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## NEW JERSEY CHAPTER

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TEL: [609] 656-7612 FAX: [609] 656-7618  
[www.SierraClub.org/NJ](http://www.SierraClub.org/NJ)

July 17, 2014

Mr. Howard Schneider, Chair  
And Members of the PJM Board  
PJM Interconnection  
PO Box 1525  
Southeastern, PA 19399-1525

RE: Comments of the NJ Sierra Club on the proposed "7K Project" in New Jersey and Delaware

Dear Board Chair Schneider and Members of the PJM Board,

We urge PJM to reject the Red Lion transmission line proposal for Artificial Island. We believe this line cuts through some of the most environmentally sensitive areas on the Atlantic coast and will have tremendous environmental impacts. The line, as proposed, will cut through Supawna Meadows National Wildlife Refuge, the Alloway Creek Watershed Wetland Restoration Site, the Abbotts Meadow Wildlife Management Area (WMA), and the Mad Horse Creek WMA. There has not been any demonstration that this line is necessary or needed for reliability. Even if the line is determined to be necessary, it does not need to follow this route. Alternatives exist with less environmental impacts. The impacts of the Red Lion line will be substantial on wetlands and fisheries. The line is in the middle of a major flyway for a variety of bird species. These preserved lands are also critical habitat for threatened and endangered species.

The environmental impacts will significantly raise the cost of the project for ratepayers through attempted mitigation projects, increased construction costs in areas with sensitive features, and significant delays. Additional costs will also come from obligations to replace public lands. You really cannot mitigate for this type of disruption in these environmentally sensitive areas.

Alloway Creek is a restoration site put in place by PSE&G put in place to mitigate the impacts to the Delaware River resulting from a lack of a closed loop cooling system at the Salem Nuclear Plant. This project would result in PSE&G having to do even more mitigation for their mitigation.

Supawna Meadows National Wildlife Refuge is considered a wetland of international importance and is a major stopover on the Atlantic flyway. The refuge is also considered an international shorebird reserve with the largest rookery for wading birds on the East Coast north of Florida. It is home to numerous threatened and endangered species. Ospreys, eagles, sandpipers, king rail, thrush, and heron are found there.

Transmission lines have significant impacts on bird populations, especially when located in flyways. Transmission lines are considered the second largest killer of birds and raptors are particularly vulnerable. Birds can die in collisions with the line and through electrocutions. This project must meet the standards of the Migratory Bird Treaty Act (MBTA).

**Sierra Club: For Our Families, For Our Future**



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Transferring this power to Delaware could potentially cause reliability issues in Southern New Jersey especially with BL England on line to shut down by 2015 and the potential closing of Oyster Creek in 2019. PJM has already stated transmission upgrader would be needed as a result of those facilities closing, and we need to ensure that there is adequate generation in the region to meet demand. Exporting this power to Delaware would decrease the capacity available to New Jersey.

Taking this unnecessary and destructive route may cause environmental damage from which the ecosystem will not be able to recover. The only benefit will be the additional costs, and in turn cost recovery, for the utility building the line. Choosing this route with all the additional costs and delays will only enrich the people building the line at the expense of the environment and the ratepayer. We urge you to reject this line.

Thank you for considering these comments.

Sincerely,

Jeff Tittel

Director, New Jersey Chapter of the Sierra Club