Date:

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

NJ Department of Environmental Protection NJ Department of Environmental Protection

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**Email to:** Commissioner@dep.nj.gov Ruth.Foster@dep.nj.gov

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**Re: Permit applications to NJDEP from Williams/Transcontinental Gas Pipeline Corporation that were announced in the DEP Bulletin on July 5, 2018 for the Northeast Supply Enhancement Project (NESE):**

Land Use Regulation Program:

* Waterfront Development Individual Permit
* Water Quality Certificate under Section 401 of the Clean Water Act
* Flood Hazard Area Individual Permit and Verification
* Freshwater Wetlands Individual Permit and accompanying Transition Area Waiver

Coastal Use Management Program:

* Concurrence with Applicant’s Coastal Zone Management Act (CZMA) Consistency Assessment

**Requests:**

1. **Request that NJDEP deny the permit applications from Transcontinental Gas Pipeline Corporation for the NESE Project due to incompleteness and maintain authority over this permitting process**
2. **Request that NJDEP hold two (2) public fact-finding meetings (“hearings”) pertaining to separate aspects of the applications – one near the proposed Compressor Station 206 in Franklin Twp. (Somerset County) and another by the Madison & Raritan Bay Loops in Old Bridge & Sayreville (Middlesex County)**

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 reject these new applications within any required timelines since information is still missing and, at the appropriate time, schedule two (2) separate public fact-finding meetings to hear the issues of citizens who would be impacted by this Project if it is approved.

* Near the proposed Compressor Station 206 site, I am concerned about impacts from construction and operation on groundwater, stormwater containment and runoff, settling of emissions on wetlands and drinking water sources, lost habitat, and risks to the health, safety and well-being of people, wildlife and the environment.
* Near the proposed pipeline sites by and in the Raritan Bay, I am concerned about the impacts from construction on wetlands, marine life, habitats, water quality, and additional impacts on the fishing and recreational/tourism industry.
* For all aspects of the NESE Project, I am concerned about decades of increased methane leaks and chemical emissions, impeding the future progress from the Governor’s commitment to clean energy, and decades of impacts from Greenhouse Gases on sea level rise, increased frequency and intensity of weather-related events, and ozone that threatens all in New Jersey.

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.

Williams/Transco withdrew their applications to NJDEP on June 14, 2018, and then their submitted new applications were received at NJDEP on June 19, 2018. TheNew York State Department of Environmental Conservation denied Williams/Transco their Water Quality Certificate for the NESE Project on April 20, 2018, and Williams/Transco submitted new applications to the NYSDEC on May 17, 2018.

The NJDEP reviewed the March 23, 2018 draft Environmental Impact Statement (DEIS) from FERC as well as the thousands of pages of supplemental information provided to FERC by Williams/Transco after the DEIS was completed. FERC has yet to publish their analysis of the supplemental information, and they have not responded to many of the concerns raised to them by the public and elected/appointed officials. I am concerned about the missing data, analyses, mitigation commitments, and studies about impacts, mitigation and alternatives that are vital for making decisions about protecting New Jersey’s waters and wetlands.

I am hoping that you will continue to diligently review the new application material and hold Williams/Transco fully accountable to New Jersey’s laws and regulations protecting our water and other natural resources. I am also hoping that you will do everything in your power to reject these new applications within any required timelines.

Some of my reasons for opposing this NESE Project are listed below.

* 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. Expansion of this infrastructure will also exacerbate the impact of intense future weather events on New Jersey.
* 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.
* 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.
* 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.
* 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.
* Gas-powered compressors emit many airborne 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), which would share a property boundary with the compressor station, 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 re-suspend and spread toxic contaminants that would adversely 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 noise and pollution.
* There would be negative impacts 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.
* Greenhouse Gases from the NESE Project would contribute to more significant health problems, ozone, and damaging weather/climate-related events that harm and cost all of us in New Jersey.

Sincerely,

Name:

Address:

Town/City:

State:

Zip:

eMail: