



December 6, 2024

via electronic mail

Ms. Jennifer Holmes, Coastal Regulatory Programs Manager
Delaware Department of Natural Resources and Environmental Control
Delaware Coastal Management Program
100 W. Water Street, Suite 7B
Dover, Delaware 19904
DNREC_federalconsistency@delaware.gov

RE: Application for Concurrence with Federal Coastal Zone Management Consistency
Certification
Silver Run Expansion Project
New Castle County, Delaware

Dear Ms. Holmes:

Silver Run Electric, LLC (“SRE”) is hereby submitting an application to request DNREC’s concurrence with SRE’s Federal Coastal Zone Management Consistency Certification for the Silver Run Expansion Project (“Project”). SRE proposes to construct, operate, maintain, and own the Project, which will increase the capacity of the existing Silver Run – Hope Creek transmission line (“Silver Run Line”), a 230 kilovolt (“kV”) alternating current (“AC”) transmission line between SRE’s Silver Run substation in Delaware and Public Service Electric & Gas Company’s (“PSEG”) Hope Creek substation in New Jersey. The Project includes installation of four new electric transmission cables in Delaware State waters (i.e., the Delaware River), including submarine cables and modifications at the existing Silver Run Line in-river transition structure facility. Additional Project details are provided in the attachments.

In accordance with Sections 307(c) and (d) of the Coastal Zone Management Act, the Federal consistency regulations (15 CFR §§ 930.54, 930.57, and 930.58), and the Delaware Coastal Management Program’s (“DCMP”) Federal Consistency Policy and Procedures (2018), SRE is pleased to provide the enclosed Coastal Zone Management Consistency Certification for the Project. DNREC’s concurrence with the Project’s Coastal Zone Management Consistency Certification is required for SRE’s pending application for U.S. Army Corps of Engineers (“USACE”) Section 10/404 Individual Permit (NAP-2016-00542-46). Based upon the information, data, and analysis included in this application, SRE, as the non-federal applicant for a federal permit, finds that the proposed activities in the State of Delaware comply with the enforceable policies of the Delaware Coastal Management Program and will be conducted in a manner consistent with such program.

In support of this application, the following documents are enclosed:

1. Completed and endorsed DNREC Coastal Zone Management Act Federal Consistency Form (Attachment A);
2. Attachment (supplement) to the DNREC Coastal Zone Management Act Federal Consistency Form (Attachment B);
3. The Project's complete application to DNREC, Wetlands and Waterways Section for Subaqueous Lands Lease, Subaqueous Lands Permit, and Section 401 Water Quality Certification (Attachment C); and
4. The Project's complete application for USACE Section 10/404 Individual Permit (NAP-2016-00542-46) (Attachment D).

Attachments C and D are available via SharePoint. Please contact the Applicant for access instructions.

The Project does not propose an activity that requires interstate consistency review pursuant to Section 4.4.1 of the DCMP's Federal Consistency Policy and Procedures. The Project does not propose dredging, filling, mining, or excavation of 50,000 cubic yards or more; offshore alternative energy development; or introduction of non-native shellfish.

SRE presented the Project to you during a pre-application meeting held on October 11, 2024.

We look forward to working cooperatively with the DCMP on this important project. Please feel free to contact me at 636-532-2200 or via electronic mail at bskoba@lspower.com with any questions.

Sincerely,

Brandon Skoba

Brandon Skoba
Environmental Permitting Specialist

Enclosures

cc: David Caplan, Project Manager, USACE, Philadelphia District (via e-mail)
Don Brickner, Silver Run Electric, LLC (via e-mail)
Dave Wilson, Silver Run Electric, LLC (via e-mail)

Payson Whitney, P.E., TRC (via e-mail)

**Attachment A. DNREC Coastal Zone Management Act Federal
Consistency Form**



Initial Review: _____
 Updated On: _____
 Complete: _____
 Official Use Only

Coastal Zone Management Act Federal Consistency Form

This document provides the Delaware Coastal Management Program (DCMP) with a Federal Consistency Determination or Certification for activities regulated under the Coastal Zone Management Act of 1972, as amended, and NOAA's Federal Consistency Regulations, 15 C.F.R. Part 930. Federal agencies and other applicants for federal consistency are not required to use this form; it is provided to applicants to facilitate the submission of a Consistency Determination or Consistency Certification. In addition, federal agencies and applicants are only required to provide the information required by NOAA's Federal Consistency Regulations.

Project/Activity Name:	Silver Run Expansion Project
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I. Federal Agency or Non-Federal Applicant Contact Information:

Contact Name/Title: Douglas Mulvey, Vice President

Federal Agency Contractor Name (if applicable): _____

Federal Agency: United States Army Corps of Engineers

(either the federal agency proposing an action or the federal agency issuing a federal license/permit or financial assistance to a non-federal applicant)

Mailing Address: 16150 Main Circle Drive, Suite 310

City: Chesterfield

State: MO

Zip Code: 63017

E-mail: dmulvey@lspower.com

Telephone #: (636) 532-2200

II. Federal Consistency Category:

☐ Federal Activity or Development Project
(15 C.F.R. Part 930, Subpart C)

☒ Federal License or Permit Activity
(15 C.F.R. Part 930, Subpart D)

☐ Outer Continental Shelf Activity
(15 C.F.R. Part 930, Subpart E)

☐ Federal License or Permit Activity which occurs
wholly in another state (interstate consistency
activities identified in DCMP's Policy document)

☐ Federal Financial Assistance
(15 C.F.R. Part 930, Subpart F)

III. Detailed Project Description (attach additional sheets if necessary):

See Attachment.

IV. General Analysis of Coastal Effects (attach additional sheets if necessary):

Project coastal effects will be minimal during construction and negligible post-construction. Effects will include temporary, short-term disturbance of sediment at the bottom of the Delaware River during installation of the submarine cables and modifications to the existing transition structure in the Delaware River (approximately 2.9 acres). The Project's permanent footprint, resulting from the installation of four new piles at the transition structure, in the Delaware River is approximately 13 square feet, so disturbance is minimal. The Project will coordinate with the The Pilots' Association For The Bay & River Delaware and the U.S. Coast Guard to prevent impacts to navigation during construction, and there will be no impacts to navigation during operation.

V. Detailed Analysis of Consistency with DCMP Enforceable Policies (attach additional sheets if necessary):

Policy 5.1: Wetlands Management

The Project has no components located in Delaware wetlands and will not affect wetlands in Delaware; thus, the Delaware Coastal Management Program (DCMP) provisions for wetlands are not applicable to the Project.

Policy 5.2: Beach Management

The Project is located approximately 24 miles north of the northern extent of the beach areas subject to the DCMP; thus, the beach management provisions are not applicable.

Policy 5.3: Coastal Waters Management (includes wells, water supply, and stormwater management. Attach additional sheets if necessary)

See Attachment.

Policy 5.4: Subaqueous Land and Coastal Strip Management

See Attachment.

Policy 5.5: Public Lands Management

Project activities will not occur within State Public Lands. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.6: Natural Lands Management

The Project does not: (i) impact or involve the establishment or maintenance of a natural preserve and (ii) include impacts to the areas identified in Section 5.6.2.1.5 of the DCMP Policy Document as the Inland Bay Watersheds. Accordingly, this section of the DCMP policies is not applicable to the Project.

Policy 5.7: Flood Hazard Areas Management

See Attachment.

Policy 5.8: Port of Wilmington

The Project will not adversely impact the Port of Wilmington or require any expansion at this port; however, vessels supporting the Project construction may use the Port of Wilmington, which would support the long-term viability of this port. Accordingly, the Project is consistent with DCMP policies.

Policy 5.9: Woodlands and Agricultural Lands Management

The Project does not involve or impact any woodlands, silviculture, agricultural lands, or tax ditches. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.10: Historic and Cultural Areas Management

See Attachment.

Policy 5.11: Living Resources

See Attachment.

Policy 5.12 Mineral Resources Management

The Project does not include the lease, extraction or production of minerals. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.13: State Owned Coastal Recreation and Conservation

The Project does not include activities within or impacts to state owned coastal recreation or conservation properties. Project construction actions will occur in the Delaware River outside of the Augustine Wildlife Area. No impacts to the Augustine Wildlife Area will occur due to construction or operation of the Project. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.14: Public Trust Doctrine

Sections 4.15 and 4.16 of the USACE application provide additional details with regard to navigation and fisheries. Outside of the construction period, the Project will have no impact on navigation or fisheries of the Delaware River. Due to the temporary nature of the construction period, Project effects on navigation and fisheries during construction will be negligible. Since the proposed Project will have negligible effects on these resources, the Project is consistent with DCMP policies on the public trust doctrine.

Policy 5.15: Energy Facilities

The Project does not involve the construction of any of the energy facility types discussed within Section 5.15 of the DCMP policies. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.16: Public Investment

The Project will not utilize public investment as detailed in Section 5.16 of the DCMP policies. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.17: Recreation and Tourism

The Project does not involve recreation and tourism development activities, nor will it adversely affect recreation and tourism. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.18: National Defense and Aerospace Facilities

The Project does not involve the development of national defense or aerospace facilities, nor will it adversely affect such facilities. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.19: Transportation Facilities

The Project does not involve the development of transportation facilities, nor will it adversely affect such facilities. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.20: Air Quality Management

Construction equipment associated with the proposed Project will emit small quantities of air emissions during the temporary construction period. However, the Project will not produce any air emissions during operation. Air quality within the Project area will be preserved as detailed in the Clean Air Act Conformity Applicability Analysis provided in Section 4.17 of the USACE application (Appendix 2). Therefore, the Project is consistent with DCMP policies regarding air quality management.

Policy 5.21: Water Supply Management

The Project will not require the withdrawal of subsurface or surface waters during construction or operation. In addition, the Project will not include any well construction or underground injection. Therefore, this section of the DCMP policies is not applicable to the Project.

Policy 5.22: Waste Disposal Management

See Attachment.

Policy 5.23: Development

See Attachment.

Policy 5.24: Pollution Prevention

The generation of any Project waste will be reduced or eliminated as expeditiously as possible, and any such waste will be recovered, reused, recycled, treated, or disposed of in a manner that minimizes any present or future threats to human health or the environment. Accordingly, the Project is consistent with DCMP policy on pollution prevention.

Policy 5.25: Coastal Management Coordination

See Attachment.

VI. JPP and RAS Review (Check all that apply):

Has the project been reviewed in a monthly Joint Permit Processing and/or Regulatory Advisory Service meeting?



JPP



RAS



None

*If yes, provide the date of the meeting(s):

February 16, 2023

VII. Statement of Certification/Determination and Signature (Check one and sign below):


☐ **FEDERAL AGENCY CONSISTENCY DETERMINATION.** Based upon the information, data, and analysis included herein, the federal agency, or its contracted agent, listed in (I) above, finds that this proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Delaware Coastal Management Program.

OR

☐ **FEDERAL AGENCY NEGATIVE DETERMINATION.** Based upon the information, data, and analysis included herein, the federal agency, or its contracted agent, listed in (I) above, finds that this proposed activity will not have any reasonably foreseeable effects on Delaware's coastal uses or resources (Negative Determination) and is therefore consistent with the enforceable policies of the Delaware Coastal Management Program.

OR

☒ **NON-FEDERAL APPLICANT'S CONSISTENCY CERTIFICATION.** Based upon the information, data, and analysis included herein, the non-federal applicant for a federal license or permit, or state or local government agency applying for federal funding, listed in (I) above, finds that this proposed activity complies with the enforceable policies of the Delaware Coastal Management Program and will be conducted in a manner consistent with such program.

Signature:			
Printed Name:	Douglas Mulvey, Officer, Silver Run Electric, LLC	Date:	12/4/24

Pursuant to 15 C.F.R. Part 930, the Delaware Coastal Management Program must provide its concurrence with or objection to this consistency determination or consistency certification in accordance with the deadlines listed below. Concurrence will be presumed if the state's response is not received within the allowable timeframe.

Federal Consistency Review Deadlines:

Federal Activity or Development Project (15 C.F.R. Part 930, Subpart C)	60 days with option to extend an additional 15 days or stay review (15 C.F.R. § 930.41)
Federal License or Permit (15 C.F.R. Part 930, Subpart D)	Six months, with a status letter at three months. The six month review period can be stayed by mutual agreement. (15 C.F.R. § 930.63)
Outer Continental Shelf Activity (15 C.F.R. Part 930, Subpart E)	Six months, with a status letter at three months. If three month status letter not issued, then concurrence presumed. The six month review period can be stayed by mutual agreement. (15 C.F.R. § 930.78)
Federal Financial Assistance to State or Local Governments (15 C.F.R. Part 930, Subpart F)	State Clearinghouse schedule

OFFICIAL USE ONLY:

Reviewed By:	Fed Con ID: 2025.0010	Date Received: 12/06/24
Public notice dates: _____ to _____	Comments Received: <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES [attach comments]	
Decision type: <small>(objections or conditions attach details)</small>	Decision Date: _____	

**Attachment B. Attachment to the DNREC Coastal Zone
Management Act Federal Consistency Form**

Attachment to Delaware Coastal Management Program Federal Consistency Form

December 6, 2024

Silver Run Expansion Project

Prepared For:

Silver Run Electric, LLC
16150 Main Circle Drive, Suite 310
Chesterfield, Missouri 63017

Prepared By:

TRC
404 Wyman Street, Suite 375
Waltham, MA 02451



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1.0 Introduction

This document is the Attachment to Silver Run Electric's (SRE's) Coastal Zone Management Act Federal Consistency Form (referred to herein as the "CZMA Form") and provides additional information in those instances where the text entry fields in the CZMA Form did not allow sufficient space for SRE's information.

SRE proposes to construct, operate, and maintain the Silver Run Expansion Project (the Project). This includes the addition of four submarine cables (one additional cable per phase and one additional spare submarine cable) to the existing Silver Run Line, a 230 kV alternating current (AC) electric transmission line between SRE's existing 230 kV Silver Run substation east of Odessa, Delaware, and PSEG's Hope Creek substation in Lower Alloways Creek Township, New Jersey. A new transition structure will be constructed on land in New Jersey, and modifications will be made to the existing in-water transition structure facility on the Delaware side of the Delaware River to support the additional submarine cables. Modifications will be completed at the Silver Run substation within the existing fenceline to accommodate the increased rating of the Silver Run Line. Three of the seven existing SRE buoys (private aids to navigation) near the in-river transition structure will be shifted south to accommodate the additional submarine cables.

The purpose of the Project is to reliably and economically construct, interconnect, and commission upgrades to SRE's existing Silver Run Line. The need for the Project is reinforced by the selection of the Project by PJM Interconnection, LLC ("PJM") and the New Jersey Board of Public Utilities ("NJBPU") as part of New Jersey's State Agreement Approach ("SAA") process to integrate future New Jersey offshore wind ("OSW") resources into the PJM system. The Project is not directly linked to any offshore wind project(s).

Figure 1 provides an overview of the location and key features of the proposed Project including the Delaware Transition Structure Facility, the submarine cable, and the New Jersey onshore transition structure.

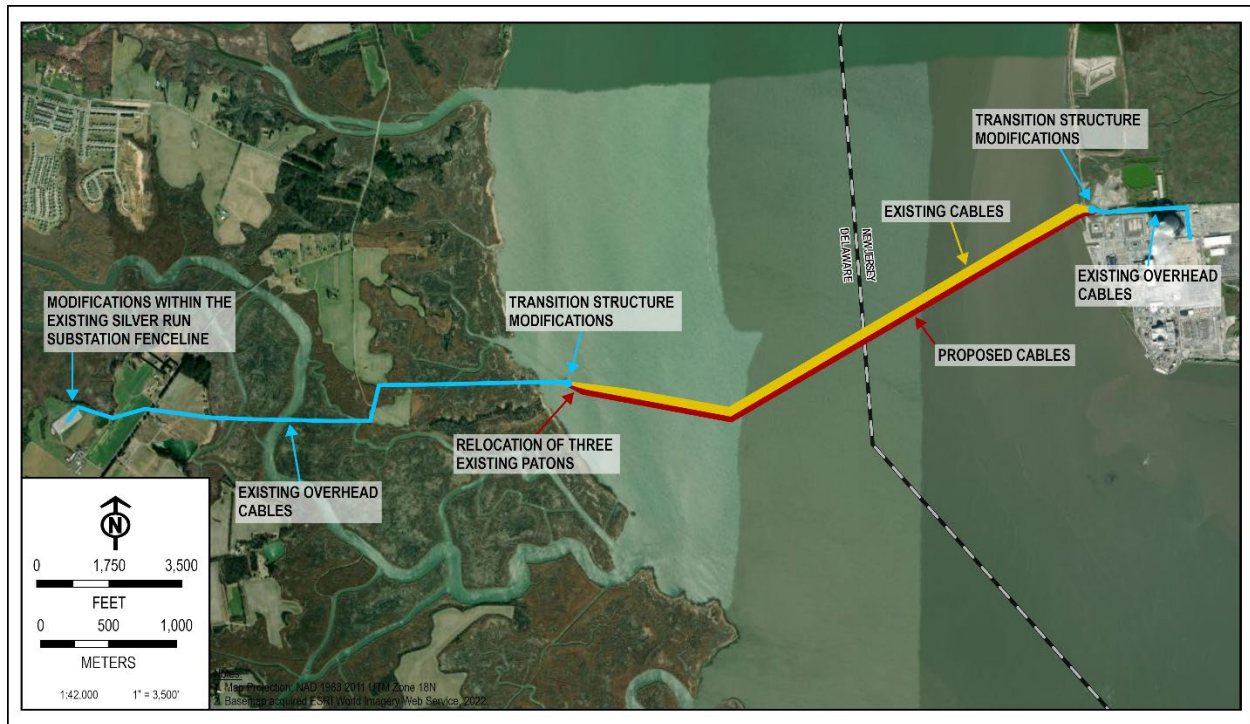


Figure 1: Project Location and Key Features

Section 2.0 below describes how the Project is consistent with the provisions of the Delaware Coastal Management Program (DCMP) Policy Document that are not fully addressed in the CZMA Form. Table 2-1 specifies which statements are provided in this document and which are included in the CZMA Form.

The U.S. Army Corps of Engineers (USACE) Section 10/404 individual permit application (referred to herein as the “USACE application”) and Section 408 request for the Project were submitted in September 2024. The USACE application is the culmination of field investigations, laboratory analyses, modeling, and other studies conducted in response to regulatory requirements and numerous consultations with Federal, State, and local regulatory officials regarding project design, and review of potential land use and environmental effects of the Project. To avoid restating lengthy passages from SRE’s USACE application, which is provided in its entirety to DNREC along with SRE’s application for concurrence with the Project’s Coastal Zone Management Consistency Certification consistency statement, the text below references selected sections of SRE’s USACE application that are relevant to the DCMP discussions.

2.0 Statement of Consistency with Delaware Coastal Zone Management Program Policies

This Consistency Statement Attachment supplements SRE’s answers in the CZMA Form regarding the applicability of the Delaware Coastal Management Program Federal Consistency Policy and Procedures, as amended in November 2018, to the proposed Project. Table 2.1 lists the Coastal Management Program Policies and identifies those that are applicable to the Project.

Table 2-1 Coastal Zone Management Rules Applicability

Delaware Coastal Management Program Policies	APPLICABILITY	LOCATION OF DISCUSSION
Date last amended: November 2018		
5.1 Wetlands Management	N/A	CZMA Form
5.2 Beach Management	N/A	CZMA Form
5.3 Coastal Waters Management	-	
5.3.1 General	Project will Comply	Section 2.1.1
5.3.2 Marinas	N/A	Section 2.1.2
5.4 Subaqueous Lands and Coastal Strip Management	Project will Comply	Section 2.2
5.5 Public Lands Management	N/A	CZMA Form
5.6 Natural Areas Management	N/A	CZMA Form
5.7 Flood Hazard Areas Management	Project will Comply	Section 2.3
5.8 Port of Wilmington	Project will Comply	CZMA Form
5.9 Woodlands and Agricultural Lands	N/A	CZMA Form
5.9.1 Woodlands		
5.9.2 Silviculture		
5.9.3 Agricultural Lands		
5.9.4 Tax Ditches		
5.9.5 Advisory Policy		
5.10 Historic and Cultural Areas Management	Project will Comply	Section 2.4
5.11 Living Resources	Project will Comply	Section 2.5
5.11.1 General		
5.11.2 Fish and Wildlife		
5.11.3 Nongame and Endangered Species		
5.11.4 Advisory Policy		
5.12 Mineral Resource Management	N/A	CZMA Form
5.13 State Owned Coastal Recreation and Conservation	N/A	CZMA Form
5.14 Public Trust Doctrine	Project will Comply	CZMA Form
5.15 Energy Facilities	NA	CZMA Form
5.16 Public Investment	N/A	CZMA Form
5.17 Recreation and Tourism	N/A	CZMA Form
5.18 National Defense and Aerospace Facilities	N/A	CZMA Form
5.19 Transportation Facilities	N/A	CZMA Form
5.20 Air Quality Management	Project will Comply	CZMA Form
5.21 Water Supply Management	N/A	CZMA Form
5.22 Waste Disposal Management	Project will Comply	Section 2.6
5.23 Development	Project will Comply	Section 2.7
5.24 Pollution Prevention	Project will Comply	CZMA Form

Table 2-1 Coastal Zone Management Rules Applicability

Delaware Coastal Management Program Policies	APPLICABILITY	LOCATION OF DISCUSSION
Date last amended: November 2018		
5.25 Coastal Management Coordination	Project will Comply	Section 2.8

2.1 Policy 5.3: Coastal Waters Management

2.1.1 Policy 5.3.1: General

The Project will protect the beneficial uses of the State's water resources and will not discharge pollution or wastes that would threaten the safety and health of state waters nor the general public. Implementation of the Project will not interfere with DNREC's policy to maintain the quality of surface waters of the State, consistent with public health and public recreation purposes, the propagation and protection of fish and aquatic life, and other beneficial uses of the water.

Sections 4.4, 4.5, and 5.2.5 of the Project's USACE application detail the existing conditions, potential impacts, and avoidance/minimization practices which may be employed in the Lower Delaware River. Tides, currents, navigation, riverbed terrain, sediment disturbance, sediment quality, water quality, submerged aquatic vegetation, and human use characteristics are discussed within the aforementioned sections.

2.1.2 Policy 5.3.2: Marinas

All vessels utilized for the Project will adhere to the applicable provisions of 33 USC 1322, as amended February 4, 1987. The Project does not involve the construction, repair, or demolition of a marina. Therefore, this section of the DCMP policies is not applicable to the Project.

2.2 Policy 5.4: Subaqueous Lands and Coastal Strip Management

Protections for subaqueous lands are provided by the Regulations Governing the Use of Subaqueous Lands, §7504, Title 7 of the Delaware Administrative Code. These protections are administered by the DNREC Wetlands and Waterways Section. SRE will apply for and receive the required authorization from DNREC's Wetlands and Waterways Section (e.g., a supplemental subaqueous lands lease and permit) prior to starting construction on the Project, which will require that the Project comply with all regulations applicable to transmission lines crossing Delaware subaqueous lands.

The coastal strip management provisions of the DCMP implement the requirements of Delaware's Coastal Zone Act. Per Section 5.5 of the Coastal Zone Act implementing regulations (Regulations Governing Delaware's Coastal Zone, §101, Title 7 of the Delaware Administrative Code), electric substations and transmission lines are deemed not to constitute initiation, expansion or extension of heavy industry or manufacturing. Therefore, the Coastal Zone Act / Coastal Strip Management provisions are not applicable to the Project.

2.3 Policy 5.7: Flood Hazard Areas Management

The Delaware transition structure facility is located within the Delaware River in an area mapped by FEMA as being on the edges of both Zone VE with a base flood elevation of 13 FT NAVD88

and an Open Water Zone (Community-Panel No. 10003C0329K, Effective February 4, 2015) with the structure being in the Open Water Zone. The proposed modifications to the in-river transition structure will take place within the bounds of the existing vessel allision protection system. Therefore, the proposed Project will not result in grade or elevation changes within FEMA mapped flood hazard areas. The modified transition structure will not alter flood flows or impact flood storage volumes. As such, no monitoring or modifications to the Project are required for consistency with the DCMP flood hazard areas management policies.

2.4 Policy 5.10: Historic and Cultural Areas Management

The Underwater Archaeological Resources survey conducted for the Silver Run Line included Phase IB diving investigations that were conducted in June 2016 and May 2017. Even though the Project is completely contained within the previously surveyed portions of the Delaware River, a submerged cultural resource desktop review was conducted using geophysical survey data collected in 2024 for this Project to evaluate the expanded submarine cable corridor and to corroborate the findings from the underwater archaeological investigations for the Silver Run Line, as previously described. For the Silver Run Line, avoidance was recommended at Target S-ND5, which was identified as a 33-foot-long wooden hull sailing or fishing vessel. For the current Project, the location of Target S-ND5 is approximately 3,400 feet north of the Project corridor and will not be impacted by construction activities related to the Project (Appendix 4.11-3 of the USACE Application). No additional culturally significant targets were identified during the survey for the Project. Therefore, there are no current targets that are required to be avoided during construction. Refer to Section 4.11 of the USACE application for further details of the Project's consideration of historic and cultural areas.

2.5 Policy 5.11: Living Resources

The proposed Project was designed to avoid and minimize impacts to living resources, fish and wildlife, and nongame and endangered species (referred to collectively as "biological resources" herein). To protect biological resources from negative impacts, the following measures will be implemented:

- Avoidance of wetland habitat areas;
- Observance of seasonal restrictions on disturbance to the bottom of the Delaware River to protect anadromous fish;
- Use of environmentally protective jetting tools for submarine cable installation; and
- Design of proposed modifications to the in-river transition structure facility in accordance with Avian Power Line Interaction Committee (APLIC) standards to reduce the potential for bird collisions.

Biological resources in proximity to the Project are further discussed in numerous sections of the USACE application. These sections include the following:

- Section 4.3: Wetlands and Waterbodies
- Section 4.4: Lower Delaware River Physical Conditions
- Section 4.5: Lower Delaware River Sediment and Water Quality
- Section 4.6: Finfish

- Section 4.7: Benthos and Shellfish
- Section 4.8: Vegetation and Wildlife
- Section 4.9: Important Habitats and Threatened and Endangered Species
- Section 4.18: Cumulative Impacts
- Section 5.2: Compliance with Section 404(b)(1) Guidelines

As discussed above and further detailed in the noted USACE application sections, the Project will have only negligible to minor effects on biological resources. Such impacts are not considered an adverse environmental effect under the DCMP policies. Accordingly, the proposed Project is consistent with DCMP policies for living resources.

2.6 Policy 5.22: Waste Disposal Management

The Project does not include construction of a wastewater treatment or disposal system, or land treatment of wastes. During Project construction, portable toilets will be supplied and managed by an appropriately licensed rental company. The portable toilets will be placed in proximity to the construction trailer in compliance with OSHA 29 CFR 1910.141 and 1926.51. No underground storage tanks are proposed, and no hazardous wastes are proposed to be generated during Project construction or operation. All vessel-collected onboard wastes will be offloaded and treated at approved handling or disposal facilities.

Project solid wastes will be limited to small amounts of construction debris generated during the construction process. Such materials will be either recycled or disposed at an appropriately licensed facility in accordance with applicable requirements for the waste type. Accordingly, the Project is consistent with the DCMP policies for waste disposal management.

2.7 Policy 5.23: Development

The Project will not result in changes to community patterns in the Project vicinity or encourage any “sprawl”. Transmission infrastructure is consistent with the existing character of the Project area, which includes the existing Silver Run Line and existing Delmarva Power and Light 230-kV transmission lines to the west and the Salem and Hope Creek Nuclear Generating Stations and 500-kV transmission lines to the east across the Delaware River (in New Jersey). Additional information about Project siting is provided in the USACE application. Based on these considerations, the Project is consistent with DCMP policies for development.

2.8 Policy 5.25: Coastal Management Coordination

The permitting process for the Project will include permitting and coordination at the local, State, and Federal levels. This will include formal consultation processes such as the Section 106 process for cultural resources and Section 7 process for endangered species wherein State and Federal agency experts jointly review and analyze the Project. Additionally, the permitting process will entail multiple public comment periods when agencies and members of the public will have opportunities to provide input regarding the Project’s permits. The coastal management reviews in Delaware and New Jersey will undergo their own internal coordination and review processes within the respective State agencies. The USACE will not issue the Section 10/404 permit for the Project until such time as it receives concurrence from both the State of Delaware and State of New Jersey regarding the Project’s coastal zone management consistency certifications, or the regulatory review timeframe has expired without a state issuing such concurrence (16 USC Part

1456(c)(3)(a)). Accordingly, the permitting process for the Project is consistent with the DCMF policies on coastal management coordination.

3.0 Conclusions

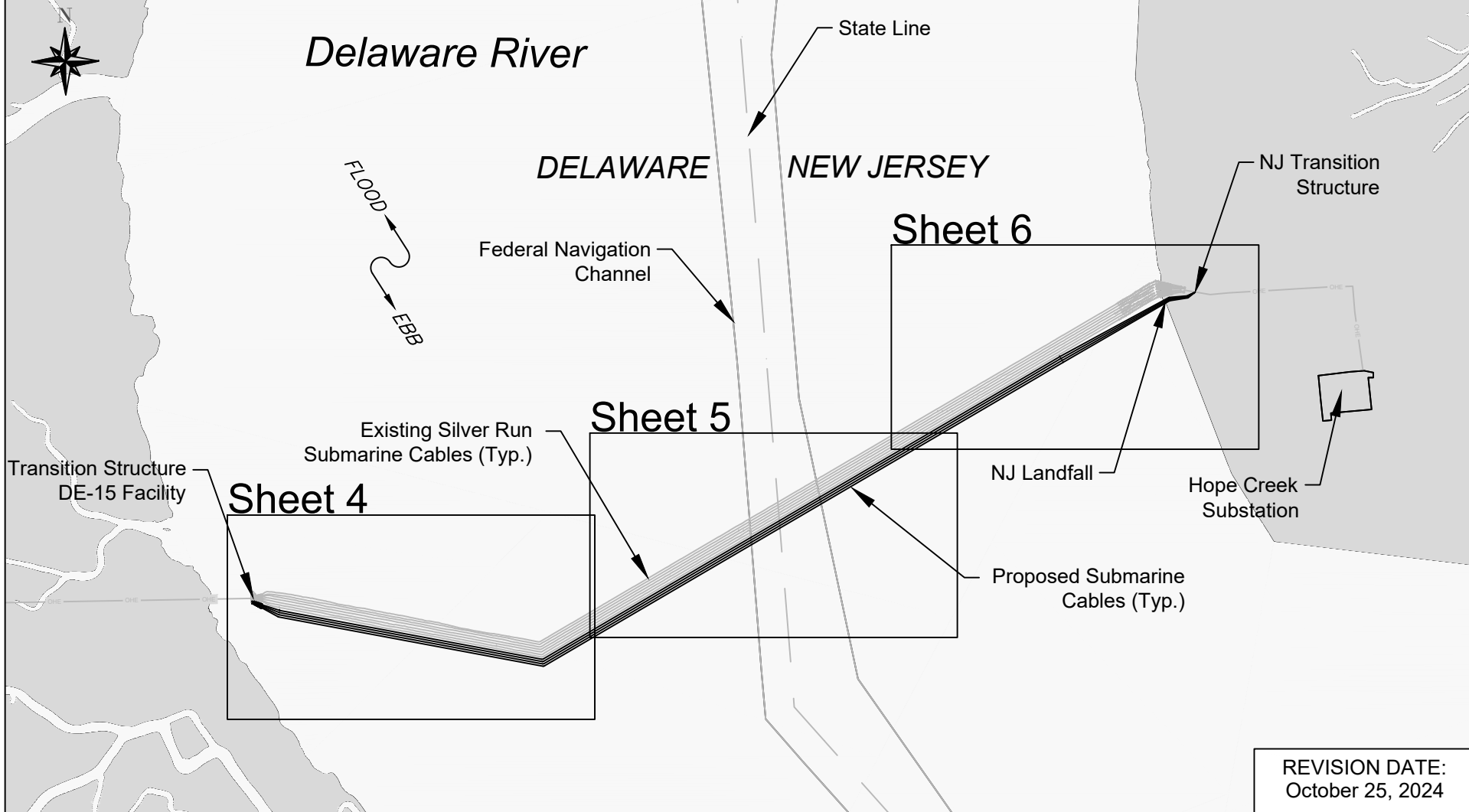
Considering the information presented herein, along with references and attachments to SRE's application for concurrence, SRE has demonstrated the consistency of the Project with the Delaware Coastal Management Program Policy Document.

Based upon the information, data, and analysis included herein and in the CZMA Form, SRE, as the non-federal applicant for a federal permit, finds that the proposed activities in the State of Delaware comply with the enforceable policies of the Delaware Coastal Management Program and will be conducted in a manner consistent with such program.

**Attachment C. Complete DNREC Wetlands and Waterways
Section Application**

Attachment D. USACE Section 10/404 Individual Permit Application

*The complete application, including the permitting plans, is available via SharePoint.
Please contact the Applicant for access instructions.



Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	Silver Run Expansion Project Key Plan	SHEET NO. 1
		DATE: September 27, 2024
		At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware In: Delaware River Applicant: Silver Run Electric, LLC

NOTES:

- Horizontal Datum: UTM Zone 18N, NAD83, U.S. Survey Feet.
- Elevations referenced to NAVD88 in Feet, unless otherwise noted.
- Tidal data from NOAA tidal benchmark at Reedy Point (8551910) [39°33.5'N; 75°34.4'W] and verified using NOAA's VDATUM model (version 3.1).
- Land Survey Source - Land and Mapping Services, Clearfield, PA
- Marine Survey - Ocean Surveys, Inc., Old Saybrook, CT and Alpine Oceanic Seismic Survey, Inc., Norwood, NJ.
- Soundings shown in project area based on field measurements taken during the period 19 March to 22 March 2024 and can only be considered as indicating the conditions existing at that time.
- Wetlands extend beyond Project boundaries.
- Boundaries of wetlands and waters at the PSEG Artificial Island property, as depicted hereon, taken from map entitled, "Wetlands Location Map (Figure 5), New Jersey Wind Port, Salem County, New Jersey;" prepared by AKRF; dated January 2023. These wetlands and waters boundaries were established by AKRF, as explained in AKRF's report entitled, "Wetland Delineation Report, PSEG Nuclear LLC, Salem and Hope Creek Generating Stations;" dated June 2020. These wetlands and waters boundaries were verified by the USACE and NJDEP in conjunction with permit decisions for the New Jersey Wind Port (NAP-2019-01084-39, dated March 21, 2022; NJDEP File No. 1704-02-0001.10 LUP210002, dated July 23, 2021).

- NJ Upper Wetlands Boundary digitized from NJDEP Coastal Wetlands Map No.231-1752.
- MHW and Spring High Tide Elevation obtained from USACE Philadelphia District Jurisdictional Determination for PSEG Nuclear, dated February 24, 2014.
- High tide line elevation (5.9 FT, NAVD88) from plans (Figures 55, 55A, 55C) provided with the USACE Public Notice, dated September 4, 2014, for the PSEG nuclear power plant/reactor site at Artificial Island (CENAP-OP-R-2009-0157).
- Existing Silver Run Line components depicted hereon, including the Delaware transition structure, New Jersey transition structure, and seven submarine/underground cables, were authorized by USACE Permit dated October 1, 2018 (CENAP-OP-R-2016-00542-75).

Estimated Disturbance Table				
Activity	Permanent (SF)		Temporary (SF)	
	Open Water (Waterward of MHW Line)	Wetland	Open Water (Waterward of MHW Line)	Wetland
In-River Transition Structure DE-15	13 ¹	0	5,742 ²	0
Vertical Injector ³	0	0	105,562	0
Jet Plow ⁴	0	0	15,758	50
NJ Shore Landing Excavation ⁵	0	0	10,838	830 ⁶
Total*	13	0	127,062	50

¹Area associated with the four proposed piles for In-River Transition Structure DE-15.

²Approximate area associated with excavation adjacent to In-River Transition Structure DE-15.

³Disturbance associated with cable burial between DE-15 excavation and NJ Shore Landing Excavation (Approx. 13,200 LF per cable).

⁴Disturbance associated with cable burial from 450 FT waterward of the NJ shoreline to the NJ shoreline.

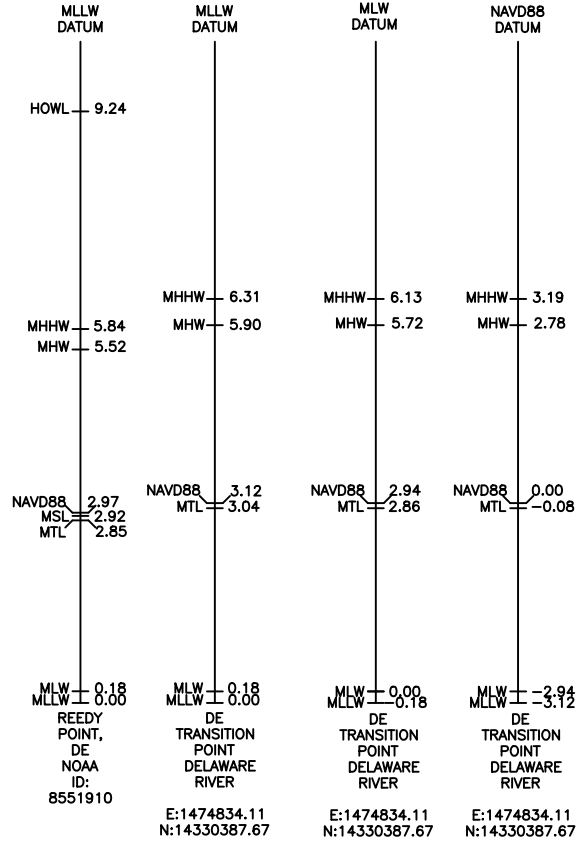
⁵Area only to be disturbed if field conditions do not allow for Jet Plow Method.

⁶Impacts to Wetland R.

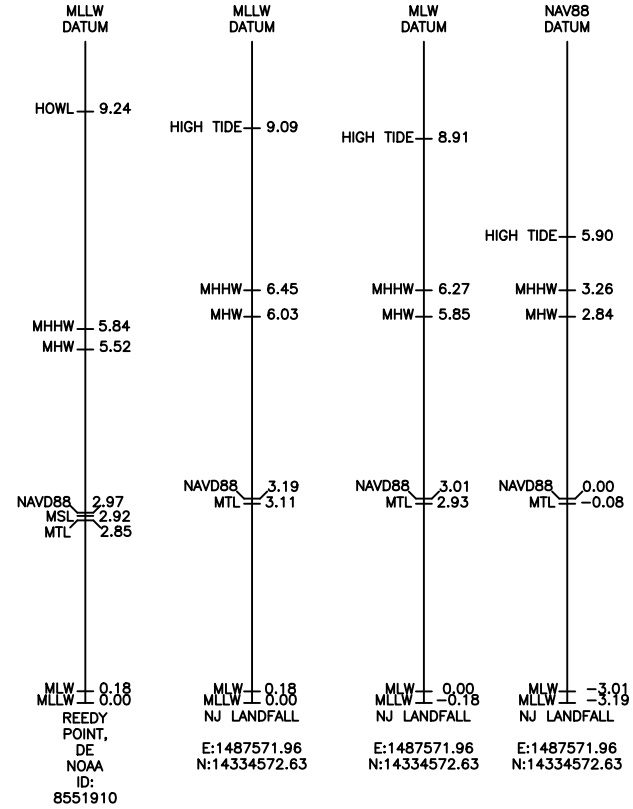
*NJ Shore Landing Excavation disturbance excluded from total due to it being considered an alternative method to the Jet Plow.

Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	<h2>Silver Run Expansion Project</h2> <h3>Notes</h3>	REVISION DATE: October 25, 2024
		SHEET NO. 2
		DATE: September 27, 2024
	At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware In: Delaware River Applicant: Silver Run Electric, LLC	PROJECT NO. 529393.0001

VERTICAL DATUM RELATIONSHIPS DELAWARE TRANSITION STRUCTURE



VERTICAL DATUM RELATIONSHIPS NEW JERSEY LANDFALL

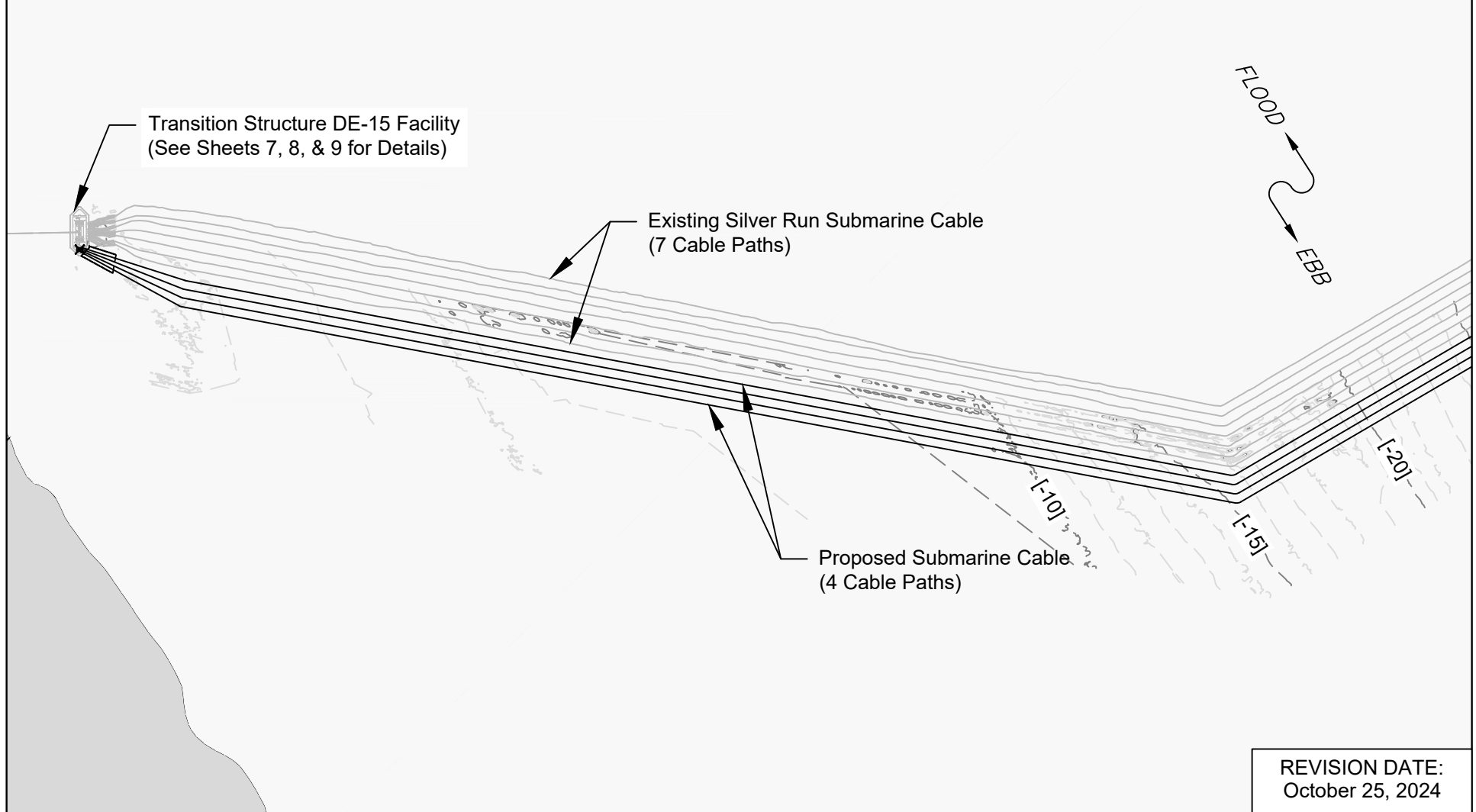


Notes:

- Tidal data from NOAA tidal benchmark at Reedy Point (8551910) [39°33.5'N; 75°34.4'W] and verified using NOAA's VDATUM model (version 3.1).

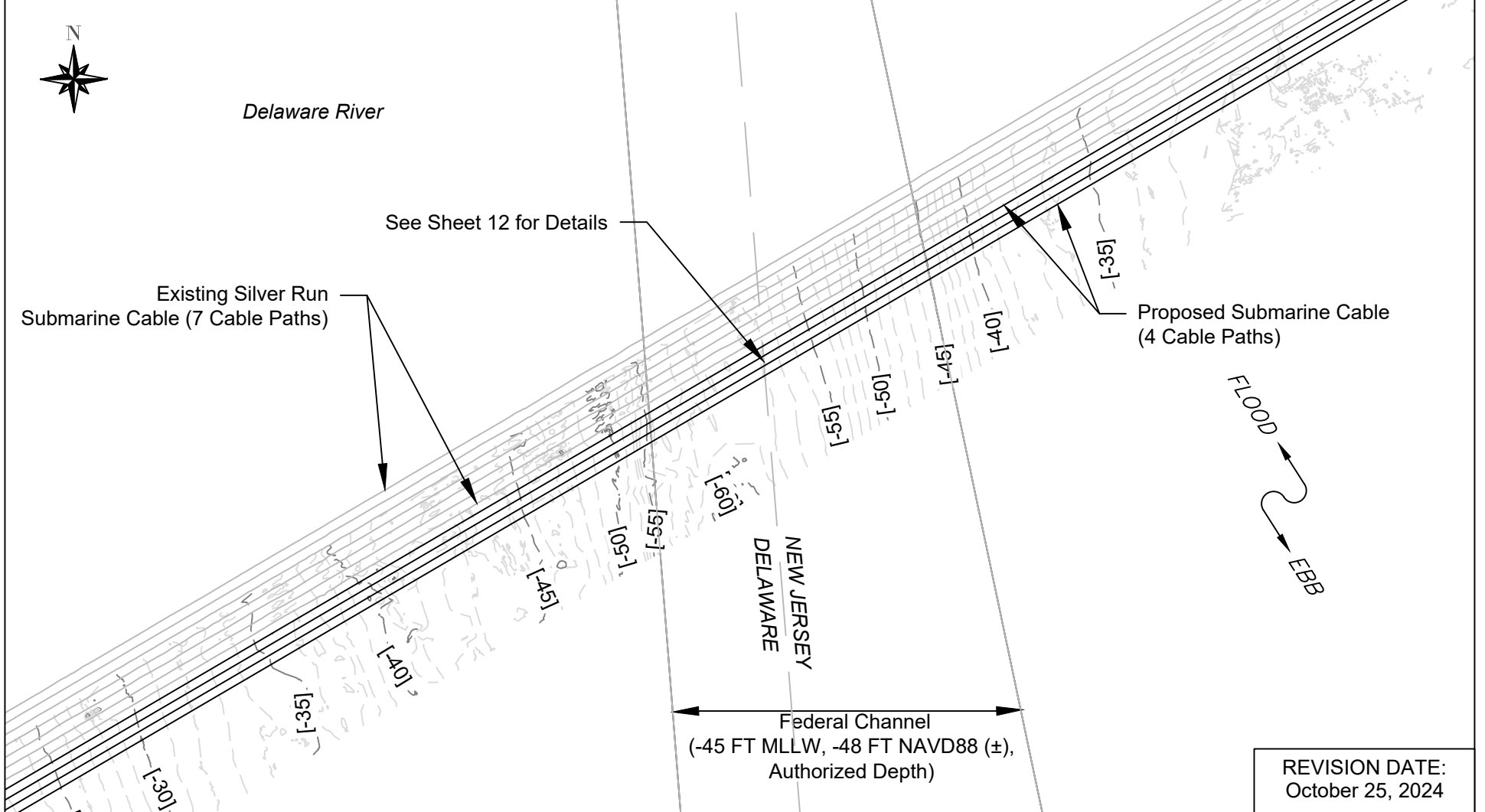
Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	Silver Run Expansion Project Datum Relationships	REVISION DATE: October 25, 2024
		SHEET NO. 3
		DATE: September 27, 2024
	At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware In: Delaware River Applicant: Silver Run Electric, LLC	PROJECT NO. 529393.0001





Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	<div data-bbox="913 1266 1438 1364" data-label="Section-Header"> <h2>Silver Run Expansion Project Submarine Cable</h2> </div> <div data-bbox="661 1388 1669 1485" data-label="Text"> <p>At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware In: Delaware River Applicant: Silver Run Electric, LLC</p> </div>	REVISION DATE: October 25, 2024 SHEET NO. 4
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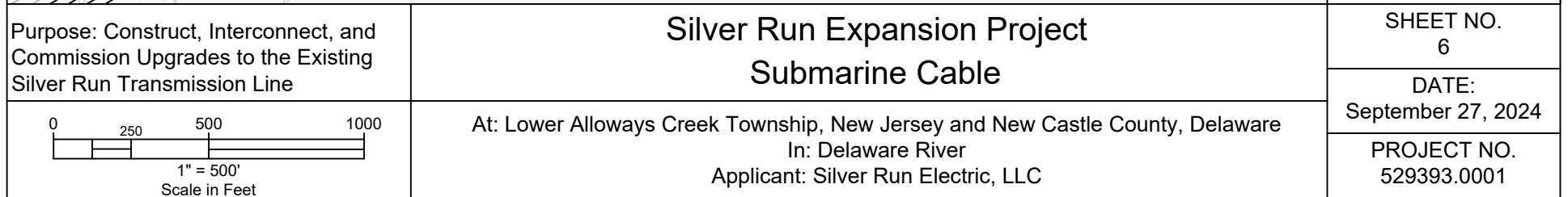


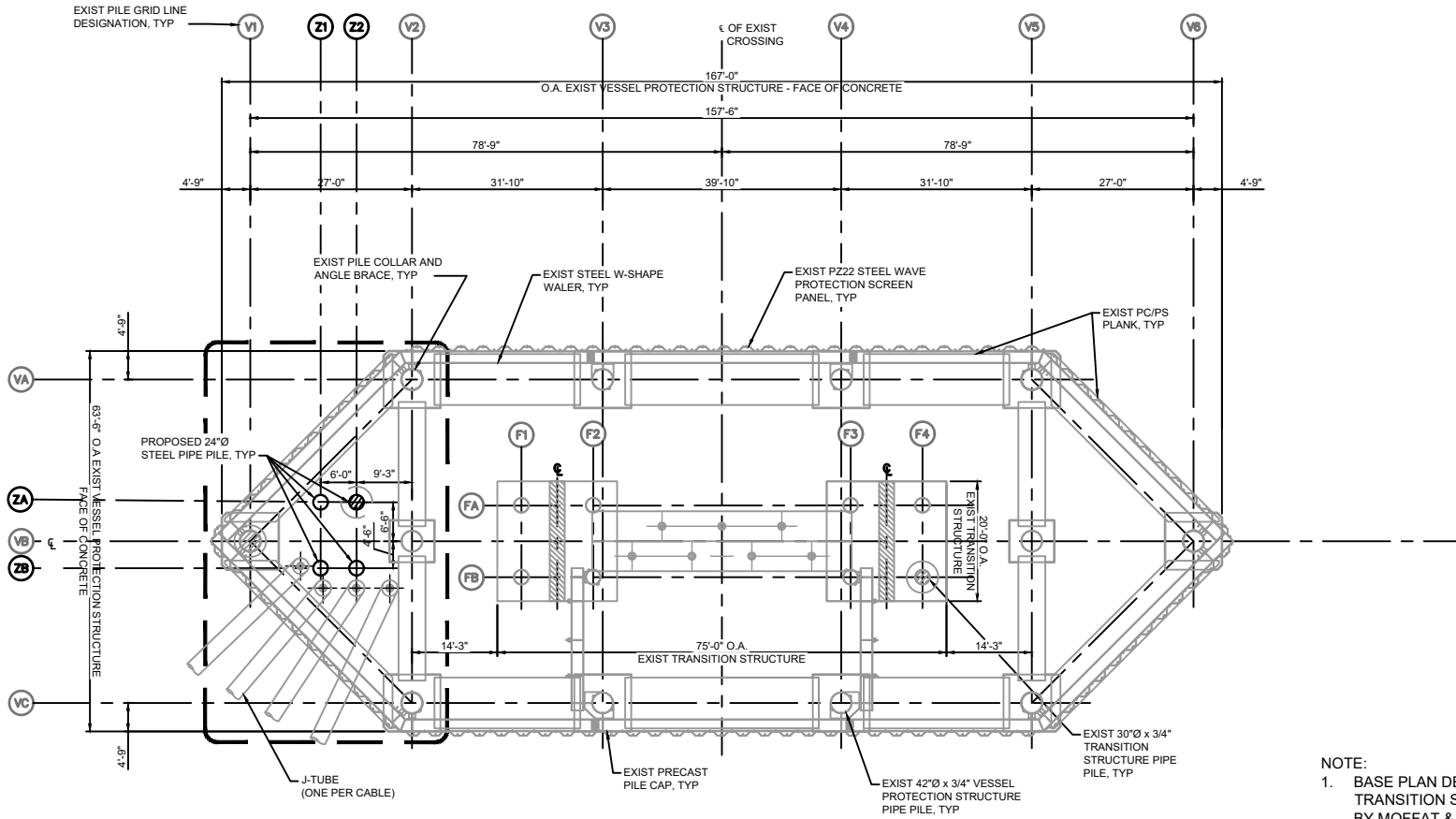


Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	<div>Silver Run Expansion Project</div> <div>Submarine Cable</div>	SHEET NO. 5
		DATE: September 27, 2024
		PROJECT NO. 529393.0001

<div><div>02505001000</div><div><div></div><div></div><div></div><div></div></div><div>1" = 500'</div><div>Scale in Feet</div></div>	<div>At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware</div> <div>In: Delaware River</div> <div>Applicant: Silver Run Electric, LLC</div>
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TRANSITION STRUCTURE TOP VIEW
 N.T.S.

Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line

Silver Run Expansion Project Delaware In-River Transition Structure Modifications

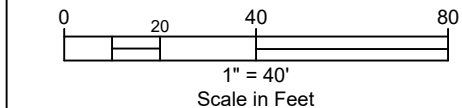
At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware
 In: Delaware River
 Applicant: Silver Run Electric, LLC

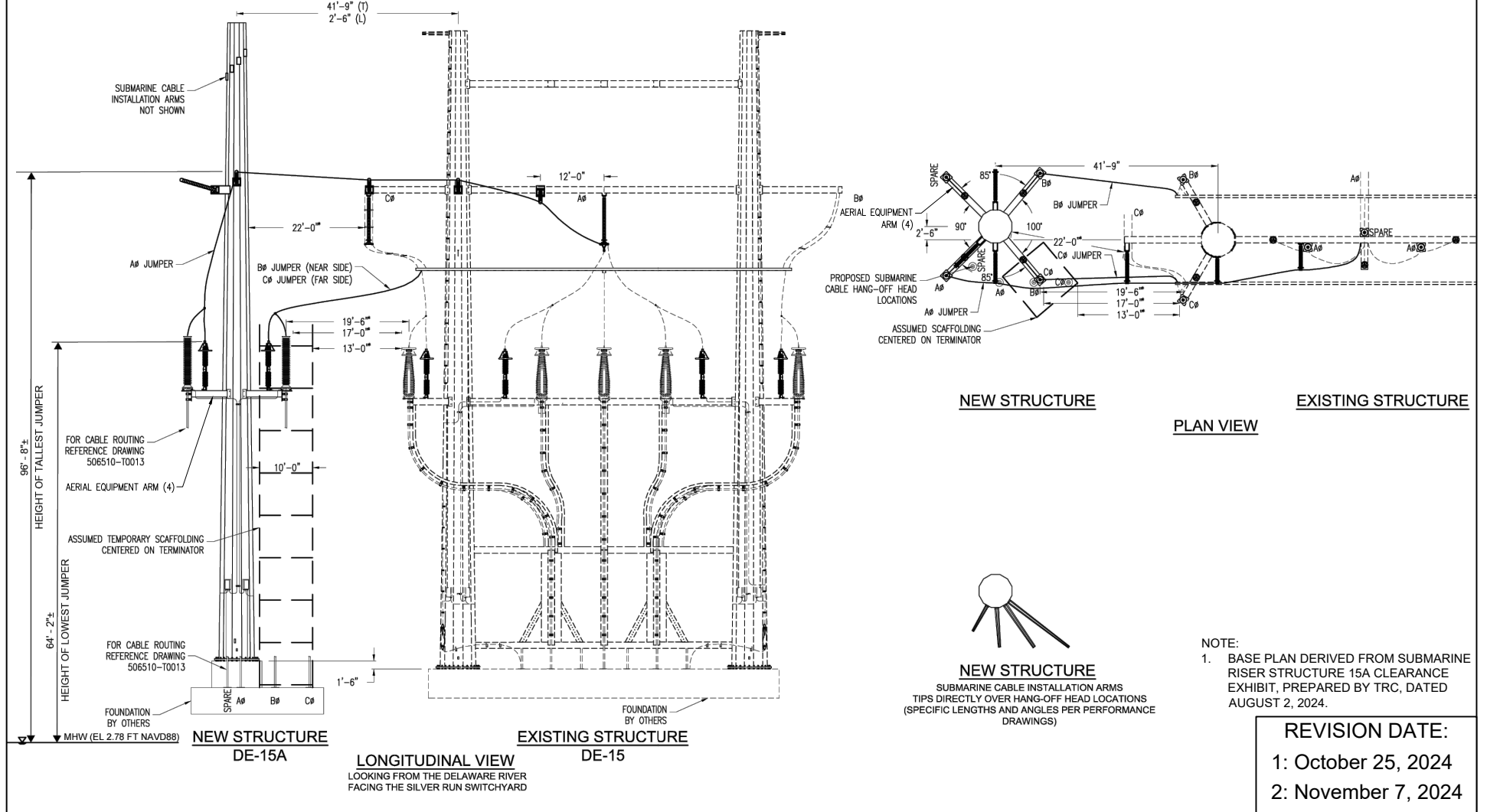
REVISION DATE:
 October 25, 2024

SHEET NO.
 8

DATE:
 September 27, 2024

PROJECT NO.
 529393.0001





Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line

0 20 40 80
 1" = 40'
 Scale in Feet

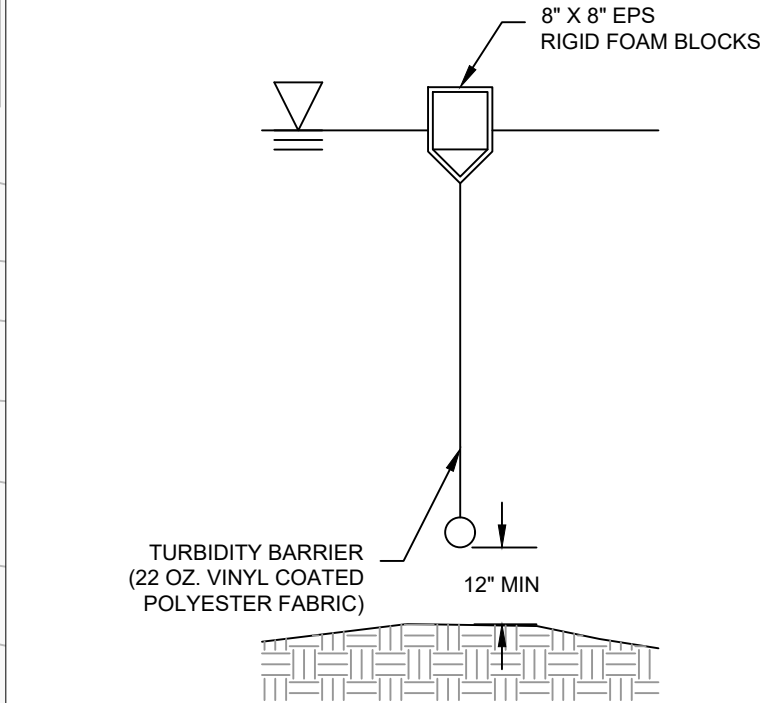
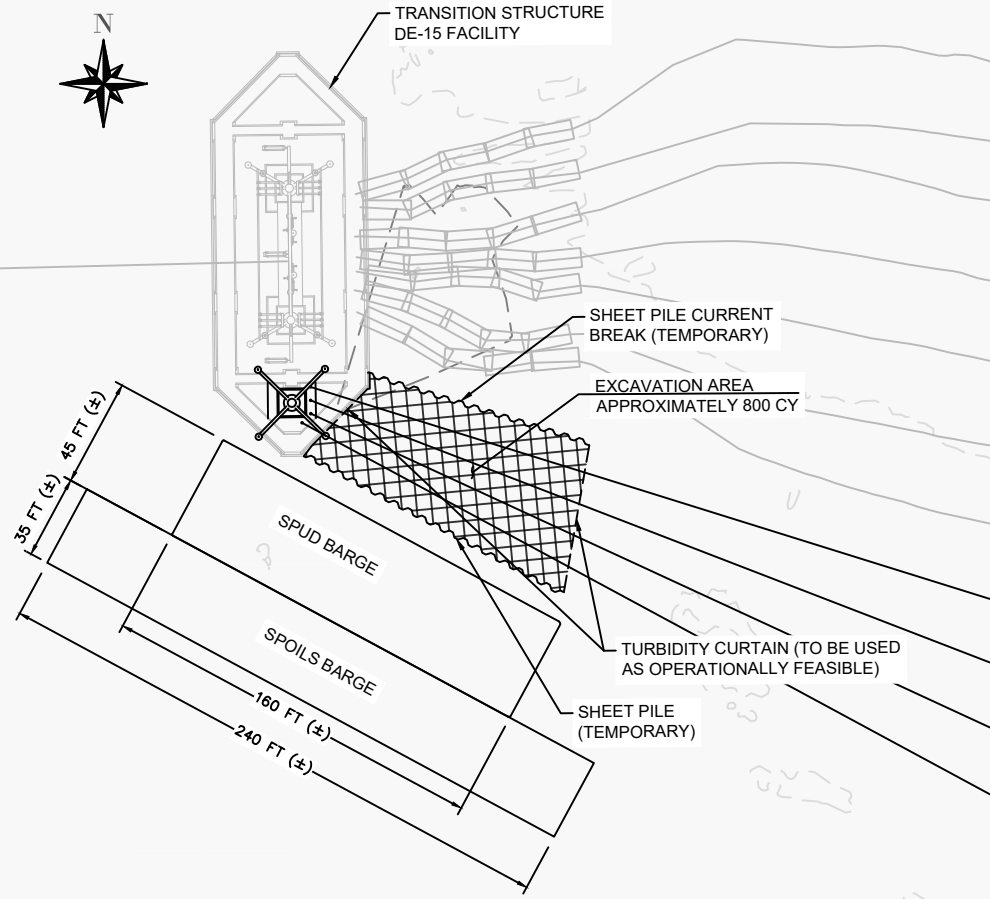
Silver Run Expansion Project
Delaware In-River Transition Structure Modifications

At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware
 In: Delaware River
 Applicant: Silver Run Electric, LLC

REVISION DATE:	
1: October 25, 2024	
2: November 7, 2024	
SHEET NO. 9	
DATE: September 27, 2024	
PROJECT NO. 529393.0001	



Note: Excavated material to be temporarily stored on the spoils barge, then replaced on the riverbed as cover material for the J-tubes and installed submarine cables beneath/adjacent to the in-river transition structure; area of temporary excavation to be restored to pre-construction contours.



NOTES:

1. TURBIDITY BARRIER AND ANCHORING SYSTEM TO BE DESIGNED FOR PROJECT SITE.
2. TURBIDITY BARRIER SHALL NOT BE ANCHORED TO DAM WITHOUT WRITTEN AUTHORIZATION BY OWNER.

TURBIDITY CURTAIN TYPICAL DETAIL
 N.T.S.

Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line

Silver Run Expansion Project Excavation Plan for Delaware Transition Structure

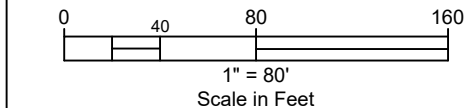
At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware
 In: Delaware River
 Applicant: Silver Run Electric, LLC

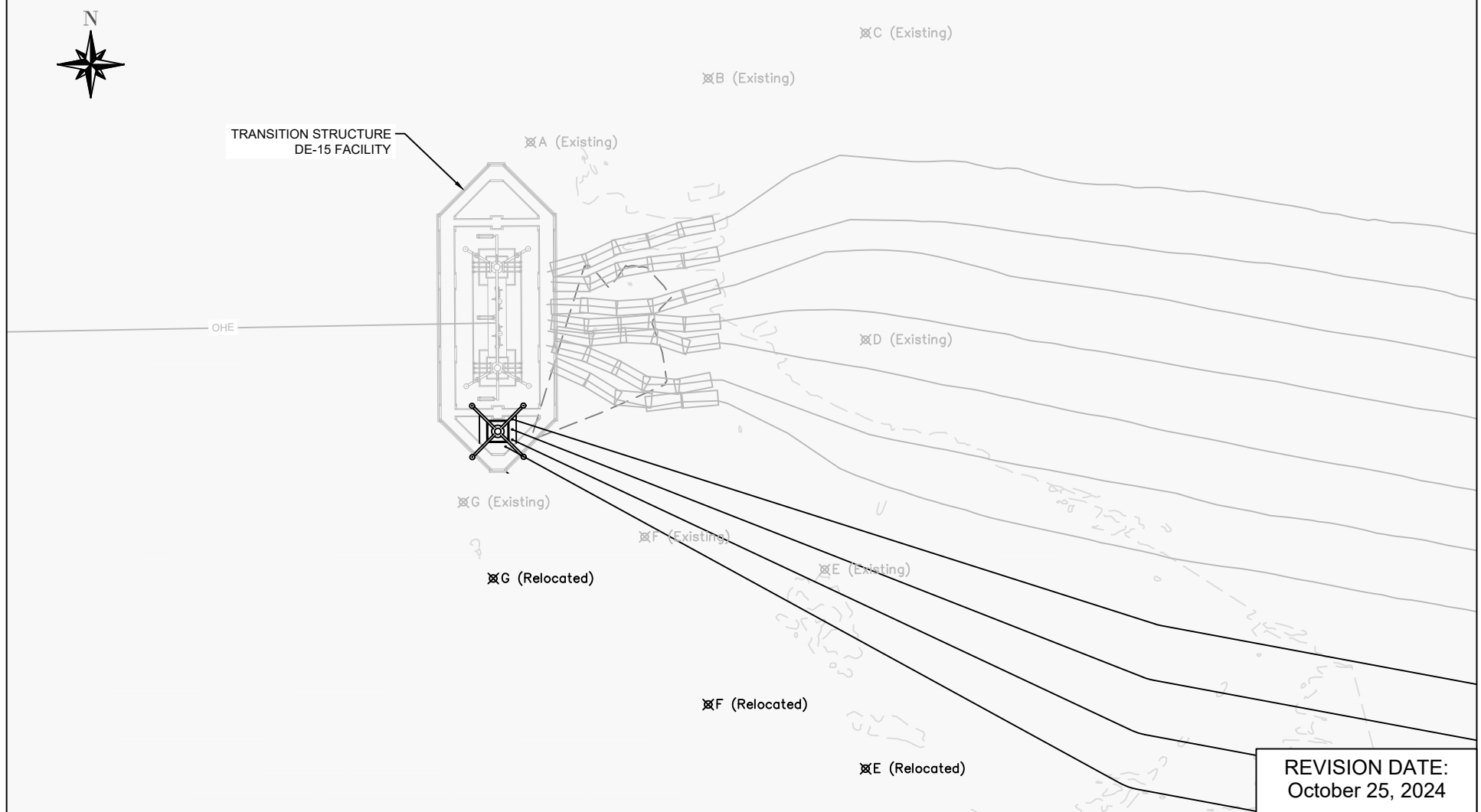
REVISION DATE:
 October 25, 2024

SHEET NO.
 10

DATE:
 September 27, 2024

PROJECT NO.
 529393.0001





REVISION DATE:
October 25, 2024

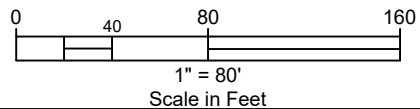
Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line

Silver Run Expansion Project Buoy Relocation Plan

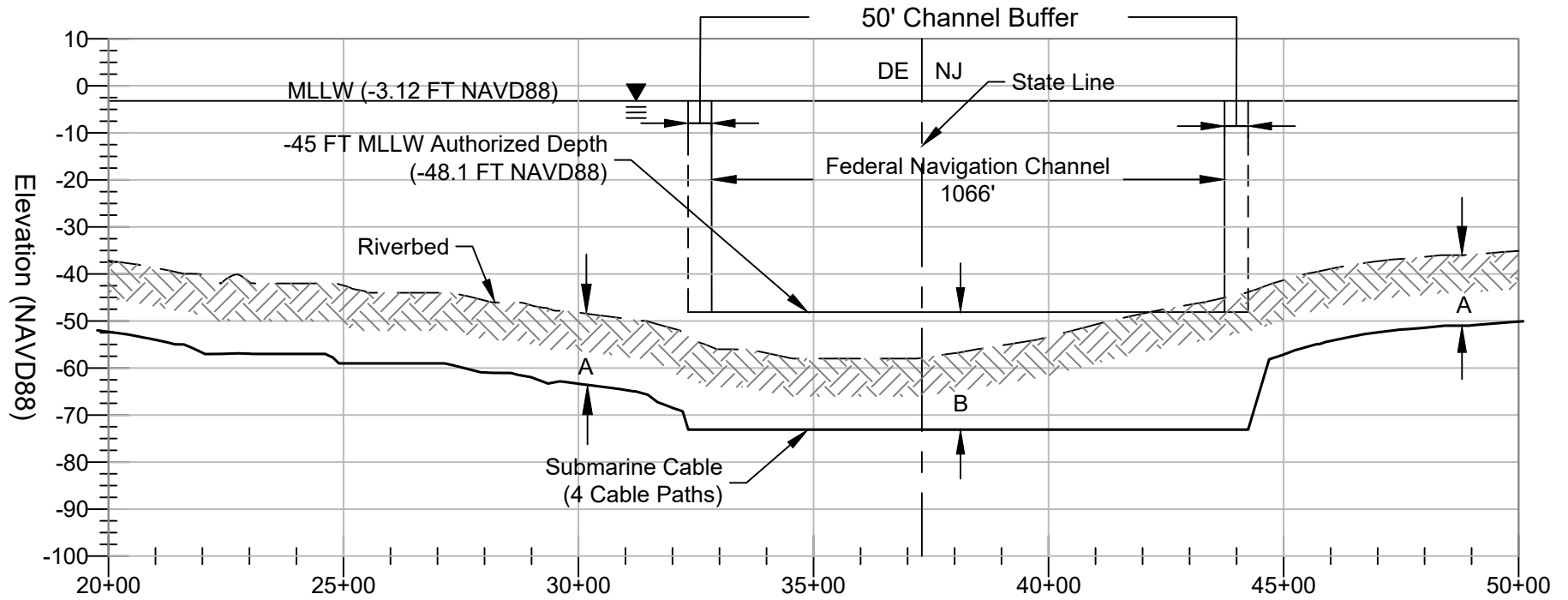
SHEET NO.
11

DATE:
September 27, 2024

PROJECT NO.
529393.0001



At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware
 In: Delaware River
 Applicant: Silver Run Electric, LLC



TARGET CABLE BURIAL DEPTH
 A= 15' below present bottom
 B= 25' below authorized channel depth or 15' below present bottom (whichever is deeper)

REVISION DATE:
1: October 25, 2024
2: November 18, 2024
SHEET NO. 12
DATE: September 27, 2024
PROJECT NO. 529393.0001

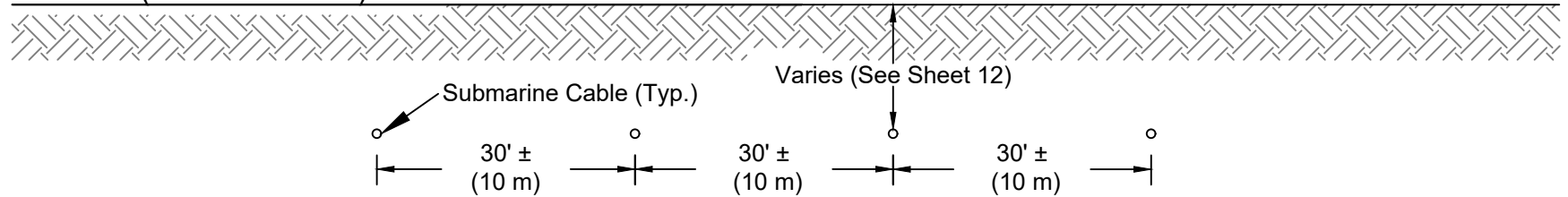
Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	Silver Run Expansion Project Federal Channel Crossing	
	At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware In: Delaware River Applicant: Silver Run Electric, LLC	





Water Line

Riverbed (Present Bottom)



Submarine Cable (Typ.)

Varies (See Sheet 12)

30' ±
(10 m)

30' ±
(10 m)

30' ±
(10 m)

Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line

Silver Run Expansion Project Typical Submarine Cable Corridor Cross-Section

NOT TO SCALE

At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware
 In: Delaware River
 Applicant: Silver Run Electric, LLC

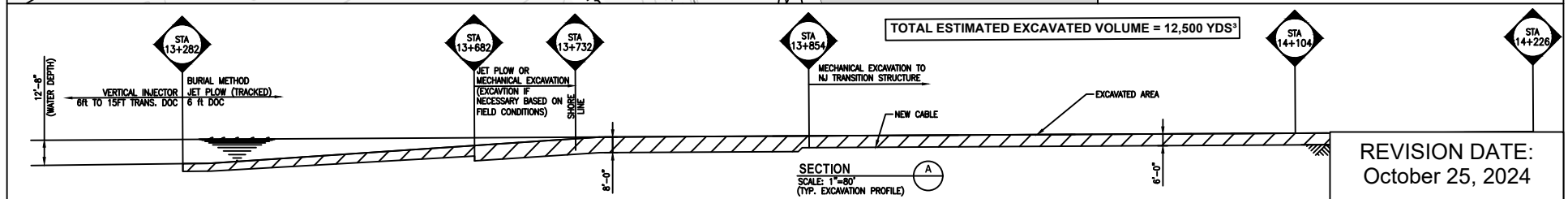
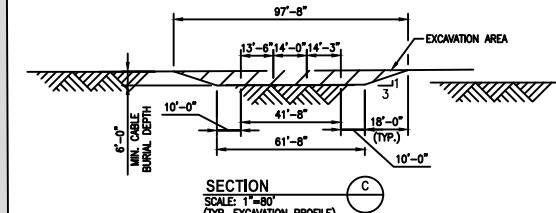
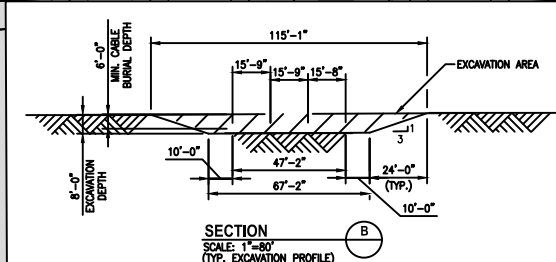
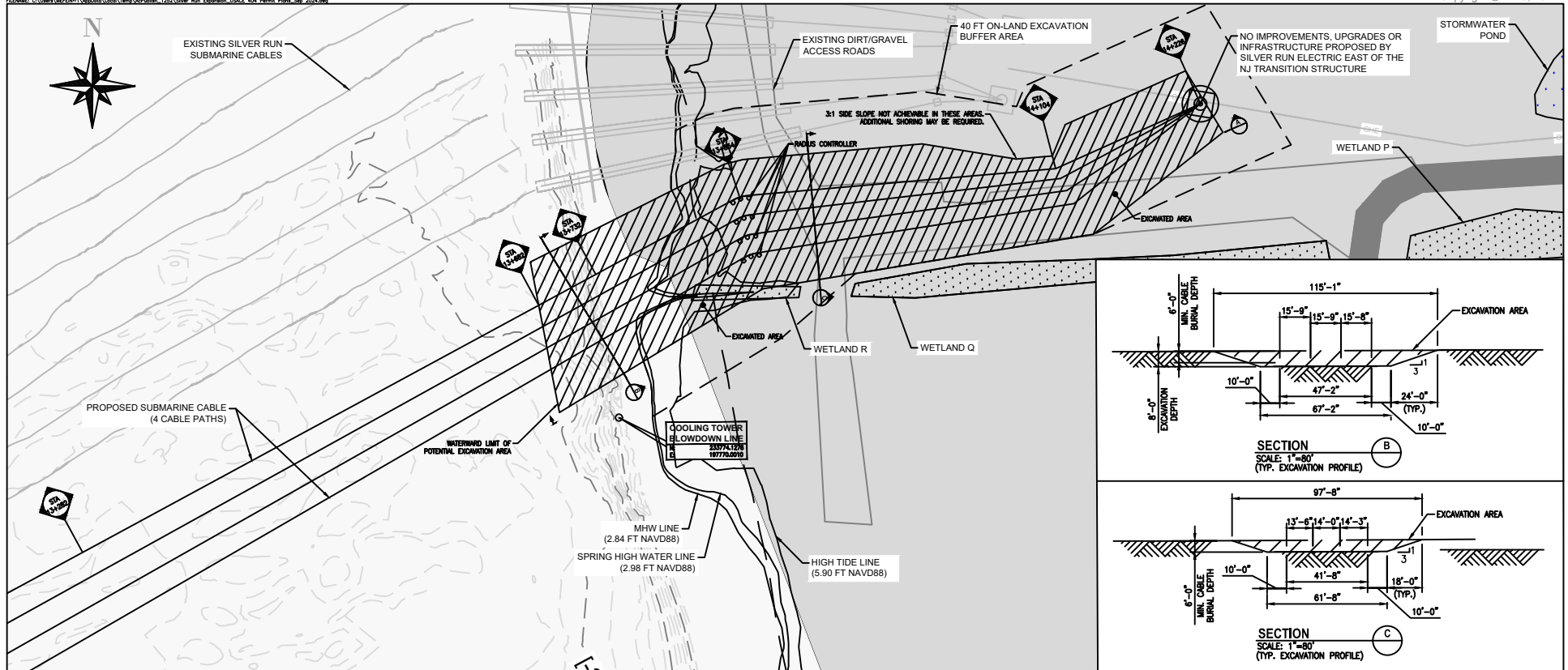
REVISION DATE:
October 25, 2024

SHEET NO.
13

DATE:
September 27, 2024

PROJECT NO.
529393.0001

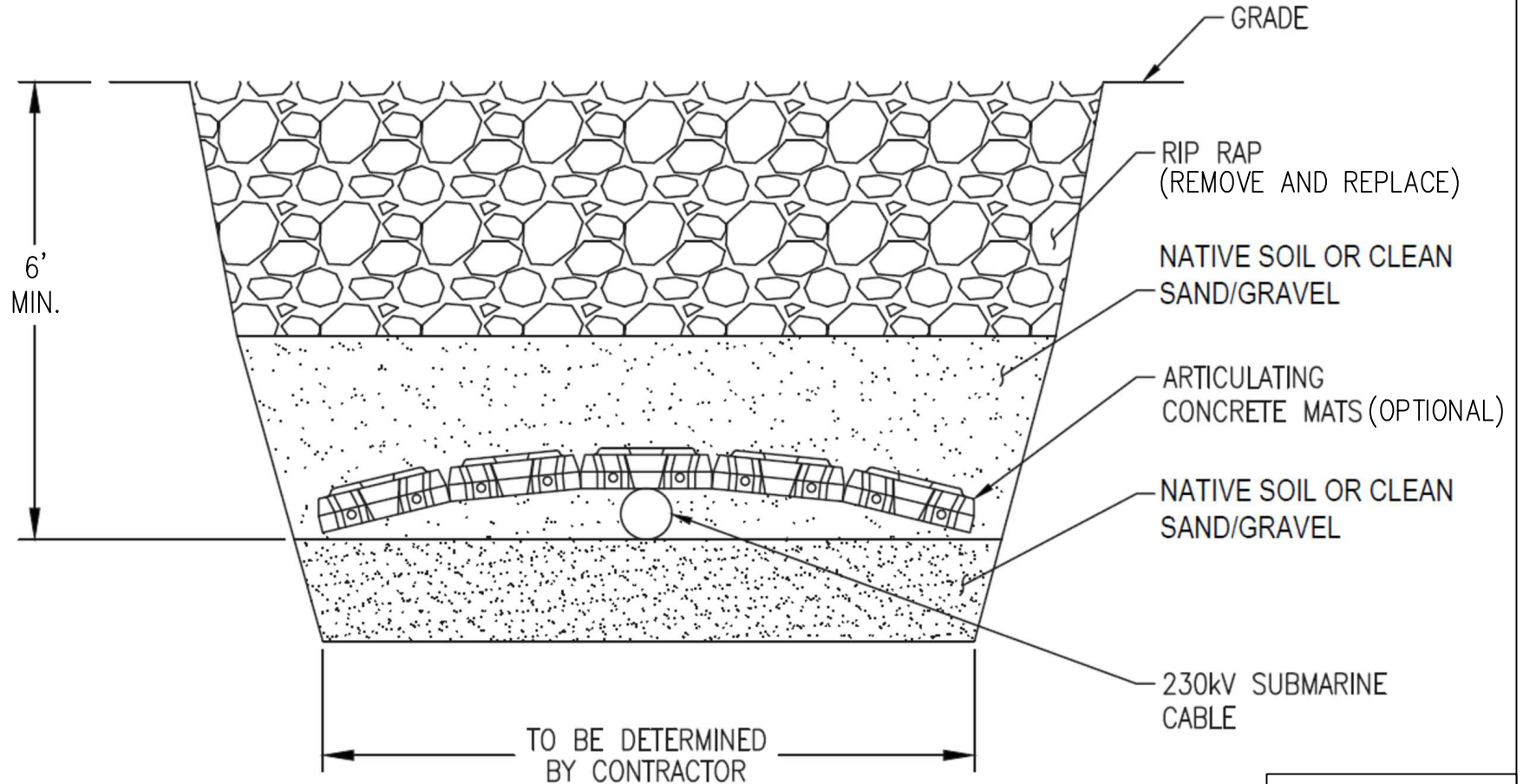




Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line	<div>Silver Run Expansion Project</div> <div>NJ Shore Landing Plan & Profiles</div>	SHEET NO. 14
		DATE: September 27, 2024
		PROJECT NO. 529393.0001

<div><div>060120240</div><div><div></div><div></div><div></div><div></div></div><div>1" = 120'</div><div>Scale in Feet</div></div>	<div>At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware</div> <div>In: Delaware River</div> <div>Applicant: Silver Run Electric, LLC</div>
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Note:
 Typical details provided by Silver Run Electric, LLC.

REVISION DATE:
 October 25, 2024

Purpose: Construct, Interconnect, and Commission Upgrades to the Existing Silver Run Transmission Line

Silver Run Expansion Project Typical NJ Shore Landing Detail

SHEET NO.
 15

DATE:
 September 27, 2024

NOT TO SCALE

At: Lower Alloways Creek Township, New Jersey and New Castle County, Delaware
 In: Delaware River
 Applicant: Silver Run Electric, LLC

PROJECT NO.
 529393.0001