



NEW JERSEY HIGHLANDS COALITION

508 Main St. • Boonton, NJ 07005 • www.njhighlandscoalition.org

December 17, 2008

New Jersey Highlands Council
100 North Rd.
Chester, NJ 07930

RE: PSE&G Susquehanna-Roseland Expansion Project – Comments Prepared for the 12/18/2008
Highlands Council Meeting

Chairman Weingart, Council Members and Council Staff:

The proposed PSE&G transmission project presents considerable concerns because of the scale and nature of the associated environmental, historic, scenic, and recreational impacts to the Highlands Region. In support of the goals and purposes of the Highlands Act and Regional Master Plan, the New Jersey Highlands Coalition is opposing PSE&G's application for a Highlands Applicability Determination (HAD) under Highlands Act exemption #11, which states:

The routine maintenance and operations, rehabilitation, preservation, reconstruction, repair, or upgrade of public utility lines, rights-of-way, or systems, by a public utility, provided that the activity is consistent with the goals and purposes of the Highlands Act; [7.38-2.3(a)11]

To address HAD applications under exemption #11 [7.38-2.3(a)11], The Regional Master Plan includes the following language:

Objective 7F1f: *Activities authorized under exemptions #9 and #11, which require a finding that the activity is consistent with the goals and purposes of the Highlands Act, shall be based upon a finding that the proposed activities are consistent with Highlands Act, the RMP, any rules or regulations adopted by the NJDEP pursuant to the Highlands Act, or any amendments to a master plan, development regulations, or other regulations adopted by a local government unit specifically to conform them with the RMP.*

The New Jersey Highlands Coalition noted almost 50 inconsistencies between the Highlands Regional Master Plan and PSE&G's proposed transmission line expansion project. The New Jersey Highlands Coalition also noted numerous inconsistencies with the NJDEP Highlands Rules, N.J.A.C. 7.38 as well as numerous inconsistencies with the goals and purposes of the Highlands Act.

Timeline:

PSE&G submitted an *Application for Highlands Applicability and Water Quality Management Plan Consistency Determination – Susquehanna-Roseland 500 KV Transmission Line*. The application was deemed administratively complete and published in the NJDEP Bulletin on 11/5/2008 and republished on 11/19/08.

The DEP is accepting public comments on the HAD application through 12/18/2008.

The New Jersey Highlands Coalition and 18 other organizations requested an extension of the deadline for public comments, a public hearing, and an electronic version of the HAD application to be available online. The request was submitted to the NJDEP on 12/2/2008 and denied by the Department on 12/10/2008.

Major Inconsistencies between PSE&G proposed project, as outlined in their HAD application, and the goals and purposes of the Highlands Act and RMP Objective 7F1f:

- **Proposed access roads are subject to change.** Locations have only been mapped using aerial images, routes have not been walked and therefore may not be feasible.
- **Proposed access roads run through Wildlife Management Area, Highlands Open Water Buffers and cross the many recreational sites including the Highlands Trail.** Access roads will be wide enough for heavy equipment trucks to pass each other. The road surfaces will 12 inches of gravel. Hiking and other recreational trails will cross proposed access roads in many locations while construction is taking place and while heavy equipment is traveling through these popular parks and natural areas. Stormwater controls for water draining from access roads and staging areas are not included in the HAD application and therefore impacts to wetlands, C1 streams and Highlands open waters may be significant.
- **The proposed Jefferson Switching Station (see appendix 1) will add 20.4 acres or disturbance (the size of an average Big Box Store and parking lot) and 7.7 acres of new impervious surfaces within/on:**
 - the Preservation Area;
 - 300' Highlands Open Water Buffers to Wetlands;
 - Critical Wildlife Habitat;
 - Prime Groundwater Recharge Area;
 - Core Forested Lands within a Forest Resource Area;
 - A mapped Wildlife Corridor;
 - Severely Constrained Steep Slopes
 - Moderately Constrained Steep Slopes
 - Steep Slope Protection Area
 - Mapped Conservation Priority Area
 - In-holding property surrounded on nearly all four sides by more than **7,700 acres of existing preserved lands.**
- **Scenic Impacts to Recreational Lands and Federally Recognized Historic Sites along or adjacent to the line.** Tower heights will range between 179 and 193 feet. Specific tower design per location has not been determined yet.
- **The incomplete nature of the project's design and engineering plans.** PSE&G has stated in public that the project is only 20-30% engineered to date. Additionally, the construction design for the Jefferson Switching Station has not been chosen. Either design will have different resource impacts.

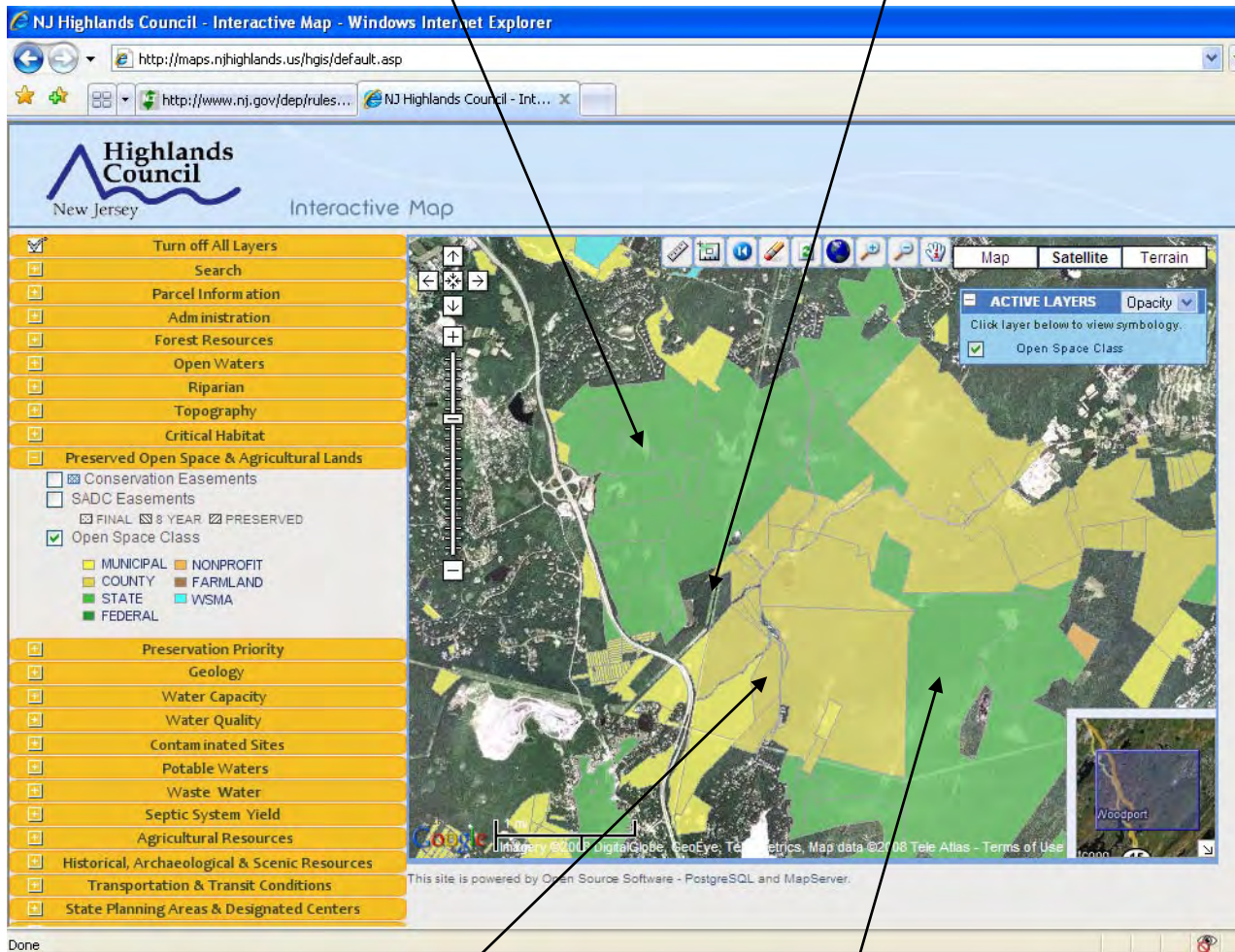
Thank you for the opportunity to comment at this time. A full copy of our comments sent to the NJDEP on 12/18/2008 RE: PSE&G's HAD application are available on our website, www.njhighlandscoalition.org/

Appendix 1: Maps of the Proposed Jefferson Switching Station

Map 1: Jefferson Switching Station – Adjacent Open Space 7,700 acres

Weldon Brook WMA
1,552 acres

Jefferson Switching Station Site
Proposed: 20.4 acres of new disturbance
7.7 acres of new impervious surface

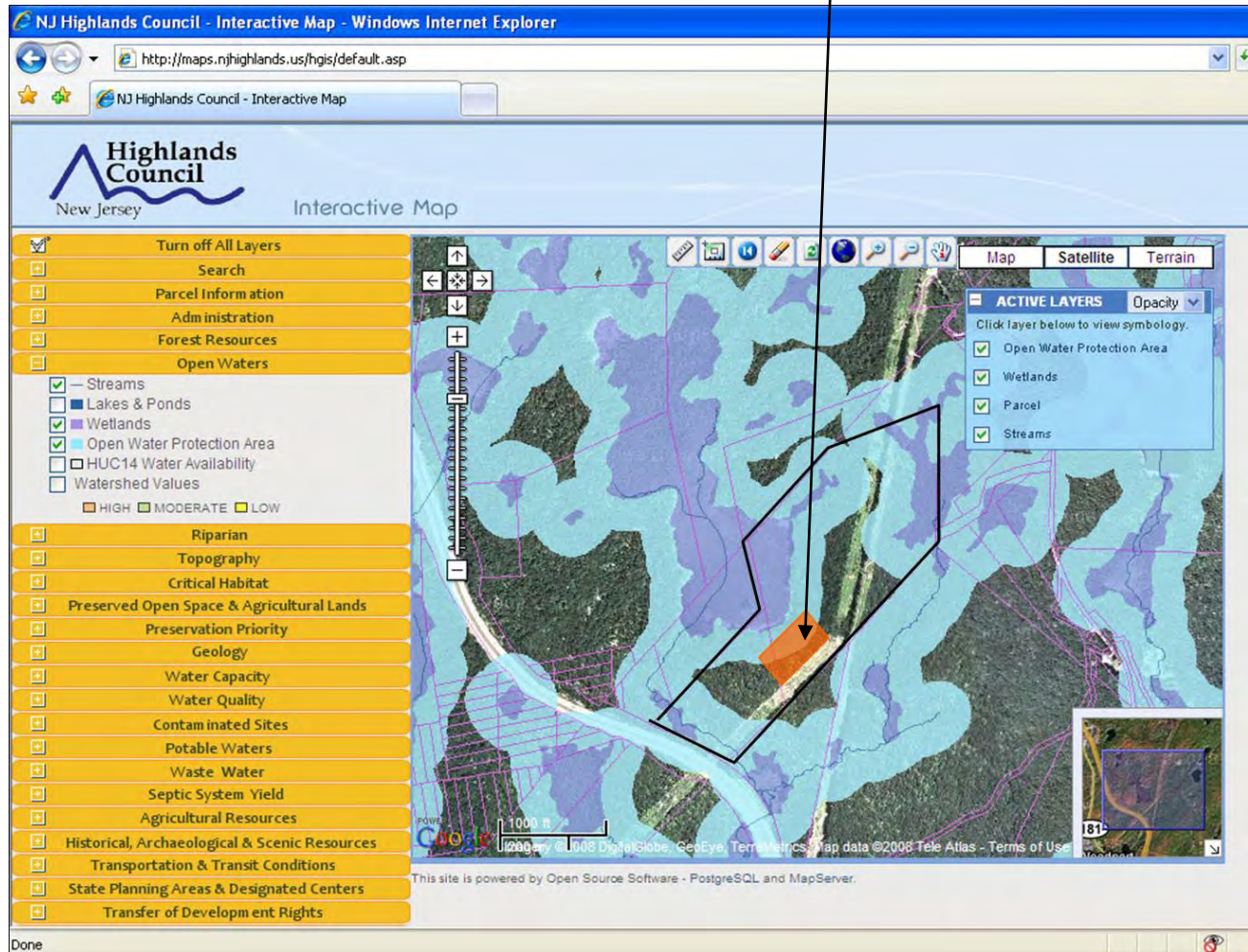


Mahlon Dickerson Reservation
Morris County Park Commission
3,200 acres

Rockaway River WMA
2,951 acres

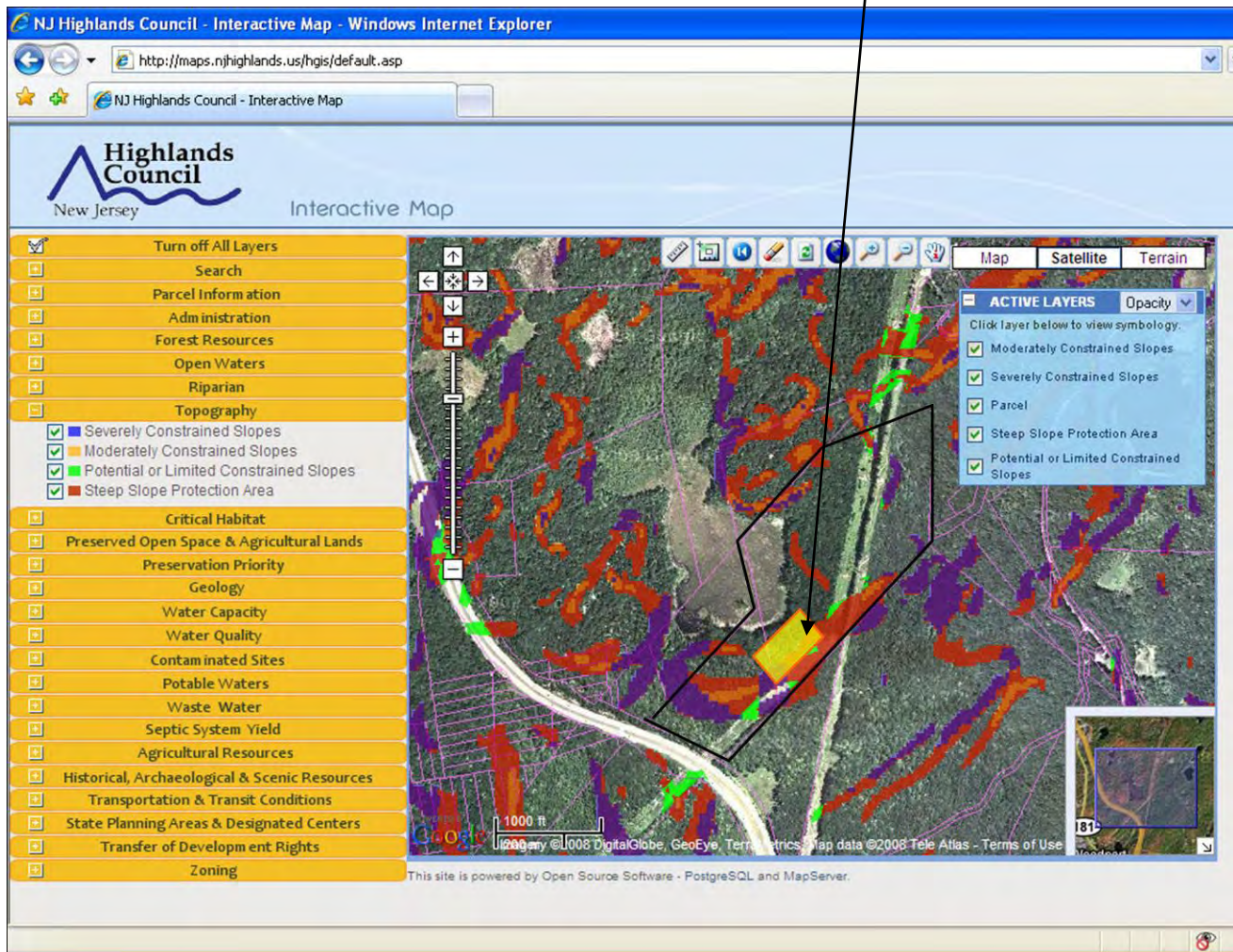
Map 2: Jefferson Switching Station – Site Constraints: Wetlands, Streams and Open Water Protection Areas (300' buffers)

Proposed Jefferson Switching Station Site



Map 2: Jefferson Switching Station – Site Constraints: Steep Slopes

Proposed Jefferson Switching Station Site

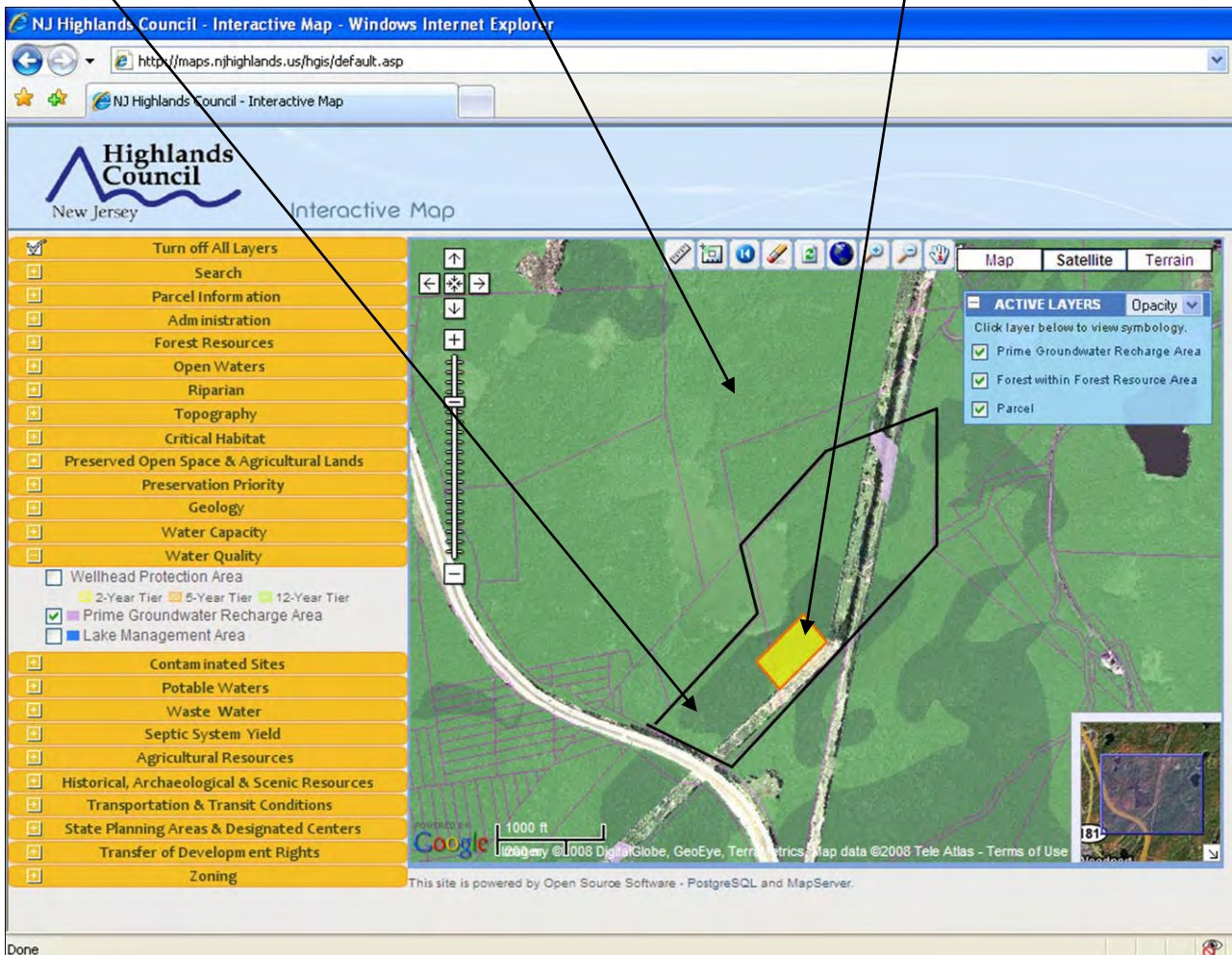


Map 2: Jefferson Switching Station – Site Constraints: Forested Lands and Prime Ground Water Recharge Areas

Prime Groundwater Recharge Areas

Forest within a Forest Resource Area

Proposed Jefferson Switching Station Site



Done