March 20, 2009

RE: Louis Berger Group’s Cultural Resources Study for the 500kV Susquehanna-Roseland Transmission Line

Dear Mr. Maresca:

We have received a copy of this report, and would like to provide our comments under Section 106 review.

To focus our concerns about certain fundamental inadequacies in the report, we have concentrated on one municipality, Jefferson Township in Morris County. The enclosed maps superimpose information from the Berger report, and the written sources they have used, on the applicant’s transmission line route map, so as to coordinate the various resource names and reference numbers and clarify the locations of potential impacts. This approach strikingly illustrates several points:

- A number of known, listed sites occur just outside of the delineated APE (map 1).
- The proposed route of the line moves straight through several sites, with no deviance shown to accommodate the resources (map 2).
- The route passes through at least two large properties (Picatinny Arsenal and the Mahlon Dickerson Reservation of the Morris Co. Park Commission) where independent listings of resources could be expected, but no mention is made of those listings (maps 1 & 2).

In light of these omissions, we question the adequacy of the CRS along the entire route of the transmission line. In particular, Montville is very rich in resources, and likely to be severely impacted.

Our concerns grow from the map and extend beyond it.

Sources
The consultants have not clearly named their sources. Apparently they checked the SHPO web site and the Acroterion Survey of Morris County Cultural Resources. They could also have used the Picatinny Arsenal web site and the NJ Highlands Council interactive map (see source list below). They could have spoken to the Morris County Park Commission. Perhaps even more serious is the omission of any report of site visits.
APE
The report states that your office has “negotiated” the dimensions of the Areas of Potential Effects (APE) for the line, the access roads, the substation and the archaeological sites. But we understand that you have told one of our members that these distances are just a starting point for discussion purposes. The presence of clusters of resources just outside of the APE, even in this one sparsely-surveyed township, indicates that the starting point needs adjustment. In an area where the topography is so varied, obviously the APE must vary accordingly. We note that the Pennsylvania SHPO required a 2-mile APE for that state’s part of the route.

Abandoned mines
Because of its geology, iron mining was the economic engine of northwestern New Jersey. Many small mines and forges existed locally, and now are forgotten. Lists of abandoned mines are notoriously incomplete. Sources for Jefferson include Boyer, NJ Dept. Labor, and NJDEP iMap. We found that the 2 Hurd Mines, just beyond the APE at the intersection of Rte. 15 and Weldon Road, were omitted by Berger. All of these abandoned mines should be mapped as cultural resources, but they should also be located for safety reasons. The path of a mine shaft cannot be predicted on the basis of a surface subsidence. The shaft follows the geological formation, which usually occurs at a diagonal to the surface, along a NE-SW axis. As support beams rot over the years, earth can collapse anywhere along this diagonal path. The safety factor is crucial for construction, or for the passage of heavy vehicles at the surface. The 1977 publication Abandoned Magnetite Iron Mines of NJ states, “…in the last 15 to 20 years, 20 to 25 buried openings have suddenly collapsed, leaving a deep opening. The status of the other lost openings must be suspect... if these areas are developed without considering the old mines, serious problems could arise in the future...The Mine Safety Act was amended to include abandoned mines in late 1973.”

Scenic vistas
Because of the topography along this entire line, a major negative impact will be visual. The new towers will redefine a mountainous viewscape which is in many places pristine. We see no recommendation in the Berger report for special protection of these vistas, and certainly no recognition of their character in the size of the APE. Depending on the physical context, the Highlands Council’s Consistency Determination suggests an APE of at least seven miles, and we concur.

Protective actions
We see no indication at all that the consultant has considered acts of avoidance, minimization, or mitigation of the possibly numerous adverse effects.

In conclusion, we find the report seriously deficient. As the 106 review progresses, we ask that our points be considered toward a final agreement.

Beyond the area of cultural resources, we cannot emphasize enough the numerous problems associated with this project. Environmental impact studies have been as deficient as the CRS. PSE&G has neither made a convincing argument for the necessity of this project, nor have they addressed the impacts it will have on our cultural and environmental resources.

Sincerely,

Elliott Ruga
Campaign and Grassroots Coordinator
And on behalf of:

The Delaware Riverkeeper Network
   Maya K. van Rossum, Delaware Riverkeeper

Eco-Action Initiatives of Warren County
   Laura Oltman, President

Morris County Trust for Historic Preservation
   Marion Harris, President

Mount Hope Historical Conservancy
   Marion Harris, President

Musconetcong Mountain Conservancy
   S. Wilder, President

New Jersey Conservation Foundation
   Wilma Frey, Senior Policy Manager

New York – New Jersey Trails Conference
   Brenda Holzinger, NJ Regional Representative

Sierra Club, NJ Chapter,
   Jeff Tittel, Director

Stop the Lines
   Dave Slaperud

South Branch Watershed Association
   Bill Kibler, Executive Director

Cc:   Kristofer Beadenkopf, Cultural Resources Specialist, the Louis Berger Group
      Mark N. Mauriello, Commissioner, NJDEP
      Donald M. McCloskey, Director, Environmental Policy & Strategy, PSE&G
      Dan Saunders, Acting Administrator & Deputy Administrator, NJ SHPO
      Julia M. Somers, Executive Director, NJ Highlands Coalition
      Eileen Swan, Executive Director, NJ Highlands Council

attachments
Sources


MAP 1

- Weldon Mine
- Highlands Archaeologic Grids

Legend:
- Proposed Tower
- Existing Tower
- Proposed Access Road
- Known Historic Resources
- Highlands Planning Area
- Transmission Centerline
- Delaware Water Gap NRA
- Swifhing Station
- Municipal Boundaries

- Morris County Cultural Resources Survey points, 1986
- Historic Resources identified by Berger study
- Archaeological Grid points from NJ Highlands Council Interactive Map
Legend
- Proposed Tower
- Existing Tower
- Proposed Access Road
- Transmission Centerline
- Switching Station
- Historic Architecture APE
- Known Historic Resources
- Highlands Planning Area
- Municipal Boundaries

Figure 1f: Susquehanna to Hollywood 500 kV Project
Historic Architectural Area of Potential Effects (APE)

46 Devil’s Punch Bowl
47 Talmadge Schoolhouse
48 Talmadge Archaeological and Historical Complex
49 Upper Longwood Forge Historic District
50 Grand Bee Rock Shelter