



## State of New Jersey

Highlands Water Protection and Planning Council  
100 North Road (Route 513)  
Chester, New Jersey 07930-2322  
(908) 879-6737  
(908) 879-4205 (fax)  
[www.nj.gov/njhighlands](http://www.nj.gov/njhighlands)



**CHRIS CHRISTIE**  
*Governor*

**JIM RILEE**  
*Chairman*

**KIM GUADAGNO**  
*Lt. Governor*

**MARGARET NORDSTROM**  
*Executive Director*

October 30, 2015

Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

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RE: Proposed PennEast Pipeline Project  
**FERC Docket # CP15-558**  
New Jersey Highlands Water Protection and Planning Council Comments

Dear Secretary Bose:

The New Jersey Highlands Water Protection and Planning Council (Highlands Council) is formally submitting the following comments to the FERC Docket in order to provide additional information regarding the Highlands Regional Master Plan (RMP) and the sensitive resources which must be considered in preparation of the Environmental Impact Statement (EIS) for the PennEast Pipeline project. Factual information regarding resources potentially affected by the installation of the PennEast Pipeline Project is extensively detailed in the attached Highlands Environmental Resource Inventories (ERIs) adopted by both Holland and Alexandria Townships through municipal resolution (resolutions also attached).

Following the passage of the Highlands Water Protection and Planning Act in 2004, the Highlands Council was established and charged with developing the RMP to guide protection of the critical natural resources and other significant values of the Highlands Region. The RMP provides for the protection and preservation of these significant values of the Highlands Region for the benefit of its residents.

The purpose of the Highlands ERI is to provide a framework that supports the efforts of each municipality to bring its planning documents, including the ERI, into conformance with the Highlands RMP. Natural resource maps and an accompanying narrative provide the basis for inventorying a community's natural resource components and provide the base source for resource conservation. Identifying a community's natural resources is the first step toward establishing mechanisms for their protection. As an integral component of a municipal master plan, an ERI functions as the basis for development of natural resources protection ordinances.

While certain resources depicted in the Highlands ERI and the RMP are regulated through state permitting programs (e.g., freshwater wetlands and stream crossings), many resources in accordance with the Highlands Act are afforded special protection and priority in the Highlands Region. These resources include, but may not be limited to: upland forest, prime groundwater recharge areas, wellhead protection areas, steep slope areas, carbonate rock areas, Highlands Open Water Buffers, habitat for rare, threatened and endangered plants and animals, scenic viewsheds, important farmland soils, and cultural and historic resources. In addition to the detailed narratives, please refer to the mapping included in the enclosed ERIs for depictions of Highlands resources within Holland and Alexandria Townships, Hunterdon County, NJ.

In review of the submitted PennEast Resource Reports, it appears that Highlands Region RMP resources are not specifically delineated, described or noted for special consideration, avoidance, minimization or mitigation. The Highlands Council requests that the FERC take into account the RMP resources during the preparation of the draft EIS, with full understanding that the two Highlands Region municipalities, Alexandria and Holland Township, have both formally resolved to provide for the protections of these resources in their communities.

It is our understanding that FERC must use *best available data* to evaluate the project. The Highlands Council's data for region-wide resources is widely regarded as the most comprehensive and up to date information in the State of New Jersey. Accordingly, Highlands Council staff has analyzed the areal extent of the following resources (not inclusive of all RMP Resources depicted) which intersect the proposed project and lie within the 400-foot study corridor for illustration:

<b>Highlands RMP Resource (Alexandria &amp; Holland Township)</b>	<b>Acreage within 400' Study Corridor</b>
Total Forest	236.50
Prime Groundwater Recharge Area	163.60
Important Farmland Soils	155.90
Critical Habitat	275.90
Carbonate Rock	7.80
Steep Slope Areas	219.20
Scenic Resources	0.28
Highlands Open Water Buffers	277.40
Wellhead Protection Areas	132.60

Please note that the acreage reported for each resource listed above was calculated from our GIS mapping data, as it was used to analyze the official project mapping and does not represent field verified delineation of Highlands Resources. In order to accurately determine impacts to Highlands Resources, field delineation for the extent of certain resources such as forest and critical habitat will be required to be conducted. Other Highlands Resources are static, such as prime groundwater recharge areas and wellhead protection areas, and may be quantified through desktop analysis.

If you have questions regarding the Highlands Council, the RMP, municipal ERIs and the specific Highlands Region resources, please contact me at (908) 879-6737 ext. 101 or via email [margaret.nordstrom@highlands.nj.gov](mailto:margaret.nordstrom@highlands.nj.gov). Our interactive website, <http://www.highlands.state.nj.us/> has links to all of our GIS mapping data, available for public download. We appreciate the opportunity to

facilitate access to comprehensive data regarding the Highlands Region and the resources afforded protection under the Highlands Water Protection and Planning Act and the Regional Master Plan.

Sincerely,



Margaret Nordstrom  
Executive Director

Attachments: Alexandria and Holland Township Highlands ERI  
Alexandria and Holland Township ERI Adoption Resolutions

- c: The Honorable Paul Abraham, Mayor-Alexandria Township, alextwpclerk@embarqmail.com  
The Honorable Ray Krov, Mayor-Holland Township, r.krov@hollandtownship.org  
Ruth Foster, NJDEP – Permit Coordination and Environmental Review,  
ruth.foster@dep.nj.gov  
John Gray, NJDEP - Office of the Commissioner, john.gray@dep.nj.gov