

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC
UTILITY COMMISSION

In the Matter of: Application of :
PPL Electric Utilities Corporation :
Filed Pursuant to 52 PA. Code :
Chapter 57, Subchapter G, for :
Approval of the Siting and : Docket No. A- 2008-2022941
Reconstruction of the Proposed :
Coopersburg #1 and #2 138/69 kV :
TAP in Upper Saucon Township, :
Lehigh County and Springfield :
and Richland Townships, Bucks :
County, Pennsylvania :

Petition of PPL Electric Utilities :
Corporation for a Finding that a :
Building to Shelter Control :
Equipment at the Substation to be : Docket No. P-2008-2038262
Constructed in Springfield :
Township, Bucks County, :
Pennsylvania is Reasonably :
Necessary for the Convenience :
or Welfare of the Public :

**DIRECT TESTIMONY
AND EXHIBITS OF
C. ROBERT WYNN, P.E.**

**On Behalf of Springfield Township,
Bucks County, PA**

August 18, 2008

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1 **I. Introduction**

2 Q. PLEASE STATE YOUR NAME, AFFILIATION AND BUSINESS ADDRESS.

3 A. C. Robert Wynn, Professional Engineer, Springfield Township Engineer, 211 West Broad
4 Street, Quakertown, PA 18951.

5

6 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

7 A. I am a graduate of Syracuse University in New York, where I received a Bachelor's of
8 Science in Forestry and a Bachelor's of Science in Civil Engineering. In addition, I hold
9 a Bachelor's of Science degree in Forest Engineering which I received from New York
10 State College of Environmental Sciences and Forestry.

11

12 Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.

13 A. I have been employed since August, 1986 by C. Robert Wynn Associates, Inc., a
14 company I formed to provide municipal engineering services to local governments. My
15 professional engineering services have included land development and subdivision plan
16 preparation and review; preparation of Subdivision, Zoning and Stormwater Management
17 Ordinances; design of sanitary sewer, stormwater management facilities, streets and
18 bridges, retaining walls, grading plan, utility plans, and landscaping plans; preparation of
19 contract specifications for construction projects; interface with State and federal agencies
20 such as County Conservation District, PennDOT, PADEP, and US Army Corps of
21 Engineers. My firm currently represents 11 municipalities including Springfield,
22 Hilltown, East Rockhill, West Rockhill, Solebury, Plumstead, Bridgeton, Nockamixon,
23 Haycock , and Upper Saucon (as "conflict engineer") Townships, and Trumbauersville

1 and Richlandtown Boroughs. Prior to employment at C. Robert Wynn Associates, Inc., I
2 worked for Hilltown Township (3.5 years) as Township Coordinator/Secretary/Treasurer,
3 Cowan Associates (3 years) as a civil engineer, and Conrail/Penn Central (3.5 years) as a
4 civil engineer. I have been licensed as a Professional Engineer in the Commonwealth of
5 PA since 1981 and hold an inactive license in NJ.

6 Q. HAVE YOU GIVEN EXPERT TESTIMONY IN ANY JUDICIAL OR QUASI-
7 JUDICIAL PROCEEDINGS?

8 A. I have provided expert testimony at various Township Zoning Hearing Boards, Bucks
9 County Court of Common Pleas, and before the Board of View (condemnation
10 proceedings.)

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12 A. My testimony, on behalf of Springfield Township, addresses the following issues:

13 (1) The potentially adverse environmental impacts of PPL's preferred transmission
14 line route.

15 (2) The federal and state requirements for the siting of the transmission line and
16 substation with respect to land use issues and PPL's compliance therewith.

17 (3) Springfield Township's comprehensive plan and zoning ordinance as they relate
18 to PPL's application for the transmission line and proposed substation.

19
20 Q. ON WHAT INFORMATION IS YOUR TESTIMONY BASED?

21 A. In preparing my testimony, I have reviewed PPL's applications.
22
23

1 **II. Springfield Township Environmental Impacts**

2 Q. AS A MUNICIPAL ENGINEER, IS PART OF YOUR JOB TO DETERMINE WHAT
3 ENVIRONMENTAL IMPACTS WILL OCCUR AS A RESULT OF A PROPOSED
4 LAND DEVELOPMENT?

5 A. Yes.

6

7 Q. DID YOU ANALYZE PPL'S PROPOSAL WITH RESPECT TO ANTICIPATED
8 ENVIRONMENTAL IMPACTS?

9 A. Yes. According to PPL's application, the preferred route will cross through
10 environmentally sensitive areas, including wetlands/wetland margins,
11 watercourses/streams, watercourse/stream margins, floodplain areas, woodlands, and
12 steep slopes. As noted in Exhibit "C" of PPL's application (the siting analysis), intrusion
13 into areas containing natural resources should be minimized as a consideration of route
14 selection. However, the selected route will, in some cases, involve disturbance to
15 wooded areas. PPL did not select a right-of-way that followed the edge of existing
16 agricultural fields which would have minimized tree disturbance. Additionally, the
17 proposed route contains lengthy sections (in some cases, several hundred feet) that run
18 parallel to existing streams/watercourses. This type of placement increases the amount of
19 disturbance to floodplain areas and involves greater disturbance to riparian buffer areas
20 along the stream corridor. These buffer areas are important to maintain water quality. As
21 noted in the PPL supporting documentation, the selected alternative has the largest
22 wetland impact (which PPL estimated to be 4.87 acres) of all of the alternatives
23 considered by PPL.

1 Disturbance of natural resources in this manner may have adverse impacts on
2 water quality, including increases in water temperature due to removal of bank
3 vegetation, and infusion of siltation or obstructions within the stream corridor from
4 construction activity; detrimental impact on wildlife, including fish/aquatic life, due to
5 the removal of habitat; detrimental impacts to vegetation diversity, including vegetation
6 unique to the ecosystem, and vegetation within wetland areas necessary to sustain
7 wildlife.

8
9 Q. DID YOU ALSO EVALUATE WHETHER PPL'S PROPOSED ROUTE WOULD
10 RESULT IN ANY DETRIMENTAL IMPACT DUE TO STORMWATER RUNOFF?

11 A. Yes. PPL's proposal may result in increased runoff volume and rate associated with
12 removal of wooded areas, as well as increased runoff volume and rate associated with
13 construction of impervious surface and compaction of existing groundcover. In addition,
14 there is an increased probability of erosion/sedimentation due to tree removal and
15 disturbance of steep slopes, and placement of structures within floodplain areas that could
16 restrict the flow of stormwater runoff during major storm events.

17
18 Q. DID YOU REVIEW PPL'S APPLICATION TO DETERMINE IF ANY FEDERAL
19 AND STATE APPROVALS RELATED TO ENVIRONMENTAL FEATURES
20 WOULD BE REQUIRED?

21 A. Yes. Projects that propose disturbance to wetlands and/or regulated waters require
22 issuance of applicable permits from Pennsylvania Department of Environmental
23 Protection (PADEP) and/or US Army Corps of Engineers. Applications for

1 encroachment permits within regulated waters and/or wetlands normally require
2 completion of a site specific wetland/regulated water study by a qualified expert in the
3 identification of wetland/regulated waters based on Federal requirements, and
4 investigation of potential impacts on threatened and/or endangered flora and fauna that
5 may be identified to be present within the vicinity of construction activity. PADEP
6 and/or the US Army Corps of Engineers may also require reconstruction and/or
7 replacement of wetlands/regulated waters that are adversely impacted due to the project,
8 in order to mitigate the negative environmental impacts caused by the project.

9
10 Q. TO THE BEST OF YOUR KNOWLEDGE, HAS PPL CONDUCTED THESE
11 STUDIES, FILED THE REQUIRED APPLICATIONS, OR RECEIVED PERMITS
12 FROM PADEP OR THE CORPS OF ENGINEERS?

13 A. No. To the best of my knowledge, PPL has not initiated the permitting process.

14
15 Q. WOULD PPL BE REQUIRED TO OBTAIN ANY OTHER PERMITS?

16 A. Yes. Projects that involve discharge of stormwater runoff from a site containing at least
17 one acre of disturbed area require the applicant to obtain a National Pollutant Discharge
18 Elimination System (NPDES) Permit, which includes preparation of a soil erosion and
19 sediment control plan to mitigate adverse impacts of construction activity and
20 degradation to downstream properties and watercourses. NPDES Permit applications
21 typically require submission of an erosion and sedimentation control plan for review by
22 Bucks County Conservation District and/or PADEP; and also require review of
23 temporary and permanent stormwater management control measures by the Township to

1 verify consistency with Springfield Township's Stormwater Management Ordinance
2 (adopted by the Township pursuant to Act 167 and PADEP regulations) prior to issuance
3 of an NPDES Permit.

4
5 Q. WILL PPL'S PROPOSED POWER LINE ROUTE INVOLVE DEVELOPMENT IN
6 ANY FLOODPLAINS?

7 A. Yes.

8
9 Q. ARE THERE ANY SPECIFIC REQUIREMENTS PPL MUST ABIDE BY BASED ON
10 ITS ENCROACHMENT INTO FLOODPLAIN AREAS?

11 A. Yes. Encroachment into floodplain areas delineated under requirements set by the
12 Federal Emergency Management Agency (FEMA) must be consistent with FEMA-
13 approved municipal Ordinances, to ensure that municipal flood insurance is maintained in
14 good standing by FEMA. In the event that proposed development activity adversely
15 impacts the FEMA floodplain such that flood elevations are increased and/or limits of the
16 floodplain are increased, modifications to the delineated FEMA floodplain must be
17 approved by FEMA. In areas where the 100-year floodplain has been approximately
18 mapped by FEMA, and lacks detailed flood elevations based on hydraulic and hydrologic
19 engineering studies, the Township Ordinance requires analysis of potential impacts on the
20 floodplain area. This analysis includes preparation of detailed floodplain studies to more
21 accurately define the limits of the 100-year floodplain and corresponding flood elevations
22 to assess whether the proposed construction activity will adversely impact the 100-year
23 floodplain area.

1
2 Q. HAS PPL CONDUCTED ANY STUDIES THAT EVALUATE THE IMPACT OF THE
3 PROJECT ON THE FLOODPLAIN IN SPRINGFIELD TOWNSHIP?

4 A. No. To the best of my knowledge, PPL has not evaluated the impacts of its proposal on
5 floodplain management and flood control in the Township.

6
7 Q. TO THE BEST OF YOUR KNOWLEDGE, CAN THE TOWNSHIP WAIVE ITS
8 FLOODPLAIN REVIEW AND MANAGEMENT RESPONSIBILITIES?

9 A. No, as far as I know the Township must maintain active review and management of any
10 development in the floodplain. If it fails to do so, it risks falling out of compliance with
11 FEMA requirements, which could result in the loss of federal flood insurance for all
12 Township residents and businesses.

13

14 **III. Springfield Township Zoning Requirements**

15 Q. DID YOU REVIEW SPRINGFIELD TOWNSHIP'S ZONING ORDINANCE IN
16 RELATION TO PPL'S CROSS COUNTRY ROUTE AND THE LOCATION OF THE
17 PROPOSED SUBSTATION?

18 A. Yes. PPL's proposed cross country route will impact Springfield Township's Planned
19 Industrial (PI) District, Rural Residential (RR) District, and Resource Protection (RP)
20 District. Additionally, a Floodway Overlay (FP) District exists within the area of the
21 Township impacted by the proposed PPL project, which regulates development activity
22 in accordance with FEMA requirements for projects proposing intrusion within
23 delineated FEMA floodplain areas.

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Q. WHAT DOES SPRINGFIELD TOWNSHIP’S ZONING ORDINANCE REQUIRE WITH RESPECT TO THE SITING OF A SUBSTATION?

A. The proposed construction of a utility substation (defined as Use F1 within the Springfield Township Zoning Ordinance) is a use permitted by Special Exception in all zoning districts, except the PI district, which permits Use F1 by right. (Applicants seeking Special Exception approval must apply for a hearing before the Township Zoning Hearing Board, which is charged with hearing and deciding such requests). In granting a Special Exception, the Zoning Hearing Board may attach such reasonable conditions and safeguards, in addition to those expressed in the Zoning Ordinance, as it may deem necessary to implement the purposes of the Zoning Ordinance. The Zoning Ordinance also specifies various area and dimensional criteria associated with the substation use, which include minimum setbacks between principal structures and all property boundaries of 50 feet, and required buffer areas (25 feet wide) measured along all street lines and abutting lot lines. General requirements for all uses within specific zoning districts may also regulate the maximum building coverage ratio and maximum impervious surface coverage ratio allowed for a permitted use within that district.

Q. WHAT DOES SPRINGFIELD TOWNSHIP’S ZONING ORDINANCE REQUIRE WITH RESPECT TO THE SITING OF A TRANSMISSION LINE?

A. Installation of overhead electric lines is classified as Use F4 within the Springfield Township Zoning Ordinance, which is permitted by-right in all zoning districts within the Township. Although no specific area/dimensional criteria are defined for the F4 use,

1 development of uses F1 and F4 are also subject to environmental protection standards
2 applicable to all zoning districts, which regulate intrusion into floodplain areas,
3 wetland/wetland margins, stream/watercourses, stream/watercourse margins, woodlands,
4 steep slopes, lake/ponds, carbonate geology areas, and productive agricultural soils.

5
6 Q. DOES SPRINGFIELD TOWNSHIP'S ZONING ORDINANCE CONTAIN SPECIFIC
7 PROVISIONS RELATED TO PERFORMANCE STANDARDS FOR NATURAL
8 RESOURCES?

9 A. Yes. The Zoning Ordinance contains specific provisions relative to limiting intrusion
10 within areas of existing natural resources, such that floodplains, wetland/wetland
11 margins, stream/watercourses, stream/watercourse margins, and lakes/ponds are 100%
12 protected from alteration, regrading, development, filling, piping, diverting, or being built
13 upon, except under the following conditions:

14 1. Floodplain protection standards specify that roads, driveways, utilities,
15 dams, culverts, bridges, and storm or sanitary sewers may be located within the 100-year
16 floodplain where approval is obtained from PADEP, the Township by Special Exception,
17 and any other regulatory agencies that have legal jurisdiction. Among the activities that
18 are specifically prohibited in the 100-year floodplain include the removal of natural
19 vegetation (trees, shrubs, and groundcover) unless accompanied by replanting of
20 vegetation that serves the same effect.

21 2. Wetlands/wetland margins may be disturbed for road, driveway or utility
22 crossings where approval is obtained from the Township by variance granted by the

1 Zoning Hearing Board after proof of hardship, and approval by PADEP after the
2 applicant proves that no other access to the property is available.

3 3. Streams and watercourses and stream/watercourse margins may be crossed
4 by a driveway, road, or utility (a) if a Special Exception is obtained from the Zoning
5 Hearing Board and (b) if applicant proves to the Zoning Hearing Board that the crossing
6 has been engineered to ensure continued functionality of the stream or watercourse using
7 best engineering practices at the time of the proposal in order to minimize the
8 environmental impact, no other access to the property is available, and the crossing
9 disturbs the minimum possible area of the stream/watercourse margin. The Zoning
10 Hearing Board may grant relief from stringent encroachment restrictions contained in the
11 Zoning Ordinance by Special Exception where the applicant can demonstrate that the
12 proposed activity will not harm the stream/watercourse and wetland in any way, that
13 there are no significant wildlife areas existing within the margin area, and the ecological
14 balance or stormwater conveyance effectiveness of the areas will not be threatened or
15 harmed for the proposed activity.

16 Woodlands and steep slope areas are protected to allow some disturbance to these
17 resources to facilitate limited development activity, while preserving the remaining
18 required areas of each resource beyond the limits of maximum intrusion requirements of
19 the Zoning Ordinance. For example, 80% of defined woodland areas within the RP
20 Zoning District must be preserved as a tree protection zone, which permits a maximum of
21 20% of the woodland area existing on a parcel to be disturbed without violating this
22 requirement.

1 **IV. Springfield Township Comprehensive Plan**

2 Q. DOES SPRINGFIELD TOWNSHIP’S COMPREHENSIVE PLAN COVER ANY
3 COMMUNITY GOALS OR OBJECTIVES RELATED TO NATURAL RESOURCES?

4 A. Yes. Springfield Township’s Comprehensive Plan provides for the community goals and
5 objectives pertaining to natural resources. The comprehensive plan provides that
6 significant natural features and natural resources such as floodplains, woodlands, steep
7 slopes, wetlands, sensitive geological formations, sensitive wildlife habitat, and bodies of
8 water are to be protected by minimizing negative environmental impacts related to
9 development and growth, protecting surface and groundwater resources from point and
10 nonpoint source pollutants through methods such as wellhead protection and source water
11 protection measures, maintaining the natural biodiversity within the Township that
12 provides a healthy living environment for plants and animals, and preserving natural
13 corridors through the Township to allow for the movement of wildlife and linked habitat
14 areas.

15
16 Q. DOES SPRINGFIELD TOWNSHIP’S COMPREHENSIVE PLAN COVER ANY
17 COMMUNITY GOALS OR OBJECTIVES RELATED TO STORMWATER
18 MANAGEMENT?

19 A. Yes. The plan promotes sound stormwater management for existing and future
20 development in the Township by managing stormwater runoff created by new
21 development activity. This takes into account the cumulative watershed wide stormwater
22 impacts from peak runoff rates and runoff volume, preserving existing natural
23 drainageways and watercourses, providing for proper maintenance of all stormwater

1 management facilities, and maintaining/improving existing water quality, especially in
2 those areas that drain to existing lakes and reservoirs, by preventing additional loading of
3 various stormwater runoff pollutants into the stream system. The comprehensive plan
4 further notes that woodlands are important due to the benefits to the environment,
5 including water and air purification, regional and local climate control, open space,
6 erosion control, habitat for wildlife, and their role in filtering upland pollutants in
7 stormwater runoff while providing areas for aquifer recharge. The Township's
8 Comprehensive Plan indicates that stream corridor and floodplain protection is valuable
9 to limit and/or reduce the negative impact of development on flooding, degradation of
10 water quality, wildlife habitat, and stormwater management. The Comprehensive Plan
11 envisions continued efforts to preserve environmental features and sets forth additional
12 objectives to increase and enhance the preservation of natural resources in order to
13 minimize the adverse effects caused by uncontrolled development activity.

14
15 **V. Springfield Township Stormwater Management Ordinance**

16 Q. HAS SPRINGFIELD TOWNSHIP ENACTED A STORMWATER MANAGEMENT
17 ORDINANCE?

18 A. Yes. Springfield Township has adopted a Stormwater Management Ordinance as
19 required by Pennsylvania Act 167, which regulates certain development activity as it may
20 affect the rate and volume of stormwater runoff, and degrade existing water quality
21 within the Township and adjoining municipalities. The Township is divided into several
22 major watershed areas that have been studied and approved by PADEP for the purpose of

1 developing release rate criteria and to mitigate the adverse impact of development on
2 runoff volumes and water quality degradation.

3 The Ordinance specifically regulates activities, including land development,
4 subdivision, construction of new or additional impervious surfaces which exceed 1,000
5 square feet in area, construction of new buildings or additions to existing buildings which
6 exceed 1,000 square feet in area, diversion or piping of any natural or manmade stream
7 channel, installation of stormwater management facilities or appurtenances thereto, and
8 temporary storage of impervious or pervious material where ground contact exceeds 5%
9 of the lot area or 5,000 square feet (whichever is less) and where the material is placed on
10 slopes exceeding 8%.

11 A regulated activity is required to conform to performance principals of the
12 Stormwater Management Ordinance unless the application is deemed by the Township to
13 meet stormwater management exemption criteria contained in the Ordinance relative to
14 the total parcel size, minimum distance to the nearest downstream property boundary, and
15 the maximum area of proposed impervious surface.

16 Specific performance principals of the Stormwater Management Ordinance
17 include the need to analyze and mitigate the increase in peak rate of stormwater discharge
18 considering the change in groundcover associated with the development activity; the
19 control of increased volume of runoff where existing soil conditions permit the use of
20 infiltration facilities to promote groundwater recharge; use of Stormwater Best
21 Management Practice devices to achieve peak rate reduction and water quality provisions
22 of the Ordinance; implementation of Best Management Practices during construction
23 activity, to mitigate the adverse effects of erosion and sedimentation that could otherwise

1 occur without proper control; and establishment of a maintenance program to guarantee
2 that temporary/permanent stormwater management facilities are installed and maintained
3 by the responsible parties in perpetuity.
4

5 **VI. Adverse Environmental Impact of PPL's Plans on Springfield**
6 **Township**

7 Q. DO YOU HAVE AN OPINION REGARDING WHETHER PPL'S PROPOSED CROSS
8 COUNTRY ROUTE WILL ADVERSELY IMPACT THE TOWNSHIP'S NATURAL
9 RESOURCES?

10 A. Yes. The development of the electric substation and overhead electric lines, as proposed
11 by PPL, will adversely impact the natural resources within the area of disturbance. If the
12 substation and electric lines are properly designed, constructed, and maintained PPL may
13 be able to mitigate some of the adverse impacts to the natural resources.
14

15 Q. DO YOU HAVE AN OPINION REGARDING WHETHER EITHER OF THE
16 ALTERNATIVE ROUTES WOULD RESULT IN A GREATER OR LESSER IMPACT
17 WITH RESPECT TO THE ISSUES PREVIOUSLY DISCUSSED?

18 A. My focus has been on the selected route. However based on a cursory review, either
19 alternative route would have lesser impact on natural resources especially wetlands and
20 woodlands.
21

22 Q. IF THE PUC WERE TO APPROVE THE CROSS COUNTRY ROUTE AND
23 SUBSTATION SITE, DO YOU HAVE ANY RECOMMENDATIONS REGARDING
24 THE CONDITIONS THAT SHOULD ACCOMPANY SUCH APPROVAL?

1 A. Yes. While I do not recommend choosing the cross country route and substation site, if
2 they were selected, I would recommend the following:

3 1. Design and construction of the proposed substation should address Zoning
4 Ordinance requirements of the Township, including regulations applicable to the specific
5 zoning district in which the facility is located (the Resource Protection district), use
6 regulations associated with Use F1, buffer requirements, and environmental protection
7 standards of the Zoning Ordinance. Additionally, PPL should be required to submit a
8 detailed engineered site plan to the Township for review, which contains design
9 information and details associated with the proposed site access and any associated street
10 improvements that are required to facilitate access to the site, compliance with Zoning
11 Ordinance provisions, compliance with provisions of the Township Stormwater
12 Management Ordinance, a plan to control erosion and sedimentation during construction
13 activity, and a plan for long-term maintenance of the facility that considers health, safety,
14 and welfare issues of property owners in the immediate vicinity of the site, as well as all
15 residents of the Township.

16 2. The route of utility line construction should incorporate modifications to
17 minimize the potential impacts of the line construction on natural resources, by avoiding
18 unnecessary disturbance to woodlands and wetlands. In addition, any facilities in or near
19 stream corridors should cross at right angles to the stream. Any proposed rights of way
20 parallel to streams must be relocated to be outside the stream margin areas. Vegetation
21 along stream corridors must be replanted to mitigate the loss of existing mature
22 vegetation during stream crossing installation. Further, PPL must provide mitigation
23 areas to replace wetlands disturbed during power line construction.

1 3. Design of temporary/permanent stormwater management facilities and
2 erosion/sediment control measures should also be reviewed by the Township prior to
3 application for Federal and State permits, which may be accomplished by submission of a
4 detailed engineered site plan identifying locations of proposed utilities, access roadways,
5 limits of disturbance, stormwater management facilities, resources requiring protection,
6 and proposed Best Management Practices to mitigate adverse impacts on stormwater
7 runoff during construction, and in the future condition.

8 4. Conditions of approval should also address the detrimental environmental effects
9 of future maintenance of right-of-way areas by PPL (which may entail periodic
10 trimming/vegetation removal and spraying of herbicides), as well as implementing a
11 means to control unauthorized access (e.g. four wheel vehicles/dirt bikes) to the right-of-
12 way areas such that natural resources within the right-of-way areas may be protected
13 from unauthorized activities that could contribute to degradation of vegetation and
14 wildlife within the right-of-way area.

15 5. If access to right-of-way corridors from public roadways is proposed, design of
16 driveway access within the right-of-way of public roadways should also be obtained from
17 the Township by PPL to ensure access design considers issues relative to
18 vehicular/pedestrian safety, provision of roadside drainage, and restoration of the public
19 right-of-way upon completion of construction activity.

20
21 Q. BASED ON THE DOCUMENTS PPL HAS PROVIDED, CAN YOU CONDUCT THE
22 REVIEWS YOU SUGGEST?

1 A. No, I cannot. The plans and documents I have reviewed, including PPL exhibits and
2 appendices in support of the certification application before the Public Utility
3 Commission, are concept plans only. The Township has not received design plans or
4 construction plans for review relative to detailed information regarding grading, stream
5 crossing design, or the many other specific details that are required to protect the
6 environment and public safety.

7
8 **VII. Conclusion**

9 Q. IF THE COMMISSION DISAGREES WITH THE TOWNSHIP'S
10 RECOMMENDATION TO REJECT PPL'S APPLICATIONS, WHAT DO YOU
11 RECOMMEND?

12 A. If the Commission disagrees with the Township and permits PPL to construct the power
13 line and substation where PPL proposes, I recommend that the Commission should order
14 PPL to provide the Township with detailed design and construction plans for review by
15 the Township Engineer for each phase, such that technical review items may be offered
16 for consideration by PPL, prior to any construction activity. I also recommend that the
17 Commission authorize a formal, expedited review process – either by an Administrative
18 Law Judge, the Commission's mediation staff, or the Township's Zoning Hearing Board
19 – in case PPL and the Township Engineer cannot agree.

20
21 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

22 A. Yes, it does.