DELAWARE RIVERKEEPER NETWORK

July 14, 2015

PJM Board of Managers
PJM Interconnection, LLC
PO Box 1525
Southeastern, PA 19399-1525

Submitted via first class mail and email

Re: Comments regarding the PJM TEAC's recommendation for stability issues at Artificial Island

Dear PJM Board,

At the April Transmission Expansion Advisory Committee (TEAC) meeting, PJM staff indicated that it would recommend that the PJM Board select LS Power's proposed project (Project 5A) to address stability issues at the nuclear complex located on Artificial Island. This proposal involves installing a 230-kV line under the Delaware River using horizontal directional drilling (HDD) technology despite acknowledgement that this crossing represents the greatest component of risk for the project. The Delaware Riverkeeper Network urges you to reject this recommendation and direct PJM Staff to consider and analyze the environment impacts of proposals, seek an alternative that recognizes the importance of minimizing destruction of natural resources. There has not been any demonstration that this line is necessary or needed for reliability, but if the line is necessary, alternatives exist with less environmental impacts.

The preferred Project 5A involves a set of new 230-kV transmission lines connecting Salem substation to the existing 230-kV "Red Lion" Transmission lines in Delaware with connection to the new "Silver Run" Switchyard. This proposal involves approximately 5.6 miles of new transmission line with approximately 2 miles of overhead line on mono-pole structures and 3.6 miles of submarine cable crossing under the Delaware River using HDD methods.

The Delaware River is an extremely valuable resource for the residents of Delaware, New Jersey, Pennsylvania, and New York. In addition to crossing the main stem of the Delaware River, the proposed route will traverse the Augustine Wildlife Area and the Appoquinimink River. These coastal areas along the Delaware side of the river include large expanses of wetlands and many braided

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stream channels. This area is part of the largest preserved coastal marshland on the east coast, and the Delaware Bay Wetlands are an internationally recognized Wetland of Importance by the Ramsar Convention, an intergovernemental treaty signed in 1971 for the purpose of conserving wetlands.

The Delaware River frontage forms the core of the Augustine Creek freshwater marsh complex, a wildlife area that was established for the purpose of wildlife and habitat conservation and to provide wildlife-associated recreation opportunities. This complex of protected lands provides important refuge for birds and wildlife in the face of sea level rise and increasing development in New Castle County, Delaware. Freshwater wetlands and forestlands contain a diversity of waterfowl, shorebirds, songbirds, birds of prey, deer, otter, and other small game. Additionally, the tidal marsh associated with the Appoquinimink River are highly valued as spawning and nursery areas for fish and aquatic species.

Several state endangered Bald Eagles breed in these areas, and the extensive tidal wetlands support state-endangered Northern Harriers. Salt marsh dependent bird species found in this area include Seaside Sparrows, Willets, Osprey, Virginia Rails, and over 3000 Marsh Wren. Effective protection of these wetlands is critical since the primary production of salt marshes is intrinsically linked to the production of marine animals and fish species. Furthermore, species such as the federally endangered Atlantic Sturgeon – of which there are less than 300 spawning adults each year of the River's genetically unique population – can ill afford additional harm to their population, spawning capabilities or juvenile survival. And lastly, these wetlands improve and protect water quality through filtration and storage of agricultural runoff from surrounding farms.

Although crossing the Delaware River and the associate wetland areas through HDD is intended to be less intrusive, there is still the potential for environmental damage due to unexpected releases of drilling mud and borehole cave-ins still exists.[1] If fractures in the drilling substrate are encountered, there is the potential for pressurized drilling fluids to leak out of the borehole and potentially reach the riverbed.[2] There is also the potential for pollution to enter surface water as the result of grading, drilling excavations, equipment washing, or other construction related activities during directional boring. Furthermore, HDD also requires large areas to be cleared for mud pits, pipe assembly areas, and staging areas, and therefore, has a significant disturbance footprint.

Cost is clearly an important factor but it should not be, as in this case, the only deciding factor. Environmental impacts are critical to the decision making process. If PJM decides to continue to pursue this Project option 5A, we will request federal agencies, as part of the permitting process, to prepare a full Environmental Impact Statement due to the potential for significant impact to the environment and to require full mitigation for any wetlands impacts. In addition to potential time delays, any environmental impacts will raise the cost of the project through the need for mitigation projects.

[1] Canadian Association of Petroleum Producers, Canadian Energy Pipeline Association, and Canadian Gas Association, *Pipeline Associated Water Crossings*, 1-4 (2005).
[2] *Id*.

PJM should be increasing reliability in ways that reduce pollution and that reflect forward-thinking solutions based on a changing energy marketplace. Clean energy policies and new technologies are advancing clean renewable energy markets, and energy efficiency and renewable energy will be needed to meet state and federal standards. PJM needs to adapt to these market changes and find solutions that focus on a sustainable energy future. Again, the Delaware Riverkeeper Network urges you to reject this recommendation and direct PJM Staff seek an alternative with less environmental impacts that does not involve crossing the Delaware River.
Respectfully,

Maya K. van Rossum
the Delaware Riverkeeper

cc: Dave Anders, Members Committee Secretary