



July 18, 2014

PJM Board
PJM Interconnection, LLC
2750 Monroe Boulevard
Audubon, PA 19403

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

Submitted via first class mail and email

Re: PJM Artificial Island Request for Proposals

Dear PJM Board,

The Delaware Riverkeeper Network urges you to reject the recommendation to select PSE&G's 7K proposal submitted in response to the Artificial Island Request for Proposals soliciting options to address electrical stability issues at the Hope Creek and Salem Nuclear facilities located on Artificial Island in Lower Alloways Township, NJ.

The PSE&G 7K option negatively impacts significant ecological resources important to communities within the Delaware River watershed. The Delaware Riverkeeper Network and many in the environmental community will strongly oppose the PSE&G 7K option if you attempt to proceed with it.

The number of environmental resources the PSE&G 7K option would adversely impact is astoundingly high:

- ☞ the Delaware River
- ☞ Supawna Meadows National Wildlife Refuge
- ☞ Alloway Creek Restoration Site
- ☞ Abbotts Meadow Wildlife Management Area
- ☞ Mad Horse Creek Wildlife Management Area
- ☞ emergent wetlands (35 crossings with a likely 200 foot right of way cleared)
- ☞ freshwater-forested wetlands (27 crossings with a likely 200 foot right of way cleared)
- ☞ freshwater scrub-shrub wetlands (11 crossings with a likely 200 foot right of way cleared)
- ☞ freshwater ponds (11 crossings)
- ☞ estuarine and marine deepwater/wetlands (35 crossings)

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- ☞ 59 waterbodies including Alloway Creek, Mill Creek and tributaries
- ☞ 4 federally-listed endangered or threatened species
- ☞ 30 state-listed endangered or threatened species

The crossing of the Delaware River will require dredging, filling, pilings and other permanent harms to the River ecosystem. Species such as the federally endangered Atlantic Sturgeon – of which there are less than 100 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 contrary to the assertions in documents we have read, the Delaware River in proximity to this project is 303d listed, and the river bottom activity this project will require is very likely to disturb river bottom sediments in a way that will have water quality impacts.

The environmental devastation caused by clearing a 200-foot right of way is not limited to its immediate footprint or a limited scope of time. When cutting through forests a right of way creates damaging impacts for an additional 300 feet on either side of the cut due to forest fragmentation and edge effects caused by transforming the area from interior habitat to that of forest edge habitat. And once cut, rights of way are not encouraged or even allowed to revert back to their natural condition, they are managed so as to allow ongoing access to the right of way for future construction or repairs.

The development that this option would require will most certainly transform forested wetlands to a less productive condition. Forested wetlands are an important and fast dwindling ecological habitat. Implementation of the PSE&G 7K option will result in forested wetlands being permanently transformed to emergent wetlands and therefore less productive and unable to sustain the ecological systems they once supported.

The habitat of threatened and endangered species will be irreparably altered with a variety of biological ramifications. And the ecological health of waterways crossed will be impacted temporarily but also with ongoing impacts resulting from changes in the watershed landscape.

The integrity of state and federal lands that our communities have sought, secured and supported protection of will be degraded, thereby violating the public trust and giving private corporations the benefit of the public investment made in protecting these areas.

The wetlands and marshes impacted by the proposed power line are part of the Delaware Bay Wetlands, an internationally recognized Wetland of Importance by the Ramsar Convention, an intergovernmental treaty signed in 1971 for the purpose of conserving wetlands. These wetlands are also recognized as an important network of protected sites for shorebirds and waterfowl. 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. And lastly, these wetlands improve and protect water quality through filtration and storage of agricultural runoff from surrounding farms.

Supawana Meadow National Wildlife Refuge, which will be adversely impacted by this project, includes 2,500 acres of tidal wetlands that supports more than 250 different species of breeding and

migrating birds, native mammals and amphibians, and other species. Osprey and bald eagles nest on the refuge, American Black ducks winter on the refuge, and the endangered Sandpiper feeds on the refuge. In addition to wildlife habitat, the refuge provides recreational opportunities including birding observation decks, scenic hiking trails, and a boat trail.

The Alloway Creek Wetland Restoration Site encompasses 1,601 acres of tidally influenced wetlands along the Delaware River, providing habitat essential for commercial and sport fishing, hunting, and trapping. Additionally, the site provides breeding and nesting habitat for Rough-legged Hawk, Snow Geese, Osprey, Yellow Warblers, and migratory shorebirds such as Red-winged Blackbird and the Great and Snowy Egret. Alloway creek is also a New Jersey Coastal Heritage Trail Route Site with other recreational opportunities including an observation platform and tower with a wildlife viewing blind and nature trails. PSE&G has already impacted these areas with the applications of herbicides and mechanical interventions, and it is important that additional harms not be imposed.

Mad Horse Creek National Wildlife refuge consists of over 9,000 acres of tidal marshes and upland habitat that provides feeding, roosting, and nesting habitat for birds, pheasants, and rabbits. Because of the nearby agricultural land, the freshwater wetlands provide additional water quality protections through filtering and storing runoff water. Maintaining the integrity of the existing forests and forested wetlands is also critical in this area. Forest fragmentation would put the wide-range of terrestrial species such as forest dwelling bats, bobcats, barred owls, Cooper's hawk, and forest passerines that rely on this habitat at risk since these animals need large tracts of land to sustain their populations.

Abbott's Meadow Wildlife Management Area consists of marsh edge and meadows that provide habitat for the Baltimore and Orchard Oriole, the Northern Cardinal and field Sparrow, various species of waterfowl and wading birds, along with raptors such as the Northern Harrier.

The information available on the PSE&G 7K proposal, including the assessment from your own consultant, GAI consultants, makes it abundantly clear that this option is very damaging environmentally, and not just to one important ecological resource, but to hundreds.

And so the Delaware Riverkeeper Network would be active and committed in our opposition. We felt it was important you were aware of our strong and informed opposition before making your final decision on July 22nd.

Respectfully,



Maya K. van Rossum
the Delaware Riverkeeper