



## CENTRE COUNTY HISTORICAL SOCIETY

April 20, 2026

Mr. Eric Murnyack, P.E., PennDOT Project Manager  
PA Department of Transportation, Engineering District 2-0  
70 PennDOT Drive  
Clearfield, PA 16830

Re: Centre County Historical Society Comment - State College Area Connector Draft Environmental Impact Statement (DEIS) and Draft Individual Section 4(f) Evaluation (Section 4(f))

Dear PennDOT District 2 Project Team,

On behalf of the Centre County Historical Society (CCHS), we appreciate the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) and Draft Programmatic Agreement (PA) for the State College Area Connector Project. We thank PennDOT and its partners for the extensive effort invested in evaluating alternatives and identifying potential impacts to the region's historical, environmental, cultural, and community resources.

The CCHS Mission is to build a critical understanding of our past, engage the issues of the present and guarantee a future which preserves our history and heritage for a diverse Centre County. To discover, collect, preserve, interpret, educate, advocate, present, and promote the county's history and culture. CCHS has been operating since 1904 and has more than 950 members interested and focused on the history of the Centre County.

As a heritage organization, CCHS recognizes the physical, cultural, visual and audible impacts on the Penns-Brush Valley National Register Eligible Rural Historic District by any construction activity along US Route 322 within the historic district and within the viewsheds identified by the National Register document as established by the National Preservation Act of 1966, specifically Section 106, and under the Section 4(f) of the National Transportation Act of 1966.

In regards to the State College Area Connector project, CCHS urges the Federal Highway Administration and PennDOT to prioritize avoidance alternatives that maintain intact agricultural tracts, preserve ridge-to-valley viewsheds, minimize stream crossings, and avoid historically significant transportation alignments and archaeologically sensitive areas. Where avoidance is not feasible, we trust that effects will be fully evaluated under Section 106, with minimization and mitigation measures commensurate with the scale and significance of this nationally important rural historic landscape.

CCHS emphasizes the importance of preserving historic farms and agricultural landscapes, in addition to individual historic structures and communities, within the study area. These resources are significant not only for their architectural and historical value, but also for their ongoing role in Centre County's agricultural economy and rural character. Historic farms reflect multi-generational stewardship, traditional land-use patterns, and vernacular building practices, while continuing to support local food systems, soil conservation,

and open space. Their fragmentation or loss would have lasting consequences for both agricultural viability and heritage tourism.

CCHS further emphasizes that the Eligible Penns-Brush Valley Rural Historic District (attached) is a highly intact and nationally significant agricultural landscape whose significance derives from the continuity and integrity of its broader cultural landscape, not solely from individual resources. As documented in the National Register nomination (submitted by CCHS, 2002), character-defining features include extensive agricultural fields and farmsteads; historic field patterns shaped by topography; hedgerows, woodlots, and tree lines defining land division; early transportation corridors such as the Lewistown Turnpike (old Route 322), Routes 45 and 192 and associated farm lanes; and hydrological systems including Spring Creek and Penns Creek and their tributaries. These elements are unified within a distinctive Ridge-and-Valley setting, where open limestone valley floors are framed by forested ridgelines, creating significant historic viewsheds. Archaeological sites, industrial remnants, and rural village settlement patterns further contribute to the district's integrity.

Fishing also has a long and well-documented history in this area, with the region serving as a host for national and international fly-fishing events. Spring Creek, a Class A, High Quality, Wild Trout, Cold Water Fishery HQ, WT, CWF., is an exceptional cold-water stream that originates within the study area and forms the headwaters for the entire waterway. Penn State's fly-fishing program, established in 1934—the same year as Fisherman's Paradise—reflects the longstanding significance of this resource. The area has attracted anglers from across Pennsylvania and the nation since the nineteenth century and continues to be associated with prominent figures in the sport, including longtime resident and angler Joe Humphreys, who lives along Spring Creek. There is strong potential for development all along Spring Creek from its headwaters next to current Route 322 throughout its path in College and Benner Townships. With all of this coming together at various points along Spring Creek, there is potential for significant degradation. Is PennDOT looking at these impacts cumulatively?

Accordingly, we encourage PennDOT to prioritize avoidance and minimization measures for historic farmsteads, associated agricultural lands, and water-based resources, including those supporting fishing. Where adverse effects cannot be avoided, mitigation strategies should support the continued viability of agricultural operations, maintain access to active fields, protection of water resources, and preserve the historic rural landscape character that defines the study area.

CCHS concurs with concerns raised by the Keystone Water Resources Center, Moshannon Group of the Sierra Club and other stakeholders regarding the proposed mitigation strategy for wetlands, streams, and surface waters. We respectfully request that mitigation be located within the Spring Creek and Sinking Creek watersheds in Centre County, rather than in the Babbs Creek watershed in Tioga County. Keeping mitigation within affected watersheds will better maintain ecological integrity, support local water quality, and ensure that impacted communities directly benefit from restoration efforts. In addition, water quality testing should be implemented in multiple and appropriate locations before, during and after construction by an independent organization.

We commend PennDOT for several important commitments outlined in the Draft Programmatic Agreement, including the creation of a Design Advisory Committee to guide context-sensitive design and the development of public educational components addressing the area's history and cultural significance. These measures represent meaningful steps toward responsible stewardship of Centre County's heritage.

Because the district's significance is fundamentally landscape-based, the proposed project has the potential to result in direct, indirect, and cumulative adverse effects through fragmentation of agricultural land, removal of vegetation patterns, disruption of historic circulation networks, alteration of hydrological systems,

and degradation of key viewsheds. Even partial intrusions would diminish integrity of the Historic District by weakening the spatial relationships among contributing features.

To strengthen the project’s approach to cultural and community resources, we respectfully ask:

1. Please identify origin and destination patterns of traffic, particularly heavy truck traffic (beyond study area) for clarity on whether there are other options that could be explored.
2. What is the budget for mitigation in this project? Please add a dedicated fund for mitigation to the project budget.
3. How will indirect and cumulative impacts (including visual, auditory, and setting-related effects) on historic properties be evaluated and mitigated?
4. How will PennDOT address farmland fragmentation and maintain farm viability where partial acquisitions occur?
5. Beyond concrete barriers, what design-based noise reduction strategies have been considered (e.g., quiet pavement, vegetative buffers, or speed management) to maintain existing sound levels within the Historic District?
6. How will local historical organizations, including CCHS, be engaged in developing interpretive materials and programming?
7. How will recommendations from the Design Advisory Committee be incorporated into final design decisions?

CCHS appreciates PennDOT’s continued engagement with local stakeholders and its consideration of long-term cultural and environmental impacts. We remain committed to working collaboratively to ensure that Centre County’s historic, agricultural, environmental, and recreational resources are thoughtfully preserved and interpreted for future generations.

Thank you for your consideration. We look forward to continued dialogue and participation in upcoming project discussions.

Sincerely,

  
Mary Sorensen  
Executive Director

  
Roger L. Williams  
President

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*CCHS Mission: Our mission is to build a critical understanding of our past, engage the issues of the present and guarantee a future which preserves our history and heritage for a diverse Centre County. To discover, collect, preserve, interpret, educate, advocate, present, and promote the county’s history and culture.*

*The Centre County Historical Society is a nonprofit, tax-exempt organization, under Section 501(c) 3 of the I.R.S. Code. Official registration and financial information about CCHS may be obtained from the Pennsylvania Department of State.*

Mitigation for Geology, Hydrology, and Groundwater impacts seems to be largely geotechnical-focused (i.e., subsidence concerns) rather than hydrologic-focused (i.e., preserving baseflow). There is no clear commitment to preserving recharge quantity, only to managing runoff impacts. Stormwater mitigation includes infiltration only conditionally, with a strong emphasis on avoiding infiltration in karst areas

- The proposed project will increase impervious surfaces, effectively reducing the natural capacity for recharge. SRBC mapping indicates a concentration of high-recharge potential areas from Iron Horse Lane to Tait Road, which is underlain by carbonate geology, a high density of karst features, and a mapped fault that provide preferential recharge pathways. If stormwater controls are inadequate, loss of infiltration could negatively affect baseflow to Spring Creek, as well as connected wetlands, seeps, and springs.
- Stormwater management should go beyond peak-rate control and emphasize volume-based, infiltration-focused, and low-impact development strategies, including bioretention, infiltration basins with amended soils, and vegetated swales. In areas of high recharge potential and near the six private wells, stormwater designs should try to strike a balance between:
  - Encouraging infiltration to maintain groundwater recharge and provide thermal benefits
  - Treating infiltrated water as needed to protect water quality for private wells and HQ-EV wetlands and streams
  - Pennsylvania guidance supports infiltration- and volume-based strategies to supplement peak-rate management, particularly in environmentally sensitive areas.
- A more thorough hydrologic characterization could consider the following to inform targeted stormwater management measures, ensuring that infiltration-based practices do not inadvertently impact private wells, and that Managed Release Concept approaches do not adversely affect wetlands, seeps, or springs:
  - Transit-loss study to determine reaches of Spring Creek and tributaries that may naturally be gaining or losing to groundwater
  - Mapping groundwater elevations in private wells to verify flow direction

Respectively Submitted  
Robert K. Vierck  
Chairman, Keystone Water Resources Center  
President Emeritus Spring Creek Chapter of Trout Unlimited.



ClearWater Conservancy  
2555 N. Atherton St.  
State College, PA 16803

20 April 2026

*Re: Comments on the Draft Environmental Impact Statement for the proposed State College Area Connector*

Dear Penn DOT District 2 and the Federal Highway Administration (FHWA),

ClearWater Conservancy (ClearWater) is an accredited land trust based in State College, Pennsylvania serving Centre and surrounding counties. We work on behalf of our more than 1,500 members, and all communities across the region, to connect, protect, restore and steward our natural resources. The proposed State College Area Route 322 Connector Project is an impactful project through the core of our service area. We have read the Draft Environmental Impact Statement (DEIS) for the State College Area Connector Project and are providing the comments summarized below and attached in detail.

ClearWater appreciates PennDOT's efforts in gathering community input and completing the DEIS. We recognize the Connector Project's impact on landowners and businesses in the corridor and acknowledge that these important stakeholders will experience many other direct and indirect impacts that will be felt during construction and permanently. In fact, ClearWater Conservancy has two easements in the corridor, and both will require mitigation for both primary (i.e., lost acreage) and secondary impacts. However, these comments focus primarily on the DEIS's assessment of the hydrologic, ecologic, and conservation impacts of the proposed project, as well as related mitigation.

It is difficult to overstate the importance of the Spring Creek and Sinking Creek watersheds regarding the landscape, recreation, business, water supply and quality of life in the Centre County region. Despite existing impacts from development and 322, these creeks remain



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high quality due to the high recharge potential of the surrounding mountain and valley and the complex karst geology. In fact, the unique hydrogeology of the region has led the State College and surrounding communities to utilize groundwater as their drinking water supply. Aquifer recharge and the interconnection of groundwater and surface water resources is critically important for the health of Spring and Sinking creeks and the water supply of our community.

ClearWater asserts that what is missing from the DEIS is at least as important as what is found in its pages. Highway construction in karst environments may cause irreversible impacts on groundwater and surface water exchange, primarily through the disruption of subterranean conduits, contamination of aquifers via sinkholes, and permanent alteration of spring discharge. Without hydrologic modeling, the impacts of the highway project on the groundwater infiltration, preferential flow paths, and temperature of inflows to the creeks cannot be assessed. Performing this modeling work prior to finalizing the EIS is necessary to determine where impacts need to be avoided, how much mitigation will be required, and how the final design can further improve outcomes.

Our **detailed comments** focus on DEIS section 3.10-3.21 and can be found attached. Our **summary comments** are immediately below. We emphasize the importance of the following elements, and we request that they be fully addressed through the ***final EIS, project design and implementation, and/or definition and implementation of mitigation.***

***Draft Environmental Impact Statements:***

- The DEIS fails to recognize and characterize the complexity and interconnection between surface and groundwater across the project site. The final EIS should include integrated hydrologic modeling and characterize the impacts of the proposed project, including but not limited to preferential flow paths and streamflow routes, groundwater recharge, seasonal patterns of streamflow and wetland levels, event-based (stormwater) volumes, water quality, and water temperature. The final EIS also should incorporate similar modeling and characterization under future hydrologic conditions.
- The DEIS's use of limited groundwater well information does not adequately characterize the underlying geology and aquifers and potential impacts. To support the modeling described above, the final EIS should use a more comprehensive groundwater dataset.
- The final EIS should incorporate a complete accounting of secondary impacts and cumulative impacts. For example, direct impacts are indicated for ClearWater

easement areas and wetland areas. Diminishment in value and function of remaining acreage is not recognized or accounted for in the DEIS. This should occur in the final EIS and mitigation should consider secondary and cumulative impacts, as well as direct impacts.

- Description of stormwater handling does little to ensure that local aquifer recharge will occur, which is critical for maintaining stream hydrology and temperatures necessary to sustain aquatic biota. The final EIS should recognize the importance and opportunities for stormwater management controls to maintain natural patterns of groundwater and streamflow, protect seasonal temperature regimes, and offer additional co-benefits such as for water quality and habitat value in these headwater stream areas.
- The characterization of fill to be used in the current proposed project (e.g., amount, source, and quality [salinity, acid-sulfate potential, heavy metals, etc.]) is not provided in the DEIS. Parameters of fill material that are fully protective of surface and groundwater quality should be defined in the final EIS and used and monitored through construction.
- The DEIS fails to recognize and address light pollution. The final EIS needs to incorporate consideration of light pollution and associated mitigation.

***Project Design and Implementation:***

- Ongoing monitoring should be carried out pre- through post-construction to document baseline conditions and ensure the implementation and adequacy of best practices. Monitoring should include:
  - quantity, quality, and timing of surface water flow
  - water table elevations
  - residence time, temperature, and infiltration vs. evaporation of stormwater from basins and other features
  - wildlife mortality on roadways
- Avoid wetland, floodplain, and stream impacts (e.g., no stream relocation or piping, minimize wetland loss and degradation). Constructed and restored wetlands do not have the value of natural wetlands.
- Maximize the ecological functions of areas under bridge spans using best practices such as proven effective height to width ratios to ensure protection of stream and riparian habitat, adequate light for native vegetation, and wildlife movement.
- Use cool pavement technology to help control temperature of stormwater runoff.
- Minimize light pollution. Examples for doing so include smart and adaptive LED streetlights that dim based on traffic, full-cutoff shielding to eliminate upward light,

appropriate lighting near bridge underpasses to support wildlife movement, and use of blue-light filtering to reduce sky glow.

- Opportunities within the project site need to be fully explored in the final EIS and project design and construction for their potential to improve existing conditions or minimize project impacts, including those for which mitigation is not required.

These might include but are not limited to:

- Restoration and expansion of riparian areas.
- Use of multi-functional green stormwater infrastructure to achieve co-benefits (i.e., ecological, environmental, and aesthetic). Examples include advanced vegetated systems using native plants that manage runoff (volume and peak flows) while improving temperature and water quality, supporting biodiversity, enhancing air quality, improving landscape aesthetics, and helping to mitigate noise.
- Enlarged culverts under existing 322 to allow movement of aquatic biota and conveyance of larger flows. Include sufficient length and height of spans to pass modeled flows as well as wildlife.

***Mitigation:***

- A minimum of 15% of the total project cost should be appropriated for and invested directly in mitigation for the impacts of this highway on our environment.
- Project mitigation funds should be invested, with priority given to efforts within the NEPA project area and associated watershed. Otherwise, mitigation efforts should be dedicated solely to adjacent and other proximate systems within Centre and Mifflin Counties. The proposed mitigation in the DEIS for locally affected resources at Babb Creek (located 90 miles from the project site) does nothing to offset local impacts and is unacceptable.

Thank you for the opportunity to comment on the State College Area Connector Draft Environmental Impact Statement. Please call or email me if any of our comments require clarification or further discussion. We appreciate PennDOT's desire to design and construct a project that becomes an asset to our region.

Sincerely,

Elizabeth Crisfield  
Executive Director  
ClearWater Conservancy

# State College Area Connector: *ClearWater Conservancy* *Detailed Comments (20 April 2026)*

ClearWater offers detailed comments below in response to sections of the Draft Environmental EIS (DEIS), specifically on Sections 3.10-3.21. Each section of our comments is accompanied by associated recommendations related to completion of the final EIS, final project design and construction, and/or project mitigation. While some of our comments apply to all three of the proposed alternatives, we give primary attention to the Central Alignment, the alternative selected in Section 5.3 of the DEIS.

## 3.10 Air Quality

The DEIS projects a modest increase in vehicles per day using the Route 322 Connector through design year 2050 and no projected adverse impact on air quality. ClearWater offers no comments for this section.

### Recommendations:

- None.

## 3.11 Noise

ClearWater recognizes the increased noise pollution from the proposed project and appreciates related modeling conducted by PennDOT for each of the three project alternatives.

### Recommendations:

- ClearWater strongly encourages PennDOT's ongoing consultation with impacted residents and businesses most immediate to the project to develop and implement the most effective and acceptable noise mitigation methods throughout the project length. As often as practical, we also strongly encourage the full consideration and integration of the use of native vegetation in mitigation to achieve myriad co-benefits (e.g., air quality improvement, habitat value, and aesthetic benefits) as well as noise reduction.
- ClearWater specifically requests a 100-foot native conifer belt be planted along the south side of the 322 Connector from Bamboo Lane extending 420 ft west to the

pond to dampen sound for wildlife and birds, as this is part of contiguous forest to Tussey Ridge.

### 3.12 Farmlands

ClearWater Conservancy recognizes that our conservation easements, the Nittany Farm and Kuhn properties, will be directly impacted by the Central Alignment. We also would like to emphasize that there will be significant secondary impacts, and the conservation values of remaining portions of the properties with our easements will be diminished due to the proximity of a new limited access highway.

#### Recommendations:

- ClearWater expects direct formal consultation with PennDOT on both direct and secondary impacts on the properties with our conservation easements, as well as necessary mitigation.
- ClearWater supports other landowners in the corridor whose impacts also go beyond the actual acreage taken by the highway footprint.
- Where farms are bisected by the highway, measures need to be taken to minimize the inefficiency of farming disconnected parcels.
- Farming with uncertainty about land use is extremely difficult. Negotiations related to compensation should move as quickly as possible.

### 3.13 Hazardous or Residual Waste Sites

ClearWater appreciates the identification of hazardous and residual waste sites throughout the project area, as well as the general characterization of these sites regarding their likelihood or potential to act as sources of environmental contamination that could be exacerbated by the preparation, construction, and existence of the proposed project. We further appreciate PennDOT's commitment to measures necessary to avoid adverse impacts to community and worker health associated with these sites.

#### Recommendations:

- The 24 waste sites identified with the Central Alternative should be included in hydrologic modeling described in the next section (3.14 Geology, Hydrology, & Groundwater) to ensure migration of contaminants does not occur.
- Unambiguous PennDOT commitment should be provided ensuring full remediation of any of these sites impacted by the project to avoid their contribution of contaminants that may harm human or ecological health.

### 3.14 Geology, Hydrology & Groundwater

As discussed previously, protecting Spring and Sinking creeks is central to the ecological health and – in many ways – the identity of the region. The proposed highway runs through the headwaters of both watersheds and is likely to have a significant impact on the hydrology of both the immediate project and adjacent areas. Hydrologic impacts are likely to be complex, as they can result from the individual and collective influence of diverse dynamics across the project area, such as the direct destruction of seeps, springs, stream reaches, wetlands and/or floodplains; changes in the locations and quantities of groundwater recharge; increases in the volumes and peaks of stormwater through elevated runoff from impervious and compacted areas; shifts in water volumes, flow patterns, and quality due to implemented stormwater management; and degraded surface and groundwater quality from stormwater runoff and the movement of water through acid producing rock and imported fill material.

However, these impacts have not been adequately assessed in the DEIS through the development and application of a hydrologic model. This deficiency precludes the adequate characterization of hydrologic (surface and groundwater) impacts associated with the proposed project alternatives, to include critically important assessments of future hydrologic conditions. Further, this deficiency calls into question related study components, including characterizations and impact assessments of Stormwater Management (Section 3.16); Streams, Rivers, and Other Surface Waters (Section 3.17); Wetlands (Section 3.18); Floodplains (3.19); Vegetation, Wildlife, and Terrestrial Habitat (Section 3.20); and components of Rare, Threatened, and Endangered Species (Section 3.21). The study's presentations of potential mitigation efforts across these sections might similarly be considered arbitrary without supporting hydrologic modeling. Further, it is noted that the thorough characterization of 218 individually delineated wetlands in Section 3.18 (Wetlands) starkly contrasts with site information gathered for this section on Geology, Hydrology and Groundwater.

#### Recommendations:

- A hydrologic model (surface and groundwater) should be developed and applied as part of the finalization of the EIS to allow adequate characterization of existing surface and groundwater flow dynamics, consideration of future hydrologic conditions, and assessment of the impacts of each of the three project alternatives. This modeling capability will also be necessary to effectively assess topics of focus under Sections 3.16-3.21, as well as to define appropriate mitigation. Section 3.14.4 (Mitigation) indicates that subsurface drilling, testing, and geotechnical analysis

must be conducted. ClearWater strongly supports this analysis being conducted along with hydrologic modeling to characterize surface and groundwater movement, assist with final project design, and identify and negate potential negative impacts.

Modeling should include, but not be limited to:

- Characterization of a seasonal water budget for current conditions (no-action alternative), including groundwater levels, wetland levels, and streamflow.
  - Seasonal water budgets, as above, for each of the three project alternatives.
  - Event-based (stormflow) modeling of the no-action alternative and three project alternatives, to include generated volumes, peak flows, and associated water quality for key parameters (e.g., pH, conductivity, temperature, TSS, nutrients, chloride, heavy metals, hydrocarbons, PAHs). We recently reviewed new surface flow data from Finan Turnage-Barney and Dr. Patrick Drohan at Penn State University. Leveraging their approach to surface water modeling could improve the avoidance of impacts considerably.
  - The management of stormwater, including the rates and spatial distribution of stormwater infiltration could affect the water table, which would have severe effects on wetlands. Where karst geology helps maintain continuity in the hydrostatic pressure, the highway may have less impact on water tables. But in confined aquifers water could stack up in some places and be drained in others. This needs to be modeled.
  - Stormwater systems are already optimized to deal with pollutants, but the higher summer temperatures of runoff and solar gain in stormwater systems must be better understood. If the subsurface flow rates are slower, the water could cool down before entering the creeks, but faster preferential flow paths may not mitigate the higher water temperatures as well.
  - Timing – it is well known how much faster water can rush off a roadway, and stormwater management is meant to manage that concentrated storm surge. But infiltration from a stormwater basin is very different than rain spread everywhere on a vegetated landscape. The subsurface conditions in the vicinity of the road will affect the rate of infiltration from stormwater basins.
- No decrease in recharge to the local aquifers should occur, including the Sleepy Creek basin. This is critical for support of groundwater contributions to Spring and Sinking creeks. The Susquehanna River Basin Commission has identified key

recharge areas in the project area. We offer the following SRBC study for your use. Also, we offer Susquehanna River Basin Commission's October 2023 report that will assist you in identifying optimal groundwater recharge locations and critical recharge areas in the project area.

- Macoy, P.O. and G. Markowitz. 2023. Identifying Optimal Groundwater Recharge Locations and Critical Aquifer Recharge Areas Within the Susquehanna River Basin, Publication No. 333. Susquehanna River Basin Commission. Harrisburg, PA. Found at: <https://www.srbc.gov/our-work/reports-library/technical-reports/333-groundwater-recharge-critical-aquifer-recharge-areas/docs/groundwater-recharge-critical-aquifer-recharge-areas-2023.pdf>

### 3.15 Soils and Erosion

The Central Alternative is to disturb 424 acres of land and will require an E&S Pollution Control Plan and NPDES Permit. We heartily support the comprehensive geotechnical and soils testing program to be implemented during the final design to determine the actual physical characteristics of the soils to be disturbed. We acknowledge and support subsurface exploration activities that will add information related to the rock underlying the soil for use in the final design. Similar attention should be given to ensuring the appropriate quality of imported fill material used in the project.

#### Recommendations:

- The characterization of fill to be used in the project (e.g., amount, source, and quality [salinity, acid-sulfate potential, heavy metals, etc.]) should be provided in the final EIS. Particular focus should be given to defining parameters of fill material that are fully protective of surface and groundwater quality, articulating these in the final EIS, and conducting pre-screen monitoring of fill material through the construction process.

### 3.16 Stormwater Management

We understand the detailed stormwater management plan will be developed in the design phase and will be reviewed as part of the NPDES permitting process. Nonetheless, we have some concerns at this stage. Aside from the construction process and the footprint of the construction, the project's stormwater basins could have a very significant impact on the total area of natural habitats in the corridor, with particular potential to replace or impact natural wetlands as these basins are gravity fed and are typically placed in low lying areas.

Further, stormwater runoff has the highest potential to affect Spring and Sinking creek's water quantity, quality, and timing. However, the DEIS does little to quantify or even characterize the scope and scale of these impacts. We see this statement in Section 3.16.4, "Stormwater runoff generated from the project will be managed to address peak rate control, volume control, and water quality improvements." We want to make sure this general sentiment is accomplished through thoughtful analysis, design, and construction, and we request greater attention and detail be given to this subject starting with the final EIS.

Recommendations:

- The final EIS should provide estimates of the acreage of stormwater basins that will be needed for the project, along with some indication of their likely locations.
- The final EIS should offer clearer description of potential stormwater impacts of the project, as well as stormwater management practices necessary to support local aquifer recharge that is critical for maintaining wetland levels, stream hydrology, and temperatures and water quality that sustain aquatic biota.
- The final EIS should further recognize the importance and opportunities for stormwater management controls not only to maintain natural patterns of groundwater and streamflow and protect seasonal temperature regimes, but also to offer additional co-benefits such as for water quality and habitat value in these headwater stream areas.
- We are specifically very concerned that the large volume and quality of stormwater from the road will differ from the current condition in any of the ways outlined below. These were not effectively characterized in the DEIS. In the final EIS and to guide the project design, we would like to see clearer characterization of:
  - Stormwater peak flows associated with both current and potential future hydrologic conditions, along with stormwater basin performance necessary to maintain natural groundwater recharge and streamflow patterns.
  - Stormwater management practices necessary to avoid water with elevated temperatures from entering the groundwater and streams.
  - Stormwater management practices necessary to control and process potentially polluted highway runoff (e.g., salinity, salts/chloride, TSS, TP, TN, heavy metals).

- The impact on groundwater recharge and associated stream base flows from using clay-lined detention basins – when employed, for example – to prevent infiltration and potential sinkhole formation.
- The Managed Release Concept mentioned in Section 3.16.4, Mitigation, leads to the slow release of runoff without infiltrating to groundwater. This would likely be counterproductive to maintaining recharge to underlying aquifers and should be modeled to prevent negative impacts.

### 3.17 Streams, Rivers, and Other Surface Waters

ClearWater appreciates the forethought and effort that has gone into the current design of the Central Alternative with several bridges, however permanent impacts to streams should only occur after every attempt to avoid them has been exhausted. Piping streams through culverts will sever any groundwater connections frequently present in karst geology, which may degrade surface and groundwater quality and quantity. Spring Creek is a cold water, exceptional value, Class A wild trout stream. Currently, the Spring Creek watershed is estimated to be at 18-19% imperviousness; however, watersheds with over 10% imperviousness usually cannot sustain a naturally reproducing trout population. The cold, frequent groundwater inputs Spring Creek receives, due to its underlying karst geology, is what keeps its trout fishery and its cold-water ecosystem alive. This is a unique and complex system of intermixing surface and groundwater. Engineering solutions made to prevent sinkholes, convey water, or fill for construction will alter how the surface and groundwater can intermix and recharge. This will affect the baseflow and recharge for Spring Creek, and it is undetermined how much impairment of Spring Creek and its trout fishery can endure, since it is already far past the point of what is ordinary. The cumulative impacts of the 322 Connector project could cause irrevocable harm to the fishery, causing not only an ecosystem collapse, but an undue financial burden on the Centre Region as well. Trout fishing in Spring Creek, not including its tributaries, brings \$18 million to the region annually, according to PFBC Communications. Spring Creek has been a statewide, regional, and national fishing destination for many decades.

#### Recommendations:

- The channel structure of both Spring and Sinking creeks should be fully protected and maintained during all phases of project development and post construction, as well as the flow magnitude, frequency, timing, duration, and rates of change, as well as water quality of streamflow. Opportunities also should be identified to restore natural channel structure where previous modifications have been made.

- All seeps should be fully protected through all phases of the project, specifically to include preventing seeps from being buried under fill.
- All wetlands should be protected throughout all phases of the project, to include maintaining their ecological functions. Opportunities also should be identified and prioritized for wetland mitigation within the project area.
- Hydrologic modeling should be conducted for Spring, Sleepy, and Sinking creeks to determine the impact of the project on critical components of flow, including magnitude, frequency, duration, timing, and rate of change.
- Extension of the bridge at section 245 east to include WL-087 and WL-53 to avoid hydrologic alteration to subsurface and surface flows which could contribute to significant cumulative impacts to Spring Creek.
- Further minimize the 2,688 linear feet of perennial stream impacts prioritizing: 1) streams designated as Exceptional Value Waters (EV); and, 2) streams designated as High Quality-Cold Water Fishes (HQ-CWF) by adding additional bridges to the design. If this is not possible, we recommend using best ecological practices, such as open bottom culverts to maintain groundwater connections to surface waters and to provide natural channel substrate for aquatic organisms.
- While not mentioned in the DEIS, the Final EIS should address secondary impacts to Spring, Sleepy, and Sinking creeks.
- Long-term impacts of disconnecting streams and wetlands from groundwater features from stream piping and wetland fill which could negatively affect baseflow to Spring Creek, as well as connected wetlands, seeps, and springs should be assessed.
- Analysis should be done of thermal impacts of stormwater from the highway on nearby streams and wetlands.
- Analysis of the impact on streams, wetlands and local wells of lost groundwater infiltration from additional imperviousness of the highway, fill areas, and clay-lined stormwater ponds. State College Municipal water supply is also sourced from groundwater.
- On page 3-69, possible impacts from APR to 6 wells is mentioned. Because underground karst waterways are unpredictable and can change over time due to

dissolving limestone, please continue your monitoring further downstream, as there is potential for impact on other wells or water bodies.

- After the secondary impacts analysis has been completed, please use this to perform a thorough cumulative impacts analysis.
- Primary mitigation should occur within the Sinking, Sleepy, and Spring creek watersheds, where impacts will occur. If that is not possible, then mitigation should occur preferentially within the broader impacted watersheds (Spring, Sinking, and Penns Creeks) or, as needed, in proximate systems in Centre or Mifflin counties. Mitigation in the Babbs Creek watershed, which is 90 miles away, does not address local impacts and is not acceptable.

### 3.18 Wetlands

Field delineation of 218 wetlands in the project area was very helpful in determining potential impacts. We note that 30 acres of direct wetland impacts are expected with the Central Alternative. Exceptional value wetlands comprise 77% of this total.

#### Recommendations:

- We advocate minimization of impacts to wetlands wherever possible with particular attention to the following:
  - Avoid and/or minimize impacts to the highest quality wetlands within the corridor through the use of extended, high-clearance bridges. This includes wetlands with extant native vegetation, subsurface and surface flow hydrology, and wetland complexes. Based on the wetland delineation data, these appear to exist primarily as scattered patches of intact emergent wetlands dominated by sedges, rushes, and native forbs, scrub-shrub and forested wetlands interspersed with highly disturbed wetland patches. Although the Central Alternative appears to avoid these areas, the potential for secondary or even direct impacts remains, and care must be taken to avoid this. Examples include Maggie's Dip, Darlington Sinking Creek Stream Valley, and Kuhns Farm wetlands.
  - Avoid or minimize impacts from altered hydrology of subsurface and surface flows to Sinking Creek and its tributaries through extended, high-clearance bridges. These areas specifically include:
    - Darlington Sinking Creek Stream Valley (WL-LTZ-040-PEM, WL-LTZ-038-PEM, WL-LTZ-39-PEM)—although the most prominent resources associated with Sinking Creek occur south of the Central Alternative

within the stream/wetland complex, bridging the wetlands listed above, which receive and connect subsurface and surface flows from south to north of the existing highway is critical to avoid direct impacts from hydrologic flow alterations.

- Prioritize monitoring before, during, and after construction, and ensure adequate bridge crossings to avoid impacts to known areas of karst geology to prevent unintended and irreversible impacts, such as potential sinkholes, groundwater contamination, and foundation issues. Areas of particular focus should include:
  - Tussey Sink (WL-LTZ-052-PEM, WL-LTZ-104-PEM, WL-LTZ-166-PEM)—this area of streams, wetland, and floodplain complexes is known for its complex karst geology and mysterious sinking streams.
- Avoid or minimize impacts from altered hydrology of subsurface and surface flows to the headwaters of Spring Creek through extended, high-clearance bridges. These areas specifically include:
  - Tussey Ridge (WL-LTZ-053-PEM, WL-LTZ-087-PEM, WL-LTZ-083-PEM, WL-LTZ-082-PEM, WL-LTZ-033-PEM)—these wetlands include the headwaters of Spring Creek and are an extension of the high-volume headwater streams fueled by precipitation and groundwater recharge from Tussey Ridge, which contributes to the hydrologic integrity of Spring Creek. Failure to bridge this entire area could significantly disrupt and alter these important hydrologic flows. This would also minimize impacts to conserved lands.
- In the final EIS, develop and account for indirect impact to wetlands that cause loss of ecological function and mitigate these impacts through the final project design. This is especially critical since most impacts are to EV wetlands.
- Thermal and water quality impact concerns are ranked as low. Because of the critical nature of these impacts noted in our Section 3.17 comments, we believe these potential impacts deserve a closer look through the modeling described previously and through monitoring before, during and after construction.
- Mitigation in the Babbs Creek watershed, 90 miles to the north, does nothing to offset local impacts and is unacceptable. We advise that mitigation be local. While created and restored wetlands cannot replace natural, undisturbed wetlands, we recognize that some impacts are unavoidable. The detailed wetland delineation and assessment results indicate multiple locations within the NEPA project area contain degraded wetland complexes that are good candidates for local wetland mitigation to improve water quality and hydrogeomorphology. These should be given the

highest priority for mitigation, followed by other well-identified mitigation opportunities more proximate to the project and its adverse impacts.

- As 25 PA Code Chapter 105 allows for providing substitute resources for compensatory mitigation, we highly recommend working with a PA DEP-approved private mitigation company and local natural resource organizations to explore these options and restore connectivity and habitat within headwater floodplain and wetland complexes to improve habitat and other wetland functions, thereby providing local benefits and giving back to the communities impacted by this project.

### 3.19 Floodplains

We note and heartily support planned completion of hydrologic modeling as part of the design and Chapter 105 permitting process. Use of StreamStats to determine flood elevation at each stream crossing is suspect given the nature and purpose of this tool and the alterations such as cutting, filling and bridging necessary for road construction. We note that 14.7 acres of floodplain impact anticipated with the Central Alternative will be reduced to 4.5 acres through floodplain avoidance from bridging.

Bridge design not only allows passage of high flows, but passage of wildlife if the span and height are appropriately designed to support natural vegetation and other native wildlife. Stream bridge widths listed in Table 3-31 are sufficiently narrow to prevent a “tunnel effect” that prevents vegetation growth and wildlife passage. Limiting intrusive noise and light enhances wildlife passage.

#### Recommendations:

- We support determination of bank full depth and flood prone depth at each crossing with robust modeling and urge enough spanned floodplain distance, and no significant change to the flashiness (magnitude and frequency of high flows) of streams at each crossing.
- A design minimum ratio of height to width should be established to ensure natural cover beneath bridges. For example, according to a 2005 report to the US Department of Transportation, “Invertebrate density, taxa richness, dominant taxa (oligochaetes, nematodes and Capitella sp.), and trophic feeding groups were negatively affected by bridges with a height/width ratio less than 0.7.” (Broome, S. W., Craft, C. B., Struck, S. D., & Sanclements, M. 2005. *Effects of Shading from Bridges on Estuarine Wetlands*).

### 3.20 Vegetation, Wildlife, and Terrestrial Habitat

ClearWater strives to maintain connectivity on the landscape, conserve it for future generations, restore native plant communities, and then steward these lands, which often involves removing invasive plants. The Central Alternative is projected to directly impact 424 acres of habitat but will disturb many more acres of soil leaving the valley vulnerable to invasive plant infestations. We recommend planning and attention given to prevent, mitigate, and monitor the construction corridor for invasive plant problems. We also recommend adding wildlife corridors to every new bridge, prioritizing first locations where there will be both a bridge on the 322 Connector and local 322 will be relocated. Secondly, add wildlife corridors to bridges on the 322 Connector and then retrofit existing culverts and bridges on local 322 as they are replaced.

#### Recommendations:

- Post construction, any areas within the PennDOT right-of-way (ROW) that can be reforested, should be replanted with native trees and shrubs to mitigate for viewshed, noise, habitat, and native vegetation loss impacts from the highway and to prevent invasive plants from establishing.
- Post construction, any areas within the PennDOT ROW that cannot be planted with native trees and shrubs should be planted with a native grass and wildflower seed mix to mitigate for viewshed, noise, habitat, and native vegetation loss impacts from the highway and to prevent invasive plants from establishing.
- Post construction, vegetated areas within the PennDOT ROW should be monitored for invasive plant presence twice per growing season, as new invasive occurrences are less costly and easier to treat if detected early.
- If plants on the Pennsylvania Noxious Weed List <https://www.pa.gov/agencies/pda/plants-land-water/plant-industry/noxious-weeds-and-controlled-plants/controlled-plant-noxious-weed-lists> are found on site, they should be treated, in a timely manner, appropriately by a Certified Pesticide Applicator.
- Habitat connectivity should be coupled with bridge span recommendations in 3.19 comments above to provide for wildlife corridors in desired areas.
- At every bridge along the 322 Connector (prioritizing those with joint relocation of local 322) provide the following wildlife crossings as applicable:
  - steel mesh critter shelf - suspended from the top of culvert, target = small mammals (used by NY DOT and The Nature Conservancy)



- solid metal critter shelf - bolted to the side of a larger culvert at the same elevation as surrounding habitat, target = small to medium mammals (used by NY DOT and The Nature Conservancy)
- wildlife shelf - a ~6' wide dirt lane built using local soil under the bridge above Mean High Water (MHW) and matched to similar elevation of surrounding habitat and planted with native grasses if bridge is tall enough to allow light penetration. target = all terrestrial animals

### 3.21 Rare, Threatened, and Endangered Species

The Pennsylvania State Wildlife Action Plan and the associated Conservation Opportunity Area Tool should be referenced to find additional Species of Greatest Conservation Need in the area of the highway. This plan outlines the species, their habitats, threats to species and habitats, and the actions that can be taken to minimize threats and recover species.

Birds: The central route passes through three Pennsylvania Bird Atlas blocks. The Bird Atlas is a statewide project to map the breeding distribution of birds. The atlas should be referenced to determine the occurrence of species.

There are 18 bird species of Greatest Conservation Need that are confirmed or probable breeders within the blocks that surround the 322 connector, including:

Ruffed Grouse	Wood Thrush
Bald Eagle	Louisiana Waterthrush
Broad-winged Hawk	Black-and-white Warbler
American Woodcock	Field Sparrow
Eastern Whip-poor-will	Vesper Sparrow
Chimney Swift	Savannah Sparrow
Red-headed Woodpecker	Grasshopper Sparrow
American Kestrel	Bobolink
Willow Flycatcher	Eastern Meadowlark

The DEIS reports that the central route will impact 139 acres of agriculture, 30 acres of wetlands, 3,799 feet of stream and 31 acres of forest. The amount of forest habitat is relatively small given the larger landscape. The wetland habitat impacts are to be mitigated

by wetland banking, and water quality should be mitigated through other regulations. Bald Eagles are receiving specific attention. It appears the loss of farmland will have the largest impact on birds and is currently not being addressed by mitigation.

Of the 18 species listed above, 7 are associated with grassland/old field/agricultural habitat (American Kestrel, Field Sparrow, Vesper Sparrow, Savannah Sparrow, Grasshopper sparrow, Bobolink, and Eastern Meadowlark. These species are each associated with separate microhabitats, but all use grassland habitat and a general mitigation practice would involve creating, managing, enhancing grassland and old field habitat.

Recommendations:

- Refer to the State Wildlife Action Plan for actions that can provide types of mitigation for habitat loss. For example, improved maintenance (prescribed fire, restoration, removal of invasives) in old fields and early successional habitats could support populations of these species.

Testimony of Potter Township  
SCAC Public Hearing  
Tuesday, April 7, 2026  
Calvary Church-Harvest Fields  
150 Harvest Fields Drive  
Boalsburg, PA 16827  
CollinsPotterParks@gmail.com

## **SUMMARY**

We are presenting the views of Potter Township on PennDOT's proposed SCAC and its Draft EIS and 4f statements. We are pleased with many of the changes that PennDOT has made in the project over the years. However, we believe PennDOT needs to do more to mitigate the impact of the project on our Potter Athletic Park (PAF) by installing a noise barrier on top of its proposed earth berm barrier in order to create a 20' high continuous barrier. If you agree to this installation, Potter Township will agree that you have mitigated the noise impact of taking 20% of our park.

We also urge PennDOT to improve bike access in the corridor and use excess capacity on General Potter Highway to connect our PAF to your new bikeway at Bear Meadow Road.

## **PETITIONERS**

My name is John Collins and I am a board member of the Potter Township Parks and Recreation Committee. I am joined by Jake Tanis (who has the next time slot) who is an elected Supervisor of Potter Township and past chair. By vote of the Supervisors at a public meeting on March 16, we have been authorized to present the official positions of the Township, answer your questions, and serve on PennDOT's SCAC Design Advisory Committee. We represent the local officials with jurisdiction over PennDOT's taking of the Potter Athletic Fields (PAF) for statutory 4f and PA Act 120 purposes.

My professional background is as an environmental engineer and lawyer. I started my career preparing the official comments of the US EPA on noise and air pollution issues in draft EISs submitted by PennDOT and other transportation agencies. Later, I worked for the US DOT and, among other responsibilities, prepared 4f statements (park impact) for the Washington Metro subway system. USDOT gave me the annual USDOT Secretary's award for my 4f work. I have been an expert witness in federal highway litigation. I have lived in Center County for 20 years and filed comments and testified at several public hearings about the SCAC as a private citizen.

Supervisor Tanis has deep roots in the community. He has been an elected supervisor in the Township for 24 years. He was involved in the acquisition of the PAF as part of an expansion in our parks to meet current and future recreation needs. He has lived in the township for over 38 years.

## **THANKS FOR IMPROVEMENTS**

PennDOT has made many improvements to the SCAC as it has moved through the study and clearance process.

- You dropped the consideration of building the connector farther down the mountain in the Route 144 corridor. The 144 location in our Township would have created safety, noise and air pollution impacts at sensitive receptors including the annual Grange Fair.

- You deleted the high-speed connector proposal from the new SCAC to Route 45 in the Hidden Lake area of Potter Township. This multi-million dollar spur would have accelerated growth in an area that does not have the needed facilities, created water quality issues in the headwaters of Spring Creek, and added traffic to the unsafe Route 45. Instead, you have wisely begun a study to improve the safety of Route 45.
- You relocated the proposed SCAC preferred alternative so that it no longer crosses our pitchers' mounds in the Potter Athletic Fields (PAF). You are still taking nearly 6 acres of our park but have agreed to build a dirt hill to reduce the visual impact. We appreciate this visual barrier because it will also improve the safety of people in the park by creating a physical barrier to vehicles that depart from the highway.

### **ADDITIONAL NOISE MITIGATION**

Potter Township has requested PennDOT comply with section 4f of the USDOT Act and PA Act 120 by building a 20' high continuous noise barrier separating the PAF from the 22,000 vehicles that will be on the SCAC in 2050. PennDOT has determined this is "warranted and feasible", but it is not "reasonable" under its cost and benefit assumptions.<sup>1</sup>

We believe PennDOT's assumptions are wrong because they overstate the cost and understate the benefits of the noise barrier. Based on our usage figures and estimates as shown in our Appendix A (attached), we believe that the correct "reasonableness" calculation is 1,864 ft<sup>2</sup>/BR which is less than 2,000 ft<sup>2</sup>/BR PennDOT criteria and therefore reasonable, and that the noise berm should be built as part of the project. Our analysis follows.

- PennDOT's assumptions are wrong. Its noise methodology in Pub 24 determines whether a noise barrier is reasonable by calculating the face of the barrier needed and dividing it by the locations and people benefitted<sup>2</sup>.
  - PennDOT doubled the size (and cost of the barrier) by assuming a 20' continuous barrier height. That is incorrect based on PennDOT's 2/20/26 Berm Assessment Memo<sup>3</sup>. PennDOT has agreed to build a soil berm to reduce visual impact that could be the base of the noise wall. Constructing a noise barrier on top of the berm would cut the height of the noise barrier roughly in half and should still achieve the desired noise reduction.<sup>4</sup>
  - PennDOT inexplicitly decreased the number of sites that would benefit from the noise reduction by more than half. PennDOT's 4(f) study identified 11 areas on the south side of the 2 fields as important features<sup>5</sup>. They did not even include other obvious noise sensitive spots like picnic tables and the 2 home plates and 1<sup>st</sup> bases where officials need to hear and be heard. They did not include any tailgating sites in the parking area or the area where food trucks can plug into

<sup>1</sup> PennDOT Draft Individual 4(f) Evaluation, February 2026, Appendix H, computer pages 266 and 269 of 271.

<sup>2</sup> PennDOT "Project Level Highway Traffic Noise Handbook", Pub. No. 24, (5-19) page 36.

<sup>3</sup> PennDOT "Potter Township Athletic Complex Visual Berm Assessment Memorandum" ("Berm Memo"), February 20, 2026, Figure 3, computer page 6 of 9.

<sup>4</sup> PennDOT Pub. 24, Op. Cit., page 36, "In determining the "Square Footage Per Benefited Receptor (SF/BR)" value during the reasonableness evaluation of any analyzed barrier, the square footage (SF) of a barrier shall be based upon its length and its height from the finished ground elevation at the base of the barrier to its top elevation (acoustical profile line)."

<sup>5</sup> PennDOT Draft Individual 4(f) Evaluation, Op. Cit., Figure 5, post page numbered 23.

electrical outlets between the fields. They selected only 6 sites in the PAF and then also included one site in an adjacent farm which is not legally or physically part of PAF.

- PennDOT underestimated the use of the fields. The fields are open to the public 365 days a year, 7 days a week, 24 hours a day. PennDOT assumed no use of the park in any manner for 24 weeks of the year<sup>6</sup>. This is incorrect because the PAF are used during the period assumed closed. PennDOT also assumed the field would only be used 4 hours/day during the week and 8 hours/day on the weekend. These are artificial limits because one of the fields has 8 pole lights to use the field at night. PennDOT did not include that the fields are used for baseball tournaments 4 times a year that attract over 450 people to the PAF. PennDOT also assumed no use of the PAF other than for baseball. This is incorrect because the fields are also used by visitors for running, walking their dogs, and driving golf balls. Our assumptions are in Appendix A.
- Since reasonableness is calculated by barrier size divided by receptors and people benefited, the calculation made it impossible to meet the 2,000 barrier size divided by receptors benefited of PennDOT Pub. 24.
- Based on our study, input from United Baseball and our official assumptions as shown in Appendix A, we believe that the appropriate calculation for reasonableness is 1,864 ft<sup>2</sup>/BR, which qualifies the visual barrier with a noise barrier on top creating a 20' high barrier as "reasonable" under the tests of PennDOT's Pub. 24.

We also want to go on record that we believe that the use of Pub. 24 to deny park noise mitigation is incorrect.

- On its face, the 2,000 ft<sup>2</sup>/BR number should not be used for PAF. According to Pub 24 Appendix E, it is based on residential data, without any indication that 4f protected properties are included<sup>7</sup>. Since this number is the criteria used by PennDOT for noise at non-4f properties, it is not designed and should not be used to measure and deny the added protection due to 4f properties by statute.
- PennDOT used traffic projections for 2050 for noise but did not adjust park use for future population growth through 2050. According to the PA State Data Center<sup>8</sup>, from 2020 to 2050 the population in Centre County is expected to grow by 12.3%. This growth will mean more children and more need for parks and open space. By not increasing use of the park due to growth, PennDOT decreases the calculation of the benefits and creates an unfair measure of park benefits.

Even if you do not agree with all of our counter-assumptions, we urge you to use your discretion to reduce the noise impact and preserve our park. According to PennDOT's Pub. 24<sup>9</sup>:

The following parameters should be assessed to make the determination for each of the three criteria: warranted, feasible, and reasonable. The decision to recommend or not recommend a highway traffic noise abatement option(s) should be based on the consideration of all of the parameters discussed below and **not just any one parameter**. This allows for the identification of

<sup>6</sup> PennDOT "Preliminary Design Noise Analysis", (Sept 8, 2025, page 27). Draft EIS, Appendix L-19. ("SCAC Noise") Activity calculated is only for 28 weeks per year.

<sup>7</sup> PennDOT, Pub. 24, Op. Cit., Appendix E, page E-1.

<sup>8</sup> PA State Data Center, "Pennsylvania Population Projections: 2020 to 2050", @ storymaps.arcgis.com, March 21, 2026.

<sup>9</sup> PennDOT, Pub. 24, Op. Cit., page 28.

the overall benefits, including the effect of such abatement on social, economic, and environmental factors. (emphasis added)

PennDOT needs to obey the statutory mandate of 4(f) and Act 120 not to take park land unless it does everything possible to mitigate the impact. On its face, using the same 2,000 number to cut off park noise mitigation as is used for commercial buildings like TV and radio stations fails the statutory test.

Pub 24, as quoted above, gives you the discretion to consider the overall benefits to the 4(f) land and we urge you to do the right thing. It would also decrease the 4f "Disadvantages" PennDOT lists for the Central Alternative from 4 to 3<sup>10</sup>.

### **BICYCLE PATHS MITIGATION**

We urge PennDOT to provide continuous access and paved connections between PAF and the other bicycle facilities in the area, including the new bicycle trails that are part of the SCAC at Bear Mountain Road.

DISCUSSION: In the PEL Draft Study for the SCAC (page 88), PennDOT wrote the following:

Multi-modal improvements could be included **as part of the Build Alternative**, where appropriate, or programmed as new projects or upgraded facilities to improve multi modal connectivity throughout the study area. Specific improvements could include park-n-ride lots with electric vehicle charging stations, **dedicated bikeways or bike lanes**,\*\*\* (emphasis added)

Therefore, we urge you to follow through on this earlier statement and include bike lanes to the PAF. Support for this recommendation was officially adopted by the Potter Township Parks and Recreation Committee at its 2/5/26 public meeting. We have asked a Penn State design team to develop detailed plans and profiles to connect the PAF to the SCAC bike trail at Bear Meadow. We believe that existing segments of business 322 (General Potter Highway) that are having traffic relocated due to the SCAC can be incorporated to reduce the cost and impact of connecting the facilities.

This connection will allow the recreational parking at the PAF to be used to provide trailhead facilities for hikers and bicycle users. There are already sewer, water, electricity, and shelter facilities at the PAF so this is a way for PennDOT to enhance the usefulness of its other trail improvements.

Thank you for the opportunity to comment. We look forward to working with PennDOT to develop a 322 facility that best meets the transportation and recreation needs of our community.

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<sup>10</sup> PennDOT Draft EIS, February 2026, Chapter 5- Preferred Alternative, page 5-4.

Appendix A  
Potter Township Usage Estimates for PAF

Except where otherwise shown, for the sake of argument, we accept the methodology and estimates made in the Preliminary Design Noise analysis for the PAF<sup>11</sup>.

The ERU value for each of the six Activity Category C noise receptors was determined using the methodology outlined in Appendix E of PennDOT's "Publication #24: Project Level Highway Traffic Noise Handbook." After constructing two small grids of three receptors each (one for each ballfield) using 130 feet spacing to represent areas of human activity as described in Appendix E, annual usage of the facility was estimated for both weekdays and weekends. The estimate for weekday usage considered 50 people per field X 2 fields X 4 hours per day X 5 days a week X 28 weeks per year = 56,000 person-hours per year (weekdays). The estimate for weekend usage considered 50 people per field X 2 fields X 8 hours per day X 2 days a week X 28 weeks per year = 44,800 person-hours per year (weekends), yielding a total of 100,800 person-hours usage per year across both ballfields. Dividing this value by the Table E2, Row L constant of 13,578 yields an ERU value of 7.4 (rounded) for the entirety of the Potter Township Athletic Complex, which equates to 1.23 ERU value per receptor.

We increase the number of people on the field for the reasons described on pages 2 and 3. We increase people per field from 50 to 75 and the weeks from 28 (7 months) to 32 (8 months). Making these changes (only) in the above text (highlighted in yellow) and redoing your calculation results in the following:

The ERU value for each of the six Activity Category C noise receptors was determined using the methodology outlined in Appendix E of PennDOT's "Publication #24: Project Level Highway Traffic Noise Handbook." After constructing two small grids of three receptors each (one for each ballfield) using 130 feet spacing to represent areas of human activity as described in Appendix E, annual usage of the facility was estimated for both weekdays and weekends. The estimate for weekday usage considered 75 people per field X 2 fields X 4 hours per day X 5 days a week X 32 weeks per year = 96,000 person-hours per year (weekdays). The estimate for weekend usage considered 75 people per field X 2 fields X 8 hours per day X 2 days a week X 32 weeks per year = 76,800 person-hours per year (weekends), yielding a total of 172,800 person-hours usage per year across both ballfields. Dividing this value by the Table E2, Row L constant of 13,578 yields an ERU value of 12.7 (rounded) for the entirety of the Potter Township Athletic Complex, which equates to 2.12 ERU value per receptor.

This is the text of the barrier analysis for the PAF in the Draft EIS noise assessment (Appendix L-19)<sup>12</sup>

A 2,216-foot-long, 20-foot-tall (average) noise barrier is 44,076 ft<sup>2</sup> and provides the required noise reduction of ≥5 dBA for all five noise-impacted receptors. This noise barrier also meets the design goal of providing a 7-dBA noise reduction for at least one benefited receptor. This optimized noise barrier benefits a total of 7.4 equivalent residential units, equating to 5,937

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<sup>11</sup> PennDOT, SCAC Noise, pp 27-28

<sup>12</sup> Ibid., page 68-69.

ft<sup>2</sup>/BR; this is more than the 2,000 ft<sup>2</sup>/BR reasonableness threshold specified by PennDOT guidance, resulting in a noise barrier that is feasible but not reasonable.

Using the same barrier analysis as the Preliminary Noise Analysis and making only changes for the narrower barrier built on the visual berm described above on page 2:

A 2,216-foot-long, 20-foot-tall (average) noise barrier is 44,076 ft<sup>2</sup> and provides the required noise reduction of  $\geq 5$  dBA for all five noise-impacted receptors. PennDOT has committed to constructing a 1,700 foot long visual noise barrier that “ranges from a few feet at the eastern and western ends up to a maximum of approximately 22 feet above the existing grade.<sup>13</sup> As calculated below<sup>14</sup>, this is an effective barrier face of 20,400 ft<sup>2</sup> which is subtracted from 44,076 to require a noise barrier 23,676 ft<sup>2</sup>. This noise barrier also meets the design goal of providing a 7-dBA noise reduction for at least one benefited receptor. This optimized noise barrier benefits a total of 12.7 equivalent residential units, equating to 1,864 ft<sup>2</sup>/BR; this is less than the 2,000 ft<sup>2</sup>/BR reasonableness threshold specified by PennDOT guidance, resulting in a noise barrier that is feasible and reasonable.(emphasis added).

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<sup>13</sup> PennDOT, Noise Berm, op. cit. computer page 6.

<sup>14</sup> Using these dimensions, and modeling by constructing one rectangle 2 by 1,700 and 2 triangles 850 feet long and 20 ft high, the effective barrier face of the visual barrier is  $2 \times 1,700 = 3,400$  ft<sup>2</sup> plus  $2 \times \frac{1}{2} \times 850 \times 20 = 17,000$  which equals a total face of 20,400 ft<sup>2</sup>.

## Comment, Nancy F. Parks

Historically, Centre County has had an agricultural crop focus - including forestry - for 275 years. We should preserve that heritage so we can locally and sustainably feed our population in the not so distant future.

SOTA 2025 by America Lung Association investigated the status of air pollution in Centre County and its effect on our population

Centre County - total population = 161,000 and at least 25,891 children under 18 and 22,922 adults 65 & over that are particularly vulnerable.

Un-Healthy here are known to be 2273 pediatric/child asthma sufferers and 13997 adults with asthma. Both these vulnerable groups will suffer under the current PennDOT proposal. Additionally, 11965 suffer from cardiovascular disease, and face pre-mature mortality from the levels of fine particle soot . 23648 live in poverty. There are 24, 506 people of color that reside here.

24 hour exposures to high levels of fine particle soot from mobile/transportation sources in Centre County rated our human habitat an almost failing rating for dangerous levels of air pollution.

###

In 2022, I testified to PennDOT on the expected daily vehicle increases and increased 'induced demand', i.e. the significant and expected increases in congestion that will result from 4 additional lanes of traffic/limited access highway between Potter's Mills and Boalsburg. That's more congestion not less.

We all recognize the dangerous road conditions from truck traffic and pass through traffic on the existing 322. The pressure on that area's residents to safely drive to work and return from their jobs is downright hellish.

WE have all the tools that we need right now to protect these residents and slow down traffic, because that is certainly what we need.

These are my ideas tonight but PennDOT should continue to have specific meetings with Tusseyville and Colyer Lake, and Boalsburg and Potters Mills residents who have the clearest perceptions of the problems.

Since we can no longer depend on 1970's ideas for inspiration we need to look to context specific and locale specific ideas to provide a safe quality of travel for all that use 322. WE can borrow from successes in other states like VA and MD.

- We don't need \$10's of millions of dollars of our taxpayer \$ spent on this engineering nightmare; I'd rather my tax \$\$ were spent on education;
- Fix the problems on the existing road;
- Slow down traffic. We don't need a new road forcing induced demand congestion and making matters worse. Ozone pre-cursor and carbon emissions from heavy duty diesel engines and gasoline engines will increase and push Centre County into non-compliance with current federal Clean Air Act requirements. Remember if we use some federal monies to build a new road, then the county will need to comply with emission reduction limits and standards. Failure to do so has already forced EPA to suspend the use of federal Highway \$\$ in PA in the past;
- We need a long term solution that will provide for a safe and healthy and economically sustainable farmland future; our future;
- Slow down traffic by reducing speed limits, adding 24/7 state police highway enforcement, and adding traffic lights so people can get onto and off the road;
- We need legal right side passing lanes just as are currently in use on Rt 45 in Mifflinburg and Lewisburg areas to make travel efficient and to prevent large emissions from mobile sources idling on the roadside;
- We need ways for agricultural equipment to cross 322 using overpass and underpasses;
- We need ways for wildlife to cross 322 using overpasses and underpasses;
- Perhaps even extend public transit.

I urge PennDOT in the strongest possible terms to do what is right for our community. I must add that there should not be consideration of lobbying pressure from the American Trucking association and the American Manufacturing and trucking Association. Pass through trucking has six existing routes to make their passage through here convenient over Routes 219, 99, 81/83, 476, routes 95 and 11/15.

There should also not be consideration of how fast athletic games participants and viewers want to reach their goal within the university. It is the safety and health of our residents that should have foremost consideration now and in the future.

###

Thank you for opportunity to testify.

Nancy F Parks  
 201 West Aaron Square, RT 45  
 PO Box 120  
 Aaronsburg, PA 16820

SCAC Comment, David Roberts  
Member, Sierra Club Moshannon Group

Having examined the State College Area Route 322 Connector plans I find substantial problems with all three options including the central "preferred option".

One major flaw is the taking of land from farm and land conservation trusts. This has a truly chilling effect on private citizen property rights and is perhaps beyond PENNDOT authority.

A second major flaw is the unacceptable impacts to the karst hydrogeological systems, headwaters, wetlands, flood plains, Class A trout streams, groundwater recharge areas, aquatic habitats, and in general the entire hydrogeology of this sensitive aquatic headwater system in the Susquehanna River Basin and Chesapeake Bay Watershed.

A third major flaw is reliance on constructed mitigation and mitigation banking to replace disturbed natural wetlands. Artificial structures and banking can never replace these natural headwater systems.

A fourth major flaw is the disturbance of bald eagles, nesting bats, native trout, migrating birds, and the loss of wildlife habitat. I leave the many other major flaws to other witnesses.

My comments concern the environmental impacts to the aquatic headwaters of Spring Creek, Sinking Creek, and their tributaries.

In the Draft Environmental Impact Statement Section 3 under Geology, discussion begins with a long list of problems associated with the geology of the adjoining karst and shale formations.

- Reedsville Formation acid producing rock
- Karst topography and sinkholes
- Subsidence
- Ground water impacts
- Impervious surface heating
- Stormwater thermal flash impacts

- Direct impact to 9,566 linear feet of stream
- Sinking Creek wild trout impacts
- Spring Creek Class A trout stream impacts
- Direct impact to 30 acres of Wetlands
- Wetland loss mitigation through purchase of bank credits to Babbs Creek mitigation site
- Direct impact to 14.7 acres of flood plain and 21.6 acres of floodway
- Water quality to high quality trout streams
- Erosion and sedimentation
- Well mitigation: Re-drill to alternate depth or different formation

Many questions have not been resolved

- Direct impact to 31 acres of forest land
- Lost habitats
- Migratory bird and bald eagle disturbance
- Karst bat habitat loss - Endangered Species Act

Cost

Likely overruns

Estimates to over a billion dollars

One of the top three most expensive highway projects in the US

Does this benefit the State College Bellefonte area or does this benefit pass through commerce? Better alternatives must be considered. We do not need a billion dollar disaster.



**COLLEGE TOWNSHIP**  
MUNICIPAL OFFICES

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April 6, 2026

Attn: Eric Murnyack, Project Manager  
Pennsylvania Department of Transportation (PennDOT)  
70 PennDOT Drive  
Clearfield, PA 16830

Re: State College Area Connector (Route 322) Project – Consideration of Spring Creek Chapter Trout Unlimited Comments

Dear PennDOT District 2 Leadership,

On behalf of the College Township Council, we write to respectfully urge PennDOT to carefully consider the attached comments and concerns submitted by the Spring Creek Chapter of Trout Unlimited regarding the State College Area Connector (Route 322) project.

The Council appreciates the significant effort that PennDOT has undertaken in advancing this critical infrastructure project and recognizes its importance to regional mobility and safety. At the same time, we believe it is essential that the project's environmental impacts, particularly those affecting our local watersheds, are addressed in a manner that reflects both regulatory intent and community values.

As outlined in the attached correspondence, the Spring Creek Chapter raises a concern regarding the proposed approach to compensatory mitigation. Specifically, they request that mitigation for impacts to wetlands, streams, and other aquatic resources associated with the project be conducted within the directly affected watersheds, namely the Spring Creek (greater Bald Eagle Creek) and Sinking Creek watersheds in Centre County, rather than through the purchase of mitigation bank credits in Tioga County.

The Spring Creek watershed is a high-quality cold-water fishery of significant ecological, recreational, and economic importance to our community. Similarly, Sinking Creek serves as an important cold-water resource. Mitigation efforts located outside of these watersheds may not adequately offset the localized environmental impacts resulting from the project.

We also note the Chapter's point that the project's extended timeline presents a meaningful opportunity for PennDOT, in coordination with the Pennsylvania Department of Environmental Protection, the U.S. Army Corps of Engineers, and local conservation partners, to identify and implement mitigation projects within the affected watersheds. Such an approach could not only satisfy regulatory requirements but also result in tangible, long-term environmental improvements to local stream systems that are already experiencing stress from development, stormwater runoff, and other factors.

*Gateway to the Centre Region*

College Township places a high value on the protection and enhancement of our natural resources. We believe that aligning mitigation efforts geographically with project impacts represents a responsible and forward-thinking approach that would better serve both the environment and the community.

We respectfully request that PennDOT give full and thoughtful consideration to the recommendations put forth by the Spring Creek Chapter of Trout Unlimited and explore opportunities to prioritize watershed-based mitigation strategies for the State College Area Connector project.

Thank you for your continued partnership and for your commitment to balancing infrastructure development with environmental stewardship. We appreciate your consideration of these comments and would welcome continued dialogue on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Trainor", with a stylized flourish at the end.

Susan Trainor, Chairperson  
College Township Council

To: PennDOT District 2 Project Team  
From: Lara B. Fowler  
Date: April 20, 2026  
Re: State College Area Connector Draft EIS, Draft 4(f) Evaluation Section

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Thank you for the opportunity to comment on the State College Area Connector Draft EIS and Draft 4(f) Evaluation Section. As a resident of Centre County, an active user of this corridor and the adjacent region for transportation and recreation, and a licensed attorney and a law professor who has worked on transportation, water, agriculture, and energy issues, I offer the following written comments to supplement my testimony provided on Tuesday, April 7, 2026 during the public hearing.

The DEIS must consider the Pennsylvania Environmental Rights Amendment

PennDOT must consider the Pennsylvania Constitution, Article 1, Section 27, which is currently not mentioned in the DEIS at all. This constitutional amendment, adopted in 1971, reads as follows:

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

In the 2013 Robinson Township Case, the Pennsylvania Supreme Court stated that “The drafters and the citizens of the Commonwealth who ratified the Environmental Rights Amendment... articulated the people's rights and the government's duties to the people in broad and flexible terms that would permit not only reactive but also anticipatory protection of the environment for the benefit of current and future generations.” The Court further noted that “public trustee duties were delegated concomitantly to all branches and levels of government in recognition that the quality of the environment is a task with both local and statewide implications, and to ensure that all government neither infringed upon the people's rights nor failed to act for the benefit of the people in this area crucial to the well-being of all Pennsylvanians.” *Robinson Twp. v. Commonwealth*, 83 A.3d 901 (Pa. 2013) (internal citations omitted). In proposing the State College Area Connector, PennDOT’s DEIS makes no mention of its affirmative duties as a trustee to prevent degradation of the Commonwealth’s natural resources, including clean air, pure water, and the natural, scenic, historic, and esthetic values of the environment.

The DEIS should have reviewed the “Upgrade Existing Alternative”

Second, the DEIS should have fully reviewed the alternative of “upgrading the existing route” as a potential redesign of the existing 322 corridor. However, as the DEIS notes, “*US 322 Upgrade Existing Alternative was dismissed from further study during the Level 2B traffic screening as it did not improve safety on the overall roadway network; therefore, it did not meet the PEL Study purpose and needs.*” Recognizing the safety concerns for the existing roadway, dismissing upgrades to the existing roadway misses opportunities for a more affordable project that minimizes the impact to the natural, scenic, historic, and esthetic values of the environment from this project. The PEL did not consider potential features such as truck-climbing lanes to reduce traffic stacking on slopes, parkway sections in some areas to provide four lanes or dedicated turning lanes, and safe transitions at Boalsburg and Potters Mills to improve the transition between two lane and the limited access segments.

As noted in the DEIS, PennDOT has upgraded different sections of the existing 322 corridor to improve safety over the last 30 years. A more in-depth analysis of potential safety and congestion improvements—with a focus on more than vehicular traffic to think about safety for multiple modes of transportation—would have provided for a more in-depth understanding of potential tradeoffs, particularly given the \$843 million to \$1.06 billion price tag of the proposed alternative.

The DEIS fails to adequately address induced demand beyond the 70 mile square scoping region  
While the DEIS recognizes the connection of this project to interstate roadways, it fails to address potential induced demand from this project by limiting the study area to the local level. This is exacerbated by a vague project purpose and a disconnect with the project scope. The DEIS includes the following language for project purpose:

The purpose of the Project is to improve roadway congestion by achieving acceptable Level of Service (LOS) and to address safety issues by reducing the predicted crash frequency along the US 322 corridor between Boalsburg and Potters Mills, Pennsylvania. Additionally, the project will aim to provide a transportation network that meets driver expectations.

The transportation needs identified for the project area are that high peak hour traffic volumes cause congestion and result in unacceptable LOS (LOS D [rural only], E, or F) on US 322 roadways and intersections; the existing roadway configurations and traffic conditions contribute to safety concerns in the project area; and the roadway network and configuration in the project area lacks continuity and does not meet driver expectations.

While the DEIS notes that the “project will aim to provide a transportation network that meets driver expectations,” it is inconsistent in which drivers (presumably of cars and trucks) this project is meant to serve. The following statements are all included in the DEIS:

- The DEIS Chapter 1 notes that the “[w]ithin the project area, US 322 serves local, regional, and interstate traffic (including truck and commuter traffic).”
- This section also notes that the “change in the roadway cross-section at both ends of the corridor creates inconsistencies which may not meet driver expectations, particularly for regional and interstate traffic.”
- Section 1.5.3 on level of service notes that “In summary, US 322 serves as the main travel route for local, regional, and interstate traffic, including trucks.”
- Table 2-2 states that the “upgrade existing” alternative would “[align] with driver expectations by keeping regional through traffic moving and limiting stops to specific areas.”

While “drivers” may include local, regional, and interstate traffic, the study area is limited to a “70-square-mile initial study area,” implying a more local project. See Section 1.3, Project History.

This inconsistent definition matters given the potential for this project to induce demand given its connection to interstate roadways. Section 1.5.1 references an origin-destination study as part of the PEL, stating that for this O&D study, “heavy trucks primarily make regional (through) trip, defined as trips that both start and end outside the traffic study area.” Section 1.5 states that annual average daily truck traffic is projected to increase by 25 and 36% by 2050. It is unclear how much of this increase is related to induced demand because of this project.

The USDOT's Federal Highway Administration's Guide for Highway Capacity and Operations Analysis of Active Transportation and Demand Management Strategies (ATDM), Appendix M, states that "highways capacity and operational improvements... will affect demand by improving travel times. It is important to consider the demand effects when evaluating the environmental impacts of capacity and operational improvements." See <https://ops.fhwa.dot.gov/publications/fhwahop13042/appm.htm>. Appendix M further notes that the "long-term demand effects are best estimated using a regional travel demand model" that "predict travel demands over the large geographic areas necessarily to fully capture travel behavior." This Appendix recognizes the effort involved in such a regional demand model and while it provides an alternative process, it acknowledges the importance of examining the demand effects thoroughly.

In addition, section 2.4.6.3 of the Interim Guidance on the Application of Travel and Land Use Forecasting in NEPA addresses "induced demand." This document, posted on the USDOT's Federal Highway Administration's website, [https://www.environment.fhwa.dot.gov/nepa/Travel\\_LandUse/travel\\_landUse\\_rpt.aspx#](https://www.environment.fhwa.dot.gov/nepa/Travel_LandUse/travel_landUse_rpt.aspx#), states that "it is important for transportation analyses to consider the significance of induced demand. Induced demand is the volume of traffic that is drawn to a new or expanded road by providing additional capacity. This induced demand comes from a number of sources, including trips diverted from other routes, discretionary trips that might not have been made without the service improvement, and improved access to employment and other activity location choices."

In this case, the State College Area Connector DEIS references the O&D study as well as the regional demand model but does not directly deal with induced demand by improving this roadway. DEIS Section 3.10.2 does state the "the new roadway attracts rerouted trips from elsewhere in the transportation network" but does not indicate how many or what is considered part of this transportation network. See page 3-46. If the study area is the local 70 square miles but the intended "affected drivers" are local, regional and interstate, the potential induced demand study area is much, much larger than the 70 mile study area. This is particularly a concern for heavy truck traffic that may bypass tolled roadways for a different—and because of the improved capacity—faster route through Centre County. Moreover, the study does not address the degree to which current demand, particularly for heavy trucks, is driven by existing tolling structures present in alternative highways. If the new section of road is untolled, then the project induces demand with negative impacts on the region. If the new section of road is tolled (likely given the enormous price tag) then the route through Centre County may no longer be competitive with alternative routes—partially negating the demand cited as the basis for the project in the first place. Without a broader examination of the regional and interstate alternatives, particularly their tolls, the OD study overlooks crucial elements of both drivers and impacts of the proposed project.

#### The DEIS fails to address the potential impacts of climate change

Failure of the DEIS to address climate change impacts at all is also a problem. Section 3.10 of the DEIS addresses air quality; this section then refers to President Trump's January 20, 2025 Executive Orders 14148 and 14154 as well as an interim final rule removing the Council of Environmental Quality's (CEQ's) NEPA regulations. The DEIS states that "no greenhouse gas emissions or climate change analyses are included in this DEIS." There is no further discussion of potential climate impacts in the DEIS.

However, Pennsylvania requires analysis of climate impacts and action to address such impacts, and indeed PennDOT itself has policies to address climate impacts that are not addressed in the DEIS. The Climate Change Act, Act 70 of 2008, requires the Pennsylvania Department of Environmental Protection to update climate impacts and greenhouse gas emissions every three years. The Pennsylvania Greenhouse Gas Inventory Report (2025) states that transportation represents 22% of Pennsylvania's Greenhouse Gas emissions under 2022 data; see <https://www.pa.gov/agencies/dep/residents/climate-change/ghg-inventory>. This inventory says that "continued effort across all three sectors [industrial, electrical production, and transportation] will be necessary to lower emissions." Pennsylvania Executive Order 2019-01 sets a target for greenhouse gas emission reductions, and requires that all "agencies under the Governor's jurisdiction shall... evaluate opportunities for the reduction of vehicle miles traveled..." among a list of other actions. See <https://www.pa.gov/content/dam/copapwp-pagov/en/oa/documents/policies/eo/2019-01.pdf>.

Pennsylvania's 2024 Climate Action Plan further addresses transportation in Pennsylvania, including the potential to reduce emissions from transportation. See <https://www.pa.gov/agencies/dep/residents/climate-change/pa-climate-action-plan>. PennDOT released its own Carbon Reduction Strategy in 2023; this would provide funding to reduce carbon emissions from projects; see <https://www.pa.gov/agencies/pennDOT/research-planning-and-innovation/carbon-reduction>. While this plan was created to access funding through the Bipartisan Infrastructure Law (BIL), later rescinded by the Trump Administration, Pennsylvania's own plan notes that funds could be used for "certain types of projects to improve traffic flow that do not increase the number of through lanes." The Carbon Reduction Strategy further "encourages MPOs/RPOs to identify specific projects to reduce carbon emissions. The processes for identifying, prioritizing, and selecting carbon reduction projects can be integrated into activities related to local Climate Action Plans (CAPs), the Transportation Improvement Plan (TIP), and the Long-Range Transportation Plan (LRTP)." Carbon Reduction Strategy, pg. 7.

While the DEIS does reference local comprehensive plans, the DEIS contains no reference or discussion to the Centre Region Climate Action and Adaptation Plan. The Centre Region Climate Action and Adaptation Plan was adopted on November 22, 2021. This plan notes that transportation is the 2<sup>nd</sup> largest emitter of greenhouse gases at 20% for the region and "represents a significant opportunity to reduce emissions and help our community meet its reduction targets." Centre Region Climate Action and Adaptation Plan, pg. 12. This plan focuses on Sustainable Transportation as a key action, including encouraging more efficient vehicles and traffic operations, reducing trips with one driver, aligning land use and housing with transportation infrastructure to increase access to walking, biking and public transit, and improving and building resilience into the transportation system. The plan further identifies the need to address "transportation vulnerabilities [including] traffic disruptions and infrastructure repairs to our roads, bridges, storm management systems and drainage ditches. Proactive planning for future climate change will help reduce the cost and risk in the long term." Centre Region Climate Action and Adaptation Plan, pg. 36. The DEIS includes no mention of this plan nor its priorities.

PennDOT's own plans to reduce the impacts of climate change on the Commonwealth's transportation system are also not referenced in the DEIS. In addition to addressing the need to reduce emissions, Pennsylvania's 2024 Climate Action Plan highlights the need to reduce the potential impacts of climate to transportation, including "flood damage to homes, businesses, and critical energy and transportation infrastructure, particularly those located in floodplains." The

Climate Action Plan states that “PennDOT completed a resiliency pilot study to identify potential data, methods, and procedures that could be integrated into PennDOT’s current design process to address climate change impacts.” Climate Action Plan, pg. 25. This study, accomplished in 2020, “has supported PennDOT’s current initiatives to update their Design Manual (DM2) to include comprehensive design checklists that guide engineers in evaluating alternative scenarios and assessing adaptation strategies for locations at risk of extreme weather events.” In reviewing potential stormwater management scenarios, incorporating current and future projections for heavier rain into stormwater management will be critical.

The DEIS expressly notes that this proposed project will increase the Total Suspended Solids (sediment), Total Phosphorous (TP), and Total Nitrogen (TN) in direct contravention to Pennsylvania’s commitments to the Chesapeake Bay Total Maximum Daily Load

The DEIS does not address water quality requirements under the Chesapeake Bay Total Maximum Daily Load. Pennsylvania is legally mandated to reduce nutrients and total dissolved sediments under the Chesapeake Bay Total Maximum Daily Load. Centre County has a county action plan that identifies improvements to water quality as a key goal, including reduction of Total Suspended Solids (sediment), total phosphorous, and total nitrogen. In contrast, the DEIS states that the preferred Central Alternative will in fact introduce “additional pollutants for Total Suspended Solids (TSS), Total Phosphorus (TP), and Total Nitrogen (TN).” DEIS pg. ES-19. While the DEIS notes that impacts to stormwater will be managed, any stormwater control measures must also consider the Centre County Action Plan and federal and state requirements under the TMDL. For more on the Chesapeake Bay TMDL, see <https://www.epa.gov/chesapeake-bay-tmdl>. For more on Pennsylvania’s implementation of the TMDL under the Phase III Watershed Implementation Plan, a legally required plan, see <https://www.pa.gov/agencies/dep/programs-and-services/water/bwrnsm/bay-restoration/healthy-waters-pa>. Finally, for Centre County’s approach to reducing nutrients and sediment, see <https://centrecountypa.gov/2237/Countywide-Action-Plan>.

In addition to stormwater, impacts from air quality also affect water quality. Less air pollution, particularly from NOx, decreases atmospheric deposition of nutrients to water and leads to an improvement of water quality. See <https://www.umces.edu/improvements-surface-water-quality-due-declining-atmospheric-n-deposition>. This is critical as Pennsylvania is legally mandated to reduce nitrogen in its waterways, including in the Centre County region. Again, there is no mention of these issues in the DEIS.

While the DEIS references the designation of Spring Creek and its headwaters as high quality trout streams, it fails to address the potential degradation to these important waters

The DEIS references a report from the Pennsylvania Fish and Boat Commission stating that “Spring Creek is one of the best Class A wild trout streams in Pennsylvania.” Page 3-77. While the DEIS includes mitigation, it simply notes that “impact avoidance and minimization measures will be further evaluated as part of the final phase of this project.” Page 3-81.

Spring Creek is a world-renowned trout fishery. Noting that impact avoidance and minimization measures will be further evaluated is insufficient to address the potential impacts to this Class A, High Quality, Wild Trout, Cold Water Fishery: these standards all indicate the highest standards and the most protection afforded to any stream in Pennsylvania. As noted in a 2011 Fish and Boat Commission, transportation is part of what leads to more impervious surface, one factor in leading to a “watershed under siege.” See Fish and Boat Commission Technical Report 01: Spring Creek: A

Watershed Under Siege (2011), available online at [https://www.pa.gov/content/dam/copapwp-pagov/en/fishandboat/documents/about-us/agencyoverview/fisheries-mgmt-plans/springck\\_fishery.pdf](https://www.pa.gov/content/dam/copapwp-pagov/en/fishandboat/documents/about-us/agencyoverview/fisheries-mgmt-plans/springck_fishery.pdf).

While the DEIS includes mitigation for impacts on wetlands, the proposed mitigation is through a wetland mitigation bank in Tioga County. If mitigation is needed, it should take place within Spring Creek. In addition, review and oversight during any construction is critical to ensure that proper stormwater and sediment management do not harm Spring Creek and its tributaries.

The DEIS fails to adequately address impacts to agricultural land and conservation easements impacted by the proposed alternative

The DEIS references 139 acres of productive agricultural land, including 18 farm operations, 16 agricultural conservation easements, and 345 acres of Farmland Protection Policy Act soils as impacted by the Central Alternative. The DEIS includes mitigation as required under federal and state lands; however, this does not address the loss of this farmland and its operations to the economic well being of this region, nor does it address the affirmative duty of PennDOT as a trustee to “the preservation of the natural, scenic, historic and esthetic values of the environment” under the Pennsylvania Constitution, Article I, Section 27. As referenced in the Centre County Historical Society’s comment letter, the agricultural character of this region is critical to the Eligible Penns-Brush Valley Rural Historic District. The proposed cut and fill construction of the proposed alternative will not only take agricultural land out of production but will detrimentally impact the character of this region.

The DEIS fails to address potential impacts of the project on the extended recreational opportunities offered by the Rothrock State Forest

While the DEIS references recreational opportunities, it mainly focused on existing athletic facilities, parks, potential bike trails, and a privately owned golf course. In addition, the DEIS addresses impacts to the Rothrock State Forest as potential impacts to wildlife, but fails to address recreational opportunities within Rothrock State Forest at all. According to the Pennsylvania Department of Conservation and Natural Resources, recreation in Pennsylvania is now estimated to be a \$20.4 billion business, with a 21% increase since 2021. See <https://www.pa.gov/agencies/dcnr/newsroom/shapiro-administration-investments-in-outdoor-recreation-continu>. Access to state forest and game lands are a key part of this opportunity for Centre County, with Rothrock State Forest providing multiple trails for hiking, biking, and other kinds of recreation. The DEIS does not and should address the impact of noise, traffic, and the presence of a new 4 lane highway through this region on recreational opportunities in the greater area.