



Brian Bury PWS, CPESC  
Manager – Environmental Programs/Projects

July 26, 2019

**VIA EMAIL: [RPCOMMENTS@apa.ny.gov](mailto:RPCOMMENTS@apa.ny.gov)**

John Burth  
Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12977

Reference: General Permit/Order 2019G-1  
Replacement of Certain Utility Poles

Dear Mr. Burth,

In response to the public comment period for the Proposed APA General Permit/Order 2019-G1, New York State Electric & Gas Corporation (NYSEG) provides the following comments:

1. APA provided email notice of the public comment period on 2019G-1 to David Daley of NYSEG on Friday July 19, 2019 and stated, "This general permit would replace existing General Permit 2017G-1, 'Access to and Replacement of Utility Poles in Wetlands'." NYSEG is seeking clarification that 2019G-1 will continue to cover all activities that would have been authorized under APA General Permit 2017G-1.
2. If the APA does not provide notice of an incomplete application nor signed certification of an application within 10 business days of receipt, is an application considered automatically authorized?
3. NYSEG recommends notifications for both incomplete applications and signed certifications under 2019G-1 be completed via e-mail in place of mail, as mailings may not necessarily be received by the applicant within 10 business days of submission for coverage.
4. NYSEG requests APA reconsider the eligibility criteria listed in item "e." under "Eligibility". Many of NYSEG's existing utility poles in need of replacement due to asset condition are 40-foot in length and stand 34-feet above grade. In order to achieve better conductor clearances and accommodate potential pole sharing with communications companies, NYSEG would replace these structures with 50-foot length poles that would stand 43-feet above grade after utilizing NYSEG's standard pole embedment standard (embed 10% of pole height, plus an additional 2-feet) however the replacement would not meet the arbitrary 25% height increase maximum in item "e." NYSEG requests the 25% criteria be eliminated or at the very least replaced with criteria that allows for coverage of the aforementioned scenario.

Thank you for the opportunity to comment on this matter. Please feel free to contact me at 607-762-8835 or via email at [bbury@nyseg.com](mailto:bbury@nyseg.com) with any questions related to NYSEG's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Bury", written over a light blue horizontal line.

Brian Bury PWS, CPESC  
Manager – Environmental Programs/Projects

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