



NEW JERSEY HIGHLANDS COALITION

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Delaware River Basin Commission
P.O. Box 7360
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**Re: Docket D-2010-018 CP-1
PPL Electric Utilities / Public Service Electric & Gas
Susquehanna to Roseland 500 kV Transmission Line**

The DRBC is undertaking a review of the Susquehanna to Roseland Transmission Line Project (S-R Project) because the Commission believes the project falls into the category of projects specified in section 2.3.5.A.12 of the Administrative Manual Rules of Practice and Procedure, where "Electric transmission or bulk power system lines" are exempt from review "unless they would pass in, on, under or across an existing or proposed reservoir or recreation project area."

4.7 miles of the project's proposed 72 miles of disturbance within the Delaware River basin is within a recognized recreation project area, the Delaware Water Gap National Recreation Area and the National Scenic Appalachian Trail. In addition, since the project is located within the drainage area of designated Special Protection Waters, per Article 3.10.3A.2.e.1 & 2 of the Water Quality Regulations, Administrative Manual - Part III, the project must have an approved Non-Point Source Pollution Control Plan.

Because the National Park Service has issued a final Environmental Impact Statement in September, 2012, approving the S-R Project's 4.7 miles through the National Park Units, and the project has received Soil Conservation District Certification from Sussex and Morris counties in New Jersey and awaiting pending certification from Warren County for the portion that drains into Special Protection Waters, the DRBC is prepared to approve this portion of the S-R Project.

The evaluation of the project by DRBC is wholly dependent upon the approvals of other agencies. The DRBC has not independently analyzed the S-R Project construction plans and methods. The DRBC has not indicated by reference or otherwise if the conditions, requirements and standards imposed by the permitting agencies are greater, lesser, or equal to those of the DRBC. The DRBC appears to be merely rubber-stamping the permitting processes of other agencies.

But more importantly, the New Jersey Highlands Coalition is concerned that the DRBC confined its consideration to only the 4.7 miles of the S-R Project's total 72 miles of linear construction disturbance within the Delaware Basin.

Section 2.3.5.A.12 of the RPP also requires review of bulk power or electric transmission line projects that "involve significant disturbance of ground cover affecting water resources."

Your Water, Your Future

The S-R Project crosses ten Delaware Basin municipalities in Sussex, Warren and Morris counties in New Jersey. Five of these municipalities; Byram, Hopatcong Borough, Sparta and Jefferson, are within the New Jersey Highlands—a federally recognized and New Jersey State-protected region and the source of more than half of New Jersey’s total water supply. The S-R Project crosses the portion of the municipalities that are within the Highlands Preservation Area, the most stringently development-regulated part of the statutory New Jersey Highlands region.

In describing the project, the DRBC states that within the 4.7 mile crossing of the National Park, the S-R right-of-way will be increased by 0.75 miles, adding an additional 50 feet to the existing right-of-way. The DRBC does not contemplate the impacts of widening the right-of-way by 50%, which will cause measureable impacts by altering natural habitat, compacting soils that will increase run-off, diminish groundwater recharge, alter hydrological conditions, and invite invasive species. There is no discussion of proposed restoration, mitigation or alternative analysis. The DRBC notes that disturbances within wetlands either are within an existing right-of-way and therefore already disturbed, or located within existing access roads. The DRBC fails to consider the impacts of construction activity, which will significantly alter the fragile ecological functions of wetlands. Existing access roads in many cases are mere fire trails that will require widening and grading to support the construction traffic necessary for the project.

These anticipated impacts will of course have consequences along the entire route, another 30 miles or so within the Delaware Basin in New Jersey, crossing open forested land in municipal, county and NJ State Parks and Wildlife Management Areas. Are PSE&G’s construction methods and plans different outside of the National Park? Is the amount of additional right of way greater? Are the regulations for construction activity stricter or less strict than those of the DRBC? Do they meet the same standards for avoidance and mitigation? What are the restoration plans and how will restoration be monitored?

The DRBC must consider these questions and answer them before they can accurately answer whether or not the S-R project would involve significant disturbance of ground cover affecting water resources. If it fails to do so, than it is merely a rubber-stamping redundant layer of regulating government.



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