

**Petition to Governor Rendell**

from the residents of SPRINGFIELD and RICHLAND Townships

*Lesson learned in our Township’s intervention against PPL Electric is the need to fix the process.*

**Dear Governor Rendell:**

Access to affordable power is in the public interest, but so too is the preservation and protection of societal and environmental resources, such as the preservation of the character of rural and historic communities, and the protection of wetlands, woodlands and watersheds.

- We **oppose** a process by which a corporation aggressively promotes its plan – including acquisition of Right of Ways and land purchases – ahead of PUC approval.<sup>1</sup>
- We **oppose** the Federal *Energy Policy Act* – designating large swaths of the Northeast as “national interest electric corridors – for similar reasons.
- We **favor** determination of the need for utility infrastructure and preferred siting by independent State Planning Committee<sup>2</sup> with strong public representation.
- We **favor** siting of utility infrastructure in existing commercial corridors.<sup>3</sup>
- We **favor** full public disclosure of utility plans and alternatives, and providing sufficient time for meaningful public input based on objective cost/benefit analysis.<sup>4</sup>
- We **favor** competitive bidding on utility infrastructure projects, so that an independent State Planning Committee<sup>1</sup> can compare costs and impacts on land resources.

*Mail or Fax to Governor Ed Rendell: 225 Main Capitol Building, Harrisburg, PA 17120 | Fax: 717-772-8284*

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

<sup>1</sup> Which we have learned can lead to biased assessments of local assets and made it necessary for our Township and representatives to file expensive interventions with the PUC (which can be prohibitively expensive in many cases, leading to undesirable land use).

<sup>2</sup> A *State Planning Committee* should include independent experts in energy systems, business, real estate, historical and environmental assets, and consumer representatives. It should also include local representation (elected Township supervisors) who will have in-depth understanding of environmental and societal resources, zoning, and community objectives. The State committee could be an expanded form of the PUC (Public Utility Commission).

<sup>3</sup> As described in other State guidance documents such as: Guidelines of Minimum Requirements for Transmission Line Applications Filed Under Virginia Code Section 56-46.1 and The Utility Facilities Act

<sup>4</sup> A corporation is biased by its mission to grow its business and increase shareholder value (many shareholders being disinterested non-residents). Thus we cannot trust that its analysis is objective when comparing impacts of substation sites and transmission line routes.

## Background:

### Concerns with PPL Electric's preferred Transmission Line Route and Substation Siting in Our Townships

#### PPL'S "PREFERRED" CROSS COUNTRY ROUTE - AND SUBSTATION LOCATION IN A RURAL AREA:

- Will *unnecessarily* degrade the historic and rural character of Springfield and Richland Townships, Bucks County.  
Of note, the 7-acre substation the will take up more than five football fields of space in a rural meadow.  
Part of the meadow the substation will rest on is designated wetland, which USDA guidelines<sup>7</sup> say should be avoided.
- Will significantly diminish property values in sight of the lines and substation, according to two independent studies.<sup>5</sup>
- Will diminish and subdivide high-quality wetlands and woodlands - habitat for endangered native plants and animal species ... the "last frontier of Bucks County"
- Will impair the quality of riparian buffers that prevent erosion and protect water quality in the Tohickon watershed.
- Will accelerate the spread of invasive plant species in ROWs, overwhelming native plants that wildlife depend on, decreasing bio-diversity.
- Could directly threaten endangered native species.
- Puts the quality of the ground water at risk if herbicides are used to suppress vegetation in ROW - repeatedly for the entire life of the transmission lines; raising concerns about health risks, which could further decrease property values in the region.
- Will require ongoing maintenance activities and access routes to ROWs, putting these sensitive environments at increasing risk in future.

Notably, PPL's "preferred route" is by zoning classification a Resource Protection Area and viable commercial alternative sites exist.

The streams that run through it and the rainwater that falls upon the rocks, runs between them and sinks into the ground serve to recharge our groundwater, not just for the surrounding homes but for homes that tap into that aquifer for water, perhaps two or more miles away.

PPL's chosen path crosses the most floodplains and wetlands; crossing streams that contain intact Tohickon riparian corridors. Riparian corridors are fragmented or absent in the other routes: SEPTA and the 309 corridor.

Notably, PPL persists in it's plan despite interventions by our Township supervisors, our elected representatives, and expert condemnation.<sup>6</sup>

#### OTHER PROBLEMS:

- The benefits of the Cross Country route cited by PPL appear to be marginal and temporary in nature (cost savings); while the negative impacts and risks will be permanent and cumulative to our Townships and State.
- PPL did *not* disclose the substation plan at the public meeting in February of 2008; and it added this "small" 7-acre piece to the application last, but purchased the rural land first – prior to doing any impact studies, which is also in opposition to USDA guidelines on the siting of rural substations.<sup>7</sup>
- PPL's cost comparisons are based on its own analysis, which is clearly biased by an earlier decision to purchase an 82-acre tract of land within the "preferred" cross country route. That is, to find otherwise would be to admit the purchase of land for the substation – a \$2 million purchase – was a mistake.

Good land and public policy decisions require an objective, independent analysis of all costs and risks, including impacts on ecosystems that may be irreversibly damaged by construction and by maintenance.

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<sup>5</sup> Journal of Real Estate Research 7(3): 315-330, 1992.,  
High Voltage Power Lines: Do They Affect Residential Property Value?

Impact: Property values and Power Lines: The Good, the Bad, and the Ugly  
[http://www.powerlinefacts.com/Power\\_Lines\\_and\\_Property\\_Values.htm](http://www.powerlinefacts.com/Power_Lines_and_Property_Values.htm)

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<sup>6</sup> Including the formal intervention by our State Senator and a scathing report by the State Department of Environmental Protection: July 25, 2008 The Morning Call.

<sup>7</sup> Department of Agriculture Rural Utilities Service RUS Bulletin 1724E-300; Issued June 2001, Design Guide for Rural Substations  
<http://www.usda.gov/rus/electric/pubs/1724e300/1724e300.pdf>