town.

ECON-2

8           How long is this project going to take?

9           It's overkill. It's too much. I get we need to  
10 fix the on ramps. Frankly, if Pennsylvania was going to  
11 invest and the federal government was going to invest their  
12 money wisely, they would take a look at Columbia and build a  
13 brand new straight bridge, six lanes, 10 lanes wide, there's  
14 lots of room, and continue that through the rural community  
15 south of here offering tremendous economic impact to Bangor,  
16 Pen Argyl, those areas, Wind Gap, Saylorsburg. That's where  
17 this should come out. A new Interstate 80 project should  
18 come out there and, then, continue on north up to Interstate  
19 80.

ALT-5

20           Thus, traffic that's not coming to Stroudsburg  
21 for any reason, they're on their way through from Detroit to  
22 New York City, they don't have to come through Stroudsburg  
23 and jam up the traffic and we can then benefit from that  
24 economic impact. Doylestown put in a bypass around  
25 Doylestown and it increased the business in Doylestown

1 because people could now actually get into town and enjoy  
2 the town.

ALT-5

3 Stroudsburg has a lot to offer, but it's going to  
4 be cut off for the next 10, 15 years, which is probably how  
5 long this project realistically is going to take and I'm  
6 going to be old and broke.

ALT-7

7 Think about it, folks. This is not a joke.  
8 It's a great idea to improve Pennsylvania's highway system.  
9 This is a waste of taxpayers' money. We need to put in  
10 another bridge and a bypass.

11 What would happen if the Delaware Water Gap bridge  
12 had to shut down for any reason? Now what? From a homeland  
13 security standpoint, it makes more sense to offer  
14 alternative routes from the Delaware Water Gap bridge.  
15 If you ever had to evacuate New York City -- you can't even  
16 get out here on a regular weekend let alone evacuate the  
17 city.

ALT-5

18 MS. HULL: Okay. Thank you. Is there anybody  
19 else in the room right now that would like to speak?

20 We have more cards if people change their minds.  
21 The public hearing was scheduled from 5:00 to 7:00. We know  
22 that people's schedules don't always allow them to be here  
23 right at 5:00, so we will stay and collect public comment  
24 until 7 o'clock.

25 VOICE: Thank you.

1 MS. HULL: And the displays will be available and  
2 the staff will be available if you have further questions of  
3 us till 7 o'clock tonight as well.

4 (Recess from 5:37 PM to 7:00 PM.)

5 - - -

6 (End of Public Hearing.)

## C E R T I F I C A T I O N

I, Donna G. Kenderdine, R.P.R., do hereby certify that the foregoing was taken stenographically by me on November 13, 2019, and that this transcript is a true and correct transcript of the same, fully transcribed under my direction, to the best of my ability and skill.

I further certify that I am not a relative or employee of any of the parties in this action; that I am not a relative or employee of any attorney in this action; and that I am not financially interested in the event of this action.

  
\_\_\_\_\_  
Donna G. Kenderdine, R.P.R.  
Notary Public

|  |  |  |  |   |
|--|--|--|--|---|
|  | <b>6</b><br><b>600</b> [2] 19/1 20/2<br><b>611</b> [8] 4/10 19/16 19/19<br>19/21 24/7 24/12 24/16<br>24/18<br><b>6th</b> [1] 8/8<br><b>7</b><br><b>7 o'clock</b> [2] 27/24 28/3<br><b>7766</b> [1] 1/25<br><b>78</b> [1] 25/22<br><b>7:00</b> [2] 27/21 28/4<br><b>8</b><br><b>80</b> [29] 1/2 3/14 3/18 4/4<br>4/18 8/5 13/3 13/9 13/9<br>13/16 14/22 15/2 15/17<br>17/22 18/1 19/17 19/21<br>20/1 21/1 23/8 24/9<br>24/10 24/13 24/14 24/15<br>25/22 26/6 26/17 26/19<br><b>80 acres</b> [1] 16/17<br><b>8th</b> [2] 17/14 17/15<br><b>9</b><br><b>90</b> [1] 13/8<br><b>992-7766</b> [1] 1/25<br><b>A</b><br><b>AAA</b> [1] 17/23<br><b>Abby</b> [1] 20/14<br><b>Abigail</b> [5] 2/8 17/19<br>20/12 20/12 20/14<br><b>ability</b> [2] 21/22 29/7<br><b>able</b> [2] 11/15 11/24<br><b>about</b> [10] 7/17 8/22<br>12/13 13/19 14/14 14/15<br>17/7 18/1 18/3 27/7<br><b>above</b> [1] 1/5<br><b>above-captioned</b> [1]<br>1/5<br><b>acceptable</b> [2] 17/2<br>22/1<br><b>access</b> [1] 6/18<br><b>accessible</b> [1] 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| <div><div>W</div><div>writing [1] 10/21<br/>written [7] 9/25 9/25<br/>10/9 12/1 12/14 15/18<br/>25/9<br/>wrong [1] 13/8</div><div>Y</div><div>year [1] 4/17<br/>years [7] 13/2 18/3 20/9<br/>22/7 25/21 26/3 27/4<br/>Yes [1] 23/24<br/>yet [3] 9/17 13/19 21/12<br/>York [2] 26/22 27/15<br/>you [64]<br/>you'll [3] 11/15 12/9<br/>12/23<br/>you're [10] 7/21 9/10<br/>12/22 13/16 14/4 14/4<br/>14/21 15/8 17/19 20/12<br/>you've [2] 15/21 22/15<br/>your [11] 3/11 3/17 3/18<br/>7/19 10/7 10/19 10/23<br/>11/6 12/13 21/14 25/13</div></div> |  |  |  |  |
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## Private Testimony

Before

THE PENNSYLVANIA DEPARTMENT OF TRANSPORTATION  
ENGINEERING DISTRICT 5-0 and the FEDERAL HIGHWAY  
ADMINISTRATION

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In Re: Public Hearing for the I-80 Reconstruction  
Project (MPMS 76357), SR 0080 Section 17M  
in Stroud Township, the Borough of  
Stroudsburg, and the Borough of East  
Stroudsburg, Monroe County.

---

Monroe County Control Center  
100 Gypsum Road  
Stroudsburg, Pennsylvania 18360  
Wednesday, November 13, 2019, beginning at 5:52  
p.m.

---

PRESENT: J. THOMAS CUSHMAN, JR., PE  
AECOM  
1700 Market Street  
Suite 1600  
Philadelphia, PA 19103

---

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**PANKO REPORTING**  
**537 Sarah Street, Second Floor**  
**Stroudsburg, Pennsylvania 18360**  
**(570) 421-3620**



1 (The following testimony was  
2 held in private:)

3 MR. RICHARD HAMMOND: Okay.  
4 So I'm just a regular citizen, retired. I want  
5 to thank you, everybody, who's put the time and  
6 effort into -- into doing this; but I think  
7 you've come to the wrong conclusion.

8 I think the money that is  
9 allocated could be spent much more wisely than  
10 this. I think going from two lanes to three  
11 lanes, back to two lanes is only gonna cause more  
12 problems.

I don't think the Dreher Avenue exit  
13 should be taken out. I think that's gonna

14 adversely affect entire communities and adversely  
15 affect emergency vehicles in either way.

16 Listen. 80 is obsolete, I  
17 mean, everybody knows that. We need upgrades to  
18 get on and off. We need shoulders that emergency  
19 vehicles can access what they need to access, but  
20 we certainly do not need a hundred and twenty two  
21 foot, a hundred and forty six foot superhighway  
22 going through this small tiny town of 5500  
23 people. It's just too much. It's overkill. I  
24 think you're wasting the money.

25 I think if you're gonna do

ALT-2

ALT-3

SFTY-1,  
SFTY-2

ALT-1

ALT-2

1 three lanes, you should've looked out west where  
2 there is much more open space.

3 You wouldn't be  
4 affecting our tax base the way this is gonna  
5 affect our tax base and I think it would be a  
6 much easier project. Just -- it just doesn't  
7 make common sense. As a -- as a -- as a resident  
8 looking at what we've got, yes, absolutely, it  
9 needs upgrading.

10 But what you're planning on  
11 doing is akin to something -- it's just a  
12 superhighway that I see in -- in East Orange, New  
13 Jersey, or something like that. It's like 280,  
14 approaching Newark. It's just way too much, way  
15 too much. I don't think it's needed. I think  
16 some of that money could be put to greater use on  
17 611. I mean, you could take the 47 percent of  
18 local traffic that now uses Route 80, you see  
19 that number drop dramatically if they had an  
20 alternative route, which we do not have at this  
21 time.

22 80 goes down -- everybody knows  
23 80 goes down, there's no place to go. 611's a  
24 parking lot, 80's a parking lot, and it -- just  
25 everything comes to a stop. If you took some of  
that traffic off of 80 it would certainly -- it

ALT-2

ECON-1

ALT-4

1 would certainly help.

2                   So I suggest you -- I think the  
3 money could be used differently and in a better  
4 way. I think you're throwing all of it into --  
5 it's just too much, too much in -- in one spot.  
6 It should be spread out.

7                   MR. CUSHMAN: Thank you for  
8 your comments and your time is up.

9                   MR. RICHARD HAMMOND: I  
10 appreciate you listening. Thank you.

11                   (Off the record at 5:55 p.m.)

12                   ---

I hereby certify that the  
proceedings are contained fully and accurately in  
the notes taken by me at the hearing in the above  
matter; and that the foregoing is a true and  
correct transcript of the same.



TAMMY M. PANKO SHAW, C.R.

**ORIGINAL**

## Public Citizen Comments

From: Lyn Bailey <[lyn.bailey@me.com](mailto:lyn.bailey@me.com)>  
Sent: Friday, November 29, 2019 12:45 PM  
To: Schieferdecker, George Alex <[Alexander.Schieferdecker@aecom.com](mailto:Alexander.Schieferdecker@aecom.com)>  
Subject: Public Comment to 11/13/19 - I80 Section 17M Environmental Assessment

Mr. Schieferdecker  
Attached is my comment to the I80/Section 17M Environment Assessment.  
Thank you for your attention in this matter.  
Lyn Bailey  
1245 Dewberry Drive  
Stroudsburg, PA 18360

To: [alexander.schieferdecker@aecocom.com](mailto:alexander.schieferdecker@aecocom.com)

FROM: Lyn Bailey, 1245 Dewberry Drive, Stroudsburg, PA 18360

Public Hearing Comment – SR 0080 Section 17M Project

Environmental Assessment

I was unable to attend the Public meeting related to this issue on November 13, 2019. I have attempted to review the 258 page EA. Since my "expertise" in such matters relates only to college course environmental studies, I have no standing to offer professional comment. On the other hand, common sense might carry the day when one considers the number of streams and wetlands immediately adjacent to or close by the stretch of I 80 in the municipalities of East Stroudsburg, Stroudsburg and Stroud Township.

I have reviewed the EA posted on your website. Even for my moderate familiarization with such issues, it is a trip down the hole and leaves one with the impression that proponents and designers of this project intend to comply with the lowest bar possible of any environmental regulations which may apply.

NEPA-1

The Brodhead Water Association provided comment to the EA with a strong suggestion that an EA is insufficient in addressing the full environment impact of this project and that a complete Environmental Impact Study is necessary. The scope of impact is broad: 4.6 miles of streams; 9.2 miles of stream bank; and 83.8 acres of active river area.

WR-2

These areas will suffer dramatic disturbance during a multi year construction phase. The areas will, no doubt, continue to suffer after construction as a result of increased impermeable surfaces and ensuing runoff - rainwater, winter road salt and fluids of substances leaked or emitted by passing vehicles.

STRM-1

A reasonable person must agree that some sections of this heavily travelled highway require remedial attention and the challenge is great given the proximity of the Pocono, Brodhead, McMichael Creeks and adjacent wetlands. There are also challenges posed by disturbing the soil of properties formerly occupied by certain factories and gas stations.

HAZ-1

I emphasize that the purpose of this project should be safety only and not a plan to invite more drivers to exceed speed limits. I drive this section of I80 almost daily and the average speed of vehicles is usually 65 – 70 mph. An additional two lanes will only exacerbate unsafe speeds.

SFTY-3

Negative effects of this project could be reduced by reducing the scope of the project.  
> Do not add two more traffic lanes

ALT-1

> Do not add a connector between West Main and Dreher  
> Do leave the Dreher Avenue exit and entrance ramps  
> Do Install rumble strips and warning lights and signs to indicate full stop at the end of the west bound Dreher off ramp

ALT-3

> Do Reduce the speed limit to 50 mph from DWG through Stroud Twp.  
> Do install flashing speed limit signs on I80 through the municipalities of East Stbg, Stbg. and Stroud Twp.

SFTY-3

> Do Improve breakdown lanes so that PSP may stop speeders

MISC-1

Any notion of traffic flow improvement achieved by increasing lanes from 4 to 6 will be confounded by the ensuing congestion as vehicles reach the bottle neck (4 lanes) on either end.

TRAF-1

## County and Local Organization Comments





PennFuture

Note: These are duplicate comments.  
All comments below are contained  
within Ms. Abigail Jones' testimony on  
pgs 22-25.

**Public Comment of PennFuture  
I-80 Reconstruction Project Environmental Assessment**

**Presented by Abigail M. Jones, Senior Attorney  
at the November 13, 2019 Public Hearing**

My name is Abby Jones and I'm a senior attorney with PennFuture, a state-wide environmental organization with an office in Mt. Pocono dedicated to protecting the headwaters and special protection waters of the Delaware River Basin. PennFuture is the founding member of the Our Pocono Waters Campaign, a collaboration of organizations, businesses, and community members fighting to keep our clean streams clean and to correct the misinformation that we can't have clean streams and economic growth. We can - and we should!

NEPA-1

PennFuture will be submitting written public comment on the impacts of the proposed I-80 reconstruction project to the water resources, which exclusively contains the most protected waters in the state—that is high quality and exceptional value streams and wetlands. In fact, some of the streams that will be impacted by the project are historically some of the best trout fishing streams in all of Pennsylvania. As our comments will detail, we believe that the impacts of this project to these high quality waters and exceptional value wetlands will be significant, warranting a full environmental impact statement.

NEPA-2

However, I am here today with a simple yet critical request: You must extend the public comment period and offer additional public hearings. Your regulations allow for additional public comment for "good cause." I can think of no better cause than to give the community a full, fair, and meaningful opportunity to express their concerns.

NEPA-3

First off, each of the previous public hearings/open houses have been held at the Stroudsburg Area High School in Stroudsburg – that is: *where* the impacts of the proposed project will most strongly be felt. It is important that community being impacted has the ability to easily attend the public hearing in order to allow for meaningful public participation. While this facility is nice, it is not easily accessible to many of the impacted community members. Consequently, you should offer an additional public hearing *in* the community that will be impacted, as it was before at Stroudsburg High School.

NEPA-2

Secondly, this environmental assessment has been over five years in the making and is almost a hundred pages long with hundreds more pages of highly technical appendices. The issues at hand include technical and scientific analyses of a wide variety of impacts to our community, including but not limited to water, land use, noise, air, congestion, public health, environmental justice, and economics. The information in the EA is overwhelming to review and digest in just 30 days.

PI-1

What you've given us is not an opportunity for meaningful public comment but appears to be nothing more than an agency wanting to rubber stamp a project without waiting around to hear the public's voice on a project that will significantly impact them.

NEPA-2,  
NEPA-3

**Please extend the comment period for at least an additional 45 days, with sufficient time for another public hearing in December.** Both the letter and the spirit of the National Environmental Policy Act dictate an opportunity for meaningful public participation, and frankly you've failed to give us that. This is the only chance for our community to comment on how this proposed project will impact OUR Health, OUR environment, and OUR LIVES. Thank you.

PI-1

From: Brodhead Watershed <[brodheadwatershed@brodheadwatershed.org](mailto:brodheadwatershed@brodheadwatershed.org)>  
Sent: Thursday, November 21, 2019 11:31 AM  
To: Schieferdecker, George Alex <[Alexander.Schieferdecker@aecom.com](mailto:Alexander.Schieferdecker@aecom.com)>  
Cc: Abby Jones <[jones@pennfuture.org](mailto:jones@pennfuture.org)>; Tarah Probst <[TProbst@stroudsburgboro.com](mailto:TProbst@stroudsburgboro.com)>  
Subject: Public comments for Public Hearing SR0080 Section 17M Project

Mr. Schieferdecker:

Please find attached the commentary of the Brodhead Watershed Association in regards to the referenced project, known locally as the I-80 widening project.

Our comments are in regards to the Public Notice and Public Hearing for the Environmental Assessment. We reserve the right to comment further on the EA within allotted time frame, if further comments are needed. Notwithstanding these comments, it is the overall position of the BWA that a full Environmental Impact Statement is necessary for a project of this magnitude.

NEPA-1

We do look forward to working with all interested parties as this concept continues. If you have any difficulty with the attached comments, please contact me.

Sincerely,

Bob Heil, Executive Director

Brodhead Watershed Association

Office: (570) 839 1120



PROTECTING OUR WATER & ENHANCING OUR ENVIRONMENT

[www.brodheadwatershed.org](http://www.brodheadwatershed.org)

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## Brodhead Watershed Association

PO Box 339 • Henryville, PA 18332  
570-839-1120 info@brodheadwatershed.org  
www.brodheadwatershed.org

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East Stroudsburg  
Kathy Uhler  
Hamilton Township

## Public Comment on I-80 Reconstruction Project Environmental Assessment

**Brodhead Watershed Association**  
**Submitted by Robert Heil, Executive Director**  
**November 13, 2019**

The Brodhead Watershed Association (BWA) is a non-profit organization that works to protect the water quality and quantity throughout the Brodhead Watershed. We educate, advocate and work collaboratively for clean and abundant water. The Brodhead Watershed is a 311-square-mile watershed in eastern Monroe County. The entire project (SR0080 Section 17M) proposed here occurs in tributaries to or the Brodhead Creek proper, and BWA appreciates this opportunity for public comment. BWA comments pertain to Options 2B and 2D, while acknowledging that the no-build option is a possibility.

While BWA appreciates the magnitude of the EA report and supplemental documentation, BWA is of the opinion that a complete Environmental Impact Statement is necessary for a project of this magnitude. Simply stated, the entire environmental impact of a multi-year construction project of this magnitude must be further studied.

NEPA-1

In response to specific sections of the EA, pages 57-58 itemize 24,342 linear feet of stream that would be impacted. Almost all of these are designated High Quality, Cold Water Fisheries. That is 4.6 miles of streams, or 9.2 miles of streambank potentially impacted. With recommended 150-foot buffers that equates to 83.8 acres of "active river area." The baseline data of these streams as well as a planned reconstruction to ecological function post construction must be studied, analyzed and planned for. Too often, small tributaries are often dismissed in project planning, but these waterways are indeed the origins of our water, and they must be properly evaluated and protected as much as or more so than main stem streams.

WR-2

Pages 58-59 of the EA identify 5.25 acres of wetlands in the project area. The economic value of wetlands is difficult to quantify, but it is widely known that wetlands have tremendous ecological value for water quality protection, nutrient reduction, flood mitigation, and habitat protection, to name just a few. 5.25 acres of wetland impact is a significant concern, and studies must go beyond cursory bog turtle habitat surveys.

Of particular concern is the first two paragraphs of Page 62. This identifies wetlands mitigation and stream mitigation. The sentences of each paragraph state "there are no potentially suitable wetland mitigation sites within or immediately adjacent to the API. The project team is looking at potential offsite wetland mitigation sites within the Delaware River watershed." The same comments apply to stream mitigation. These are unacceptable concepts. If wetland and stream mitigation is required it ought to

WR-1





## Brodhead Watershed Association

PO Box 339 • Henryville, PA 18332  
570-839-1120 info@brodheadwatershed.org  
www.brodheadwatershed.org

### Officers

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**Bob Heil**  
Hamilton Township

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East Stroudsburg  
**Kathy Uhler**  
Hamilton Township

occur within the same sub watershed and upstream, if necessary. This would restore the ecological functions within the same sub watershed. The taking of natural resources in this sub watershed and to the benefit of a downstream community are unacceptable.

WR-1

The comments on Post Construction Stormwater Management Plans lacks specificity and detail. An EIS would identify that and provide specificity.

STRM-1,  
NEPA-1

Page 63 in reference to the PA Natural Diversity Inventory is particularly weak and would benefit from a full EIS. While bog turtles are most commonly associated with Cherry Valley, they have indeed been identified in the greater McMichaels drainage. Additionally, other species of concern may be noted through a full EIS evaluation. In the 1990s, the Marshalls Creek bypass project identified two rare fishes – the bridle shiner and the ironcolor shiner - which were protected by identification prior to construction. The presence or absence of these or other rare fishes can only be identified through a more detailed study as part of an EIS.

T&E-1

The construction impact of this large-scale project is concerning. While inspectors will be there to review structural and engineering designs, the same degree of inspection is necessary for environmental impacts. We suggest a dedicated fund to provide the Monroe County Conservation District with sufficient capacity to completely inspect for Chapter 102 and Chapter 105 compliance though the duration of this project.

MISC-2

An omission from this report is that the two affected municipalities (Stroudsburg Borough and Stroud Township) are MS4 municipalities. Their MS4 permit requirements as well as Pollution Reduction Plans (where appropriate) should be considered in parallel with this project and coordination between PennDOT and municipalities should occur for both permit compliance and the improvement of stormwater.

STRM-1,  
STRM-3

Finally, the use of Green Stormwater Infrastructure should be the lead of the design. GSI shall be the standard of any design, not simply used when convenient or economically driven. This will provide for lasting water quality improvements for years to come.

STRM-1

**In summary**, the BWA asks for a complete Environmental Impact Statement to be conducted for a project of this size and magnitude. The largest infrastructure project in recent history of the county, coupled with numerous stream crossings, wetland areas, and stormwater controls makes a strong case statement to identify baseline status and provide for appropriate mitigation when necessary.

NEPA-1

Bob Heil  
BWA executive director

From: Abby Jones <[jones@pennfuture.org](mailto:jones@pennfuture.org)>  
Sent: Wednesday, November 27, 2019 3:00 PM  
To: Schieferdecker, George Alex <[Alexander.Schieferdecker@aecom.com](mailto:Alexander.Schieferdecker@aecom.com)>  
Subject: Public Comment on the Environmental Assessment for the I-80 Reconstruction Project (MPMS 76357), SR 0080 Section 17M

Dear Mr. Schieferdecker:

Attached please find PennFuture's public comments on the I-80 Reconstruction Project Environmental Assessment. These comments are in addition to the comments made by PennFuture at the November 13, 2019 public hearing.

Sincerely,  
Abigail M. Jones  
Senior Attorney  
(she, her, hers)



425 Carlton Road, Suite 1  
Mt. Pocono, PA 18344  
570-216-3313  
[jones@pennfuture.org](mailto:jones@pennfuture.org)  
[www.pennfuture.org](http://www.pennfuture.org)

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November 27, 2019

Submitted via Email

Alex Schieferdecker  
AECOM  
1700 Market St., Suite 1600  
Philadelphia, PA 19103  
[Alexander.Schieferdecker@aecom.com](mailto:Alexander.Schieferdecker@aecom.com)

**Re: Public Comment on the Environmental Assessment for the  
I-80 Reconstruction Project (MPMS 76357), SR 0080 Section 17M**

Dear Mr. Schieferdecker:

On behalf of Citizens for Pennsylvania's Future (PennFuture) and its members, I hereby submit the following public comments regarding the Environmental Assessment ("EA") for the I-80 Reconstruction Project (MPMS 76357), SR 0080 Section 17M (October 2019) ("I-80 EA").<sup>1</sup>

PennFuture is a membership-supported, environmental non-profit organization dedicated to leading the transition to a clean energy economy in Pennsylvania and beyond. PennFuture strives to protect our air, water and land, and to empower citizens to build sustainable communities for future generations. PennFuture enforces environmental laws and advocates for the transformation of public policy, public opinion and the marketplace to restore and protect the environment and safeguard public health. A significant focus of PennFuture's work relates to protecting and improving Pennsylvania's water resources.

While there are a number of important and significant environmental and socio-economic impacts discussed in the I-80 EA, these comments focus only on the impacts to the water resources from the proposed reconstruction of a section of Interstate 80 in Monroe County, PA ("the Project"). In sum, we believe that due to nature of the special protection waters at issue and the significant level of impact being proposed to those special protection waters by the Project warrants a full Environmental Impact Statement ("EIS") under the National Environmental Policy Act ("NEPA").

NEPA-1

<sup>1</sup> See PennDOT and FHA, Notice of Public Hearing and Availability for Public Review and Comment: Environmental Assessment Report, available at [http://www.i80project.com/wp-content/uploads/I-80\\_Newspaper-Ad-for-Nov-13-2019-HEARING.pdf](http://www.i80project.com/wp-content/uploads/I-80_Newspaper-Ad-for-Nov-13-2019-HEARING.pdf) (all written comments must be received/post-marked by 5:00pm on November 29, 2019).



## **The Agencies Must Extend the Public Comment Period and Offer Additional Public Hearings**

Before we comment on the impacts to the water resources, PennFuture must reiterate the comments we made during the November 13, 2019 public hearing that the Pennsylvania Department of Transportation (“PennDOT”) and the Federal Highway Administration (“FHA”) (collectively, “the Agencies”) must provide for an extension of the public comment period (at least 45 days) and hold at least one additional public hearing within the impacted community.

One of the hallmarks of NEPA is that it guarantees that federal agencies account for the environmental costs of their actions, promoting environmental protection through the procedural process, which necessarily ensure meaningful citizen involvement as an *integral part* of the analysis of the potential environmental impacts.<sup>2</sup> As the Supreme Court recognized, one of NEPA’s goals is to give “the public the assurance that the agency ‘has indeed considered environmental concerns in its decisionmaking process,’ . . . perhaps more significantly, provide[] a springboard for public comment.”<sup>3</sup> When agencies fail to provide meaningful opportunity for public comment, as the Agencies did here, they frustrate the purpose of NEPA by denying the public its full right to be involved in the process. The Supreme Court in *Robinson* stated:

NEPA ensures that the agency will not act on incomplete information, only to regret its decision after it is too late to correct. Similarly, the broad dissemination of information mandated by NEPA permits the public and other government agencies to react to the effects of a proposed action at a meaningful time.<sup>4</sup>

The Agencies’ failure to provide an adequate public comment period or accessible public hearing opportunities regarding the I-80 EA violates both the spirit and letter of NEPA. The surprisingly lackluster turnout at the public hearing is evidence that the Agencies must do more to provide for meaningful public input from the impacted communities. For example, all other public hearings and open houses regarding the Project were held at the Stroudsburg Area High School,<sup>5</sup> a location that is not only centrally located relative to the Project but is also easily accessible to all, including via public transportation. In the past, these public meetings regarding the Project have been extremely well attended, with over 100 community members attending the first meeting. Moreover, given the sheer length and highly technical nature of the I-80 EA,

<sup>2</sup> *Weinberger v. Catholic Action of Haw./ Peace Educ. Project*, 454 U.S. 139, 143 (1981) (NEPA serves twin aims of “inject[ing] environmental considerations into the federal agency’s decisionmaking process” and “inform the public that the agency has considered environmental concerns”); see *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989) (“[NEPA gives the public the assurance that the agency ‘has indeed considered environmental concerns in its decisionmaking process,’ . . . perhaps more significantly, provides a springboard for public comment”) (quoting *Baltimore Gas & Elec. Co. v. Nat’l Resources Def. Council, Inc.*, 462 U.S. 97 (1983)). See, generally, CEQ, A Citizen’s Guide to the NEPA (2007), [https://ceq.doe.gov/docs/get-involved/Citizens\\_Guide\\_Dec07.pdf](https://ceq.doe.gov/docs/get-involved/Citizens_Guide_Dec07.pdf).

<sup>3</sup> *Robertson*, 490 U.S. at 349.

<sup>4</sup> 490 U.S. at 349.

<sup>5</sup> See AECOM, I-80 Project Website: Public Involvement, <http://www.i80project.com/public-involvement/>

the public deserves a longer period of time to review and digest the information – and if necessary, consult with experts – in order to provide the Agencies with appropriate and meaningful public comment that will inform the decisionmaking process.

NEPA-2

### **The Proposed Impacts to Special Protection Waters from a Project of This Magnitude Warrants a Full EIS**

NEPA<sup>6</sup> was established in recognition of our human impact on the environment around us.<sup>7</sup> With NEPA, Congress created a framework for environmental review within federal agency decision-making.<sup>8</sup> NEPA guarantees that federal agencies account for the environmental costs of their actions, promoting environmental protection through the procedural process.<sup>9</sup> While not outcome determinative, NEPA's goal is to foster informed decision-making within the federal agencies, and as a corollary ensure citizen involvement within the process:

The ultimate goal of the NEPA process is to foster excellent action that protects, restores, and enhances our environment. This is achieved through the utilization of environmental assessments (EAs) and environmental impact statements (EISs), which provide public officials with relevant information and allow a “hard look” at the potential environmental consequences of each proposed project.<sup>10</sup>

NEPA-1

NEPA's main tools for achieving these goals lie within the EA and EIS requirements of environmental review process. Whereas the purpose of an EA is to determine the significance of the environmental effects and to look at alternative means to achieve the agency's objectives,<sup>11</sup> preparation of an EIS is required for all “major Federal actions significantly affecting the human environment.”<sup>12</sup> While an EIS contains a more in-depth analysis, both EAs and EISs must at least contain identification of all feasible alternatives, including the proposed action, and a “hard look” analysis of their corresponding environmental impacts both direct and indirect.<sup>13</sup>

This is one of the largest infrastructure projects for Monroe County in recent history, which is dependent on numerous crossings of highly sensitive special protection waters – waters that provide not only ecological benefits but recreational tourism benefits to the community. The I-80 EA fails to take the requisite hard look at the impacts of the Project on water resources and therefore erroneously concludes that an EIS is not required.

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<sup>6</sup> 42 U.S.C. §§ 4321, *et. seq.*

<sup>7</sup> 42 U.S.C. § 4331; *see also* Congressional White Paper, 19<sup>th</sup> Cong., Congressional White Paper on a National Policy for the Environment (1968); *Robertson*, 490 U.S. at 348 (“Section 101 of NEPA declares a broad national commitment to protecting and promoting environmental quality.”).

<sup>8</sup> 42 U.S.C. § 4331.

<sup>9</sup> *See Robertson*, 490 U.S. at 349 (citing *Kleppe v. Sierra Club*, 427 U.S. 390, 409 (1976)); *Weinberger*, 454 U.S. at 143.

<sup>10</sup> CEQ, National Environmental Policy Act “Welcome” page, <https://ceq.doe.gov/> (last visited Nov. 27, 2019).

<sup>11</sup> 40 C.F.R. §§ 1501.4(b)-(c).

<sup>12</sup> 42 U.S.C. § 4332(C).

<sup>13</sup> *See* 43 C.F.R. § 46.310 (EA Requirements); 40 C.F.R. §§ 1502.14, 1502.16 (EIS Requirements).



The Project involves 3.5 miles of full roadway reconstruction, widening, and interchange reconfiguration for a heavily-traveled stretch of Interstate 80 along Stroud Township and the Boroughs of Stroudsburg and East Stroudsburg.<sup>14</sup> The I-80 EA describes two options (Built Alternative 2B and Build Alternative 2D) in addition to the standard no-build option, but preliminarily recommends Build Alternative 2D as the preferred alternative.<sup>15</sup> The I-80 EA concludes that the Build Alternative 2D would have “fewer impacts on the natural and built environment” as compared to the other alternatives, including, as is relevant to these comments, “less stream, floodway, and floodplain impacts” and “less impacts on wetlands.”<sup>16</sup> To be sure, however, the Project is no small undertaking and will have a significant impact not only on the natural environment, but also on the communities and residents along this section of I-80.

The preferred Build Alternative 2D would replace four main surface water crossings, impacting, among others, Pocono Creek, McMichael Creek, and Brodhead Creek, and improve or replace several of the smaller stream crossing structures.<sup>17</sup> To be clear, this means that new bridge structures will be built in these HQ waters.<sup>18</sup> The Agencies also engaged in refinement of the design of preferred Build Alternative 2D, and identified additional water resource impacts that were not considered in the initial analysis.<sup>19</sup> In fact, the I-80 EA states that the increased impacts to water resources is one of “[t]he main adverse impacts” of the proposed design refinements to Build Alternative 2D.<sup>20</sup> In total, the I-80 EA summarizes that preferred Build Alternative 2D for this massive construction project would result in impacts to a total of:

- 11,022 linear feet of primarily HQ streams<sup>21</sup>
- 2,144 linear feet of Class A Wild Trout Stream<sup>22</sup>
- 29.9 acres of 100-year floodplains<sup>23</sup>
- 14.7 acres of floodways<sup>24</sup>
- 1.57 acres of EV wetlands<sup>25</sup>

The preferred Build Alternative 2D will also result in impact to 65.2 acres of woodlands,<sup>26</sup> which have an indirect, and in many cases a direct, influence on the water quality

NEPA-5

<sup>14</sup> FHA and PennDOT, Interstate 0080 Section 17M I-80 Reconstruction Project Environmental Assessment (MPMS 76357, Oct. 2019), at 1-3, available at <http://www.i80project.com/environmental-assessment-ea/> (“I-80 Environmental Assessment”).

<sup>15</sup> See *id.* at 1, 81.

<sup>16</sup> *Id.* at 81.

<sup>17</sup> I-80 Environmental Assessment, at 59.

<sup>18</sup> *Id.*

<sup>19</sup> See, generally, *Id.* Section 5.

<sup>20</sup> *Id.* at 90.

<sup>21</sup> *Id.* at Table 20.

<sup>22</sup> *Id.* at Table 11. Note that Class A Wild Trout Streams qualify as HQ waters under 25 Pa. Code § 93.4b(a)(2)(ii).

<sup>23</sup> *Id.* at Table 20.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> *Id.* at 83.

of streams and wetlands. The I-80 EA, however, seems to gloss over these significant impact to critical water resources.

NEPA-5

As is relevant to the focus of these comments, Section 3.14 of the I-80 EA discusses the impacts of the Project on water resources. The Project will impact 16 streams – including 10 High Quality (HQ) waters.<sup>27</sup> All of these 16 streams contain both stocked and naturally reproducing trout, and 6 are classified by the Pennsylvania Fish and Boat Commission (“PFBC”) as Class A wild brown trout streams.<sup>28</sup> Moreover, all of the wetlands surrounding these streams are considered Exceptional Value (“EV”) wetlands.<sup>29</sup>

The classification of the majority of these impacted waters as “special protection waters” under the Pennsylvania Clean Streams Law and the Pennsylvania Department of Environmental Protection (“PADEP”) regulations must not be overlooked in the environmental assessment. Special Protection Waters include both HQ and EV waters, both of which are recognized as the most important waters of the Commonwealth (with EV being the most exceptional, as the name implies). Because of their outstanding water quality, special protection waters are afforded the most stringent protections under Pennsylvania law. For example, the outstanding water quality of EV waters cannot be degraded under any circumstances.<sup>30</sup> The water quality of HQ waters (including Class A Wild Trout Streams<sup>31</sup>) may only be lowered in limited circumstances where it is proven that the degradation is necessary for some important economic or social development but only if the existing use is maintained and protected.<sup>32</sup> For EV wetlands, there are significant restrictions on the ability to build in or impact the wetlands and the applicant must affirmatively prove that its project meets all the stringent standards.<sup>33</sup>

WR-3

The I-80 EA fails to account for the extremely sensitive nature of the special protection and trout waters that will be impacted by the Project. The water quality of HQ streams and EV wetlands is the best in the Commonwealth and, consequently, degradation of any kind is not allowed or severely restricted. The I-80 EA provides no consideration or analysis based on the outstanding water quality of these water resources, to which even the slightest adverse impact could result in a significant adverse impact. Moreover, there seems to be no accounting for the cumulative impacts that the Project will have on the water quality of the streams and wetlands downstream of the Project, including the long-term effects of temporary construction impacts on wild trout population health.<sup>34</sup>

<sup>27</sup> *Id.* at Table 9; *id.* at 88-89.

<sup>28</sup> *Id.* at Table 9; *id.* at 88-89.

<sup>29</sup> *Id.* at 58 (under 25 Pa. Code § 105.17(1)(iii), wetlands that are in or adjacent to naturally reproducing trout streams are considered EV wetlands).

<sup>30</sup> 25 Pa. Code § 93.4a(d).

<sup>31</sup> 25 Pa. Code § 93.4b(a)(2)(ii) (Class A wild trout stream qualifier for HQ waters).

<sup>32</sup> 25 Pa. Code §§ 93.4a(c), 93.4c(b)(1)(iii).

<sup>33</sup> 25 Pa. Code § 105.18a(a).

<sup>34</sup> The I-80 EA uses the Lower McMichael Creek and Lower Pocono Creek subwatersheds as the research study area (RSA) for analyzing the cumulative impact of the Project on water resources. See I-80 Environmental Assessment, Section 3.18. This level of study fails to account for the Project’s impacts on downstream HQ and/or EV waters and trout habitat and populations.

In conclusion, due to the significant impacts of the Project on special protection water resources, the Agencies must undertake a full EIS.

NEPA-1

**Any Stream or Wetlands Mitigation Must Be Located within the Brodhead Watershed**

The I-80 EA proposes that any necessary stream or wetlands mitigation required as a result of the Project's impacts must necessarily occur outside of the Brodhead Creek watershed.<sup>35</sup> This is simply unacceptable. The Agencies must apply the "watershed approach" to wetlands and stream mitigation, using the Brodhead Watershed as the appropriate scope.

It may be that the immediate Project impact area and corridor may prove limiting in the availability of suitable mitigation sites.<sup>36</sup> However, the Agencies' conclusion that its project team should consider potential offsite stream and wetland mitigation sites within the *Delaware River watershed* is highly inappropriate. The Agencies should choose "mitigation sites that best fit with the mitigation goals of the project *and its contributing basin*."<sup>37</sup> Although there are parts of the Brodhead Watershed that are highly urbanized and industrialized, such as along the I-80 corridor, there are many other areas that are more natural landscapes and ecosystems.

WR-1

The Agency staff must limit their review of potential offsite stream mitigation sites to locations within the Brodhead Creek Watershed. This would allow not only the ecology of the Brodhead watershed to benefit from mitigation of destruction of wetlands and surface waters, but would also provide the necessary benefit for the community members who have been negatively impacted by the Project.<sup>38</sup> Finally, any proposed mitigation should be done in consultation with the community and those conservation organizations who are the true experts on the waters of the Brodhead Watershed, including but not limited to Brodhead Watershed Association and the Brodhead Chapter of Trout Unlimited.

**Construction Windows Must Be Imposed for Water Adjacent Construction Projects to Protect Trout Populations**

All of the impacted streams support trout populations. According to the I-80 EA, construction windows will be imposed for all in-stream work in order to protect trout populations, the time and duration of which is dependent on the classification of the stream

WR-3

<sup>35</sup> See *id.* at 62.

<sup>36</sup> See *id.* at 62.

<sup>37</sup> Hruby, T., K. Harper, and S. Stanley, Selecting Wetlands Mitigation Sites Using a Watershed Approach (Wash. Dept. of Ecology Publication #09-06-032) (Dec. 2009), at 1 (emphasis added), available at <https://fortress.wa.gov/ecy/publications/documents/0906032.pdf>.

<sup>38</sup> Although we do not think it likely given the size of the Brodhead Watershed, should the Agency staff need to look outside of the immediate watershed, they should be limited to consideration of adjacent watersheds.

(i.e., stocked trout, naturally reproducing trout, or Class A Wild Trout).<sup>39</sup> These limitations on in-stream construction work are critical to the health of the trout populations (which, in turn, supports the area's fly-fishing tourism industry), and must be imposed. Given that almost all of the impacted streams have been identified as having one or more PFBC trout stream classifications (e.g., "stocked trout and natural reproduction of trout"),<sup>40</sup> it must be made clear that the appropriate construction windows will be imposed, even if that means that multiple construction restrictions will be imposed on the same stream. For example, in some cases *both* the March 1 – June 15 and the October 1 – December 31 (or April 1) construction restrictions must be imposed for a particular stream.<sup>41</sup>

WR-3

As is discussed above and recognized in the I-80 EA, even construction that takes place adjacent to or in close proximity to surface waters can have direct and indirect impacts.<sup>42</sup> Consequently, these construction windows must be imposed upon all construction activities that take place adjacent to or in close proximity to the streams or that will otherwise have the potential to impact the water quality of the streams in order to fully protect the health of these important trout waters.

### **Development of Stormwater Basins along I-80 Does Not Negate the Significant Impacts to the Water Resources the Project Will Cause**

The I-80 EA states that "PennDOT will develop and implement an approved Post-Construction Stormwater Management ["PCSM"] Plan for the project to protect water resources."<sup>43</sup> The goal of this stormwater management will be that "[t]he quality and quantity of stormwater runoff will be managed through the use of preventative non-structural BMPs where possible through mitigation using structural BMPs, such as the proposed basins and establishment of buffers."<sup>44</sup> We recognize that there is currently no such stormwater management for I-80 and that the establishment of such controls will likely be a benefit for the special protection waters in the vicinity of the Project. However, the I-80 EA must not consider these post-construction stormwater controls to in any way negate or diminish the significance of the impacts the Project will have on the special protection waters along I-80. Indeed, construction of the propose basins may result in some adverse impacts to the surface waters they are meant to ultimately help protect. The I-80 EA fails to take a hard look at the potential impacts on water resources from the construction of stormwater mitigation measures.

STRM-1

Finally, in developing its PCSM Plan, PennDOT must incorporate the use of green stormwater infrastructure ("GSI") to the fullest extent. The benefits of GSI cannot be overstated:

<sup>39</sup> I-80 Environmental Assessment, at 61.

<sup>40</sup> See *id.* at Table 9.

<sup>41</sup> The I-80 EA does state in Table 20 that "In summary, instream work is permitted July 1 – Sept 30." *Id.* at 92.

<sup>42</sup> I-80 Environmental Assessment, at 60 (impacts from the widening of I-80 and associated facilities, for example, will "impact[] surface waters that run parallel and in close proximity to the roadway").

<sup>43</sup> *Id.* at 62.

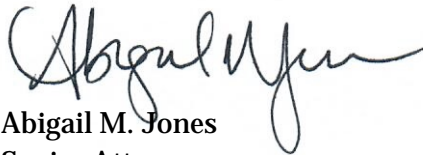
<sup>44</sup> *Id.*

[GSI] is a nature-based solution to water quality issues that urban stormwater runoff causes and provides greater benefits than conventional (or “Gray”) stormwater solutions. GSI combines economic and environmental sustainability, adaptability, resiliency, and social equity. GSI is defined as soil-water-plant systems that intercept stormwater, infiltrate a portion of it into the ground, evaporate a portion of it into the air, and in some cases release a portion of it slowly back into the sewer system. In addition to better stormwater management practices and improved water quality, GSI provides benefits such as beautified communities, improved public health, creation of ecological habitat, and enhanced local economic vitality.<sup>45</sup>

STRM-1

Use of GSI for the Project must not be an afterthought or only an option if such measures are economically practicable, must be the standard for the PCSM design.

Respectfully submitted,



Abigail M. Jones  
Senior Attorney

[jones@pennfuture.org](mailto:jones@pennfuture.org)

570-216-3313

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<sup>45</sup> PennFuture, “What is Green Stormwater Infrastructure,” <https://pennfuture.org/what-is-green-stormwater-infrastructure>.

From: Mark Connors <[MConnors@stroudsburgboro.com](mailto:MConnors@stroudsburgboro.com)>  
Sent: Friday, November 29, 2019 5:17 PM  
To: Schieferdecker, George Alex <[Alexander.Schieferdecker@aecom.com](mailto:Alexander.Schieferdecker@aecom.com)>  
Cc: Tarah Probst <[TProbst@stroudsburgboro.com](mailto:TProbst@stroudsburgboro.com)>; kristen battle <[i80projectimpactaaa@gmail.com](mailto:i80projectimpactaaa@gmail.com)>  
Subject: SR 0080 Section 17M Project Environmental Assessment Report Public Input

Please see attached files in <Word> and pdf-formats of input from the Stroudsburg Route 80 Project Impact Task Force regarding the Environmental Assessment Report and the Project in general.

- Mark Connors  
Stroudsburg Borough Councilmember  
Chair Route 80 Project Impact Task Force

From Mark Connors, chair Stroudsburg Route 80 Project Impact Task Force

I have spent a considerable amount of time analyzing the Route 80 Project through Stroudsburg and I have chaired a Task Force convened by The Borough of Stroudsburg Council, working with many citizens and civic leaders who are concerned about the impact of Project 17M.

Task Force participants have sought out substantive information and answers, have provided input, feedback, valuable insights and suggested alternatives to improve the project. Our mission is to seek to maximize the benefits of this project while minimizing its negative impacts.

Towards that end, my written comments here regarding the recently issued Environmental Assessment Report ("The Report") accurately represent and largely reflect the views of our Task Force, Stroudsburg Borough Council and hundreds of citizens who have taken the time to respond and participate. [ e.g. 600 responses from a questionnaire previously submitted to the project team ) At the same time, my comments here should not, by any means, be considered exhaustively complete or a substitute for additional input that may be received from individuals and organizations that might just not have the time to monitor & comment on this Project in detail.

In general, for a project of this magnitude, importance, impact and cost, the public and all stakeholders deserve nothing but the best - which depends on maintaining a high degree of rigor, careful analysis, creative thinking, open-minded awareness, and professional effort.

Specifically regarding the environmental impacts referenced in The Report, it's critical that the comments from the Brodhead Creek Watershed Association (submitted at the public hearing Nov 13) be seriously addressed because water quality is crucial to so many aspects of our local environment and there is no "off-site" substitute for protecting the quality of our water resources.

STRM-1,  
WR-1

And echoing the Watershed Associations request for more detailed, in depth evaluation of impacts and proposed mitigation measures, impacts associated with specific features and design elements of this project should not be glossed over. The underlying and fundamental shortcoming of The Report is to not break down and connect specific impacts with specific design choices. The Report often considers just a black-or-white, all-or-nothing comparison of impacts between the "No-Build" Alternative and/or Alternatives 2B and 2D but not relative to the potential reduction of impacts due to possible specific refinements of any of the schemes.

NEPA-4

As examples, non-capacity-adding solution such as Transportation Systems Management (TSM) and Intelligent Transportation Systems (ITS) are identified as not solving all the needs of the project and therefor are abandoned entirely. If such types of non-construction approaches were better evaluated for their potential to ease the problems & needs to be addressed, then perhaps the construction impacts could be reduced by down-sizing the solutions deemed necessary.

Another example of poor logic in the Report is dismissing the widening of Route 611 where it parallels the project, because that effort would not solve the *safety* problems on Route 80. D'uh, improving Route 611 would address the *congestion* issues and, of course, we *also* need the exit/entry/bridge/shoulder safety issues addressed on Route 80. But **addressing those safety issues does not require widening Route 80 to 6 travel lanes** = a 50% increase in pavement area, water runoff, land disturbance and project environmental impacts.

ALT-4

The property impacts of the 611 solution were also not adequately analyzed for relative impact; sliver-takings (most) vs full-property (almost none), the current use and qualities of those slivers (parking lots, pavement and scrub-brush). It is this lack of quality depth of analysis that calls into question the other assumptions regarding impacts in The Report.

The most direct way to reduce and limit the adverse environmental and other impacts of this project is to not over-build and to take every opportunity to evaluate the impacts of specific ways to "trim the fat" off these design proposals.



The West Main St interchange – currently the only one in the project area that offers all the choices of “connectivity” that PennDOT reveres, is slated to be completely reconstructed much farther west at great expense and great impact – and resulting in an interchange that no longer will have “full connectivity”. But this wasteful design “feature” was not analyzed on its own and was dismissed with the rationale that all access points between Route 209 South to West Main St to Dreher Ave are “considered as one interchange” which is a geographically and functionally absurd “assumption”.

ALT-3

Under Section 2.5 Alternatives Refinement.

The description of Exit 307 is confusing or contradictory – Eastbound exit/entry ramps at Rte 611 and Route 191

MISC-3

The PM Peak period, between exit 302 & 303 = LOS F due to reduction to 2 travel lanes at the Project limits. This result completely undercuts the LOS arguments for expanding the number of travel lanes

TRAF-1

**P 17** The mobility benefits of connector roads (touted by PennDOT) only serve to fix problems caused by changes in interchange locations (i.e additional connector roads solve problems that shouldn't be created in the first place by elimination of Dreher Ave access points & relocation of portions of West Main St. interchange

**P 18** “good system continuity” is touted by PennDOT but see chart of connections & those eliminated at West Main St – The Report cites “proximity” as being equivalent to full choices at interchanges but such proximity is not otherwise good enough.

ALT-3

The West Main St interchange – currently the only one in the project area that offers all the choices of “connectivity” that PennDOT reveres, is slated to be completely reconstructed much farther west at great expense and great impact – and resulting in an interchange that no longer will have “full connectivity”. But this wasteful design “feature” was not analyzed on its own and was dismissed with the rationale that all access points between Route 209 South to West Main St to Dreher Ave are “considered as one interchange” which is a geographically and functionally absurd “assumption”.

The CONCEPTUAL POINT OF ACCESS STUDY, referred to in The Report, is apparently a pivotal piece of the puzzle but it was not widely discussed, readily available, nor summarized in The EA Report

MISC-4

## **ENVIRONMENTAL CONSEQUENCES**

Since the Report states there is not much difference between Alternatives 2B & 2D relative to impacts on “visual resources”, those impacts were not discussed and are only available in the Project’s “technical file”. This is an egregious example of only looking at impacts compared between PennDOT preferred designs and not at the relative impacts due to minor, yet significant refinements to the designs.

NEPA-4,  
NEPA-6

3.2 EXISTING & FUTURE LAND USE – The Report says there will be no change to *types* or *patterns* of land use but there will definitely be changes to specific property & land uses, such as the elimination of Perkins Restaurant and other businesses near the West Main St interchange. See Comments under Section 307

MISC-5

## **3.5 COMMUNITY COHESION**

“sense of community.....formed by social interaction and physical connection...”

Evaluate whether and where alternatives have potential to create change or eliminate barriers  
Alternative 2D = better mobility access and circulation than 2-B  
Reconstruction of bridge crossings (over/under Rte 80) with bike lanes and sidewalks would be improvement to “community cohesion” = yes BUT such efforts are important but they do not mitigate the greater adverse impacts on “community cohesion” due to more pavement, more lanes and less interchange choices.. More cohesion = more interchanges not less and less disruption of existing travel patterns & choices

MISC-6



### 3.7 LOCAL & REGIONAL ECONOMY

Despite citing academic literature that found that noise barriers can increase the value of residential houses located nearby, not increasing the noise problem by not increasing the noise would likely have similar positive results. This is a solution to a problem exacerbated by the specific Project proposals and should not be credited as a positive impact justifying the largest possible project.

NO-1

Just because the Report finds that "Relocation of commercial properties in the project study area is potentially possible" it does not mean that the impacts of such relocation will not be significant and significantly negative. The Report completely sidesteps evaluating what those economic impacts will be and how they will be geographically distributed. Just because businesses may have possibilities to relocate it does not mean they can survive or want to endure such disruption, and it may take years for the negative impacts to subside.

ECON-3

The Report cites "potential new development in the vicinity of new interchanges" which again is a solution to a problem that does not have to be created by this project. It's much less impact to keep the development we have than to force its destruction and hope for reconstruction.

### 3.8 AIR QUALITY

AQ-1

The Report in effect says "Because CO would remain within established limits, there is no impact."

#### P 60

The Report states that Impacts to surface water & wetlands are "primarily the result of widening I-80" "impacts at bridges would require minor amounts of fill that would not substantially change the amount, quality, or characteristics of waterways and wetlands. Placement of fill in waterways and wetlands will require permits and mitigation to offset the impacts." Except for correctly attributing the impacts to the widening of Route 80, the description of the impacts are generalized statements not substantiated by the Report and likely to some extent not true. And, of course, **the extent of impacts to streams, wetlands and waterways could be greatly reduced by not expanding the number of travel lanes !**

WR-2

ALT-1,  
ALT-2

"Constructed wetland replacement is most likely necessary" *Constructing wetlands elsewhere does not address impacts on the high-quality streams we have right here* The macro-environment might balance out on paper, but our local resources will never be the same. **so the project must find all possibilities for treading lightly and reducing impacts before they occur, while solving safety concerns**

WR-1

ALT-8

See the Brodhead Watershed Association comments, submitted separately, for an excellent critique of the lack of analysis of the impacts on wetlands and woodlands

### 4 PUBLIC INVOLVEMENT

#### P 78

**Interchange Closure and Effect on Local Traffic :** Project area residents use I-80 to accelerate local trips and accommodating local use is a stated objective of the Project. The proposed removal of Interchange 306 (SR 2004/Dreher Avenue) and loss of access is of great concern to residents. In response, PennDOT designed a new road from SR 2004 / Dreher Avenue to West Main Street (Interchange 305), known as the Dreher Avenue Connector (Section 2.6.2). This excess amount of construction, with related impacts is necessary only to solve a problem created by the Project itself. The solution is simple and involves significantly less impact = do not close Dreher Ave access points.

ALT-3

Furthermore, the impacts of closing access from Dreher Ave relative to emergency services were not adequately evaluated in The Report

SFTY-1,  
SFTY-2

In addition, the unsupported assumption to consider Exits 304, 305, and 306 as one interchange system, as mentioned earlier in these comments is not justifiable. This is not "one interchange system" and cannot be considered as such just for the convenience of PennDOT's pre-determined preferences.

ALT-3

The Report accurately cites that “Another public concern is traffic congestion at the eastern and western limits of the project area, where the proposed three lanes would merge to two lanes. PennDOT assessed the future traffic volumes at the project limits and found there will be acceptable levels of service until year **2032. – but this does not address the safety problems created by creating heavy merge zones at the project’s limits.**

SFTY-1,  
TRAF-1,  
ALT-2

This logic implies :

- a) That with no expansion of travel lanes in the project area, there also won’t be negative LOS within the project limits until then either ( with the same number of travel lanes as the highway beyond the project limits)
- b) It’s OK to have negative LOS impacts after 2032 (until the target-study year of 2045) outside of the Project limits but not acceptable to have similar limitations within the Project extent.

#### P 79

Highway Expansion: Concerns were expressed that widening the highway from two to three lanes in each direction may cause increased speeding, traffic and air pollution yet the answer provided in The Report only addresses that there will be acceptable levels of impact to *air quality* and does not address the problem of speeding and dangerous merging. This is a huge omission.

ALT-1,  
SFTY-3  
TRAF-1

**Location: It was suggested that this project is not the right area to start reconstructing I80,** and that other areas, such as the I-80/I-380 and Bartonsville interchanges, have bigger issues. This public input was related to congestion and the expansion of travel lanes and not to safety concerns. Residents want safety improvements within the Project extent to proceed as soon as possible but do not want additional travel lanes through town until there is additional traffic capacity farther West and farther East over the Delaware River.

ALT-1,  
ALT-2

Just because safety should be addressed in Stroudsburg Segment 17M does not mean that expansion has to be addressed there at the same time = address safety through Stroudsburg and address capacity at the Delaware River and at Bartonsville/Tannserville first.

#### P 79

**Improvements to PA 611:** As an alternative to widening I-80, the public suggested that PA 611 be made two full travel lanes in each direction. The superficial property impact opinions about Route 611 in The Report were mentioned earlier in these comments

The Report goes on to dismiss the alternative of improving Route 611 by saying that, widening of PA 611 *alone* would not address the existing substandard shoulder widths on I-80 and lack of sufficient length for acceleration and deceleration lanes. It’s worth repeating here : **OF COURSE NOT ! Improving Rte 611 would merely address the very important congestion issue used to justify the addition of travel lanes – The Report need to separate issues !**

ALT-2,  
ALT-4

The Report states that, widening PA 611 would improve traffic for local users; however, it would not address the increased truck, commercial vehicle, and through-traffic volumes anticipated on I-80. **But 47% of traffic on 80 is local ! So getting local traffic off Rte 80 would automatically improve congestion for all travelers ON Route 80.**

**Bypass Option:** Several residents have requested a bypass be built around Stroudsburg instead of widening I-80. A bypass option was evaluated in the 2009 I-80 Corridor Study and was dismissed due to exceptionally high construction costs and impacts. *The issues of limited capacity across the Delaware River are not going to go away, nor get any cheaper. The 17M project alone will cost half a billion dollars yet will not solve interstate travel congestion due to pinch points*

#### 5.1 DESIGN REFINEMENTS

The Report States “As the project design advances, PennDOT is committed to refining the design with the goal of avoiding or minimizing impacts and providing mitigation where effective and reasonably feasible. .... PennDOT already has made additional design refinements....” Those efforts are laudable and commendable but are not sufficient > Continued improvement and refinement of designs with detailed analysis of the relative impacts must be pursued vigilantly.

MISC-7

The Stroudsburg Route 80 Project Impact Task Force calls on project designers, managers, and our elected & appointed officials to re-examine some assumptions and refine the Project designs to limit its negative impacts while maximizing the benefits.

ALT-1

Specifically, the following must be seriously considered and evaluated :

- Do not widen Route 80 to 6 travel lanes.
- Do not close the Dreher Ave access points
- Do not relocate a significant portion of the West Main St interchange
- Do Improve & widen travel lanes on Route 611 in the Project vicinity *as part of this Project now.*
- Do Consider context-sensitive solutions that respect our area's unique character and resources even if that may require some adjustment away from idealized design parameters that would otherwise result in over-building and excess negative impacts.

ALT-3

ALT-4

MISC-8

## Federal Agency Comments

From: Dostie, Daniel - NRCS, Harrisburg, PA <[daniel.dostie@usda.gov](mailto:daniel.dostie@usda.gov)>  
Sent: Friday, November 8, 2019 7:53 AM  
To: Schieferdecker, George Alex <[Alexander.Schieferdecker@aecom.com](mailto:Alexander.Schieferdecker@aecom.com)>  
Cc: Coleman, Denise - NRCS, Harrisburg, PA <[denise.coleman@usda.gov](mailto:denise.coleman@usda.gov)>; Marquart, Susan - NRCS, Harrisburg, PA <[susan.marquart@usda.gov](mailto:susan.marquart@usda.gov)>; Crews, Gwendolyn - NRCS, Harrisburg, PA <[gwendolyn.crews@usda.gov](mailto:gwendolyn.crews@usda.gov)>; Jones, Hathaway - NRCS, Harrisburg, PA <[hathaway.jones@usda.gov](mailto:hathaway.jones@usda.gov)>; Smeltz, Heather - NRCS, Harrisburg, PA <[heather.smeltz@usda.gov](mailto:heather.smeltz@usda.gov)>; Plowden, Yuri - NRCS, Harrisburg, PA <[yuri.plowden@usda.gov](mailto:yuri.plowden@usda.gov)>; Dunn, Marcie - NRCS, Harrisburg, PA <[marcie.dunn@usda.gov](mailto:marcie.dunn@usda.gov)>  
Subject: comment on State Route 0080, Section 17-M, I-80 Reconstruction Project

Dear Mr. Schieferdecker,

Thank you for the notification of availability of the Environmental Assessment for the State Route (SR) 0080 Section 17M Reconstruction Project in Monroe County, Pennsylvania. After completing a review of the project's potential to impact federal actions where NRCS has control or responsibility, no potential for impact has been found.

Easements obtained or funded by NRCS may be viewed at NRCS's [Stewardship Lands Easements Locator](#). Owners of dams and other watershed management structures assisted by NRCS may monitor their infrastructure on line at the [DamWatch](#)® website.

Sincerely,

No response required

Dan Dostie | State Resource Conservationist  
USDA, NRCS | 359 East Park Drive, Suite 2 | Harrisburg, PA 17111  
[daniel.dostie@usda.gov](mailto:daniel.dostie@usda.gov) | 717-237-2256

"There is no virtue in planning merely for the sake of planning. Unless plans can be translated into action, planning becomes a profitless mental exercise." – Hugh Hammond Bennett, Chief, Soil Conservation Service

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From: Gillespie, Joy  
Sent: Wednesday, November 27, 2019 2:11 PM  
To: Otto, Camille (FHWA) <[camille.otto@dot.gov](mailto:camille.otto@dot.gov)>  
Cc: [inathaniel@pa.gov](mailto:inathaniel@pa.gov); Rudnick, Barbara <[Rudnick.Barbara@epa.gov](mailto:Rudnick.Barbara@epa.gov)>; Okorn, Barbara <[Okorn.Barbara@epa.gov](mailto:Okorn.Barbara@epa.gov)>  
Subject: I-80 Reconstruction Project EA - EPA Comments

Ms. Otto,

Thank you for the opportunity to review the Environmental Assessment (EA) for the I-80 Reconstruction Project, located in eastern Monroe County, Pennsylvania, prepared by Federal Highway Administration and Pennsylvania Department of Transportation. The EPA has reviewed the EA in accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508).

Overall, the document is complete and is supported by adequate data collection and analysis. Based on our review, we have the following comments:

MISC-9

#### Air Quality:

- To minimize and mitigate air quality impacts during the construction phase of the project please consider implementing the following Best Management Practice (BMPs):
  - Utilize appropriate dust suppression methods during on-site construction activities. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions;
  - Maintain a speed of less than 15 mph with construction equipment on unpaved surfaces as well as utilize fuel with lower sulfur content;
  - Employ a construction management plan in order to minimize interference with regular motor vehicle traffic;
  - Use electricity from power poles instead of generators whenever possible;
  - Repair and service construction equipment according to the regular maintenance schedule recommended for each individual equipment type;
  - Use low-VOC architectural materials and supplies equipment; and
  - Incorporate energy-efficient supplies whenever feasible.

AQ-2

#### Noise:

- It is noted in the document that construction noise will add limited sound above existing noise of the highway. It is suggested that some BMPs may assist at maintaining acceptable noise levels for the neighboring areas. Please provide more detail on how construction-related noise will be addressed. We suggest you consider noise mitigation measures that may be implemented during renovation, demolition and/or construction. These measures may include:

NO-2

- maintenance of construction equipment and installation of mufflers to reduce noise;
  - time of day restrictions on construction and maintenance activities to eliminate noise during those times of day when it is most objectionable; and
  - timing of demolition and/or construction activities to avoid primary breeding and nesting seasons of avian and other affected species.
- The EA also lacked specifics on the potential for blasting and how the associated noise and vibration impacts will be minimized and or mitigated. We suggest this information may be useful to present to the public in the Final document.

NO-2

#### Environmental Justice:

- The Environmental Justice assessment for the project area seems reasonable. Populations of Environmental Justice concern have been reasonably identified.
- Much of the population of the study area is composed of areas of Environmental Justice concern (9 of 11 block groups). Therefore, it may not be reasonable to state that EJ and none EJ populations are impacted equally.
- Greater detail regarding the mitigation of potential impacts upon minority and/or low-income populations would be helpful.
- There should be focused efforts to assure the meaningful participation of all populations, with consideration given to assuring effective and meaningful outreach to minority and/or low-income populations.

EJ-1

PI-2

#### Water Resources:

- EPA suggest using the Watershed Resources Registry <https://watershedresourcesregistry.org/> to assist with selecting an appropriate mitigation site.
- We recommend the study provide more detail on the potential stream impacts due to the project such as description and location of temporary and permanent impacts and quantity and description of stream that will be permanently or temporarily impacted.
- EPA appreciates PennDot's goal to preserve the integrity of the stream channels. EPA suggests PennDot consider uplifting any sections, within the project area, that might be historically degraded by installing habitat enhancements.
- EPA would request that PennDot consider Low Impact Development (LID) to address stormwater. Federal agencies are required to reduce the impacts on watershed hydrology and aquatic resources. LID implements environmentally and economically beneficial landscape practices into landscape programs, policies and practices by using a natural approach to land development and stormwater management. EPA encourages and promotes principles of "sustainable landscape design and management" which recognizes the interconnection of natural resources, human resources, site design, building design, energy management, water supply, waste prevention, and facility maintenance and operation. It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which

WR-1

WR-4

WR-1

STRM-1

have proven to not be entirely successful. More information on LID can be found here: U.S. EPA's Low Impact Development Website: [www.epa.gov/nps/lid](http://www.epa.gov/nps/lid)

STRM-1

#### Threatened and Endangered Species:

- Bald Eagles are thriving in Pennsylvania, especially in northeast PA. Consideration of Bald (and Golden) Eagles and their habitat must be incorporated into the NEPA analysis. It is not clear if that occurred for this project. In considering if a proposed project has potential to impact bald eagles or their habitat, consider as part of the affected environment whether breeding territories/nests, feeding areas, roosts, or other important bald eagle use areas are located within the analysis area. It would be helpful if the document included any coordination done with the U.S. Fish and Wildlife Service

T&E-2

#### Pollution Prevention:

- We suggest the NEPA document contain an analysis of any hazardous materials that maybe on site during project construction, particularly associated with the use of heavy construction equipment. It appears that heavy construction equipment may be used near various water resources. Effort should be made to avoid and or minimize the release of petroleum product or other potential pollutants associated with construction activities into the waterways and wetlands. An analysis should consider spill and pollution prevention.

STRM-2

Thank you for considering EPA's comments. Please feel free to contact me if you have any questions, comments, or need clarification on the above.

Sincerely,  
Joy

Joy M. Gillespie, Life Scientist  
office: 215.814.2793

Office of Communities, Tribes & Environmental Assessment  
U.S. EPA Region III  
1650 Arch Street (3RA10)  
Philadelphia, PA 19103  
[www.epa.gov](http://www.epa.gov)





# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Pennsylvania Field Office  
110 Radnor Road, Suite 101  
State College, Pennsylvania 16801-4850  
814-234-4090

November 29, 2019

Christopher Kufro  
(Attn: Alex Schieferdecker)  
AECOM  
1700 Market Street  
Philadelphia, PA 19103

RE: USFWS Project #2020-0208  
PNDI Receipt #664105

Dear Messrs. Kufro and Schieferdecker:

Thank you for your letter of October 25, 2019, which provided the U.S. Fish and Wildlife Service (Service) with information about the Environmental Assessment for the proposed State Route (SR) 80, Section 17M, reconstruction project located in the City of Stroudsburg, Monroe County, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species, and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*) to ensure protection of other fish and wildlife resources.

The Pennsylvania Department of Transportation (PennDOT) proposes to reconstruct 3.5 miles of roadway, including reconstructing or eliminating five interchanges to relieve congestion and alleviate safety issues, relocating ramps, adding travel and auxiliary lanes, improving local roads, adding stormwater management facilities, and bringing the existing roadway up to current standards. We have reviewed the Draft Environmental Assessment and have the following comments and concerns:

### Federally Listed Species

#### **Indiana bat**

The proposed project is located within the range of the Indiana bat (*Myotis sodalis*), a species that is federally listed as endangered. Removal of trees and forested areas within the project area could result in the direct take of roosting Indiana bats, which could be injured or killed when trees are cut. Studies have found that forested areas near hibernacula provide important foraging and roosting habitat for Indiana bats, especially during the fall and spring, when bats are building

T&E-3

up their fat reserves prior to and after hibernation. In addition, female maternity colonies and individual male bats may be found in the vicinity of hibernacula throughout the summer months.

To avoid killing or injuring Indiana bats, PennDOT proposes to cut trees between November 15 and March 31. This seasonal tree cutting applies to trees that are greater than or equal to 5 inches in diameter at breast height (DBH). Where possible, retain shagbark hickory trees, dead and dying trees, and large diameter trees (greater than 12 inches DBH) to serve as roost trees for bats. Where possible, also retain forested riparian corridors and forested wetlands. In addition, we support PennDOT's commitment to reduce the amount of new right-of way needed as they refine the project design, to reduce impacts to woodland and potential summer bat habitat.

T&E-3

Based on a review of the project information, including the size of the project area and the anticipated effects on forest habitat, the Service has determined that the proposed project will not have a significant adverse effect on overall habitat quality or availability for the Indiana bat. Therefore, if the seasonal restriction on tree cutting is implemented as proposed to avoid the take of Indiana bats, we have determined that the effects of the project on the Indiana bat are insignificant or discountable. However, if PennDOT is unable to implement the seasonal restriction on tree cutting, please contact this office for further coordination.

#### **Northern long-eared bat**

The Service promulgated a Final 4(d) Rule in 2016 establishing measures that were determined to be necessary and advisable for the conservation of the northern long-eared bat. We reviewed your project and determined it is not located within 0.25 mile of a known northern long-eared bat hibernaculum or within 150 feet from a known, occupied maternity roost tree; therefore, any incidental take that may occur is in accordance with the Final 4(d) Rule and is not in violation of the Endangered Species Act. Because this project is authorized, funded, and/or permitted by a Federal agency or designated non-Federal representative (i.e., Pennsylvania Department of Transportation, PennDOT), consultation under section 7 of the Endangered Species Act is required. The Service completed a nationwide biological opinion that fulfills this requirement, provided the conditions of the Final 4(d) Rule are implemented. The Service created a framework to streamline section 7 consultations when Federal or designated non-Federal representative actions may affect the northern long-eared bat, but do not cause prohibited take. PennDOT should complete section 7 consultation under the streamlined consultation process by using the Determination Key that is available through our Information for Planning and Consultation (IPaC) website. More information about the framework and instructions for using the online Determination Key are available here: <http://www.fws.gov/midwest/endangered/mammals/nleb/s7.html>.

T&E-4

#### **Bog turtle**

The project is within the known range of the bog turtle (*Clemmys muhlenbergii*), a species that is federally listed as threatened. Bog turtles inhabit shallow, spring-fed fens, sphagnum bogs, swamps, marshy meadows, and pastures characterized by soft, muddy bottoms; clear, cool, slow-flowing water, often forming a network of rivulets; high humidity; and an open canopy. Bog turtles usually occur in small, discrete populations occupying suitable wetland habitat dispersed

T&E-5

along a watershed. The occupied "intermediate successional stage" wetland habitat is usually a mosaic of micro-habitats ranging from dry pockets, to areas that are saturated with water, to areas that are periodically flooded. Some wetlands occupied by bog turtles are located in agricultural areas and are subject to grazing by livestock.

We previously commented on this project by letters dated April 3, 2015, April 10, 2018, October 5, 2018, and August 30, 2019. Through a series of Phase 1 and Phase 2 surveys (conducted in May and June of 2014 and 2018) for both the original and expanded project areas, we concluded that the construction and implementation of the proposed project is not likely to adversely affect the bog turtle. As it appears that there have been no changes in the expanded project that we reviewed, or on-site biological information, our comments remain the same.

This determination is valid for 2 years from the date of this letter. If the proposed project has not been fully implemented prior to this, an additional review by this office is recommended. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.

T&E-5

#### Streams and Wetlands

This project involves nearly 2 miles of stream impacts and over 1.5 acres of wetland impacts (some designated as Exceptional Value). We encourage PennDOT to minimize impacts to aquatic resources and reduce the footprint of the overall project as they refine the project design, including implementing such measures as steepening the roadway embankment slopes in cut and fill areas (1.5:1 vs 2:1); installing headwalls, wing walls, or retaining walls; relocating project features; and siting stormwater management facilities appropriately (out of aquatic resources).

We understand that PennDOT anticipates wetland impacts in excess of the *de minimis* threshold of 0.05 acre, and stream impacts in excess of 1.5 miles. Consequently, PennDOT has proposed compensatory mitigation to offset impacts to both wetlands and streams. We support PennDOT's commitment to develop a Compensatory Mitigation Plan for the impacts to, or losses of, the aquatic resources as a result of project implementation. We urge PennDOT to develop a mitigation plan that fully compensates for any wetland, stream channel, streambank, floodplain, and riparian habitat losses that would occur should impacts become unavoidable. We request that PennDOT work in coordination with the Service in developing an appropriate mitigation plan, and that we be provided the opportunity to review and concur with the plan. To expedite mitigation plan development, we encourage PennDOT to coordinate with the local watershed group or County Conservation District, as they might have identified candidate sites.

WR-1

*To avoid potential delays in reviewing your project, please use the above-referenced USFWS project tracking number in any future correspondence regarding this project.*

Thank you for the opportunity to comment on the Draft Environmental Assessment for the proposed project. Please contact Jennifer Kagel of my staff at 814-206-7451 if you have any questions or require further assistance regarding this matter.

Sincerely,

A handwritten signature in black ink, reading "Sonja Jahrsdoerfer". The signature is written in a cursive, flowing style.

Sonja Jahrsdoerfer  
Project Leader

cc:

PGC – Librandi-Mumma

EPA – Okorn

PFBC - Raab

[jobachman@pa.gov](mailto:jobachman@pa.gov)  
[tlibrandi@pa.gov](mailto:tlibrandi@pa.gov)  
[Okorn.Barbara@epa.gov](mailto:Okorn.Barbara@epa.gov)  
[draab@pa.gov](mailto:draab@pa.gov)

### Air Quality Related Comments (AQ)

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#### AQ-1

A quantitative carbon monoxide (CO) hot-spot analysis was performed to identify “worst-case” CO concentrations throughout the project corridor. The results of the hot-spot analysis indicate that CO concentrations for the No-Build Alternative as well as Build Alternatives 2B and 2D would be within acceptable levels compared to the CO standards. This means that no air quality impact would occur with regard to CO under the No-Build Alternative or Build Alternatives 2B or 2D. The standards (i.e. National Ambient Air Quality Standards [NAAQS]) have been developed by the Environmental Protection Agency in an effort to protect public health and welfare. The CO standards are 35 parts per million (ppm) and 9 ppm for the second highest 1-hour and 8-hour periods, respectively. Under all scenarios at each receptor location evaluated, the highest 1-hour and 8-hour CO concentrations are projected to be well below the CO NAAQS. Specifically, under Opening Year Build (2025) conditions, the highest 1-hour and 8-hour CO concentrations were projected to be 3.5 and 1.9 ppm, respectively. Under Design Year No-Build (2045) conditions, the highest 1-hour and 8-hour CO concentrations were projected to be 3.2 and 1.6 ppm, respectively. Under Design Year Build (2045) conditions, the highest 1-hour and 8-hour CO concentrations were projected to be 3.1 and 1.6 ppm, respectively. Please refer to Section 3.8 and the project’s 2016 Final Air Quality Technical Report<sup>1</sup> for further details regarding the air quality analyses.

#### AQ-2

PennDOT will utilize standard temporary best management practices to minimize air quality impacts during construction. For instance, the Maintenance and Protection of Traffic Plan will identify regular motor vehicle traffic patterns during construction to minimize interference with construction activities. Specific methods of minimizing construction-related air quality impacts will be determined in final design and incorporated into the construction plans and specifications in accordance with Publication 408, which contains current construction specifications for PennDOT projects.

### Alternatives Related Comments (ALT)

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#### ALT-1

Design year projections (2045) show increased congestion along I-80 from Interchange 304 to Interchange 307 and most ramps operating at level of service (LOS) F in the No-Build condition. Refer to the project’s congestion need stated in Section 1.1 for more information. Further, many alternatives were considered, as documented in the 2009 I-80 Corridor Study (Section 1.2) and in Section 2, to address the project congestion need and other defined project needs. Ultimately, widening to three travel lanes in each direction was determined to best fit the project purpose and need while also minimizing impacts and costs (Sections 1.2 - 2). Furthermore, property and other resource impacts resulting from the proposed widening and other aspects of the project were reduced based on public input. As the project design advances, PennDOT will continue design refinements to minimize impacts (Section 5.1).

#### ALT-2

Following completion of the 2009 I-80 Corridor Study, which covered approximately 18 miles of the I-80 corridor from Exit 298 (I-380) to Exit 310 (Delaware Water Gap), it was desirable for PennDOT to identify

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<sup>1</sup> McCormick Taylor, 2016. Interstate 80 Reconstruction Project Final Air Quality Technical Report. Available online at <http://www.i80project.com/technical-reports-index/>

a section of the study area to be advanced as the initial project. An 18-mile stretch of highway is too costly to be effectively completed as a single project by PennDOT. As a result, PennDOT sought to break up the I-80 corridor at logical termini and identify the section with the most critical needs. The section of I-80 through Stroudsburg and Stroud Township was chosen by PennDOT to be addressed first due to the safety concerns which include geometric deficiencies, poor pavement condition, traffic congestion, and mobility issues. The attached crash activity figure (Attachment 1) displays the frequency of crashes between 2014 and 2018 along the I-80 corridor from mile marker 290.5 to the Delaware River Bridge. As shown on the figure, the highest frequency of crashes occurred in and immediately adjacent to the Borough of Stroudsburg.

Building on the initial priority of addressing safety concerns in Stroudsburg, the western terminus was chosen to be near milepost 304. As stated in the I-80 Corridor Study<sup>1</sup>, Exit 303 is the rough dividing line between the urban section of I-80 to the east and the rural section of I-80 to the west. Furthermore, the I-80 Corridor Study<sup>1</sup> also states that milepost 304 to 311 is the highest priority section for pavement reconstruction due to the high traffic volumes and the pavement conditions. Therefore, it was logical to set the western project limit to include Interchange 303 and the mainline to milepost 304 in the I-80 Section 17M project so that the urban area with the most critical need was addressed. The eastern terminus was determined to be east of the I-80 Bridge over Brodhead Creek in East Stroudsburg, at the boundary of another ongoing project at Exit 308, known as the I-80 Section 05S Project. Based on these considerations, the I-80 Section 17M Project has logical termini. For more detail on establishing the initial project location, please see Section 4.4 of the Environmental Assessment.

Widening I-80 to three lanes in each direction will address the existing and future projected traffic congestion. Traffic growth within the project area is from both the New Jersey area as well as within Pennsylvania from areas that would primarily access I-80 from Interchanges 310, 309, and 308. Beyond the limits of the current and other active projects, the number of travel lanes will be reduced from three lanes to the existing two-lane condition. This condition is unavoidable due to the need to address the I-80 corridor across multiple projects of manageable size, while addressing the critical locations first. As noted above, this project (I-80 Section 17M) will tie into the ongoing project at Exit 308, known as the I-80 Section 05S Project. The I-80 Section 05S Project will also widen I-80 from four lanes to six lanes. Furthermore, the Delaware River Joint Toll Bridge Commission (DRJTBC) is responsible for maintaining and rehabilitating the Delaware Water Gap Bridge. This bridge was constructed in 1953, and it is expected that at some future time the bridge will need to be replaced. At that time, it is anticipated that any need for wider shoulders and/or additional lanes on the bridge will be evaluated by DRJTBC in cooperation with PennDOT, the New Jersey Department of Transportation, Federal Highway Administration, and cooperating agencies.

In consideration of the transition from three lanes to two lanes at the project's western terminus, PennDOT performed a traffic volume and level of service (LOS) sensitivity analysis. This analysis shows that the transition area from three to two lanes will function at an acceptable LOS for many years after opening (projected to be year 2032). Thus, the project also has independent utility. Annual increases in projected traffic volumes will gradually decrease the peak period LOS at this transition area. At that time (2032) potential widening of the western sections in Bartonsville and beyond may be warranted. PennDOT is currently studying the corridor and will identify projects to address the needs of the overall I-80 corridor.

In an effort to identify these future projects beyond I-80 Section 17M, PennDOT is currently performing traffic studies along I-80 from Bartonsville to Scotrun, I-80 from Exit 308 to the state boundary line at

the Delaware River, and State Route (SR) 611 from Mountain View Drive to Main Street. Additionally, any widening of SR 611 and subsequent lack of widening on I-80 would not address the increased truck, commercial vehicle, and through-traffic volumes anticipated on I-80.

As mentioned above, the project also needs to address the overall deteriorating condition of the roadway and bridges along I-80. The pavement is deteriorated such that reconstruction is required. In order to reconstruct I-80 and maintain two lanes open in each direction during construction, widening is necessary. Thus, the width of roadway required to construct the proposed six-lane section is not significantly more than that required to build a four-lane section. Construction staging and maintaining four travel lanes during construction (two lanes each direction along I-80) are the primary reasons that widening is needed and the difference in width is minimal.

#### ALT-3

Federal Highway Administration and PennDOT chose to eliminate the Dreher Avenue Interchange to reduce the number of vehicular conflict points (thus, improving safety) along I-80 and because traffic studies determined that it is the least used interchange. In the proposed condition, the Dreher Avenue Connector Road would be added within the existing transportation right-of-way to provide a local traffic connection between West Main Street and Dreher Avenue. Please refer to Section 4.4 of the Environmental Assessment for more detail on why the closure of the Dreher Avenue Interchange (Interchange 306) is proposed and how the Preferred Alternative would accommodate traffic movements after the Dreher Avenue Interchange is eliminated.

Furthermore, Interchange 304 (US 209) offers two out of four possible movements in the existing condition, and key connections between I-80 and US 209 are missing (Section 1.1, Table 3). The proposed Interchange 304 consolidates the I-80 eastbound on- and off-ramp movements from Interchange 305 (West Main Street) so that Interchange 304 would have full movements in the proposed condition (Section 2.6.2). Thus, mobility would be improved between I-80, US 209, and West Main Street.

Full movements at interchanges are desirable according to PennDOT design criteria; however, due to the streams, wetlands, and properties surrounding Interchange 305, extensive impacts would occur if all movement options were provided at Interchange 305 using current design criteria. Interchanges 304 and 305 are approximately 0.5 mile apart and together will provide full movement in the proposed condition. Thus, the Preferred Alternative will improve access and mobility while minimizing environmental impacts.

#### ALT-4

A summary of the various alternatives and solutions considered since the inception of this project is provided in Sections 2.2 – 2.6. An alternative must meet all of the project's needs to be selected (Section 1.1 and the project's Purpose and Need<sup>2</sup>).

The expansion of State Route (SR) 611 would not meet all of the project's needs and was therefore not included as part of the I-80 Reconstruction Project (Section 4.4). Reconstruction of the existing pavement on I-80 is necessary. As mentioned above in the ALT-2 response, the four lane reconstruction footprint would be similar to the six lane reconstruction footprint. Thus, if the project included the expansion of SR 611 and reconstruction of a four lane I-80, then environmental impacts would be

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<sup>2</sup>AECOM, 2014. I-80 Reconstruction Purpose and Need. <http://www.i80project.com/technical-reports-index/>



increased further. Since the expansion of SR 611 is not necessary to meet the needs of the project and it would result in higher environmental impacts, it was not considered in detail. PennDOT recognizes that there are safety and congestion needs on SR 611 and has initiated a traffic study to identify needs, potential upgrades, and future projects on SR 611 as stated above in the ALT-2 response.

#### ALT-5

A bypass option was previously evaluated and dismissed due to extraordinary cost and environmental impacts (Sections 1.2 and 4.4).

#### ALT-6

It is anticipated there would not be enough space between interchanges to include the existing Dreher Avenue ramp movements into the proposed design. There is currently minimal interchange spacing with the proposed design. Modifications to accommodate the Dreher Avenue ramps would further reduce this spacing. The existing Dreher Avenue ramps would need to be redesigned to meet current PennDOT design criteria such as extending the acceleration and deceleration lane lengths and improving the horizontal curvature. Inclusion of the redesigned Dreher Avenue ramp movements into the proposed design would subsequently impact the I-80 mainline alignment and configuration of ramps for the adjacent interchanges (Exit 305 and Exit 307). For example, the I-80 mainline alignment would need to be shifted south to accommodate the westbound off-ramp to Dreher Avenue and avoid impacts to Stroudsburg Cemetery. These design modifications not only reduce the spacing between interchanges, but would also result in additional impacts to surrounding resources including residential and commercial properties, McMichael Creek, and wetlands.

#### ALT-7

Once cleared for construction, this project is anticipated to take a minimum of three years and more likely about five years to construct. The construction duration is dependent on a number of factors including: available funding by year, potential phasing of the project into multiple sub-projects, and traffic control. The construction schedule will be detailed during final design. In addition, the final design, construction plan, and traffic control plan will maintain the existing connectivity of the local roadway network across and under I-80 as well as interchange and ramp accessibility during construction (Section 3.16).

#### ALT-8

Anticipated environmental impacts have progressively been reduced since the project's inception in 2014. Originally, conceptual layouts of both Build Alternatives 2B and 2D included extensive stormwater basins as noted in the project's Phase I Alternatives Analysis<sup>3</sup> and displayed to the public at the open house round #2 held in December 2014<sup>4</sup>. As the alternatives design progressed, PennDOT worked with the Monroe County Conservation District to identify alternative stormwater management options and still meet regulatory requirements. This resulted in a revised stormwater basin layout, which reduced the overall project footprint. In addition, PennDOT elected to use retaining walls to minimize slope impacts and reduce the overall project footprint (Sections 3.4.3, 4.4, and 5.1). This revised project footprint was utilized in the preparation of the Environmental Assessment. By reducing the overall project footprint, environmental impacts, particularly property impacts, have also been reduced. As the

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<sup>3</sup> AECOM, 2014. I-80 Reconstruction SR 0080 Section 17M Phase I Alternatives Analysis.

<http://www.i80project.com/technical-reports-index/>

<sup>4</sup> Display boards from the open house meeting, round #2 are available online at <http://www.i80project.com/public-involvement/open-house-meeting-round-2/>

project design advances, PennDOT will continue to refine the design with the goal of avoiding or minimizing impacts.

### Economic Related Comments (ECON) \_\_\_\_\_

#### ECON-1

Proposed municipal tax losses from Build Alternative 2D are estimated to be negligible at approximately 0.7%. Refer to Section 3.7.3 of the Environmental Assessment for a discussion of tax impacts.

#### ECON-2

Employment generated by I-80 reconstruction is anticipated to result in more than \$200 million in earnings for Monroe County. Post-construction economic benefits are also anticipated due to improved mobility, safety, and traffic flow of I-80. Refer to Section 3.7.3 for further information about anticipated direct and indirect economic impacts.

Furthermore, when traveling on I-80 eastbound in the proposed condition, you will have the opportunity to exit onto West Main Street at Interchange 304 and then continue traveling east on West Main Street toward the town center. When traveling on I-80 westbound in the proposed condition, you will have the opportunity to access West Main Street at Interchange 305, which is similar to the existing condition. The Preferred Alternative would also provide direct access to West Main Street from US 209 northbound at Interchange 304, which is currently unavailable. All of this mobility potentially increases economic opportunity as travelers access Stroudsburg via West Main Street from Interchanges 304 and 305.

Existing access to Broad Street (State Route 191) from I-80 eastbound and from I-80 westbound remains unchanged in the proposed condition.

#### ECON-3

Final property impacts have not yet been determined. PennDOT will work with affected individual property owners regarding means to minimize and mitigate property acquisitions and displacements. PennDOT will follow established procedures in working with displaced businesses to identify suitable relocation opportunities, if so desired. Property acquisition activities would occur in accordance with the Uniform Act as amended and State laws that establish the process through which PennDOT may acquire real property through a negotiated purchase or through condemnation (Sections 3.4.4 and 3.7.4)

There is the potential for increased revenue for service businesses located near full interchanges due to improved interstate access (Section 3.7.3).

### Environmental Justice Related Comments (EJ) \_\_\_\_\_

#### EJ-1

Since the environmental justice (EJ) analysis identified the primary impacts to EJ populations as the direct residential housing displacement, the continued minimization of impacts through design modifications may further reduce the total displacements (Section 3.6.4). The principal method of mitigation for the displacement impacts will be through the Department's Relocation Assistance Program and authority provided by Chapter 9 of the Eminent Domain Code, 26 Pa.C.S. Sections 901-907 (Special Damages for Displacement); the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. Section 4601; and federal regulations entitled Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs, 49 C.F.R. Part 24.

Therefore, the project would not have a disproportionately high and adverse effect on EJ populations based on the impacts and mitigation efforts. Additional details regarding the EJ analysis are presented in the project's Environmental Justice Technical Memorandum<sup>5</sup>.

### Hazardous and Residual Waste Related Comments (HAZ)

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#### HAZ-1

The project area was reviewed for potentially contaminated sites including factories, gas stations, and other facilities. The Phase I Environmental Site Assessment<sup>6</sup> included research into the current and previous ownership and uses of properties, examination of the potential for environmental concerns related to the properties, and assessment of the potential for contaminated materials and hazardous waste to impact the project. PennDOT will develop and implement a Waste Management Plan and a site-specific Health and Safety Plan for the eight hazardous waste sites identified to address soil and groundwater management, environmental health, worker safety, and public health safety during project construction activities. Refer to Section 3.13 of the Environmental Assessment for further detail.

### National Environmental Policy Act (NEPA) Document Related Comments (NEPA)

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#### NEPA-1

PennDOT in coordination with the Federal Highway Administration (FHWA) determined an Environmental Assessment (EA) is the appropriate level of NEPA document for a project of this scale and magnitude (Section 2.1). According to 23 CFR 771.115 and PennDOT's Publication 10B, Post-TIP NEPA Procedures (Design Manual 1B)<sup>7</sup>, there are three tiers of NEPA actions based on the significance of potential environmental impacts. Projects with significant impacts require preparation of an Environmental Impact Statement (EIS). Projects with no significant impacts are categorically excluded from the preparation of an EIS. Projects where the significance of the impacts is not certain are begun as an EA. The purpose of an EA is to determine if there are significant impacts warranting an EIS. Significance of impacts is based on context (or setting) and intensity (magnitude of effects).

EIS projects tend to be complex projects with significant impacts to a variety of environmental resources. The following are examples of projects that can be expected to significantly affect the environment and thus require the preparation of an EIS:

- A new limited-access highway
- Highways of four or more lanes constructed on new alignment
- Long highway or roadway segments of two or more lanes constructed on new alignment
- Construction or extension of fixed guideway systems (e.g., exclusive busway), expected to cause major shifts in travel patterns and land use.
- Construction involving extensive demolition, displacement of many individuals or businesses, or substantial disruption to local traffic patterns. (This classification is made on the basis of building conditions and the availability of comparable replacement facilities for displaced residences or businesses.)<sup>7</sup>.

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<sup>5</sup>AECOM, 2018. I-80 Reconstruction Project Environmental Justice Technical Memorandum. Available online at <http://www.i80project.com/technical-reports-index/>

<sup>6</sup>The Phase I Environmental Site Assessments can be found at <http://www.i80project.com/technical-reports-index/>

<sup>7</sup>PennDOT, 2019. Design Manual 1B Post-TIP NEPA Procedures.

<http://www.dot.state.pa.us/public/PubsForms/Publications/PUB%2010/Pub%2010B/July%202019%20Change%20No%201.pdf>

The proposed project is a reconstruction project on existing alignment that will not cause a major shift in travel patterns or land use, extensive displacements, or substantial disruptions to local traffic patterns. Impacts to threatened and endangered species were thoroughly examined and coordinated with the proper resource agencies. Mitigation for impacts has been incorporated to further reduce overall impacts. PennDOT and FHWA have confirmed that an EA is the appropriate level of NEPA documentation for the I-80 Reconstruction Project.

#### NEPA-2

When determining the length of a public comment period, Federal Highway Administration (FHWA) and PennDOT must balance public opportunity for involvement against the cost to the public in time and money occasioned by delaying a project. Both FHWA's regulations at 23 CFR §771 and PennDOT policy<sup>8</sup> provide that the public review and comment period should be 30 days unless there is good cause for a different period. The I-80 Reconstruction Project Environmental Assessment public comment period was open for 36 days (October 25, 2019 – November 29, 2019) to provide ample time for public review and comment. FHWA and PennDOT appreciate the efforts that the commenters have put into improving this project but concluded that the project schedule should not be delayed by further extending the public comment period. In addition, three public open house sessions have been held to keep the public informed and gather their input as the project studies were occurring; and open house display materials have been available on the project website throughout the duration of the project.

#### NEPA-3

The public hearing was held at the Monroe County Control Center due to key facility features, such as a large classroom setting with a large screen and projector for the public testimony session, a smaller classroom setting for the private testimony session, a common area for a plans display, compliance with the Americans with Disabilities Act of 1990, and within a reasonable distance/travel time from the immediate project site, approximately 5 miles and 10-15 minutes respectively. In addition to the public hearing, written comments were accepted via mail or email during the public comment period. This is in accordance with 23 CFR §771 and PennDOT policy<sup>8</sup>. Federal Highway Administration (FHWA) and PennDOT appreciate the efforts that the commenters have put into improving this project but strive to be respectful of the public's time and money when considering delaying a project. FHWA and PennDOT concluded that the project schedule should not be delayed by holding an additional public hearing.

#### NEPA-4

PennDOT and Federal Highway Administration studied several alternatives, and based on environmental impacts and public input, narrowed it down to two alternatives (Alternatives 2B and 2D) to study in detail in the Environmental Assessment (EA). Mitigation measures are identified throughout the EA to minimize unavoidable environmental impacts of the alternatives on various resources. In instances where there is no difference in impacts between the two Build Alternatives, the mitigation measures are the same for either Alternative 2B or 2D. This is in accordance with PennDOT's policy<sup>7</sup> for EAs in which alternatives are considered, effects are examined, and mitigation measures are explored for unavoidable environmental impacts; a Preferred Alternative is then identified if multiple alternatives are being considered. After a preferred alternative is selected, design refinements will continue to be made

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<sup>8</sup>PennDOT, 2011. Project Level Public Involvement Handbook.

<http://www.dot.state.pa.us/public/PubsForms/Publications/PUB%20295.pdf> and PennDOT, 2019. Design Manual 1B Post-TIP NEPA Procedures.

<http://www.dot.state.pa.us/public/PubsForms/Publications/PUB%2010/Pub%2010B/July%202019%20Change%20No%201.pdf>

during final design to further minimize impacts to sensitive natural, cultural, and socioeconomic features.

#### NEPA-5

The Environmental Assessment identifies potential environmental impacts and mitigation measures. Mitigation commitments are summarized in Section 5.2. As per Federal Highway Administration and PennDOT policy<sup>7</sup>, mitigation is a consideration in determining whether an impact is significant or not. In addition, design refinements will continue to be made in final design to further minimize impacts to environmental resources.

#### NEPA-6

Visual resources and visual impacts are the same for Build Alternatives 2B and 2D. The roadway exists currently, and Build Alternatives 2B and 2D generally follow the existing roadway alignment; hence, changes to visual resources would not be significant and thus had no bearing in the decision making process for selecting a preferred alternative. As a result, visual resources were not discussed in the Environmental Assessment, but the impacts were considered (Section 3).

#### Noise Related Comments (NO)

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##### NO-1

Existing (2013) worst-case noise levels exceed Federal Highway Administration/PennDOT Noise Abatement Criteria (NAC) at 52 receptor sites representing 112 residences, four commercial properties and one cemetery (Section 3.9.2). The dominant source of noise at each measured location is traffic on I-80 and/or the local roadway network. In addition, noise levels under the No Build Alternative will exceed NAC at 66 receptor sites representing 152 impacted units (residences, businesses, and one cemetery) (Section 3.9.3). Therefore, the community is already impacted by noise. The proposed noise abatement measures that are part of the Preferred Alternative will improve existing and future noise impacts. The No Build Alternative, as well as any alternative that would not add a lane; shift lanes substantially closer to receptors; or qualify in another way as a Type I noise project per 23 CFR 772.5, would not qualify for noise walls to abate the existing (or proposed) noise levels.

##### NO-2

Public outreach and agency coordination activities described in Section 4.4 identified a number of issues that are important to the stakeholders of the project; one such issue is potential impacts due to construction noise and vibration (blasting, pneumatic impact hammers, pile driving, etc.). As indicated in the Environmental Assessment, PennDOT will develop appropriate noise reduction measures to minimize noise impacts during construction – balancing residential needs during overnight hours and daytime noise/vibration levels that may affect adjacent business operations. This may involve sequencing of work, muffling of construction equipment, and specific construction methods that will reduce excessive noise/vibration levels. Specific methods of minimizing construction-related noise impacts will be determined in final design and incorporated into the construction plans and specifications in accordance with Publication 408, which contains current construction specifications for PennDOT projects.

Note that no federal or state agencies with jurisdiction over wildlife species have identified concerns for noise impacts during breeding/nesting periods.

If blasting will be conducted, an exterior and interior pre- and post-blast survey will be conducted on all structures, buildings, or utilities in the vicinity of the blasting site. In addition, vibration monitoring would be conducted during blasting events.

#### Public Involvement Related Comments (PI) \_\_\_\_\_

##### PI-1

Public comments have been received and incorporated into the project design throughout the project development process. A summary of public involvement efforts is provided in Section 4. Specifically, several Phase I Alternatives were dismissed or refined based on public support and comment (Section 2.2), Build Alternative 2A was also dismissed in part due to low public support (Section 2.4), property impacts were minimized (Section 4.4), and the Broad Street Bridge replacement along State Route 191 was adjusted in coordination with the Stroudsburg Borough representatives (Attachment G of the Environmental Assessment). In addition, public involvement will continue throughout the remainder of the design and construction phases.

##### PI-2

The project team completed several rounds of public meetings and implemented a plan which included identification of specific stakeholders with significant abilities to aid in engaging minority and low-income populations, as described in Section 4.3 of the Environmental Assessment as well as Section 5 in the Environmental Justice Technical Memorandum<sup>5</sup>. The public involvement process will continue through the project development, and environmental justice populations will continue to be included in the outreach effort.

#### Right-of-Way Related Comments (ROW) \_\_\_\_\_

##### ROW-1

PennDOT is currently proposing the widening of I-80 to three travel lanes in each direction within the project area. This project area was evaluated for traffic volumes 20 years beyond the opening year, as per Federal Highway Administration policy. Since the proposed project has an opening year of 2025, this project addresses traffic volumes and level of service (LOS) through 2045. Further widening of this section of I-80 is not anticipated through the design year of 2045. Thus, the I-80 Reconstruction Project Environmental Assessment evaluates the impacts of widening to three lanes. When I-80 was built in the 1950s and 1960s, it was built through the town of Stroudsburg. Therefore, the town surrounds the roadway in the present condition. Property impacts are unavoidable. Refer to Sections 3.4, 5.1, and 5.1.1.2 for a discussion of proposed property impacts and minimization measures.

#### Safety Related Comments (SFTY) \_\_\_\_\_

##### SFTY-1

There will be approximately 44-percent fewer predicted crashes per year with the Preferred Alternative. Please refer to Section 3.3.3 of the Environmental Assessment for more detail on how the proposed project will improve safety and traffic flow. Coordination is ongoing with emergency medical service (EMS) providers. PennDOT will continue to work with EMS providers to coordinate traffic staging and traffic control during construction and develop updated traffic and incident management plans during final design.

## SFTY-2

Federal Highway Administration requires that a proposed project is consistent with their policy on interstate access. One aspect of that policy is that full interchanges (i.e. those that provide for all traffic movements) be constructed. Partial interchanges may be considered for special access for managed lanes (e.g., transit or high occupancy vehicle lanes). The Preferred Alternative proposes to improve partial movement interchanges to full movement interchanges at Exit 303 and 304, maintain full access at Exit 307, and eliminate a partial interchange at Exit 306 (Dreher Avenue). Exit 304 together with Exit 305 would provide a single, full movement interchange due to their proximity. The proposed interstate access changes will increase driver expectancy and safety, which is a primary component of the project's Purpose and Need<sup>2</sup>. A summary of the effects on local traffic due to the closure of the Dreher Avenue Interchange can be found in Section 4.4.

Furthermore, improvements to West Main Street are proposed to increase pedestrian safety. Provisions for pedestrian traffic will be incorporated into the proposed project, including adding signage, signals, and striping for crosswalks and bicycle travel; adjusting existing crosswalk locations and sidewalk routing; and connecting sidewalk facilities on new roadway elements within the project limits to meet existing facilities in the adjacent local roadway network. Please refer to Sections 3.5.3 – 3.5.4 for more details.

At the two proposed interchange locations with US 209 and I-80 on West Main Street, bicycle and pedestrian accommodations will be provided with paved 8-foot wide right and left shoulders and 5-foot sidewalks on both sides of the roadway. Pedestrians will also be accommodated by marked crosswalks and push buttons at the signalized intersections of West Main Street and US 209 and West Main Street and the I-80 westbound interchange ramps. In between the interchange locations, where West Main Street will be milled and overlaid, a continuous 5-foot sidewalk will be provided on the north side of West Main Street.

PennDOT will coordinate with emergency service providers and make the appropriate accommodations to ensure there is no significant impact to emergency response times or services. Coordination with emergency service providers is currently ongoing (Sections 3.3.4 and 5.2).

## SFTY-3

The proposed highway will be posted for 55 miles per hour (MPH) and is designed to safely convey traffic at 60 MPH, which is the design standard for this type of highway. The current level of project development does not include a detailed sign layout and design. The existing speed limit signs within the project area include one sign with flashers at milepost 304.9 eastbound where the 50 MPH speed limit begins. All other speed limit signs within the project area include an orange colored object marker sign to enhance sign visibility for motorists. During final design, the need for speed limit signs with flashers and orange object marker signs will be considered. See Section 4.4 of the Environmental Assessment for more detail.

## Stormwater Management Related Comments (STRM) \_\_\_\_\_

### STRM-1

The current level of project development does not include a detailed analysis of the stormwater management techniques that will best fit the site conditions and the sensitive nature of the surrounding resources. The level of detail suggested is generally developed during final design, regardless of the type of NEPA document (Environmental Assessment/Environmental Impact Statement). PennDOT will follow



all federal and state requirements for handling construction and post-construction stormwater discharges and will coordinate closely with the Monroe County Conservation District, the Pennsylvania Department of Environmental Protection (PADEP), and municipalities to ensure there is no degradation to water quality, to manage stormwater runoff volumes and rates to water resources, and to provide sufficient controls to eliminate impacts to the municipal stormwater systems (Section 3.14.4). As specified in Chapter 105 and per PADEP policy, impacts to water resources may not occur due to proposed stormwater management features. The proposed project does not and will not include stormwater management facilities that negatively impact watercourses or wetlands.

Green Stormwater Infrastructure and Low Impact Development practices are commonly used by PennDOT and will be incorporated into the stormwater management design as appropriate and where possible in accordance with Pennsylvania's antidegradation laws and federal National Pollutant Discharge Elimination System requirements.

Furthermore, stormwater runoff from I-80 currently enters the surrounding surface waters without an existing system of stormwater management basins (Section 3.14.2). This unregulated runoff results in flooding, water quality, and sedimentation issues within the watershed. Since the Preferred Alternative would provide the appropriate stormwater management controls, the existing stormwater-driven issues surrounding I-80 would improve.

#### STRM-2

The contractor will implement standard best management practices in accordance with PennDOT Publication 408 to minimize potential construction impacts due to inadvertent releases of fuel or other materials from concrete batch plants and similar facilities into the project area watercourses. The contractor will follow all Pennsylvania Department of Environmental Protection (PADEP) regulations regarding Pollution Prevention Control plans and procedures. These plans are required under 25 Pa. Code Chapter 91.34 and are required for National Pollutant Discharge Elimination System (NPDES) permits. These are not prepared as part of the NPDES permit application but are normally prepared by the contractor and must be made available upon request to PADEP and the county conservation district.

#### STRM-3

PennDOT has its own National Pollutant Discharge Elimination System (NPDES) permit for the discharge of stormwater from the municipal separate storm sewer system (MS4) serving state highways in urbanized areas. Requirements of PennDOT's MS4 permit are incorporated into PennDOT's policies and standards and addressed at a program level. Please note that a separate NPDES permit associated with the project's proposed earth disturbance will still be obtained.

### Threatened and Endangered Species Related Comments (T&E)

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#### T&E-1

Reviews of the project area were completed by those federal and state agencies with jurisdiction over protected species. The agency reviews identified no additional investigations specific to rare, threatened or endangered species other than those completed for the project. The federal and state agencies are considered the authority on the presence of suitable habitat for these species. Project coordination with these agencies is documented in the text and the correspondence is included in Attachment F of the EA. In addition, the threatened and endangered species studies and coordination completed for this project would be the same even if an Environmental Impact Statement was prepared for the project. PennDOT



follows all threatened and endangered species laws and regulations regardless of the NEPA documentation level. See Section 3.15.1 of the Environmental Assessment for further detail.

#### T&E-2

Bald eagles are protected under the Migratory Bird Treaty Act of 1918 (16 USC 703-712) and the Bald and Golden Eagle Protection Act of 1940 (16 USC 668-668d). The project correspondence with the United States Fish and Wildlife Service (USFWS) is included in Attachment F of the Environmental Assessment (EA). The USFWS commented on fish and wildlife resources within the area of potential impact. The USFWS did not indicate the presence of or a concern for bald eagle breeding/nesting, foraging, or roosting areas. See Section 3.15.1 of the EA for further detail.

#### T&E-3

A seasonal tree clearing restriction will be followed for the project. This restriction is in place to minimize the project impacts to the Indiana bat. See Section 3.15.4 of the Environmental Assessment for further detail.

#### T&E-4

As requested, PennDOT has completed Section 7 consultation under the streamlined process by using the determination key available through the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website. Attachment 2 contains the IPaC generated species list and verification letter for the northern long-eared bat (NLEB). The species list identified the Indiana bat, bog turtle, and northeastern bulrush. The Indiana bat and bog turtle conflicts have been resolved as part of the Pennsylvania Natural Diversity Inventory (PNDI) search and previous coordination with the USFWS (Section 3.15 and Attachment F of the Environmental Assessment). The northeastern bulrush was not identified as a potential conflict during the PNDI search. Since the PNDI database records and search tool are more precise than the IPaC system, the northeastern bulrush conflict can be considered resolved. In regard to the NLEB and based upon the IPaC submission, the USFWS determined that the proposed project is consistent with activities analyzed in the Programmatic Biological Opinion. The proposed project may affect the NLEB; however, any take that may occur as a result of the project is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Therefore, the Programmatic Biological Opinion satisfies and concludes PennDOT's responsibilities for this project under ESA Section 7(a)(2) with respect to the NLEB. PennDOT will continue to update the PNDI search and coordinate with the USFWS throughout final design and project construction.

#### T&E-5

Bog turtle surveys were completed for the project area, and the United States Fish and Wildlife Service (USFWS) concluded that the construction and implementation of the proposed project is not likely to adversely affect the federally-listed bog turtle. PennDOT will continue to update the Pennsylvania Natural Diversity Inventory search and coordinate with the USFWS through the duration of final design and project construction. See Section 3.15.2 of the Environmental Assessment for further detail.

### Traffic Related Comments (TRAF)

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#### TRAF-1

The proposed I-80 Reconstruction Project has a specific purpose as defined in Section 1.1. Part of the project's purpose is to reduce future congestion on I-80 in the 2045 design year to level of service (LOS) E or better. The Preferred Alternative will achieve the project purpose. The lane reduction from three to

two lanes at the project limits is anticipated to operate at an acceptable LOS when the project is completed and up to year 2032. Potential future projects are being considered to address the remaining corridor, as stated in Section 4.4.

Northbound West Main Street volumes are estimated to increase by about 10-percent, while the southbound direction is anticipated to decrease much more significantly, especially in the PM peak hour. Bridge Street traffic is anticipated to decrease in both directions when comparing the No Build Alternative to the Preferred Alternative. Overall the LOS on roadways within the project area are shown to improve as a result of this project. Please refer to Section 2.6.2 and the project's Conceptual Point of Access Study<sup>9</sup> for further details.

#### Water Resources Related Comments (WR)

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##### WR-1

The project team looked for suitable wetland and stream mitigation sites within and immediately adjacent to the project site to mitigate for the 1.57 acres of wetland impacts and 11,022 linear feet of stream impacts. The availability of potential mitigation sites was limited or non-existent due to other protected environmental resources and existing development. Mitigation will be performed in accordance with the existing laws, regulations, policies, and guidance documents, including the United States Army Corps of Engineers (USACE) 2008 Mitigation Rule (33 CFR Part 332 Compensatory Mitigation for Losses of Aquatic Resources)<sup>10</sup> and the Pennsylvania Department of Environmental Protection (PADEP) Design Criteria – Wetlands Replacement/Monitoring (Document Number: 363-0300-001)<sup>11</sup>. PennDOT will continue to look for suitable mitigation sites within the impacted subwatersheds first, then expand the search area if suitable areas cannot be found which is in accordance with USACE and PADEP regulatory requirements. Impacts to water resources' functions and values will be also mitigated in accordance with these regulations. See Section 3.14.4 of the Environmental Assessment for further detail.

The PennDOT design team will utilize the Watershed Resources Registry as recommended by the United States Environmental Protection Agency and will coordinate with federal, state, and local agencies and watershed organizations to research potential candidate mitigation sites for further investigation.

##### WR-2

The proposed water resources impacts are listed in Section 3.14.3, Table 11 and Section 5.1.1.7. The Preferred Alternative would impact 1.57 acres of wetlands, 11,022 linear feet (2.09 miles) of streams, 14.7 acres of floodways, and 29.9 acres of floodplains (Section 5.2, Table 20).

Jurisdictional wetlands and watercourses, including small tributaries, within the project study area were identified and confirmed in coordination with the United States Army Corps of Engineers and Pennsylvania Department of Environmental Protection regulatory reviewers. Baseline data of the water resources, including identification, classification, hydrological regime, aquatic life use, and recreational

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<sup>9</sup>AECOM, 2015. I-80 Reconstruction SR 0080 Section 17M Conceptual Point of Access Study.

<http://www.i80project.com/technical-reports-index/>

<sup>10</sup>[https://www.nap.usace.army.mil/Portals/39/docs/regulatory/Mitigation/33cfr332\\_final\\_mitig\\_rule.pdf](https://www.nap.usace.army.mil/Portals/39/docs/regulatory/Mitigation/33cfr332_final_mitig_rule.pdf)

<sup>11</sup><http://www.depgreenport.state.pa.us/elibrary/GetDocument?docId=7751&DocName=DESIGN%20CRITERIA%20-%20WETLANDS%20REPLACEMENT%20-%20MONITORING.PDF%20%20%3Cspan%20style%3D%22color%3Agreen%3B%22%3E%3C%2Fspan%3E%20%3Cspan%20style%3D%22color%3Ablue%3B%22%3E%3C%2Fspan%3E>

use, are described in Section 3.14.2. Water resource functions and values as well as temporary, permanent, direct, indirect, and cumulative impacts to wetlands and waterways will continue to be analyzed and detailed during the Chapter 105/Section 404 permitting phase of the project, and mitigation will be provided for all adverse impacts as part of the permitting process.

#### WR-3

The classifications of the water resources within the project study area, including the Chapter 93<sup>12</sup> designated use, existing use, exceptional value or high quality status, and trout classification are identified and discussed in Section 3.14.2. The time of year restrictions for stocked, wild trout, and Class A wild trout streams will be in place during construction (Section 3.14.4). This is a Pennsylvania Fish and Boat Commission (PFBC) guidance based on the classification of trout streams and the Chapter 93 stream designations for water quality. The PFBC is a commenting agency on the future Chapter 105 permitting requirements which provides the agency the opportunity to include special conditions for the instream construction restrictions. In addition, PennDOT will adhere to the applicable state and federal laws related to special protection waters and follow the related mitigation measures identified in Section 3.14.4. With the mitigation measures identified in Section 3.14.4 and summarized in Section 5.2, there will be no adverse impacts to special protection waters or trout waters in the temporary or permanent conditions.

#### WR-4

The anticipated direct permanent impacts for streams are presented in Sections 3.14.3 and 5.1.1.7. Stream impacts reported in the Environmental Assessment (EA) are a worst-case scenario and were calculated based on the area of potential impact (API) developed for the project. The API includes the following (Section 3.1):

- Cut and fill lines for the proposed roadway alignment and stormwater basins;
- Footprint of structures and elevated roadway;
- Pavement removal areas outside the anticipated proposed roadway limits; and
- A buffer up to 50' wide to allow for potential temporary construction easements, drainage ditches, outfalls, and any temporary or permanent elements required as part of the highway reconstruction.

Detailed design of the stream crossings will be completed in final design with the goal of reducing all stream impacts. Temporary stream impacts will also be determined at that time. Temporarily impacted streams will be restored and stabilized post-construction (Section 3.14.4). The presented impacts are consistent with the level of detail documented throughout the EA. Final stream impacts will be detailed in the Chapter 105/Section 404 waterway permit, which will be prepared in final design.

Other/Miscellaneous Comments (MISC) \_\_\_\_\_

#### MISC-1

The Preferred Alternative will include full 12-foot wide inside and outside shoulders (Section 2.6.2) that would provide areas for breakdowns and access for state police and emergency medical services.

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<sup>12</sup><http://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/025/chapter93/chap93toc.html&d=reduce>

#### MISC-2

It is PennDOT's standard practice to provide construction inspectors for all projects for adherence to plans and specifications, including environmental requirements. For example, PennDOT will inspect the stormwater controls weekly and after each rain event as a condition of the National Pollutant Discharge Elimination System permit for the project. In addition, PennDOT has a Memorandum of Understanding in place with the Pennsylvania Department of Environmental Protection (PADEP) and an Interagency Agreement with the United States Army Corps of Engineers (USACE) regarding Chapter 105 and Chapter 102 permit review and compliance. Within PADEP and USACE, there are several staff positions that are dedicated to the priority review of PennDOT projects.

#### MISC-3

The description of Interchange 307 is accurate in Section 2.5 for the alternatives refinement conducted in 2016-2017. Also refer to the Alternatives Design Plans in Attachment B of the Environmental Assessment for a visual representation of the proposed Interchange 307 configuration.

#### MISC-4

The project's Conceptual Point of Access Study is summarized in Section 2.3 and available on the project's website at: <http://www.i80project.com/technical-reports-index/>.

#### MISC-5

Section 3.2 regarding land use focuses on broad patterns. Specific property impacts are discussed in Section 3.4.

#### MISC-6

The provisions for access improvements at the I-80 interchanges that are part of Build Alternatives 2B and 2D are expected to benefit local circulation patterns and reduce congestion; therefore, community connectivity would be improved. Existing interchanges will have excessive congestion under the No Build Alternative, thereby reducing local mobility and connectivity/cohesion. See Section 3.5.3 of the Environmental Assessment for further detail.

#### MISC-7

Please refer to Section 5.2 for proposed mitigation commitments, which include continued design refinements.

#### MISC-8

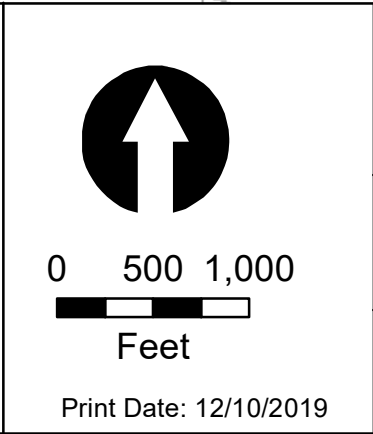
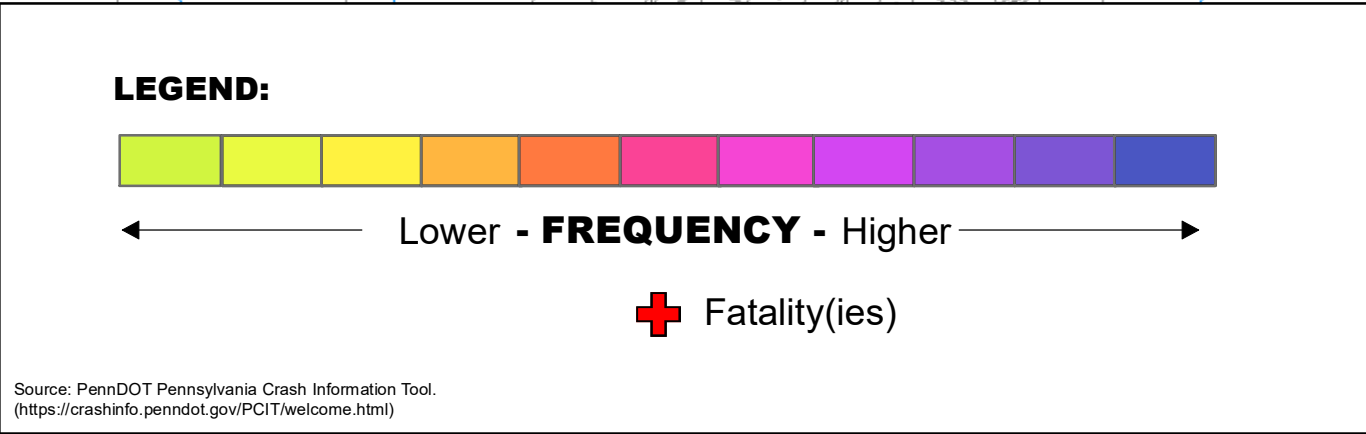
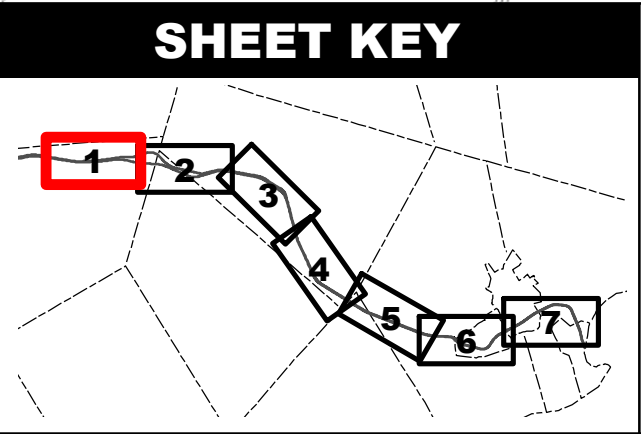
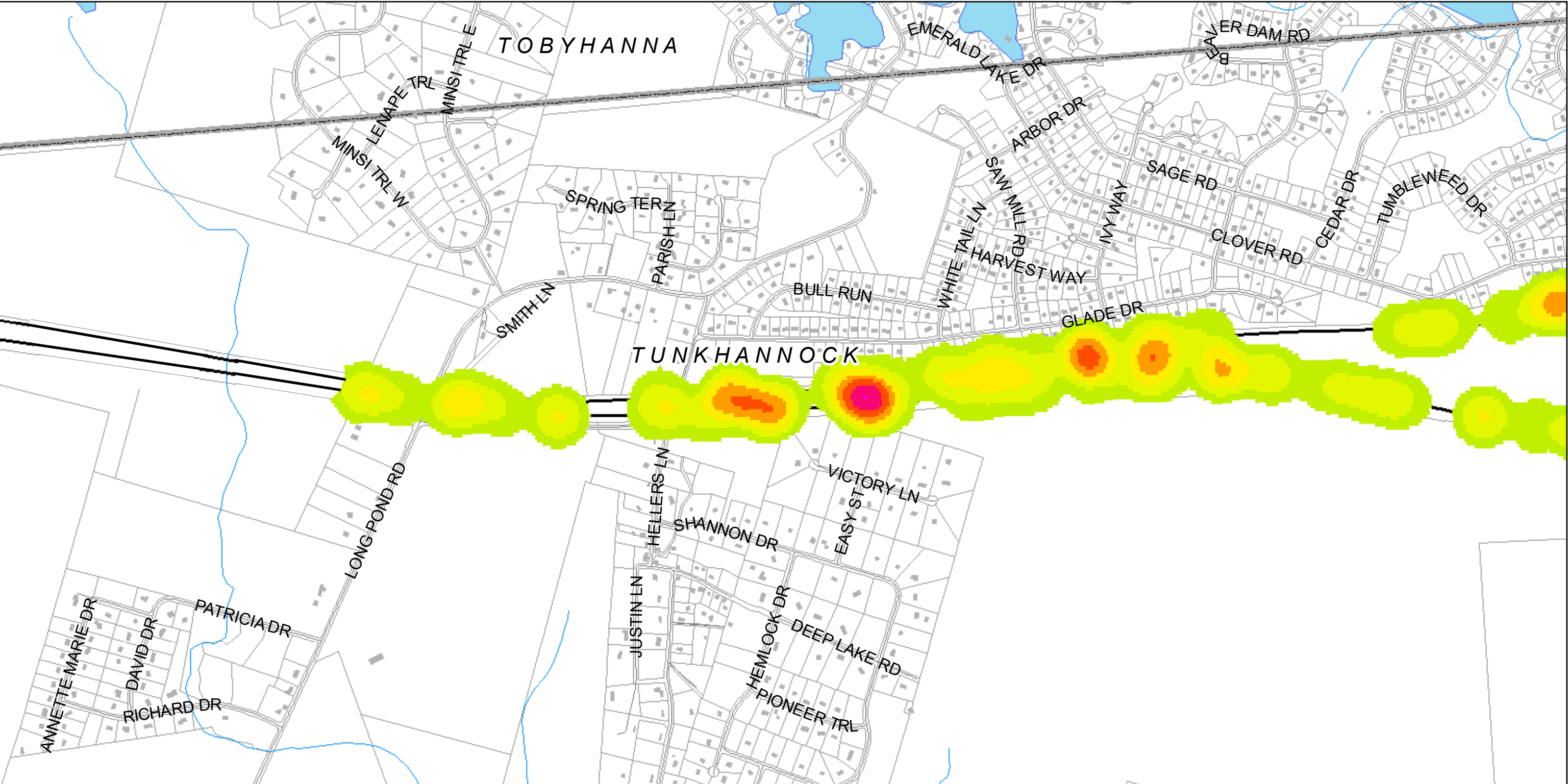
Context sensitive solutions are considered and included where appropriate. For instance, the proposed Broad Street Bridge will include a context sensitive railing treatment (Section 5.2 and Attachment G of the Environmental Assessment).

#### MISC-9

Thank you for your comment.

# Attachment 1

## Crash Activity Figure



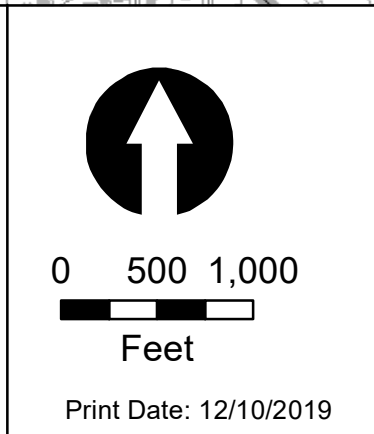
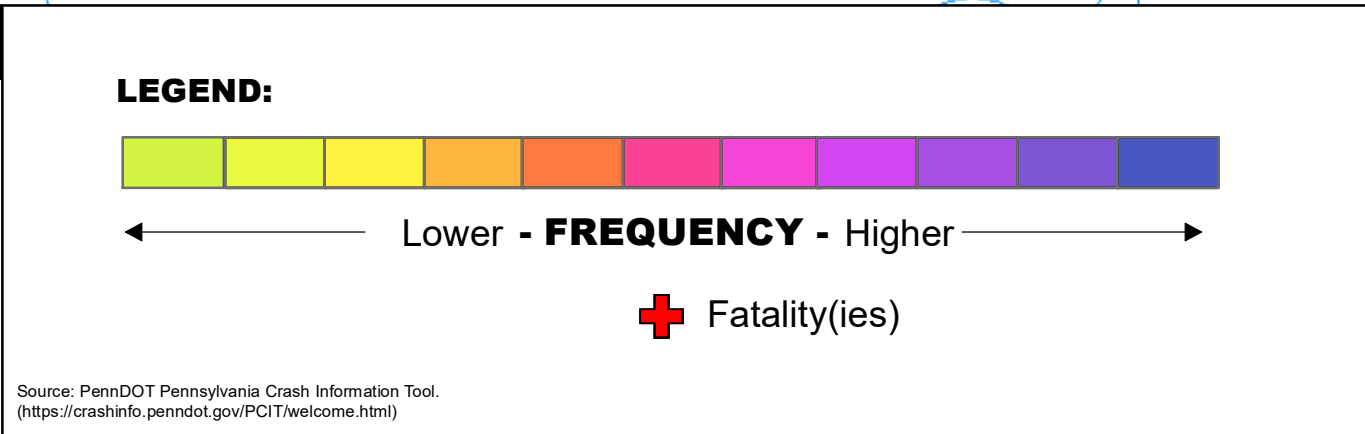
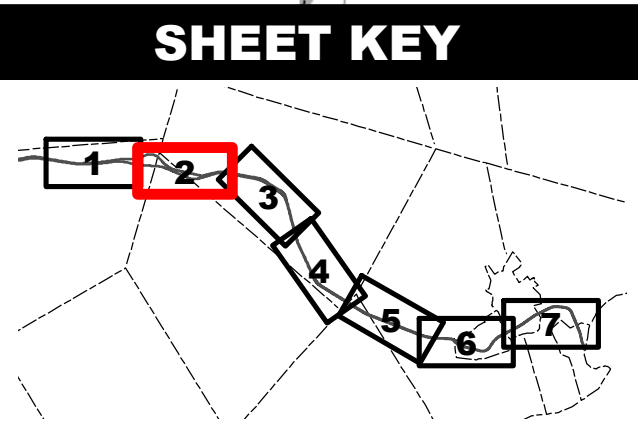
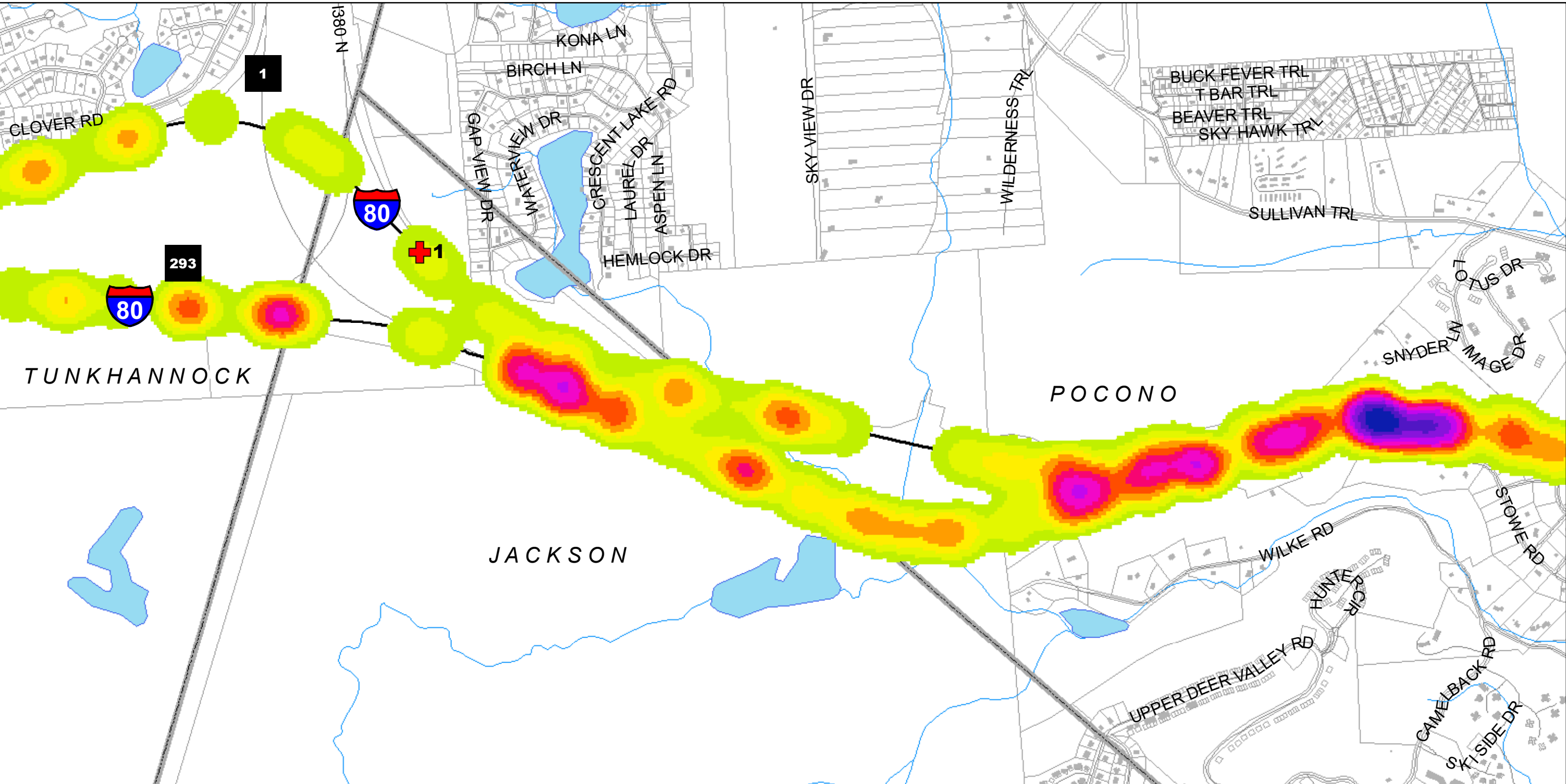
**SR 0080, Section LBS**  
**I-80 Advanced Traffic Studies**  
Sheet 1 of 7

**I-80 CRASH ACTIVITY: 2014-2018**  
**BOTH DIRECTIONS**

**pennsylvania**  
DEPARTMENT OF TRANSPORTATION

**AECOM**



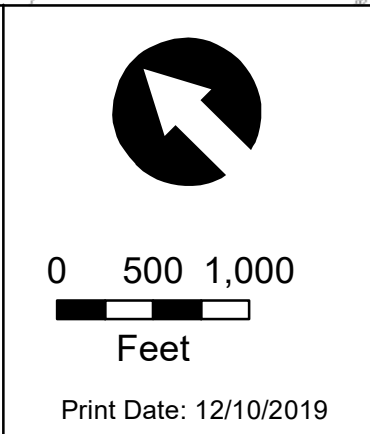
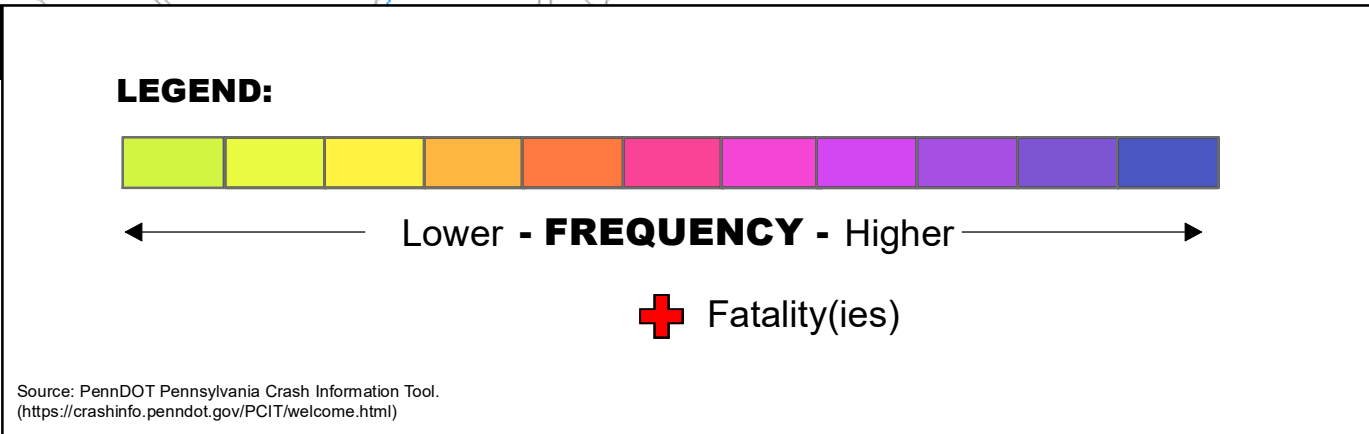
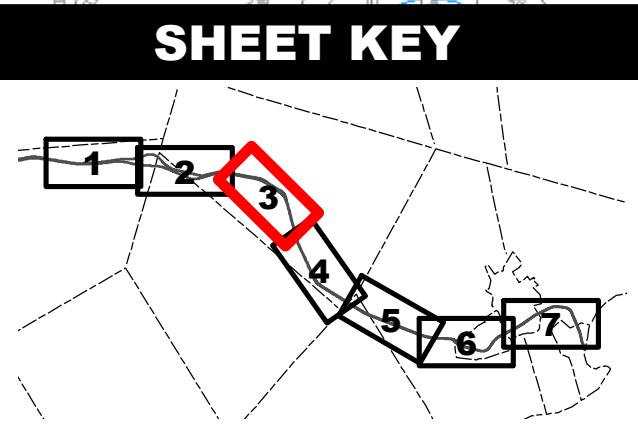
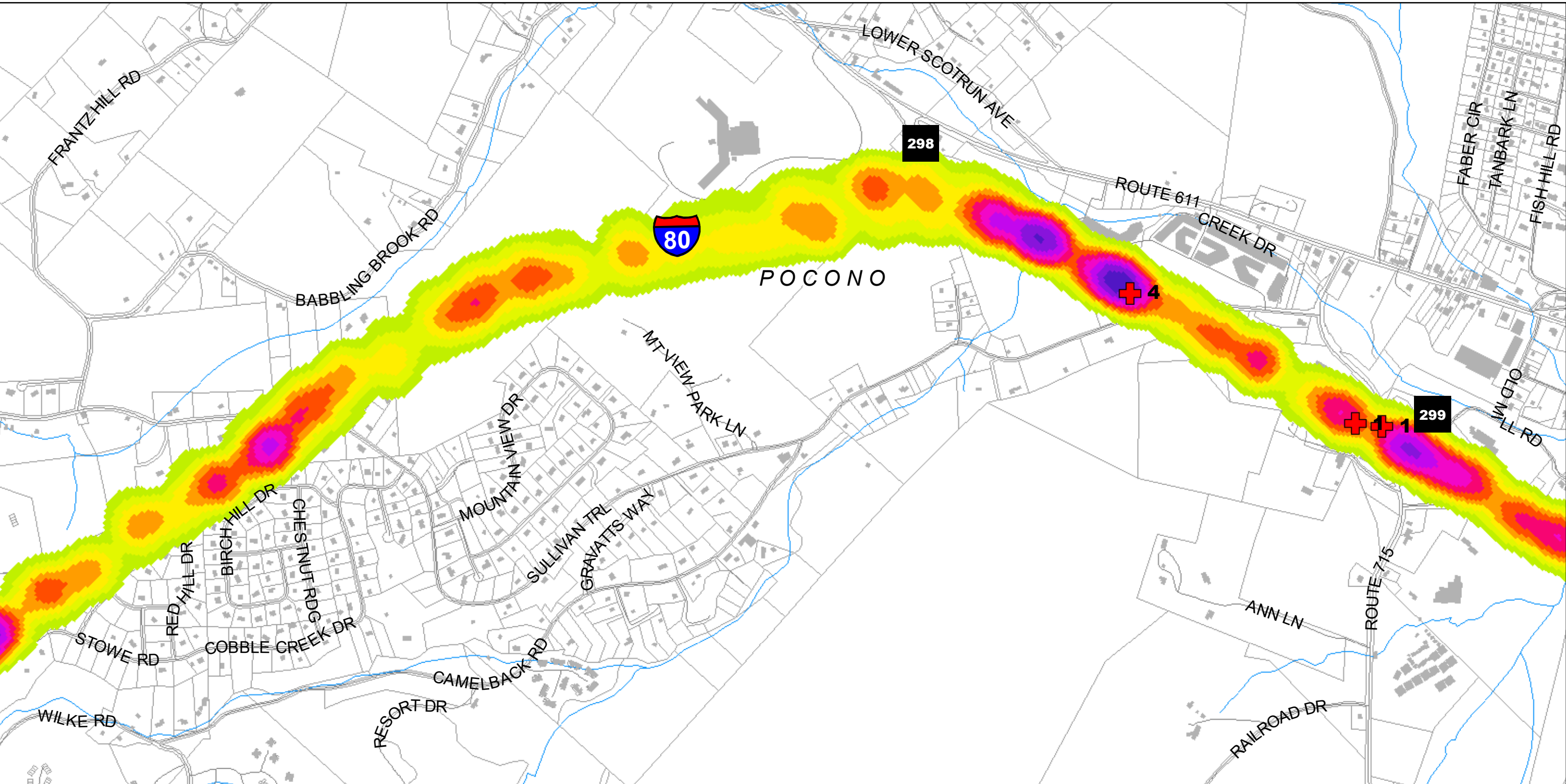


**SR 0080, Section LBS**  
**I-80 Advanced Traffic Studies**  
Sheet 2 of 7

**I-80 CRASH ACTIVITY: 2014-2018**  
**BOTH DIRECTIONS**

**pennsylvania**  
DEPARTMENT OF TRANSPORTATION

**AECOM**



**SR 0080, Section LBS**  
**I-80 Advanced Traffic Studies**  
Sheet 3 of 7

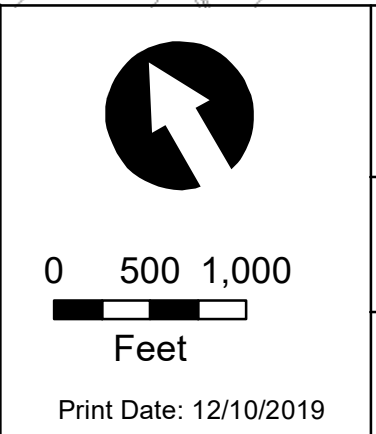
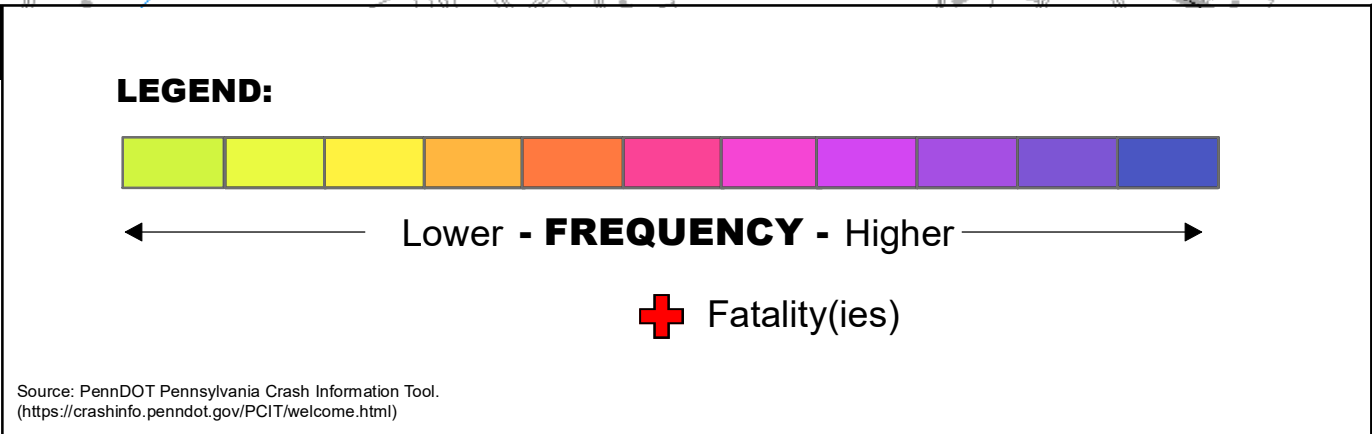
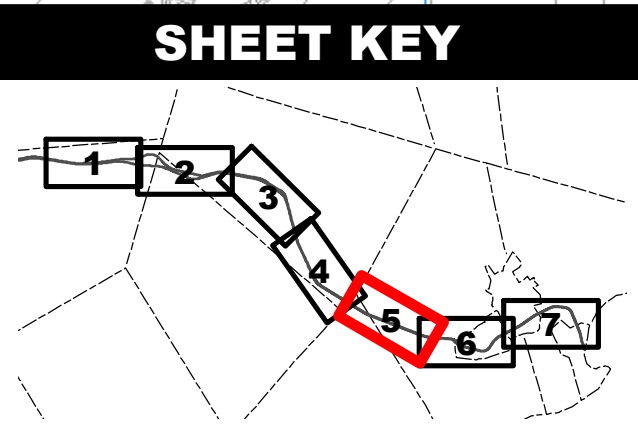
**I-80 CRASH ACTIVITY: 2014-2018**  
**BOTH DIRECTIONS**

**pennsylvania**  
DEPARTMENT OF TRANSPORTATION

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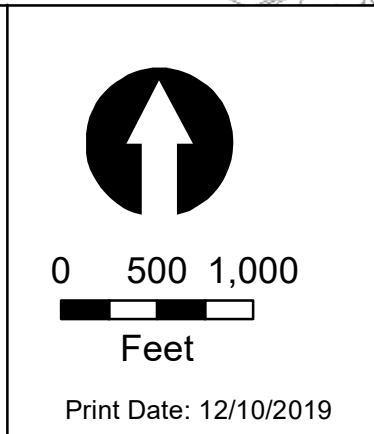
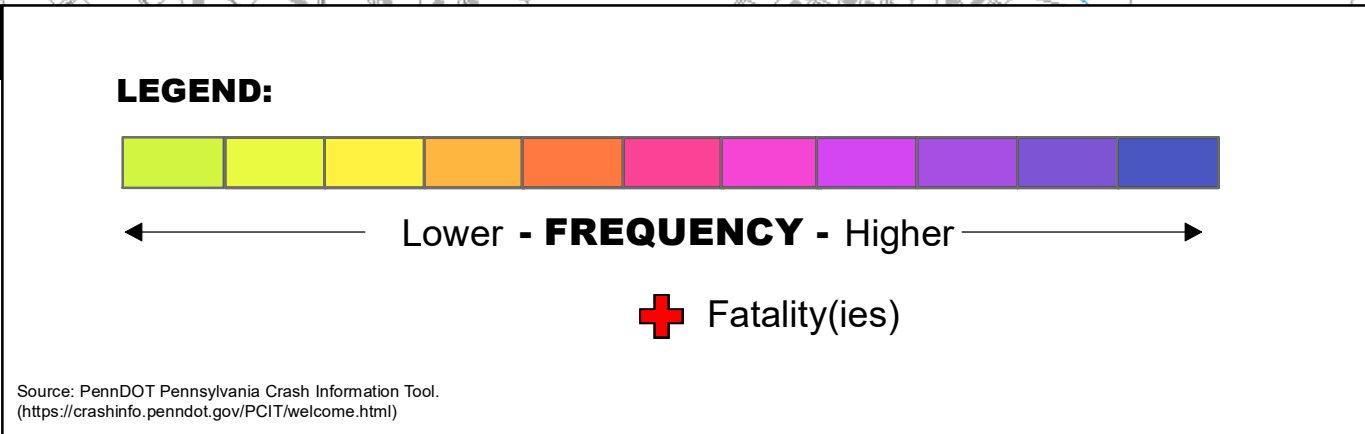
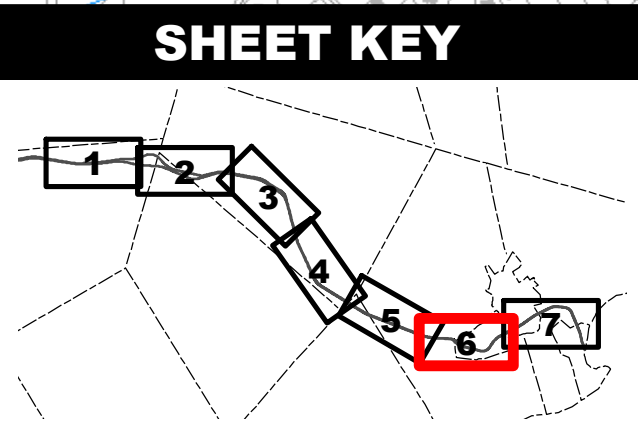
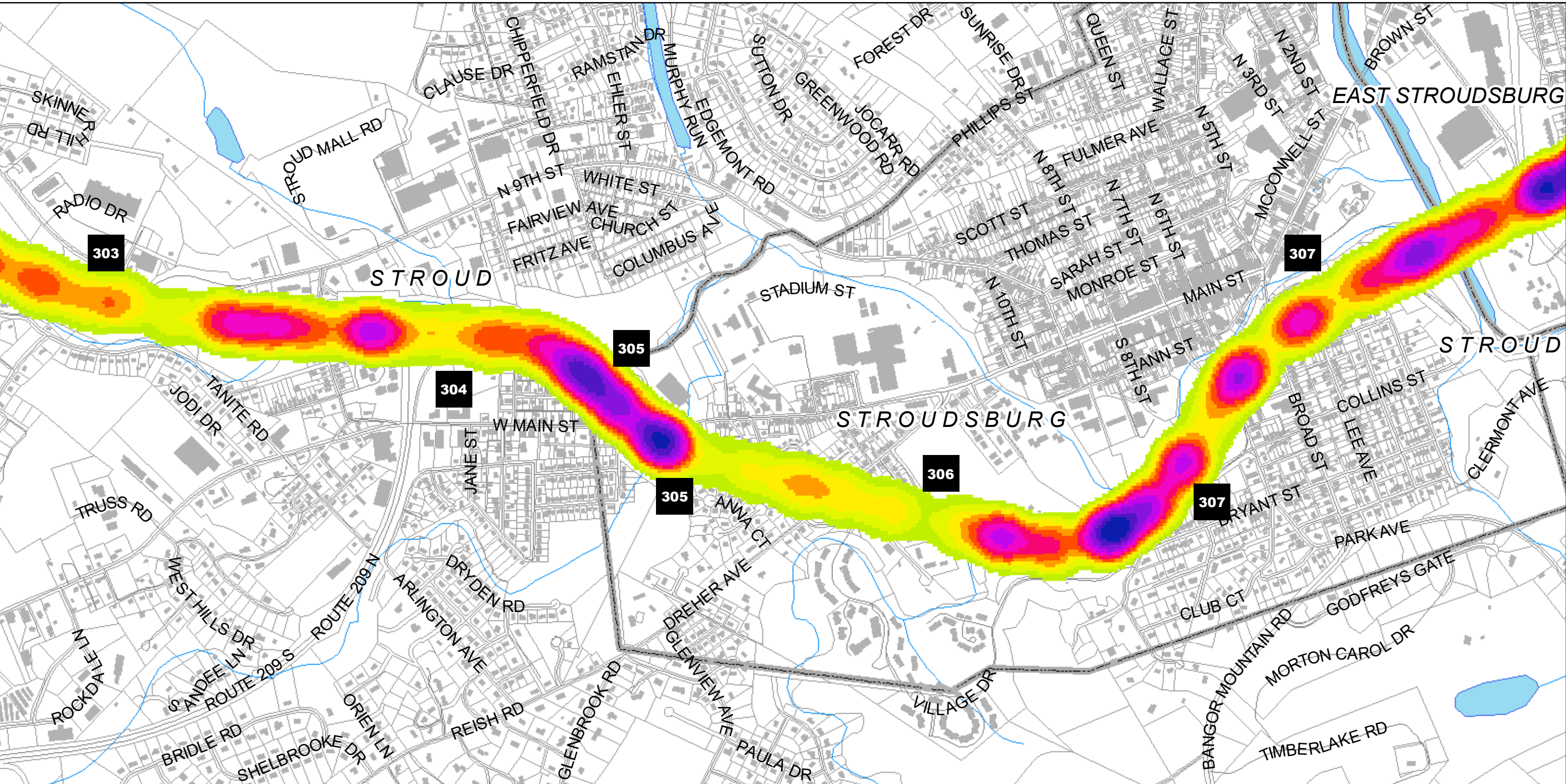
**SR 0080, Section LBS**  
**I-80 Advanced Traffic Studies**  
Sheet 5 of 7

**I-80 CRASH ACTIVITY: 2014-2018**  
**BOTH DIRECTIONS**

**pennsylvania**  
DEPARTMENT OF TRANSPORTATION

**AECOM**





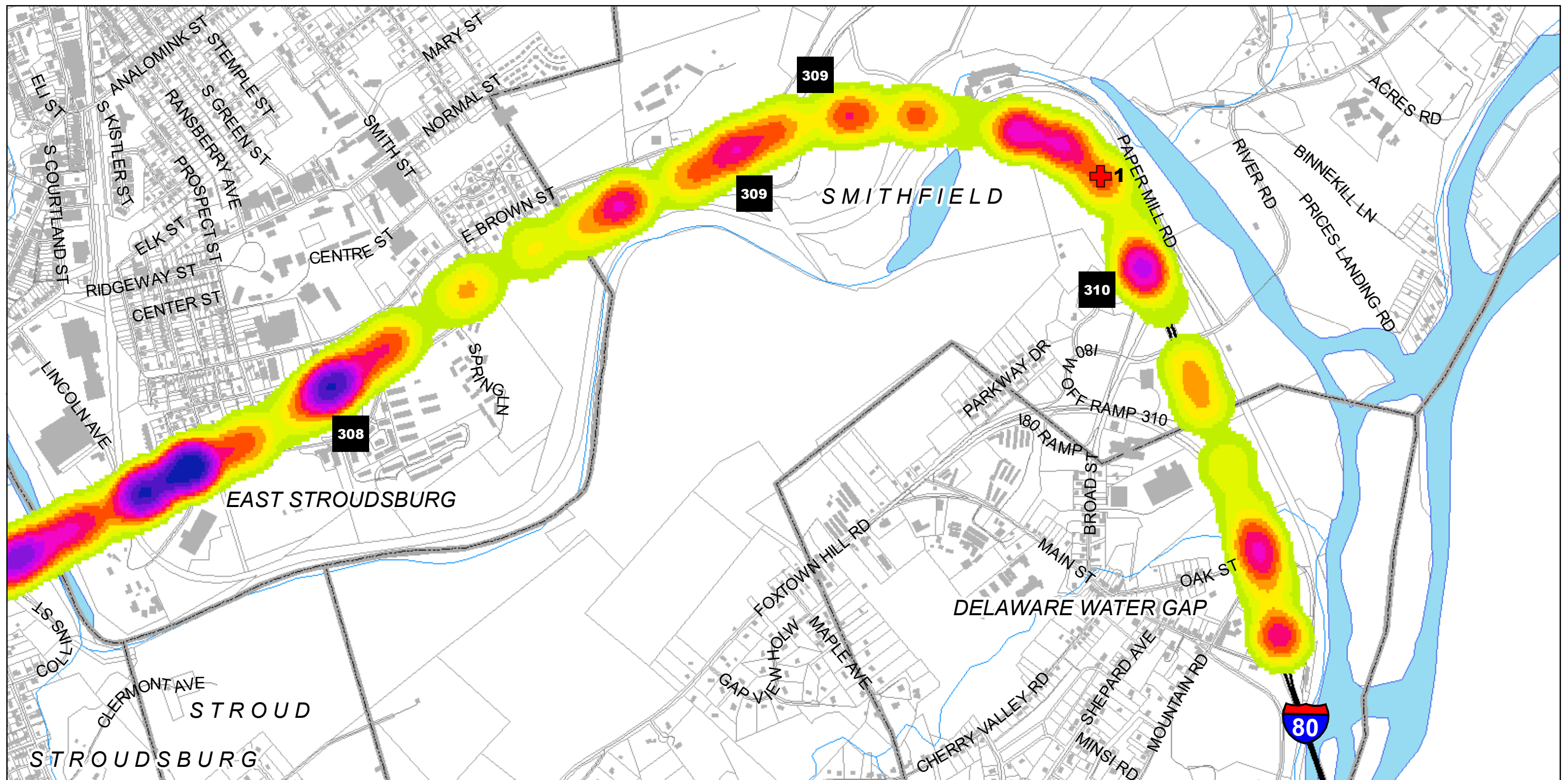
**SR 0080, Section LBS**  
**I-80 Advanced Traffic Studies**  
Sheet 6 of 7

**I-80 CRASH ACTIVITY: 2014-2018**  
**BOTH DIRECTIONS**

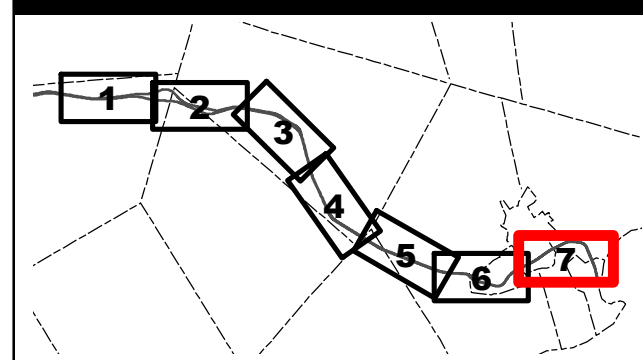
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## SHEET KEY



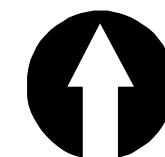
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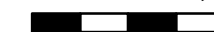
← Lower - **FREQUENCY** - Higher →

✚ Fatality(ies)

Source: PennDOT Pennsylvania Crash Information Tool.  
(<https://crashinfo.penndot.gov/PCIT/welcome.html>)



0 500 1,000



Feet

Print Date: 12/10/2019

## SR 0080, Section LBS I-80 Advanced Traffic Studies

Sheet 7 of 7

**I-80 CRASH ACTIVITY: 2014-2018  
BOTH DIRECTIONS**



**AECOM**

# Attachment 2

## IPaC Consultation



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pennsylvania Ecological Services Field Office  
110 Radnor Road Suite 101  
State College, PA 16801-7987  
Phone: (814) 234-4090 Fax: (814) 234-0748  
<http://www.fws.gov/northeast/pafo/>

In Reply Refer To:  
Consultation Code: 05E2PA00-2020-SLI-0386  
Event Code: 05E2PA00-2020-E-01762  
Project Name: I-80 17M Reconstruction

December 30, 2019

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

Any activity proposed on National Wildlife Refuge lands must undergo a "Compatibility Determination" conducted by the Refuge. Please contact the individual Refuge to discuss any questions or concerns.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
  - USFWS National Wildlife Refuges and Fish Hatcheries
-

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Pennsylvania Ecological Services Field Office**

110 Radnor Road Suite 101

State College, PA 16801-7987

(814) 234-4090

---



## Project Summary

Consultation Code: 05E2PA00-2020-SLI-0386

Event Code: 05E2PA00-2020-E-01762

Project Name: I-80 17M Reconstruction

Project Type: TRANSPORTATION

Project Description: 3.5 miles of full roadway reconstruction, widening, and interchange reconfiguration.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/40.98502902647027N75.22258399803744W>



Counties: Monroe, PA

---

## Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Mammals

| NAME   | STATUS     |
|--|------------|
| Indiana Bat <i>Myotis sodalis</i><br>There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat.<br>Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a> | Endangered |
| Northern Long-eared Bat <i>Myotis septentrionalis</i><br>No critical habitat has been designated for this species.<br>Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>                           | Threatened |

## Reptiles

| NAME   | STATUS     |
|--|------------|
| Bog Turtle <i>Clemmys muhlenbergii</i><br>Population: Wherever found, except GA, NC, SC, TN, VA<br>No critical habitat has been designated for this species.<br>Species profile: <a href="https://ecos.fws.gov/ecp/species/6962">https://ecos.fws.gov/ecp/species/6962</a> | Threatened |

---

## Flowering Plants

| NAME   | STATUS     |
|--|------------|
| Northeastern Bulrush <i>Scirpus ancistrochaetus</i><br>No critical habitat has been designated for this species.<br>Species profile: <a href="https://ecos.fws.gov/ecp/species/6715">https://ecos.fws.gov/ecp/species/6715</a> | Endangered |

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

# USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

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## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Pennsylvania Ecological Services Field Office  
110 Radnor Road Suite 101  
State College, PA 16801-7987  
Phone: (814) 234-4090 Fax: (814) 234-0748  
<http://www.fws.gov/northeast/pafo/>



In Reply Refer To:

December 30, 2019

Consultation Code: 05E2PA00-2020-TA-0386

Event Code: 05E2PA00-2020-E-01771

Project Name: I-80 17M Reconstruction

Subject: Verification letter for the 'I-80 17M Reconstruction' project under the January 5, 2016, Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-eared Bat and Activities Excepted from Take Prohibitions.

Dear Julia Moore:

The U.S. Fish and Wildlife Service (Service) received on December 30, 2019 your effects determination for the 'I-80 17M Reconstruction' (the Action) using the northern long-eared bat (*Myotis septentrionalis*) key within the Information for Planning and Consultation (IPaC) system. This IPaC key assists users in determining whether a Federal action is consistent with the activities analyzed in the Service's January 5, 2016, Programmatic Biological Opinion (PBO). The PBO addresses activities excepted from "take"<sup>[1]</sup> prohibitions applicable to the northern long-eared bat under the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based upon your IPaC submission, the Action is consistent with activities analyzed in the PBO. The Action may affect the northern long-eared bat; however, any take that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Unless the Service advises you within 30 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the PBO satisfies and concludes your responsibilities for this Action under ESA Section 7(a)(2) with respect to the northern long-eared bat.

Please report to our office any changes to the information about the Action that you submitted in IPaC, the results of any bat surveys conducted in the Action area, and any dead, injured, or sick northern long-eared bats that are found during Action implementation. If the Action is not completed within one year of the date of this letter, you must update and resubmit the information required in the IPaC key.

This IPaC-assisted determination allows you to rely on the PBO for compliance with ESA Section 7(a)(2) only for the northern long-eared bat. It **does not** apply to the following ESA-protected species that also may occur in the Action area:

- Bog Turtle, *Clemmys muhlenbergii* (Threatened)
- Indiana Bat, *Myotis sodalis* (Endangered)
- Northeastern Bulrush, *Scirpus ancistrochaetus* (Endangered)

If the Action may affect other federally listed species besides the northern long-eared bat, a proposed species, and/or designated critical habitat, additional consultation between you and this Service office is required. If the Action may disturb bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act is recommended.

---

[1]Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct [ESA Section 3(19)].

---

**Action Description**

You provided to IPaC the following name and description for the subject Action.

**1. Name**

I-80 17M Reconstruction

**2. Description**

The following description was provided for the project 'I-80 17M Reconstruction':

3.5 miles of full roadway reconstruction, widening, and interchange reconfiguration.

USFWS Project #2020-0208

PNDI Receipt #664105

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/40.98502902647027N75.22258399803744W>

**Determination Key Result**

This Federal Action may affect the northern long-eared bat in a manner consistent with the description of activities addressed by the Service's PBO dated January 5, 2016. Any taking that may occur incidental to this Action is not prohibited under the final 4(d) rule at 50 CFR §17.40(o). Therefore, the PBO satisfies your responsibilities for this Action under ESA Section 7(a)(2) relative to the northern long-eared bat.

**Determination Key Description: Northern Long-eared Bat 4(d) Rule**

This key was last updated in IPaC on May 15, 2017. Keys are subject to periodic revision.

---

This key is intended for actions that may affect the threatened northern long-eared bat.

The purpose of the key for Federal actions is to assist determinations as to whether proposed actions are consistent with those analyzed in the Service's PBO dated January 5, 2016.

Federal actions that may cause prohibited take of northern long-eared bats, affect ESA-listed species other than the northern long-eared bat, or affect any designated critical habitat, require ESA Section 7(a)(2) consultation in addition to the use of this key. Federal actions that may affect species proposed for listing or critical habitat proposed for designation may require a conference under ESA Section 7(a)(4).

---



## Determination Key Result

This project may affect the threatened Northern long-eared bat; therefore, consultation with the Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.) is required. However, based on the information you provided, this project may rely on the Service's January 5, 2016, *Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions* to fulfill its Section 7(a)(2) consultation obligation.

## Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?  
Yes
2. Have you determined that the proposed action will have "no effect" on the northern long-eared bat? (If you are unsure select "No")  
No

3. Will your activity purposefully **Take** northern long-eared bats?  
No

4. Is the project action area located wholly outside the White-nose Syndrome Zone?  
**Automatically answered**  
No

5. Have you contacted the appropriate agency to determine if your project is near a known hibernaculum or maternity roost tree?

Location information for northern long-eared bat hibernacula is generally kept in state Natural Heritage Inventory databases – the availability of this data varies state-by-state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited. A web page with links to state Natural Heritage Inventory databases is available at [www.fws.gov/midwest/endangered/mammals/nleb/nhsites.html](http://www.fws.gov/midwest/endangered/mammals/nleb/nhsites.html).

Yes

6. Will the action affect a cave or mine where northern long-eared bats are known to hibernate (i.e., hibernaculum) or could it alter the entrance or the environment (physical or other alteration) of a hibernaculum?

No

---

7. Will the action involve Tree Removal?

*Yes*

8. Will the action only remove hazardous trees for the protection of human life or property?

*No*

9. Will the action remove trees within 0.25 miles of a known northern long-eared bat hibernaculum at any time of year?

*No*

10. Will the action remove a known occupied northern long-eared bat maternity roost tree or any trees within 150 feet of a known occupied maternity roost tree from June 1 through July 31?

*No*

---

## Project Questionnaire

**If the project includes forest conversion, report the appropriate acreages below. Otherwise, type '0' in questions 1-3.**

1. Estimated total acres of forest conversion:

65

2. If known, estimated acres of forest conversion from April 1 to October 31

0

3. If known, estimated acres of forest conversion from June 1 to July 31

0

**If the project includes timber harvest, report the appropriate acreages below. Otherwise, type '0' in questions 4-6.**

4. Estimated total acres of timber harvest

0

5. If known, estimated acres of timber harvest from April 1 to October 31

0

6. If known, estimated acres of timber harvest from June 1 to July 31

0

**If the project includes prescribed fire, report the appropriate acreages below. Otherwise, type '0' in questions 7-9.**

7. Estimated total acres of prescribed fire

0

8. If known, estimated acres of prescribed fire from April 1 to October 31

0

9. If known, estimated acres of prescribed fire from June 1 to July 31

0

**If the project includes new wind turbines, report the megawatts of wind capacity below. Otherwise, type '0' in question 10.**

---

10. What is the estimated wind capacity (in megawatts) of the new turbine(s)?

0

---

## **ATTACHMENT B**

### **Environmental Assessment Advertisements**

# **NOTICE OF PUBLIC HEARING AND AVAILABILITY FOR PUBLIC REVIEW AND COMMENT**

## **ENVIRONMENTAL ASSESSMENT REPORT**

The Pennsylvania Department of Transportation (PennDOT) Engineering District 5-0, in coordination with the Federal Highway Administration (FHWA), will conduct a Public Hearing on November 13, 2019, for the I-80 Reconstruction Project (MPMS 76357), SR 0080 Section 17M in Stroud Township, the Borough of Stroudsburg, and the Borough of East Stroudsburg, Monroe County. The hearing will be conducted as part of a 30-day public review and comment period on the Environmental Assessment (EA) Report. The public review and comment period will begin on October 25, 2019 and end on November 29, 2019.

The EA considers improvements to I-80 from Interchange 303 (PA 611/North 9th Street) to Brodhead Creek, including Interchange 304 (US 209), Interchange 305 (BUS 209/SR 2012/West Main Street), Interchange 306 (SR 2004/Dreher Avenue), and Interchange 307 (PA 611/Park Avenue and PA 191/Broad Street). The preferred alternative meets the project needs to improve safety, reduce congestion and alleviate access and mobility concerns, while minimizing environmental impacts and addressing public and agency feedback. The EA has been prepared in accordance with, 23 CFR § 771, and the National Environmental Policy Act.

---

### **The EA Report is available for review at the following locations:**

- *Eastern Monroe Public Library – 1002 North Ninth Street, Stroudsburg, PA*
- *Monroe County Planning Commission – One Quaker Plaza, Room 106, Stroudsburg, PA*
- *Northeastern Pennsylvania Alliance – 1151 Oak Street, Pittston, PA*
- *Federal Highway Administration – 228 Walnut Street, 5th Floor, Harrisburg, PA*
- *PennDOT District 5-0 – 1002 Hamilton Street, Allentown, PA*
- *Senator Mario Scavelllo – 2398 Route 611, Suite 201, Scotrun, PA*
- *Representative Maureen Madden – 18 S. 9th Street, Stroudsburg, PA*

### **The EA Report is also available for review on the I-80 Project website:**

**<http://www.i80project.com/>**

In lieu of oral testimony, written comments may be submitted by email to [alexander.schieferdecker@aecom.com](mailto:alexander.schieferdecker@aecom.com) or by mail to:

ATTN: Alex Schieferdecker  
AECOM  
1700 Market Street, Suite 1600  
Philadelphia, PA, 19103

**All written comments must be received / post-marked by  
5:00 PM, November 29, 2019**

---

### **PUBLIC HEARING**

**DATE:** Wednesday, November 13, 2019

**TIME:** Registration / Plans Display: 4:00 - 5:00 PM  
Public Testimony: 5:00 PM - 7:00 PM

**PLACE:** Monroe County Control Center  
100 Gypsum Road,  
Stroudsburg, PA 18360

*The public hearing location is compliant with the Americans with Disabilities Act of 1990 (ADA). Any person requiring additional information or special assistance to participate in the hearing should contact Mr. Imtiaz Nathaniel, Senior Project Manager at 610-871-4564 or email at [inathaniel@pa.gov](mailto:inathaniel@pa.gov) by Friday, November 8, 2019.*



Venture forges repair capability for gun system

Jacqueline Boucher  
US ARMY

TOBYHANNA ARMY DEPOT – Technicians overhauling a naval gun system component had to use a crane to install its 800-pound, retractable gun port shield (GPS).

Navy officials are working with Tobyhanna Army Depot to develop repair capability for hundreds of the oversized, dome-shaped weather shields protecting Mark 45 guns from the elements and detection. The gun systems are installed on board ships in the U.S. Navy’s fleet and other allied nations.

“This is a win for the United States Navy and Army,” said Kevin Jackson, fleet support manager, Program Executive Office Integrated Warfare Systems (PEO IWS). “Tobyhanna is doing an excellent job of integrating this work into their core competency of business.”

Challenges during the repair process became opportunities to excel for Team Tobyhanna. The goal is to spend \$65,000 and six weeks repairing each weather shield.

The first joint effort unfortunately missed the mark in both areas, according to Logistics Management Specialist Rob Fried, who is also the project manager for the new workload.

He explained that initially a shorter repair cycle time for the weather shield lead to overtime costs.

Then a number of challenges extended the project timeline, which led team members to discover new and better ways to meet customer requirements.

Once the first asset arrived,



Industrial worker helper J.J. Johnson installs the locking mechanism for the weather shield door. The goal is to spend \$65,000 and six weeks repairing each weather shield is assigned to the Systems Integration and Support Directorate's Electronics Shelter System Branch. [THOMAS ROBBIN/US ARMY PHOTO]

it became clear that small changes would reap big dividends, according to Brian Sivak, production controller on the project. For instance, the team’s plan to paint parts simultaneously at multiple locations eliminates assembly delays, he explained.

Other improvements include selecting a dedicated

location on the depot, outfitted with the tools to support the mission.

Fried and Sivak work in the Production Management Directorate’s Program Management and Materiel Management divisions, respectively. Fried works closely with the customer to plan and finance the weather

shield workload, while Sivak monitors the day-to-day activities within the shops.

Communication with the customer has proved crucial to the success of this mission.

“We’re able to work together to develop capability that meets customer requirements,” Fried said. “Everyone is focused on fostering best

practices to build a solid process for future workload.”

Jackson is determined to streamline the complex processes so Tobyhanna can deliver sea power into the hands of the United States Sailor.

“As Tobyhanna continues to work more weather shields for the Navy, I am confident

the price will come down and quality will remain high in overhaul, repair and modernization,” Jackson said. “From day one, Tobyhanna Army Depot has been an excellent organization to work with. The employees and management understand Navy business as it relates to weather shield work for the fleet.”

Police offering \$10K reward in Mount Pocono train derailment/vandalism

By Maria Francis  
Pocono Record Writer

Pocono Mountain Regional Police (PMRP) responded to a call from the Delaware/Lackawanna Railroad property off Fairview Avenue in Mount Pocono on July 31 about vandals causing a train derailment.

Months later, PMRP Chief of Police Chris Wagner said they are still investigating and now offering a \$10,000 reward from Crime Stoppers for information leading to those responsible.

“The railway cars had been tampered with, their breaks were released and this caused them to roll down the tracks uncontrolled and derail,” said Wagner. “It could not have been accidental, there was definite signs of tampering found.”

“Whether it was kids messing around or something



The scene of a four car derailment at Delaware/Lackawanna Railroad off Fairview Avenue in Mount Pocono Borough in July. [PHOTO PROVIDED]

more serious like internal tampering, the damage was extensive and we are continuing to investigate the signs left behind,” said Wagner.

The damage to the railway

cars and the cost to the railway was estimated around \$300,000 said Wagner.

Anyone with information is asked to contact the PMRP at 570-895-2400.

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**NOTICE OF PUBLIC HEARING AND AVAILABILITY  
FOR PUBLIC REVIEW AND COMMENT**

**ENVIRONMENTAL ASSESSMENT REPORT**

The Pennsylvania Department of Transportation (PennDOT) Engineering District 5-0, in coordination with the Federal Highway Administration (FHWA), will conduct a Public Hearing on November 13, 2019, for the I-80 Reconstruction Project (MPMS 76357), SR 0080 Section 17M in Stroud Township, the Borough of Stroudsburg, and the Borough of East Stroudsburg, Monroe County. The hearing will be conducted as part of a 30-day public review and comment period on the Environmental Assessment (EA) Report. The public review and comment period will begin on October 25, 2019 and end on November 29, 2019.

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**The EA Report is available for review at the following locations:**

- Eastern Monroe Public Library – 1002 North Ninth Street, Stroudsburg, PA
- Monroe County Planning Commission – One Quaker Plaza, Room 106, Stroudsburg, PA
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- Senator Mario Scavella – 2398 Route 611, Suite 201, Scotrun, PA
- Representative Maureen Madden – 18 S. 9th Street, Stroudsburg, PA

**The EA Report is also available for review on the I-80 Project website:**

**<http://www.i80project.com/>**

In lieu of oral testimony, written comments may be submitted by email to [alexander.schieferdecker@aecom.com](mailto:alexander.schieferdecker@aecom.com) or by mail to:

ATTN: Alex Schieferdecker  
AECOM  
1700 Market Street, Suite 1600  
Philadelphia, PA, 19103

**All written comments must be received / post-marked by  
5:00 PM, November 29, 2019**

**PUBLIC HEARING**

**DATE:** Wednesday, November 13, 2019

**TIME:** Registration / Plans Display: 4:00 - 5:00 PM  
Public Testimony: 5:00 PM - 7:00 PM

**PLACE:** Monroe County Control Center  
100 Gypsum Road,  
Stroudsburg, PA 18360

The public hearing location is compliant with the Americans with Disabilities Act of 1990 (ADA). Any person requiring additional information or special assistance to participate in the hearing should contact Mr. Imtiaz Nathaniel, Senior Project Manager at 610-871-4564 or email at [inathaniel@pa.gov](mailto:inathaniel@pa.gov) by Friday, November 8, 2019.





It's still unknown what caused the fire at Pocono Manor Resort & Spa. [MICAELA HOOD/POCONO RECORD]

# Cause of Pocono Manor fire likely ‘undetermined’

By Micaela Hood  
Pocono Record Writer

The cause of a fire that destroyed the Pocono Manor Resort & Spa last week will likely be undetermined, according to the Pennsylvania State Fire Marshal.

“We haven’t determined a cause yet, there was too much damage [done] to the structure,” Troop R Fire Marshal Jeffrey Winters said. “Whether or not we will ever find the cause, I don’t know. As of now, it’s closed as undetermined in nature.”

On Monday, Winters — along with Pocono Township Police Detective James Wagner and other state police officers— spent about 11 hours at the site investigating what started the massive blaze at the historic inn.

“The officers interviewed and spoke with some people who were there when the fire started,” Winters said.

Due to the immense damage to the structure of Pocono Manor, investigators were unable to determine the cause of the blaze.

“The whole structure is destroyed, and we did not find any evidence of (foul play), nothing has come to light.”

Wagner said he’s still gathering information from the public.

“Business was open and employees were there at the time the fire started, so there’s a lot more to this before we can make an official determination,” he said.

The resort had surveillance cameras, which may also help in the investigation.

“The cameras were destroyed but we were able to secure some hard-drives that will hopefully give us some information on what happened in this fire,” he said.

The fire started at 6:30 a.m. Friday in the kitchen, located on the North side of the building. There were no injuries reported.

By Sunday the fire was under control, although firefighters continued to battle hot spots.

“It was one of the worst I have ever seen,” Winters,

a veteran firefighter said. “And it was fueled by the winds, which spread the fire rapidly.”

Not helping matters was that the building was an older, wooden structure, Winters said.

The inn was supposed to close Nov. 29 as part of a renovation project and partnership with Pocono Springs, an entertainment and retail complex slated to open in 2022.

“Rest assured we will build a brand new and spectacular facility here that I’m sure everyone will be proud of,” Joe Jerome, owner of Pocono Manor, said during a press conference Sunday held at the site.

Crews and contractors have started to clean-up and remove the rubble and debris from the building.

Fellow resorts such as Woodloch Resort, Skytop Lodge, Kalahari Resorts & Conventions, The Shawnee Inn and Golf Resort, Baymont Inn & Suites, Camelback Lodge, French Manor Inn & Spa, Great Wolf Lodge are

offering assistance to guests and employees affected by the fire, according to the Pocono Mountain Visitors Bureau.

If anyone has information regarding the fire, contact Detective Wagner at the Pocono Township Police Department at 570-629-7200 ext 214.

*The Pocono Record is working on a tribute about Pocono Manor. If you have happy memories or historic tidbits to share with our staff, please contact Micaela Hood at mhood@poconorecord.com or call 570-420-4341.*

# Brodheadsville man arrested, charged with receiving stolen equipment

By Brian Myszkowski  
Pocono Record Writer

CHESTNUTHILL TOWNSHIP — A Brodheadsville man was taken into custody and charged with receiving stolen construction equipment on Monday, according to a release from the Monroe County District Attorney’s office.



The District Attorney’s Criminal Investigation Division announced on Nov. 4 that William Eichelsdoerfer, 52, was charged with receiving stolen property involving the theft of a Caterpillar Power Rake valued at \$9,000, a 4-foot forks attachment valued at \$2,100, a Belmont trailer valued at \$7,800, and a Caterpillar bucket attachment valued at \$1,800.

Eichelsdoerfer was arrested on Monday and arraigned before Magisterial District Judge Colleen Mancuso, and then released on a \$10,000 unsecured bail.

He has been charged with three third-degree felony counts of receiving stolen property.

On Oct. 8, 2018, Pennsylvania State Police responded to a complaint from I.B. Abel, Inc. reporting the theft of equipment valued at \$20,700 from 105 Greenview Drive in Chestnuthill Township.

According to the criminal complaint, a representative from I.B. Abel informed authorities that the stolen power rake had a GPS device affixed to it, and that the device would “ping” if the equipment was moved.

The representative informed the state

police that the device had “pinged” at location on Fairfield Drive in Brodheadsville, though on Oct. 8, it “pinged” again at an address in Oxford, New Jersey.

State police interrogated the man who lived at that Oxford property on Oct. 28, 2018. The man claimed that at the time, he had worked at Intercounty Paving, with Eichelsdoerfer working as his direct supervisor.

The man claimed that on Oct. 5, 2018, he was instructed by Eichelsdoerfer to pick up a trailer and equipment from Eichelsdoerfer’s home on Oct. 7. The worker picked up the equipment and took it to his own residence, though he did note that he was unaware that the equipment was stolen.

According to the criminal complaint, he was only made aware of that fact when he came home from work on Oct. 8, 2018 to find the Washington Township Police Department in his driveway.

On Oct. 17, 2019, the investigation was turned over to the Monroe County District Attorney’s Criminal Investigation Division Detective Robert Sebastianelli, who had recently been assigned to the Northeast Pennsylvania Auto Theft Task Force, for further investigation.

Follow-up interviews with the former employee of Intercounty Paving revealed that he did ask Eichelsdoerfer what had happened with the equipment after not hearing anything for quite some time, and that Eichelsdoerfer had responded the matter had been “swept under the rug.” The worker also confirmed his written statement from the interview that had occurred the year before, as well as the location of Eichelsdoerfer’s home.

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**jlabar@poconorecord.com**





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[Menu](#) ☰

## Public Hearing

PennDOT will hold a public hearing for the I-80 Reconstruction Project at Monroe County Control Center at 100 Gypsum Road, Stroudsburg on November 13, 2019.

**The meeting will consist of 2 parts:**

From 4:00 to 5:00, PennDOT will hold a plans display of the preferred alternative, refinements to the preferred alternative and typical sections.

From 5:00 to 7:00, PennDOT will conduct a public hearing session providing the public with an opportunity to provide comments by public testimony, private testimony or written testimony.

**Below are the links to the materials that will be presented at the plans display / public hearing:**

[Preferred Alternative \(Alt 2D\)](#)

[Refinements to Preferred Alternative \(Alt 2D\)](#)

[Typical Sections](#)

[Hearing Handout](#)

[Hearing Comment Form](#)

[Hearing Testimony Card](#)

[Sign-in Sheet](#)

[Pub 83 When Your Land is Needed for Transportation Purposes](#)

[Hearing Public Notice](#)

The public is encouraged to review the [Hearing Public Notice](#) for important details on the public comment period and the available options to provide comments.



**PennDOT Engineering District 5-0 • 1002 Hamilton Street • Allentown, PA 18101**

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October 24, 2019

Monroe County Planning Commission  
One Quaker Plaza  
Room 106  
Stroudsburg, PA 18360

**SUBJECT:       HARDCOPY DELIVERY OF ENVIRONMENTAL ASSESSMENT**  
**I-80 Reconstruction Project**  
**SR 0080 Section 17M, Monroe County, PA**

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Please acknowledge receipt of the copy of the EA by completing the receipt below.

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**RECEIPT**

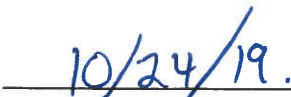
I have received a copy of the Environmental Assessment for the SR 0080 Section 17M Reconstruction Project via hand delivery.



Signature



Name (Printed)



Date

October 24, 2019

Northeastern Pennsylvania Alliance  
1151 Oak Street  
Pittston, PA 18640

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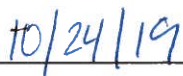
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Name (Printed)



Date

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Senator Mario Scavella  
2398 Route 611  
Suite 201  
Scotrun, PA 18355

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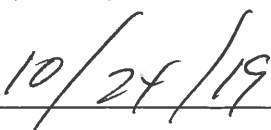
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Name (Printed)

  
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October 24, 2019

Representative Maureen Madden  
18 South Ninth Street  
Stroudsburg, PA 18360

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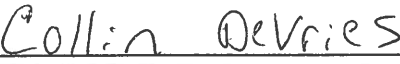
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Signature

  
\_\_\_\_\_  
Name (Printed)

  
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Date

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Eastern Monroe Public Library  
1002 North Ninth Street  
Stroudsburg, PA 18360

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\_\_\_\_\_  
Signature

Mary Stewart Erm  
\_\_\_\_\_  
Name (Printed)

10/24/2019  
\_\_\_\_\_  
Date