

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE PETITION OF	:	
PUBLIC SERVICE ELECTRIC AND GAS	:	
COMPANY FOR A DETERMINATION	:	
PURSUANT TO THE PROVISIONS OF	:	
N.J.S.A. 40:55D-19	:	BPU DOCKET
	:	
(SUSQUEHANNA-ROSELAND)	:	

**TO THE HONORABLE COMMISSIONERS OF THE
NEW JERSEY BOARD OF PUBLIC UTILITIES:**

**SUMMARY OF
PRE-FILED DIRECT TESTIMONY OF ROBERT POLLOCK
ON BEHALF OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY**

Robert Pollock, President of Environmental Resource Consulting, LLC and a licensing and permitting consultant to Public Service Electric and Gas Company (“PSE&G”) for the Susquehanna-Roseland Project (the “Project”), testifies on behalf of PSE&G in this proceeding.

Mr. Pollock has responsibility for managing the environmental and construction permitting efforts for this Project and for coordinating with the associated permitting agencies. Specifically, Mr. Pollock has the responsibility of ensuring that PSE&G obtains all necessary environmental permits and authorizations so that the Project can proceed. Mr. Pollock is also responsible for addressing any threatened and endangered species concerns in coordination with the Project’s construction and planning functions.

In his testimony, Mr. Pollock identifies and explains the various Federal, State and local agency permits that are required to construct the Project. Mr. Pollock also discusses any environmental impacts associated with the Project and explains how

locating the Project within an existing, disturbed overhead transmission line right-of-way is the most reasonable alternative as it requires the least amount of new disturbance to natural resources. Mr. Pollock also describes the measures to be taken to reduce impacts to the environment and how any permanent impacts will be mitigated in accordance with the applicable laws and regulations.

Mr. Pollock also testifies that underground construction, if it were to be technically feasible, would increase the potential for serious adverse environmental impacts and would require PSE&G to cause greater disturbance to potentially environmentally sensitive areas.

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**PRE-FILED DIRECT TESTIMONY OF ROBERT POLLOCK ON BEHALF OF
PUBLIC SERVICE ELECTRIC AND GAS COMPANY IN SUPPORT OF
SUSQUEHANNA-ROSELAND TRANSMISSION LINE PROJECT**

1 **Q.** **Please state your name, the name of your employer and your current position**
2 **with that employer.**

3 **A.** My name is Robert Pollock. I am the President and owner of Environmental
4 Resource Consulting, LLC (“ERC”). I formed the company in 2003.

5 **Q.** **What is your affiliation with PSEG Services Corp?**

6 **A.** I am currently a consultant contracted through PSEG Services Corp’s Licensing
7 and Permit group. I have provided permitting services and technical support to
8 PSEG’s operating companies for approximately 10 years.

9 **Q.** **Please describe your educational background and list any professional**
10 **degrees and licenses you hold.**

11 **A.** I graduated from Millersville University of Pennsylvania with a Bachelor of
12 Science in Biology in 1995. Since graduating, I have attended numerous

1 continuing education courses within technical and regulatory disciplines related to
2 my field.

3 **Q. Please describe your previous professional employment experience.**

4 **A.** After graduating from college, I was a biologist and general manager at
5 Biosphere, Inc., a clam aquaculture facility in Tuckerton, New Jersey. From
6 January 1999 to January 2003, I was employed by Paulus, Sokolowski and Sartor
7 and Birdsall Engineering, both of which are engineering and environmental
8 consulting firms. While employed by both firms, I provided permitting services
9 and project management for a wide range of clients within the residential,
10 commercial and utility fields.

11 **Q. Please describe your responsibilities as President of ERC.**

12 **A.** In 2003 I started ERC, a consulting company which provides local, State and
13 Federal permitting services with a primary focus on the utility discipline. I am
14 involved in all aspects of company operations as well as providing technical
15 permitting expertise to my utility clients.

16 **Q. Please describe your experience with transmission projects at PSE&G.**

17 **A.** I have been involved with transmission operations at PSE&G for approximately 5
18 years. Recently, I was involved with the New Jersey Department of
19 Environmental Protection (“NJDEP”) freshwater wetland and flood hazard area
20 permitting efforts for the Branchburg – Flagtown Transmission Line Project. The
21 Branchburg-Flagtown Project is a four mile, 230kV overhead electric
22 transmission line, between PSE&G’s Branchburg Switching Station located in
23 Branchburg Township and PSE&G’s Flagtown Switch Rack located within

1 Hillsborough Township in Somerset County, New Jersey. The Branchburg-
2 Flagtown Project involved wetland impacts as well as several stream crossings,
3 thus requiring applicable authorizations from the NJDEP. Additionally, ERC
4 assisted in securing the NJDEP individual wetlands permit and mitigation
5 agreements for PSE&G's new transmission line in Winslow Township, Camden
6 County, New Jersey. Finally, we provide environmental assessments and review
7 for critical areas as part of PSE&G's transmission line maintenance throughout all
8 of New Jersey.

9 **Q. What has been your role in this Project?**

10 **A.** Specifically related to the existing Roseland-Bushkill right-of-way (the "Right-of-
11 Way"), I have provided wetland and threatened and endangered species studies
12 for maintenance planning purposes. In support of permitting and planning for the
13 Project, ERC and its partners delineated all of the wetlands and provided species
14 specific investigations for the Right-of-Way. Furthermore, I actively participated
15 with the Louis Berger Group ("Berger") in providing input into the Alternative
16 Route Identification Report for the Susquehanna to Roseland Project, New Jersey
17 Portion, dated August 15, 2008, attached as Exhibit JH-1 to the testimony of
18 PSE&G witness Jack Halpern, because of my knowledge and past field work on
19 this Right-of-Way.

20 Currently, I am managing Berger's environmental permitting efforts on behalf of
21 PSE&G with respect to this Project. This includes State programs, which regulate
22 freshwater wetlands, flood hazard areas and the New Jersey Highlands, as well as
23 coordination with PPL Electric Utilities ("PPL Electric") for the federal approvals

1 required for crossing the Delaware Water Gap National Park. In addition, I am
2 addressing associated threatened and endangered species concerns in coordination
3 with the Project and construction planning for the Project.

4 **Q. Are you sponsoring any exhibits to your testimony?**

5 **A.** No.

6 **Q. Please list the permits that PSE&G has applied for or may need to apply for**
7 **from any Federal, State, or local government agency in order to construct**
8 **and operate the Project.**

9 **A.** In addition to this Petition before the Board of Public Utilities, PSE&G has
10 applied for or will be applying to various agencies for the following approvals and
11 authorizations to proceed:

- 12 1. National Park Service (in conjunction with PPL Electric): a construction
13 permit is required for the construction of facilities on federal lands within
14 the Delaware Water Gap National Park;
- 15 2. NJDEP (Freshwater Wetlands, NJ Highlands, Flood Hazard Area Control
16 Act, Green Acres): required for all activities located within the above
17 mentioned areas;
- 18 3. New Jersey Department of Community Affairs (“NJDCA”): all activities
19 located with electrical substations are subject to issuance of construction
20 permits from the NJDCA;
- 21 4. New Jersey Department of Transportation (Highway Occupancy Permit):
22 required for the crossing of any State or Federal highway, for example
23 Route 15, I-287, etc.

- 1 5. County Soil erosion and sediment control: required for all activities
2 associated with soil disturbances greater than 5,000 square feet; and
3 6. Local construction permits: local construction officials are required to
4 approve foundations and structural steel for the transmission structures.

5 Moreover, as part of the overall approval process, PSE&G will be coordinating
6 with numerous agencies including, but not limited to: New Jersey State Historical
7 Preservation Office, US Fish and Wildlife Service, NJDEP Endangered and Non-
8 game Species Program, and the NJ Highlands Council.

9 **Q. Are there any water crossings along the route of the Project?**

10 **A.** Yes, there are approximately 64 stream crossings for the Project. Long term
11 impacts to the water crossings would typically be associated with the loss of
12 shading affects due to the clearing of vegetation along banks of impacted streams.
13 However, because the Project will be constructed within the existing Right-of-
14 Way, clearing will be minimal; resulting in no additional impacts to existing
15 stream corridors. The largest water crossing is the Delaware River within the
16 Delaware River National Recreation Area. PSE&G will be working in
17 conjunction with PPL Electric to obtain the appropriate approvals from the
18 National Park Service and Army Corps of Engineers with respect to this crossing.

19 **Q. Are there any environmental impacts associated with this Project?**

20 **A.** There will be impacts associated with the Project. PSE&G, however, has selected
21 the route intended to minimize such impacts. PSE&G contracted with the Berger
22 to analyze several routes for feasibility and potential impacts to a number of

1 resources. PSE&G witness Jack Halpern from Berger will provide a detailed
2 explanation of this route selection analysis.

3 **Q. Please describe what actions have been and will be taken to minimize**
4 **environmental impacts.**

5 **A.** Once the final route was selected, PSE&G and its consultants made every attempt
6 to limit disturbance within the existing cleared or disturbed rights-of-way so as to
7 minimize permanent impacts to wetlands, forested areas and other critical areas.
8 During the design process, field study and mapping information including
9 NJDEP's Landscape Data for T&E's, Highlands GIS information, wetlands,
10 floodplain, and flood hazard area riparian areas were placed on the base design
11 maps to aid in determining the placements of access roads and transmission
12 structures. Critical areas were spanned aurally wherever feasible.

13 During construction, impacts will either be temporary or permanent in nature.
14 Temporary impacts will be limited by utilizing protective measures such as
15 matting or the use of low profile vehicles designed for distributing weight so as
16 not to cause unnecessary soil compaction in wetland areas. Matting can be made
17 of steel, timber or plastic. Silt fencing and other soil erosion and sediment control
18 measures will be utilized in accordance with approved plans from the respective
19 Soil Conservation District.

20 For certain critical species, such as bog turtles, pre-construction field surveys will
21 be performed by United States Fish and Wildlife certified bog turtle surveyors. In
22 addition, construction monitoring will be conducted to reduce any potential for
23 mobile species to enter an area during construction. In addition, time or seasonal

1 restrictions may be implemented in order to minimize potential impacts to
2 threatened or endangered species.

3 For the most part, it is my understanding that structure replacement will take place
4 within the existing Right-of-Way in as near a location as the existing structures,
5 and thus there will be minimal net loss of wetlands or critical resources. In the
6 isolated event that an additional pole must be placed in a critical area because of
7 engineering constraints, the permanent impact will be isolated to the footprint of
8 the structure base or foundation. Any permanent impacts will be mitigated in
9 accordance with the applicable laws and regulations of the governing entity.

10 **Q. Are there any environmental impacts associated with Project construction**
11 **activities at the Jefferson and East Hanover switching stations?**

12 **A.** The Jefferson and East Hanover switching stations will require the removal of
13 both forested wetland and upland areas to accommodate the new equipment and
14 connection to the Project. The placement of the East Hanover switching station
15 will also require the filling of regulated areas subject to the Freshwater Wetlands
16 Act. All disturbances will be located on land currently owned by PSE&G.
17 During the permitting process, PSE&G will be required to mitigate for the loss of
18 any environmentally sensitive areas. Mitigation will be performed at or above the
19 regulatory thresholds to assure no net loss of important environmental resources.

20 **Q. After the Project is completed, will maintenance activities on the Right-of-**
21 **Way result in any additional environmental impacts?**

22 **A.** Since the Project will be in the existing Right-of-Way, long-term maintenance
23 activities will be consistent with current practice and will not result in any

1 additional impacts to existing resources. Since the Project will be located within
2 an existing, disturbed overhead transmission line right-of-way, it is my opinion
3 that the Project is being proposed in the most logical and reasonable location
4 available, with the least potential environmental impact.

5 **Q. What, if any, visual impacts will result from the Project?**

6 **A.** Tower height is being driven by engineering requirements and constraints, as
7 discussed in the testimony of PSE&G witness Richard F. Crouch. PSE&G
8 intends to work with agencies, including but not limited to the New Jersey State
9 Historic Preservation Office, Appalachian Trail and the National Park Service to
10 minimize potential impacts wherever possible.

11 **Q. In your opinion, from an environmental perspective, is there a rational basis
12 to support underground construction of this 500kv transmission line?**

13 **A.** As discussed in the testimony of PSE&G witness Richard F. Crouch, the
14 technology does not exist for the placement of a 500 kV alternating current
15 transmission line underground. In connection with a 500kV direct current
16 underground facility, given the size, complexity and scope of this Project, from a
17 natural environment view, I do not see a rational basis to support underground
18 construction. Placement of underground cables, particularly in areas of critical
19 habitat or large wetland areas, increases the potential for serious adverse
20 environmental impacts. For overhead transmission lines, the disturbance is
21 limited to the placement of the transmission structure foundations. As I indicated
22 earlier, structures were located outside of wetlands and critical areas wherever
23 possible. Underground cable installation would require the clearing of all

1 vegetation, removal of stumps and grading activities along the entire linear
2 alignment. For example, if PSE&G were to propose underground lines within the
3 Muckshaw Ponds area in Newton or the Troy Meadows, extensive trenching and
4 unnecessary disturbances to wetland vegetation would occur. Generally
5 underground installations are utilized in more urban environments where use of
6 overhead ROWs are not feasible. Water crossings would also require the
7 disturbance and trenching of bottom sediment resulting in unnecessary adverse
8 impacts to water quality. Additionally, once an underground cable is installed, it
9 is more difficult to maintain as PSE&G would be required to enter and excavate
10 extensive areas in potentially sensitive areas.

11 **Q. Based upon your personal knowledge and experience, your visual**
12 **observation of the Right-of-Way, the information you have obtained**
13 **concerning the construction of the Project and your review and analysis of**
14 **the materials prepared by PSE&G as part of this proceeding, do you have an**
15 **opinion concerning the environmental impacts of the Project along the route**
16 **selected?**

17 **A.** Yes, it is my opinion that the selected route is the most reasonable alternative.
18 The Project will be located within an existing ROW, which has been in existence
19 and maintained since the 1920's. It will require the least amount of new
20 disturbance to natural resources, in contrast to a new virgin or modified linear
21 right-of-way.

22 **Q. Does this conclude your testimony?**

23 **A.** Yes it does.