Date:

Catherine R. McCabe, Commissioner Ruth W. Foster, PhD., P.G., Acting Director

NJ Department of Environmental Protection NJ Department of Environmental Protection

401 East State Street Office of Permit Coordination and Environmental Review

7th Floor, East Wing 401 East State Street

PO Box 402 PO Box 420

Trenton, NJ 08625-0402 Trenton, NJ 08625

**Re: (1) Request that NJDEP deny the permit applications from Transcontinental Gas Pipeline Corporation to NJDEP, listed below, that pertain to construction of pipeline and Compressor Station 206 parts of the Northeast Supply Enhancement Project (NESE) quickly and maintain authority over this permitting process; and**

**(2) Opposition to the Northeast Supply Enhancement Project**

**FLOOD HAZARD AREA PERMITS: Application received by NJDEP** on June 23, 2017

**PI Number, Activity Number:** 0000-01-1001.3-FHA170001 (verification of construction)

**PI Number, Activity Number:** 0000-01-1001.3-FHA170002 (individual permit - construction)

**FRESHWATER WETLANDS PERMIT: Application received by NJDEP** on June 23, 2017

**PI Number, Activity Number:** 0000-01-1001.3-FWW170001 (individual permit - construction)

**COASTAL WETLANDS PERMIT: Application received by NJDEP** on July 10, 2017

**PI Number, Activity Number:** 1200-17-0006.1-CSW170001 (permit – construction)

**WATERFRONT DEVELOPMENT PERMITS: Application received by NJDEP** on July 10, 2017

**PI Number, Activity Number:** 1200-17-0006.1-WFD170001 (individual permit – in-water construction)

**PI Number, Activity Number:** 1200-17-0006.1-WFD170002 (individual permit – upland construction)

Dear Commissioner McCabe and Director Foster:

I am writing to express my strong opposition to the Northeast Supply Enhancement project (NESE) and urge you to do everything in your power to stop it. Some of my reasons for opposing this NESE Project are listed at the end of this letter. I recognize that the NJ Department of Environmental Protection has the authority and responsibility to protect the waters and wetlands of New Jersey from damaging projects under the federal Clean Water Act.

For the NESE Project, the Federal Energy Regulatory Commission (FERC) published their Draft Environmental Impact Statement (DEIS) on March 23, 2018. On May 11, 2018, Williams/Transco issued thousands of pages of data, information and maps that need to be thoroughly reviewed and independently analyzed. **The studies and data pertaining to impacts, mitigation, and alternatives that are needed for a thorough environmental assessment remain incomplete and, at times, incorrect.**

At this time, I am writing with an urgent request that **the NJDEP deny the permit applications of Williams/Transco for the NESE project quickly so that NJDEP can maintain its authority to protect the waters of New Jersey.**

**I am concerned that FERC could rule that NJDEP forfeited its right to make a decision about protecting the waters of New Jersey if the NJDEP does not issue its denial of permit applications quickly.** That happened to the New York State Department of Environmental Conservation (NYSDEC) after they did not render a decision within one year of receiving permit applications for the Valley Lateral component of the Millennium Pipeline Project. However, when NYSDEC acted within the one-year timeline in denying permit applications for the proposed Constitution Pipeline, federal courts upheld their denial of water quality permits, and FERC did not overrule that decision. The U. S. Supreme Court rejected an attempt by Williams/Transco to overturn a lower federal district court decision that allowed New York to deny water quality permits for the project because of environmental concerns.

Regarding the NESE Project, New York State Department of Environmental Conservation denied Williams/Transco their Water Quality Certificate for the NESE Project on April 20, 2018. Therefore, I am hoping that you will do the same since critical information is missing from the applications and DEIS.

**Some of the reasons why I oppose the proposed NESE Project are:**

* Williams/Transco has a long history of safety violations that have led to fires/explosions and leaks with loss of lives, illnesses, injuries and damaged land and buildings.
* There is potential danger from increased capacity and velocity of gas through aging Class 1 and Class 2 pipelines in densely populated residential neighborhoods, with many elementary schools, day cares, places of worship and adult communities nearby.
* At Trap Rock Quarry, mining and processing activities include blasting with dynamite. There are no reported studies, or a plan from Williams/Transco, about the impact of tremors on the stability of the compressors over time for decades. Concerns are that the ongoing blasting could destabilize the gas-powered compressor turbine units and cause fire/explosion with resulting added emissions of toxins.
* The pipeline includes some segments that are over 50 years old, and corrosion or cracks in them can lead to gas escapes (explosions/fires). Adding increased gas along lines may add stress, and this combination (added compression + older pipelines) has led to dangerous explosions/fires.
* The site for the proposed compressor station has a high water table, is on Carters Brook, and run-off of pollutants is of concern.
* In the State’s Water Supply Plan, Trap Rock Quarry is considered a potential reservoir site after they stop mining in 2040. There is concern that the continued emission of toxins over time would pollute this water resource.
* Gas-powered compressors emit many toxins as part of routine operations, and these include known carcinogens as well as respiratory irritants. Particulate emissions are mostly at the point where natural gas is burned (i.e., at the gas-fired compressor unit). Particulate Matter can get deep into lungs and carries other toxic chemicals. Modeling has shown that it can travel 2.5 to 6 miles away. Studies have shown that the NAAQS levels for PM2.5 are not protective of human health.
* At the NJ Buddhist Vihara (NJBV), walking meditation is a common practice, and there are frequent outdoor religious observances as well as a weekend Dhamma School where children engage in activities outdoors. Noise, toxic emissions and the feared risk of an explosion or fire would interfere with the rights of the Monks and congregants to practice their religion. The NJBV serves as both a place of worship and a cultural center for those of Sri Lankan heritage and the community-at-large. Their Samadhi Buddha statue is the largest and tallest in the Western Hemisphere, and it was designated as a Cultural Landmark by Franklin Township.
* Construction and operations would interfere with communication, breeding, food sources and navigation of wildlife.
* Construction in the Raritan Bay would impact benthic habitat and marine mammals.
* The feeding habitats and nesting grounds of birds on State and Federal Endangered and Threatened Species lists by the Raritan Bay would be affected by construction.
* There would be a negative impact on recreational boating/fishing and commercial fishing to communities along the Raritan Bay that include, but are not limited to, a potential to cripple businesses dependent upon seasonal visitor access to the Bay.
* Adding natural gas facilities and pipelines does not support the missions of NJ and NY to decrease reliance on fossil fuels and transition to renewable energy sources while also increasing energy efficiency, and it can exacerbate intense future weather impacts on New Jersey.

I trust that the professionals at NJDEP are carefully reviewing all information relevant to the permit applications. I trust that the NJDEP will hold Williams/Transco fully accountable to New Jersey’s laws and regulations protecting our water and other natural resources. I am counting on you to:

1. Deny the water quality permit applications to NJDEP, as they currently exist, for the NESE Project quickly so that NJDEP maintains its authority to be the decision-maker in this matter, and
2. Post that denial letter to the FERC Docket No. CP17-101.

Sincerely,

Name: Signature:

Address:

Town/City: State: Zip:

eMail: