



July 31, 2014

Mr. Peter R. Blum, P.E.  
Attn: Environmental Resources Branch  
US Army Corps of Engineers  
Wanamaker Building  
100 Penn Square East  
Philadelphia, PA 19107-3390

**Re: CENAP-PL-E-14-01**

Dear Mr. Blum,

The Delaware Riverkeeper Network requests that a public hearing and 45 day extension of the public comment period be granted for **CENAP-PL-E-14-01, Environmental Assessment of the Proposed Land Exchange of Properties at Artificial Island, Salem County, NJ for Properties in Oldmans Township, Salem County and Logan Township, Gloucester County, NJ; Development of Confined Disposal Facility.**

The ramifications of this land swap for the Delaware River in terms of how PSE&G will utilize the lands they receive are severe. Additionally, the impacts for Logan Township and Oldmans Township residents and natural resources resulting from the proposed Confined Disposal Facility are significant. And yet, the U.S. Army Corps of Engineers issued this public notice for its lengthy Environmental Assessment during the height of summer vacation time. In order to ensure the public a full and fair opportunity to be heard, I would ask that you extend the public comment period into the month of September and hold a public hearing in September as well.

In this proposed land swap:

- ☞ the Army Corps would be the recipient of 354 acres of land located in Oldmans Township, Salem County and Logan Township, Gloucester County, NJ; and
- ☞ PSE&G would, in exchange, be the recipient of 631 acres (94 acres of CDF and 537 acres of coastal wetlands) on Artificial Island.

The Army Corps proposes to accept this land swap so it can construct a new Confined Disposal Facility (CDF) at Site 15G in Oldmans and Logan.

PSE&G is seeking to secure title to the Artificial Island acreage for the purpose of constructing a new nuclear power plant ("Salem 4"). PSE&G has already submitted application materials to the Nuclear

DELAWARE RIVERKEEPER NETWORK  
925 Canal Street, Suite 3701  
Bristol, PA 19007  
Office: (215) 369-1188  
fax: (215) 369-1181  
drm@delawareriverkeeper.org  
www.delawareriverkeeper.org

Regulatory Commission (NRC) demonstrating their intent to construct the new nuclear power plant at this location if necessary permits and permissions are granted.

And so, clearly, negotiating and undertaking this land swap is not just to service creation of a new CDF for the Army Corps, but it is also for the known purpose of allowing construction of Salem 4 by PSE&G at the Artificial Island location. The Army Corps is aware of this foreseeable outcome. In fact, to be sure the Army Corps was aware, on June 24, 2010, the Delaware Riverkeeper Network submitted a letter to the Army Corps informing it of PSE&G's NRC filings and intent.

Because of the direct relationship between the construction of Salem 4 and the proposed land swap, the environmental and community impacts of the project must be considered in the draft Environmental Assessment and the subsequent Environmental Impact Statement we anticipate will follow. There are many significant environmental impacts that will result from the construction of Salem 4 on Artificial Island to be considered, including, but not limited to:

- Studies are documenting the increasing level of flooding that will take place on the island in the coming 50 and 100 year time frames. Additional development of a nuclear plant puts the facility, the workers, and the nuclear materials to be stored on the site at risk of harm, and puts the Delaware River and ecological systems at serious risk of environmental harm from any release that might result.
- Construction of a new nuclear facility at this location will require the damage of wetlands and have adverse affects on a variety of aquatic life, bird life and wildlife.
- Construction of an additional nuclear facility on this location will impact the health, aesthetics and quality of life of those fishing, boating, birding and living in the region.

Given PSE&G's known intentions for construction of Salem 4 on Artificial Island on these swapped lands, all of these ramifications are foreseeable impacts from the land swap and therefore must be considered in any National Environmental Policy Act analysis.

These issues and others, that we will comment on in a follow up comment letter, need to be examined by the Army Corps, and be subject to public comment, before the Army Corps makes any final decisions regarding the land swap and the confined disposal facility.

In order to ensure full opportunity for public review and comment, we ask that you hold a public hearing on the proposal and the recently released Environmental Assessment in the month of September at earliest and that you provide a minimum 45-day extension for written comments.

Respectfully,



Maya K. van Rossum  
the Delaware Riverkeeper