

The PPL Line Routing in Upper Bucks County: A citizen's plea for reason
By W. Scott Douglas

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Good Evening Your Honor, members of the PUC, and everyone in the audience who has taken the time to come out tonight. My name is Scott Douglas, residing at 3450 Rt 212 Springtown, and I am very concerned about PPL's proposal for routing of their new power line. I beg everyone's indulgence tonight, as I present a short slideshow that will help me illustrate my points. I have copies of my presentation and comments for the benefit of the participants.

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I have been a resident of Springtown for 10 years, and a resident of upper Bucks County since 1990. I hold a Bachelors degree in Zoology and a Masters in Natural Resources Planning. I currently work for New Jersey DOT as a Program Manager and Environmental Planner. For those who don't know, I am a founding member of the Environmental Advisory Council in Springfield, and its current Chairperson. I am also a founding and current member of the Durham EAC. I am the current President of the Cooks Creek Watershed Association, which is the watershed encompassing $\frac{3}{4}$ of Springfield Township and $\frac{1}{2}$ of Durham Township. I am currently a member of the Springfield Planning Commission and an Assistant Scoutmaster for Troop 27 of the Boy Scouts. Finally, I am the Vice Chairman of Springfield bucks Undesireable Land Use, otherwise known as SbULU. As you might imagine, I know a great deal about this area, its resources and how best to protect them.

People who know me know I love to teach. I teach kids, graduate students at Rutgers, and any of my peers who will listen about our water resources, and how to properly use them. And I care very deeply about this Township, the people who live here and the natural beauty around us. I have carefully reviewed all the information available on this project and I have come up with way more questions than answers. But always, I come away with one overarching question. Why? Why would any organization, much less one with the resources that PPL has available, choose to destroy the tranquil, natural scenic beauty of this area, in a manner at complete odds with the community, when there is a feasible alternative. Why?

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As I understand the project, PPL proposes to replace their existing lines with new, higher voltage service which the growing populations to our north and south require. This project will be taking place in what is know as the headwaters of the Upper Tohickon Watershed, a 13.7 square mile area that comprises about 18.5% of the upper Tohickon Watershed – the watershed that feeds into Lake Nockamixon. According to the upper Tohickon Watershed Conservation Plan, published in December of 2005, the streams in this area are characterized by high water quality, largely the result of an intact riparian buffer system, comprised of a highly diverse series of wetlands. It also contains the busy highway commercial district of Route 309. As you all probably know, PPL has studies three alternative routes, one that takes the existing power line route, along Route 309; one

that would run along the unused SEPTA rail line, and a third that takes a circuitous route along the stream corridor known as the “cross country route”.

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As a member of the Springfield Planning Commission, I find it interesting to compare the three alternatives to our zoning map. This map is a portion of the current zoning map, adopted last year, after a several year process. Both the 309 Route, and the SEPTA route, run through our Highway Commercial and Planned Industrial districts. However, the cross country route – PPL’s preferred route, runs through our resource protection and rural residential districts.

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PPL has stated and published the guidelines they are supposed to follow when siting new power lines. The reason for this is because they know that the construction and long term maintenance of the lines results in a permanently altered landscape, like this high tension line that crosses Springfield Township.

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So why select this route if it is at odds with their own policy? PPL has made it clear that they will follow these guidelines “whenever possible”. The definition of “possible” is relative of course. A thorough alternatives analysis must take into account all of the costs and benefits: to PPL, to Springfield, and to the effected ecosystems. I have reviewed PPLs proposal and their environmental analysis and find it lacking in both detail and accuracy, particularly when it comes to the environment along their “preferred route”.

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The upper Tohickon has its source on the slopes of the Lookout, one of Bucks County’s areas of natural significance. These headwaters, if left in a natural condition, are much like the capillaries in our bodies, providing many acres of contact with clean forest soils that purify water and keep it cool. PPL proposes to cross these headwater tributaries 12 times along their cross country alternative exposing them to stormwater runoff, pesticide residue and an influx of invasive plant species.

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This beautiful example of the pristine condition of the upper Upper Tohickon Creek, behind the village of California, is only a few hundred feet from the proposed route. When I sampled these creeks earlier this year, I frequently found greater than 90% pollution intolerant stream invertebrates. Many, like this section have invertebrate communities that rate high enough for High Quality or Exceptional Value status.

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The Tohickon Watershed contains many diverse high value wetland habitats, including riparian fringe, vernal pools and bogs. This diversity of habitats has created refuges for many rare and unusual species. On some of my walks I have seen plants that prior I had only seen in a wildflower key. Many locations, right along the proposed route are prime habitat for the endangered bog turtle, which has been documented in several locations in

and near the study area. It is my understanding that Dr. Anne Rhodes of the Morris Arboretum intends to include this area in her upcoming revision to the important natural areas of Bucks County.

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There are approximately 3000 acres of mature hardwoods in the upper Tohickon, and this secondary growth forest is contiguous with the upper Cooks Creek Watershed on Flint Hill and the Lookout, both high priority natural areas of Bucks County. Contrary to PPL's environmental report, these woodlands are not highly fragmented, but are some of the best remaining intact woodlands in upper Bucks County. PPL's preferred route will permanently remove more than 60 acres of mature woodland.

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Much of the woodland along the floodplain of the upper Tohickon is wooded wetland. These wetlands are largely responsible for the high water quality in the Creek. The entire area is known for its high water table, poor infiltration and ease of flooding. These wetland areas serve a valuable purpose in soaking up stormwater and preventing flooding of roadways, farmfields, and downstream properties, as well as ensuring that the stormwater has time to infiltrate into the aquifer. This aquifer is what the communities of Springfield, Richland and Quakertown use for their drinking water supply.

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We ignore the value of these woodlands and wetlands at our own peril. PPL proposes to remove 60 acres of woodlands, much of it wooded wetland. This acreage may not sound like much, but it only takes a 10% reduction in infiltration surface in a watershed to create situations like this.

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The natural area in question here is not one that people flock to for recreation, but one that wildlife thrives in, and one that keeps its secrets. Native peoples knew this, that is why there are numerous native artifacts and sites throughout the study area. When Europeans settled the area, they built mills to take advantage of the power of the streams. Some of these structures are still here, lovingly restored and a testament to the industry that made Pennsylvania and a new nation strong. The people who live here today do so because it is quiet and peaceful and beautiful.

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But, progress is inevitable as they say. We need more electricity, or at least the growing communities to our north and south do. PPL insists that there are no viable alternatives. But just what are the alternatives? In this aerial comparison of the alternatives, the differences are clearly visible. The Rt 309 and SEPTA alternatives are largely cleared and commercialized, whereas the cross country route is largely undeveloped land. Springfield Township values this open space for the resources and services it provides, as does Bucks County. And we put our money where our mouth is too, with large bonds to protect open space. The County has already purchased land along the cross country route, and Springfield would like to follow suit, but not if this proposal goes through.

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PPLs environmental analysis implies that the ecosystems along the alternatives is just as valuable as that along the preferred route. The evidence does not agree. The stream corridor along the SEPTA/309 corridor is already impacted by infrastructure and development. Polluted stormwater runoff has filled them in with silt and eroded the streambanks. The biological communities are visibly impacted. The property owners along the cross country route can expect the same should PPL be allowed to proceed with their plan.

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The upland vegetation along both alternative routes is scrub/shrub, opportunistic and invasive species that can tolerate the degraded conditions. Wetlands present are of relatively low value, except as stormwater retention basins. This is the kind of trade off that we must make for progress, but it need not be allowed everywhere. We must retain some natural areas or we will lose the services they provide.

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In my opinion, this is a much more appropriate location for power lines. This is no longer habitat. Nor is this. And although trees must come down to upgrade these lines, the impacts to the ecosystem are not comparable to those that would result from the same activities along Hickon or Povenski road.

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There are no easy answers, only intelligent choices. I have spent many days working with my peers in the transportation industry trying to come up with ways to ensure that needed infrastructure minimizes impacts. And we try as hard as we can to make sure that the needs and desires of the community are taken into account. Sure, the Rt 309 route would require negotiation with PennDOT, and the rail line route might require purchase of an easement from SEPTA, but this is part of what a good steward of resources must contend with to protect the greater good. And what about the plans of the community? We have already made our choices, and we chose to have our development, industry and commerce in the 309/SEPTA corridor. There is plenty of land available in the corridor too, some that would be ideal for a substation like the one proposed.

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What about the substation? We heard in the public meeting this winter that PPL intends to build a substation on property that it has already purchased along the "preferred route". And not just any station, but one that will sit on a 7 acre footprint. They say that they can put this substation in even without approval from the Township. Obviously they intend to run lines to the station, and because this property is not along the existing line, they need a new one. I am no lawyer, but it seems like PPL has intentionally stacked the deck.

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And this is the land that they have chosen. It contains fields, woods and wetlands. It is surrounded by old farmhouses and scattered homesteads. It is zoned for resource

protection, not industrial use. I wonder how long it will take until PPL forces the Township to upgrade the roads so they can get their equipment in to build the station, to construct the lines and to maintain them. Certainly traffic and noise will increase. And the lights and ugly steel will drive the neighbors away. And bit by bit, industry and commerce will come in to take advantage of the power. The zoning will be forced to change, and the ecosystem will be lost. How is this possible? There are other available properties of this size, some of them in the commercial zone along the SEPTA and 309 alternative routes. Why not select one of those?

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In closing, I would like to plead with you to consider our case, Your Honor. Consider the wildlife and natural areas, yes, but also consider the people. In this case, justice need not be blind. When you go on your field trip, take your hiking boots and your binoculars. Walk into the woods a bit. Consider a tour of a stone farmhouse, or the gristmill in the village of California. Have a chat with the local farmer who ekes out a living on the stony wet ground that he inherited from his great grandfather. And take a look at the alternatives; the abandoned railway and the busy thoroughfare. I hope that you too will ask, Why?