

**Environment New Jersey
Byram CARES
New Jersey Environmental Federation
New Jersey Highlands Coalition
New Jersey Sierra Club
Stop The Lines**

October 23, 2008

Dear Municipal Officials,

PSE&G's proposal to construct a major expansion of the New Jersey portion of the Susquehanna to Roseland transmission power line deserves serious scrutiny. We applaud your municipality for working in the best interest of local residents and ratepayers throughout the PSE&G service area to ensure this proposal is carefully scrutinized.

We would like to inform you that the groups signing this letter have formed a coalition to ensure all public concerns raised by this line expansion – ranging from property rights to environmental, public health and energy resource planning issues – are fully examined. After several weeks of studying and discussing these various concerns, our coalition has decided to oppose the proposed expansion of the line. In our view, PSE&G's proposal to increase the power transmission capacity along the line by several hundred percent to deal with 1% annual increase in peak demand is excessive, irresponsible and profit motivated. The \$650 million it would cost PSE&G's customers to build the line would be better spent on renewables and energy efficiency measures, and that's why we are calling for PSE&G to offer an alternative proposal that focuses on these clean energy strategies rather than a line expansion.

On October 14th, PSE&G began formal proceedings with the New Jersey Board of Public Utilities (BPU) to seek approval for the transmission line expansion. This gives the company the option to by-pass municipal level approvals. PSE&G may still choose to continue its requests for local approvals, and we believe municipalities should demand that this occur. It is also in your interest to be involved in the BPU proceedings, preferably with legal representation, as the BPU's administrative process is very legalistic. If the municipalities wish, they could choose to form a coalition to combine resources and support for joint representation.

Ultimately, the five BPU Commissioners will make a decision, based on the analysis developed by its staff. It is our understanding that the BPU's decision will largely be based on electric grid reliability concerns, although we believe other concerns may be examined as part of the review proceedings – particularly if our groups and your towns call on the BPU to consider them as they make their decision.

To accomplish a thorough review of all concerns, our coalition plans to formally intervene in the BPU proceedings. We welcome the opportunity to work closely with all the affected municipalities to represent what we believe is the broad public interest throughout these proceedings. In the short term, we ask that your municipality consider joining us to call on the BPU to reject PSE&G's request for approval to expand the transmission line and to instead require that PSE&G develop an alternative proposal that employs energy efficiency and renewable energy to meet the regional electricity needs. We are currently writing a draft resolution, which we will be forwarding you in the coming week.

Our main question to the BPU – one that we ask your municipality also raise in your communication and intervention – is why PSE&G's ratepayers should be asked to spend \$650 million on a transmission line expansion of this magnitude. We believe that other more environmentally beneficial, community, and public health protective alternatives – such as small-scale distributed renewable energy installation, efficiency and conservation measures – can meet the region's electricity needs.

It is worth noting that Governor Corzine has pledged to hold electricity demand almost flat at a minimum, and at best to ensure that by 2020 we are using less electricity statewide than we use today. Any assertion by PSE&G that our electric demand will continue to rise by 1% a year or more is in conflict with efforts now underway by the Corzine Administration to meet that goal and reign in runaway electricity usage. In fact the Administration will spend just under one billion dollars on energy efficiency in the next four years to deliver this important change. We see no reason why this investment would not be targeted at the regions most in need of enhanced power reliability, including the region that the Susquehanna – Roseland line serves.

In addition, on October 22nd Governor Corzine released a fifteen year energy plan that proposes to increase the state's renewable energy standard to 30% by 2020, requiring utilities to meet an increasing portion of the state's energy needs with wind, solar and other clean sources of energy. Within that goal, the state will develop 3000 MW of offshore wind energy and 1800 MW of solar. These renewable energy goals – in concert with the Governor's efficiency goals – can more than meet the state's energy needs without asking New Jersey ratepayers to fund major transmission line expansions.

In addition to the energy planning question, PSE&G's request for approval to expand the Susquehanna – Roseland transmission line also raises a host of health, property rights, economic and environmental concerns that must be considered by the BPU, now that it has been approached by PSE&G for approval of this project. Attached is a list of other concerns we have begun to compile. Please let us know if there are other concerns on your list, so that we can add them to ours and help to amplify them in our efforts.

Should you desire, members of our group would be happy to meet with you and your colleagues to share information, or to discuss coordinating our efforts. Please feel free to contact Dena Mottola Jaborska at Environment New Jersey who is leading the formal intervention with the BPU on our behalf at 609-392-5151, ext. 306 to discuss.

Once again, thank you for your efforts thus far on behalf of New Jerseyans.

Sincerely,

Dena Mottola Jaborska, Executive Director, Environment New Jersey

Donna Griff, Group Coordinator, Byram CARES

David Pringle, Campaign Director, New Jersey Environmental Federation

Julia Somers, Executive Director, New Jersey Highlands Coalition

Jeff Tittel, New Jersey Sierra Club

David Slaperud and Tom Hill, Stop The Lines

Concerns Raised by the Proposed Expansion of the New Jersey portion of the Susquehanna – Roseland Transmission Line:

Open Space, Park and Recreation Lands Concerns:

- *May Divert Green Acres Land Preserved By Taxpayers:* The proposed expansion of the Susquehanna-Roseland line (S-R line) would run through parkland and open space preserved with grants from New Jersey's Green Acres program. In many cases, county and municipal taxes also contributed to local land acquisitions. These critical open space and recreation lands were paid for in part by New Jersey taxpayers with the expectation that these lands would be permanently protected. If the deed of easement on these lands does not allow the addition of taller electric poles and more wires, the lands will be subject to the Green Acres diversion rules.
- *Impacts to Local Parklands:* Construction of the S-R line expansion would take place on some Morris County parkland, including Pyramid Mountain Natural Historic Area in Montville and Kinnelon, as well as the southern edge of the Mahlon Dickerson Reservation in Jefferson.
- *Federal Parkland Also Threatened:* In testimony at the July 31, 2008 hearing in the Senate Energy and Natural Resources Committee regarding energy transmission, Craig Obey, Vice President for Government Affairs at the National Parks Conservation Association (NPCA) voiced the Association's concerns about the impact the S-R line could have on the Delaware Water Gap National Recreation Area. Mr. Obey stated the path taken by this line would cross: at least 15 wetlands; 7 areas with known state and federally-listed protected animal and plant species; 10 Natural Heritage Priority Areas; several known pre-historic and historic (National Register-listed or eligible) resources; 4 heavily used visitor use areas including campsites, a picnic area, and river launch
- *Scenic Value Diminished:* There would be a significantly negative impact on scenic resources in the area if the proposed expansion were allowed to go forward. The more than doubling of the height of existing towers and additional wires would alter the landscape forever. Many recreational lands would lose scenic value, and this could threaten New Jersey's eco-tourism economy.

Natural Resources Concerns

- *Damage to Forests and Habitat:* Roads cut for construction would cause forest and habitat fragmentation, and the loss of vegetation would have a negative impact on water supply. Disturbance to steep slopes, wetlands and migratory birds would also occur.

Health issues Related to Electromagnetic Fields (EMF's) concerns:

- *Possible Carcinogen:* While PSE&G continues to state that results of studies are "inconclusive" and that "there is no causal relation between EMF's and childhood leukemia or cancer," both the National Institute of Environmental Health Sciences (NIEHS) and World Health Organization (WHO) classify EMF's as a possible

human carcinogen. Recent studies seem to indicate *some* relationship between living near transmission lines and health problems, especially cancer. Currently, we are aware of at least one “cancer-cluster” that exists along the lines in question.

PSE&G claims they will use “reverse phasing” to minimize magnetic fields. This is a complex and unproven technology, far less effective when the lines are carrying different loads, as is the case here. At best, it is an admission to the fact that they are attempting to “minimize” EMF’s – for which there is no state or federal standard – despite their claim that they pose no health hazard.

Property rights concerns:

- There are numerous potential property rights issues with existing easements. Some easements exist with a width of less than the 150’ that is being proposed for the project by PSE&G, and specify tower heights and/or line voltage. Many of them were written in the late 1920’s, and may need renegotiation or could force the use of eminent domain for acquisition of additional property. Are 150-foot easements appropriate through residential neighborhoods, considering the over 190-foot height of the towers being proposed? Who will be watching out for the interest of these property owners during this process?
- Economics are an important concern as well. The increased line voltage, visual impact of more than doubled tower height, and greater vegetative clearing will negatively affect property values of homes currently adjoining the lines. The increased tower height will also raise the lines and towers into view above the mature forest canopy in many densely developed residential areas. This new visual impact will decrease the value of many homes currently not impacted by these lines. Every 100 homes with a decreased assessment of just \$10,000 each will create a \$1-million ratable deficit for your municipality.

Highlands Regional Concerns:

- The proposed Susquehanna-Roseland line would require significant environmental impacts, both in siting pole locations and during the construction process. The current right of way crosses through the Delaware Water Gap National Recreation Area, the Appalachian Trail, Kittatinny Valley State Park, Rockaway River Wildlife Management Areas, Wildcat Ridge Natural Area, the New Jersey Highlands Preservation and Planning Areas, as well as numerous state, county and local open space lands. The scenic integrity of ridgelines and the integrity of wetlands, riparian areas, core forests, critical habitat and Special Environment Zones, designated as no build areas by the Highlands Council, will be significantly impacted. The proposed line is inconsistent with the drinking water protection standards, scenic resource standards and critical wildlife standards set forth by the Highlands Water Protection and Planning Council in the Highlands Regional Master Plan.