

TOWNSHIP OF KINGWOOD

Environmental Commission Meeting:
Fourth Tuesday of Each Month – 7:30pm
Municipal Building:
Corner of Rt. 519 & Oak Grove Rd.
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Cheryl A. LaFleur, Chairman
Federal Energy Regulatory Commission
888 First Street Northeast, Room 1A
Washington, DC 20426

RE: Docket PF15-1-000

August 18, 2015

Dear Ms. Bose,

Kingwood Township held a special meeting of the Kingwood Township Committee on 10/29/2014 at which the public expressed overwhelming opposition to the proposed PennEast pipeline (FERC Docket PF15-1). Therefore, the Kingwood Township Committee adopted RESOLUTION NO. 2014 – 98 RESOLUTION CONCERNING PENNEAST PIPELINE. Kingwood Township filed written comments to FERC on 2/5/2015 and 2/25/2015, and oral and written comments at the Scoping Meetings detailing the township's concerns about environmental, economic and safety impacts of the pipeline. However, we found that the scoping comments summaries and the Resource Reports have failed to address these concerns. This letter presents our comments on Resource Reports 8, 9 and 11. These are merely examples. We did not undertake to identify each and every omission or deficiency in PennEast's responses.

Penn East Resource Report 8: Land Use, Recreation and Aesthetics

According to PennEast's plan, 34,427.3 linear feet of the proposed pipeline would be installed in Kingwood (34% agricultural land, 61% forested land, 1% open land, 1% residential land, and 3% industrial/commercial (note that wetlands are not a category in this section)).¹ Lands impacted by the pipeline in Kingwood would total 51.6 acres for temporary workspace during construction and 39.5 acres for the permanent pipeline ROW.^{2, 3} An additional 45 locations in Kingwood would require

¹ PennEast Pipeline Project Resource Report 8: Land Use, Recreation, and Aesthetics FERC Docket No. PF15-1-000, Pre-Filing Draft April 2015, page 8-3.

² Ibid, page 8-7.

³ Ibid, page 8-5: The Rights of Way (ROWs) widths would be as follows, according to the report:

50 foot permanent ROW + 50 foot temporary = 100 foot in most areas

50 foot permanent ROW + 50 foot temporary + 25 foot to stockpile topsoil = 125 feet in agricultural areas

75 foot construction corridor in wetlands except where PennEast requests additional space, information not available yet

30 foot permanent ROW in forested areas

10 foot permanent ROW in wetlands

Additional areas, information not available yet

additional temporary workspace (ATWS) totaling 11.8 acres.⁴ PennEast also desires to construct a 1,581 foot access road in Kingwood, near mile marker 86.8 off of Horseshoe Bend Road (driveway to The Church property), which they state would require 0.9 acres.⁵ Mainline Block Valve 6 is planned near mile marker 85.5 in Kingwood on Ridge Road, which would permanently impact 0.1 acres.⁶ PennEast further desires to locate a pipeyard in Kingwood off Route 519 across from Milltown Road, which they state is 25 acres of temporary impacts, which would be allowed to “revert to prior land uses or will be restored”⁷ so they do not anticipate permanent impacts.⁸ The total acreage to be appropriated by PennEast appears to be 88.4 acres for temporary workspace and 40.5 acres of permanent space based on the information provided at this time.

PennEast repeatedly states that, “PennEast has minimized cumulative impacts to land use by co-locating much of the proposed facilities with existing utility corridors.”⁹ However, we question the assumption that co-location will reduce impacts because underground gas pipelines and overhead powerlines cannot safely be placed in close proximity; therefore the two ROWs are more likely additive (i.e. add the widths of the two ROWs, rather than overlap and reduce impacts). This misrepresentation of the facts is disturbing, if it is representative of PennEast’s approach. Table 8.2-3 Co-location of the Project Pipeline Facilities with Existing Rights-of-Way is incomplete. Clearly, we need this information in order to more fully comment and will need adequate time to do so, once that information is received.

With respect to the construction activities, no mention is made of limiting construction activities for the safety and respect of nearby residents. Many of our roads are winding and narrow with no shoulders (i.e. unsuitable for a high volume of traffic or large construction vehicles) and the safety of our children is paramount. Therefore, it would be necessary to place limits on PennEast’s activities in regard to hours of operation, such as no activity while school buses are actively picking up children in the morning and afternoon and on restrictions on lighting and noise. Parking is not permitted along Kingwood’s roads and PennEast must clearly describe how parking would safely be done. Furthermore, Kingwood Township will need financial compensation in regard to damage to township roads and bridges from these overweight vehicles.

Resource Report 8 states, “...there is no facility abandonment or replacement associated with the Project.”¹⁰ Why not? Various estimates of the pipeline’s useful life vary from 5 to 100 years. The US Energy Information Administration estimates the natural gas will run out in 84 years¹¹ at the lower rate of extraction that was occurring when the study was done in 2012. Therefore even the most optimistic expectation must acknowledge that the pipeline will soon become obsolete. As a society, we cannot responsibly leave this financial, environmental and safety liability to successive generations, as previous generations have often burdened our own. PennEast gets all the short-term profits, therefore an escrow fund must be established that will guarantee adequate funding for responsible removal, clean-up and environmental restoration of the pipeline route as soon as the Marcellus Shale gas wells decline in yields.

PennEast repeatedly states that, “Upon completion of the Project, these areas will be allowed to revert

⁴ Ibid, pages 8-55 to 8-57.

⁵ Ibid, page 8-14.

⁶ Ibid, page 8-69.

⁷ Ibid, page 8-16.

⁸ Ibid, page 8-16.

⁹ Ibid, page 8-5 (also pages 8-8, 8-71, 8-85, 8-87, 8-88, 8-89, 8-106, 8-107 and 8-108).

¹⁰ Ibid, page 8-71.

¹¹ U.S. Energy Information Administration. *How much natural gas does the United States have and how long will it last?* Website accessed 2/20/2015. <http://www.eia.gov/tools/faqs/faq.cfm?id=58&t=8>

to prior land uses through natural successional processes or will be restored in accordance with landowner agreements. Therefore, no permanent impacts to these areas are anticipated as a result of the Project."¹² To the local community, by definition, permanent impacts are those that remain after the construction phase is completed, therefore all forested, wetland and stream crossing locations *are permanent impacts*. It is disingenuous to claim that, for example, removal of mature forests of 100 year-old trees would not be a permanent impact. Due to our overpopulation of deer (which would be exacerbated by the huge increase in edge habitat that would result from the pipeline ROW) and the extreme pressure of aggressive invasive species like autumn olive and mile-a-minute vine, cleared forests and other cleared habitats *do not* naturally revert to their prior ecological integrity. Even if they did, the assumption that a tree started through random chance from seed would be immediately equivalent to the lost biomass and benefits of 100 year-old forests is absurd.

PennEast says, "To the greatest extent possible, PennEast has worked with planning officials and private developers to avoid and/or minimize potential direct impacts to residential and commercial areas identified during these discussions."¹³ However, PennEast refused to meet publicly in Kingwood. We believe that just because a landowner isn't currently planning to develop their property doesn't mean PennEast hasn't impacted a landowner's future development potential and potential earnings from their land. Also, PennEast doesn't even consider the intrinsic value of the land, which many people value above the dollar value of development. No consideration is given for properties that are planned for future preservation; while the pipeline would impact the value of the land for conservation purposes.

In Kingwood, PennEast has identified 6 structures within 50' of work areas (2 barns, 2 sheds and 2 houses).¹⁴ "In cases where the workspace cannot reduce [sic] to maintain a 25-foot separation from the residence, a site-specific construction plan will be created."¹⁵ However, when PennEast recently published a route change on 7/22/2015, the new route brought an additional 19 homes within the 400' corridor. Everyone in Kingwood has a well and an on-site septic system and these have not been inventoried at all. We are concerned with damage from construction blasting and vibrations to structures, wells and septic systems which could occur much farther than 25 feet from the proposed pipeline centerline. Is PennEast aware that, because Kingwood soils are generally poor for septic systems, a replacement system costs approximately \$50,000 to \$70,000? Damaged wells may impact residents' health, in addition to the costs of repair, water treatment, and/or well deepening; or possibly an entirely new well, plus abandonment of the ruined well. We are skeptical of PennEast's platitudes because Kingwood landowners were promised by the Buckeye Pipeline that no damage would occur due to construction, but were then never compensated when structures were subsequently damaged by pipeline construction.¹⁶ Clearly, we need full inventories of homes, structures, wells and septic systems and detailed mitigation plans in order to more fully comment and will need adequate time to do so, once that information is received.

We have the same issue with generalized statements about "proper restoration" of agricultural lands and compensation for crop losses when PennEast makes statements such as, "**To the extent possible**, PennEast will maintain landowner access to fields and other agricultural facilities during construction [emphasis added]."¹⁷ We feel like PennEast will only do what they deem is "possible" for their own convenience and we don't feel that issues have been adequately addressed, such as loss of access to

¹² PennEast Pipeline Project Resource Report 8, page 8-16 (also pages 8-105 and 8-106).

¹³ Ibid, page 8-71.

¹⁴ Ibid, page 8-79.

¹⁵ Ibid, page 8-72.

¹⁶ William Pandey, October 29, 2014 Kingwood Township Committee Special Meeting.

¹⁷ Ibid, page 8-83.

portions of a property (temporary and permanent); loss of flexibility in the use of the entire property; loss of potential to be organic farms; permanent crop loss related to construction and maintenance of the ROW; loss of options for trees; stray voltage; pipeline heat; loss of property value; adequate depth of the pipeline; changes in water flow due to water following the pipeline route; damage to the soil (especially if construction would be done when soils are wet); and introduction of invasive species. Also, not only does this construction affect the landowner but if the property is actively farmed by a tenant farmer, they are financially effected as they lose part of their crop (especially if a crop is planted at the time of construction) for the year or longer or permanently.

No areas used for timber production were identified,¹⁸ however there are several managed woodlands in the pipeline route within Kingwood which PennEast failed to identify.

PennEast states, “To the extent possible, PennEast has minimized impacts to conservation areas”¹⁹ This is another statement which doesn’t seem to be upheld by the evidence. According to PennEast’s inventory (which failed to note Block 23 Lot 17 in Kingwood), a total of 61 state owned lands would be crossed by the pipeline (one in Kingwood), plus 61 lands with private easements (6 plus an additional lot that PennEast failed to note in Kingwood). Within Kingwood, 23 to 24% of the length and acres affected by the proposed pipeline is on preserved land. Preservation of these lands used public and private funds specifically to set them aside for conservation and/or farmland; NOT to provide a convenient location for a pipeline that cannot be proven to provide public benefit.

This table excerpts Kingwood preserved parcels from Table 8.4-1 and Table 8.4-2²⁰

Tax-ID	Begin MP End MP	Land Owner	Managing Agency	Easement Type	Approximate Crossing Length (feet)	Land Affected During Construction (acres)	Land Affected During Operation (acres)
1016-12-19	86.3 86.5	Private	County of Hunterdon Agricultural	Agricultural	1,118.9	3.2	1.3
1016-12-31	87.0 87.3	Private	NJCF Conservation	Conservation	1,655.3	4.2	1.9
1016-23-17	Not included in inventory by PennEast						
1016-24-4	89.1 89.3	Private [Frenchtown Solar]	Delaware and Raritan Canal Commission Conservation	Conservation	996.7	2.4	1.1
1016-24-14.01	89.9 90.2	Hunterdon Land Trust Alliance	NJDEP Conservation	Conservation	1,519.0	4.0	1.7
1016-24-8	89.3 89.6	NJDEP	State owned land		1,432.1	2.9	1.6
1016-26-4	90.2 90.4	Private	Unknown Conservation	Conservation	1,129.3	3.7	1.3
1016-36-11	91.5 91.5	Private	Hunterdon County Agricultural Development Committee	Agricultural	220.2	0.5	0.3
Total:					8071.5	20.9	9.2
% of Pipeline Impacts in Kingwood that would occur on Preserved Land:					23%	24%	23%

PennEast states that, “Details on mitigation measures that will be used to reduce impacts from pipeline construction and operation are discussed in more detail in Section 8.3.4” and “... in Section 8.3.3.”²¹

¹⁸ Ibid, page 8-83.

¹⁹ Ibid, page 8-89.

²⁰ Ibid, pages 8-93 and 8-96.

However, these “details” are superficial. Clearly, we need this information in order to more fully comment and will need adequate time to do so, once that information is received.

According to PennEast’s calculations, construction would “temporarily” affect approximately 555.6 acres of forested land. Approximately 468.2 acres would permanently remain open land or be used for facilities, while “Development of the adjacent temporary and non-maintained permanent ROW will require temporary removal of the trees in this area”²² and “will be allowed to revert to forest through natural successional processes.”²³ Much of the proposed route bisects Core Forest areas (> 10 hectare contiguous forests).²⁴ Many of our rare, threatened and endangered wildlife species require these vanishing habitats, and therefore special efforts must be made to preserve them; *not* destroy their integrity with pipeline ROWs. As previously stated, “allowing” natural succession to occur will not result in an ecologically equivalent functioning ecosystem due to the overpopulation of deer and pressure from invasive species. In addition, approximately 62% of the impacted forests in Kingwood are mature deciduous, coniferous or mixed forests with crown closure > 50%.²⁵ That fact, plus a comparison of today’s forested areas to aerial photos from 1930,²⁶ make it clear that many of our forests have been growing for over 100 years. It should not need to be said that the loss of 100 year-old trees is not “temporary,” but is permanent on the scale of several generations. Destruction of old growth trees cannot be mitigated.

Resource Report 8 states that, “PennEast has minimized impacts to visual resources from construction of the pipeline segments by proposing to co-locate the pipeline with existing pipeline ROWs to the extent practical.”²⁷ It is necessary to reiterate that co-location is a misnomer, since gas and electric utilities must be separated for safety, the ROWs will be additive, and the visual impact will therefore be augmented, not diminished, by “co-location”. It further claims that, “Visual impacts associated with the Project have been evaluated, minimized, and avoided wherever possible.”²⁸ Since PennEast neglects to consider local scenic resources (they only mention federally and state designated scenic resources and no visual mitigation plans are provided), we don’t agree with this statement. Local land values depend greatly on scenic resources, i.e. keeping the area as natural and rustic looking as possible.

PennEast concludes Resource Report 8 with the following statement, “**Taking into account all past, present, and likely future impacts, the cumulative impacts to land use are currently expected to be minimal. Therefore, at this time there are no reasonable and foreseeable future impacts to land use arising from the Project** [emphasis added].”²⁹ We heartily disagree with this negligent statement that completely discounts the value of our homes and land. The loss of 220.5 acres of agricultural lands permanently and 381.1 acres “temporarily” (13.3 acres permanently lost and 21.0 acres “temporarily” lost in Kingwood) (more if loss of access to lands is considered) should be fully taken into account. A British Columbian farmer impacted by a pipeline expressed this concern well, “In the end, all of society loses if we do not defend our agriculture land. The planet is running out of decent agriculture land as

²¹ Ibid, page 8-105 and 8-106.

²² Ibid, page 8-106.

²³ Ibid, page 8-105.

²⁴ NJDEP. *Species Based Habitat, Skylands Region (Version 3.1) and Vernal Pools*. February 21, 2012. <http://www.nj.gov/dep/gis/listall.html>

²⁵ NJ Office of Information Resources Management. *2007 Land use/Land Cover Update, Central Delaware Watershed Management Area, WMA11*. July 2010. <http://www.state.nj.us/dep/gis/digidownload/zips/lulc07/w11lu07.zip>

²⁶ NJDEP. 2005. NJDEP 1930 Aerial Photography of New Jersey (Black and White). <http://njwebmap.state.nj.us/njimagery?>

²⁷ Ibid, page 8-106.

²⁸ Ibid, page 8-108.

²⁹ Ibid, page 8-108.

populations swell and demand for high quality food increases. By 2050, we will have 9 billion people on the planet; we are now just over 7 billion at the time of writing.”³⁰

Penn East Resource Report 9: Air and Noise Quality

PennEast states that the project’s operational total Potential to Emit (PTE) will equal 212,698 tons per year of GHG (greenhouse gas equivalents).³¹ This number does not include emissions from production to end use of the natural gas. If comprehensive impacts from the industry are evaluated, studies have shown that fracked natural gas is NOT cleaner than other fossil fuels. One such study concluded, “Considering the 20-year horizon, the GHG footprint for shale gas is at least 20% greater than and perhaps more than twice as great as that for coal when expressed per quantity of energy available during combustion Over the 100-year frame, the GHG footprint is comparable to that for coal... For the 20 year horizon, the GHG footprint of shale gas is at least 50% greater than for oil, and perhaps 2.5-times greater. At the 100-year time scale, the footprint for shale gas is similar to or 35% greater than for oil.”³²

A recent EPA analysis of significant reduction of GHG emissions compared to a future in which current emissions continue to grow found that, “Mitigation is estimated to result in significant public health benefits in the U.S., such as avoiding 13,000 premature deaths in 2050 and 57,000 premature deaths in 2100. Economic benefits to the U.S. of avoided premature deaths are estimated at \$160 billion in 2050, and \$930 billion in 2100.”³³ Note that the numbers given are *annual* deaths and economic benefits and that without mitigation, impacts increase in each year that GHGs are not significantly reduced. Granting PennEast a certificate of public convenience and necessity would be the opposite of the global action that the EPA has determined is needed to prevent the impacts of global climate change such the one cited above (the EPA study lists many others). Of course, many other actions are needed to slow climate change, but additional pipelines would result in accelerated GHGs being released into the atmosphere and not in the reduction that is urgently needed. Therefore we ask that FERC institute an immediate moratorium on new pipelines in addition to immediately denying PennEast a certificate of public convenience and necessity.

We are also concerned that PennEast, if approved, plans to mitigate dust during construction with water, but does not state where this water will come from.³⁴ As previously stated, Kingwood is concerned about potential impacts to our limited ground and surface water resources. If the weather during construction is dry enough to produce dust problems, our streams will be suffering low-flow or possibly no-flow conditions and our wells will be receiving no recharge. Therefore our surface and ground water will not be available for this use and PennEast needs to include information about where the water will come from in a revised resource report.

³⁰ Tom Baumann. Energy Pipelines and Agriculture: How much do we stand to lose/gain? In Modern Agriculture.

<http://modernagriculture.ca/energy-pipelines-and-agriculture-how-much-do-we-stand-to-losegain/>, accessed 7/14/2015.

³¹ PennEast Pipeline Project Resource 9: Air and Noise Quality FERC Docket No. PF15-1-000, Pre-Filing Draft April 2015, page 9-11

³² Howarth, R. W., R. Santoro, and A. Ingraffea. 2011. Methane and the greenhouse gas footprint of natural gas from shale formations. Climatic Change Letters, DOI: 10.1007/s10584-011-0061-5 http://www.eeb.cornell.edu/howarth/publications/GHG_update_April_11_2011.pdf and Howarth, R. W., R. Santoro, and A. Ingraffea. 2012. Venting and leakage of methane from shale gas development: Reply to Cathles et al. Climatic Change. doi:10.1007/s10584-012-0401-0. http://www.eeb.cornell.edu/howarth/publications/Howarthetal2012_Final.pdf

³³ EPA. 2015. Climate Change in the United States: Benefits of Global Action. United States Environmental Protection Agency, Office of Atmospheric Programs, EPA 430-R-15-001.

³⁴ PennEast Pipeline Project Resource 9: Air and Noise Quality FERC Docket No. PF15-1-000, Pre-Filing Draft April 2015, page 9-12

Most of the section of the report that would address noise pollution is blank. Clearly, we need this information in order to more fully comment and will need adequate time to do so, once that information is received.

Penn East Resource Report 11: Reliability and Safety

Kingwood Township agrees with PennEast's statement, "...it is imperative that [pipelines] be safe and reliable" but we are not comfortable with the next sentence, "Overall, the natural gas transmission industry has an excellent record of safety and reliability."³⁵ Catastrophic events and near-misses concerning natural gas pipelines occur with alarming regularity, including recent incidents here in Kingwood on 4/23/2015³⁶ and nearby in Holland Township on 1/25/2015³⁷.

The federal Pipeline and Hazardous Materials Safety Administration (PHMSA) admits to the very dangerous nature of gas pipelines, *hoping* to lower the accident rate and achieve the following safety and environmental goals by 2016:

- "Reduce the number of pipeline incidents involving death or major injury to between 26-37 per year..." and
- "Reduce the number of hazardous materials incidents with environmental damage to between 44-64 per year."³⁸

We do not find these numbers encouraging and we have no desire for our loved ones, environment or property to be among those losses that PennEast and PHMSA find acceptable. We are also not mollified by PennEast's expectation to monitor the pipeline for integrity every 7 years.³⁹

Based on population density and statements made by PennEast, we expect Kingwood to be classified as "Class 1" which receives the lowest safety and construction requirements. In this report, it is stated that "Class locations representing more populated areas require higher safety factors in pipeline design, testing, and operation. In accordance with USDOT requirements, pipelines constructed on land in Class 1 locations must be installed with a minimum depth of cover of **30 inches in normal soil (18 inches in consolidated rock)**. Pipelines in Class 2, 3, and 4 locations, as well as under drainage ditches of public roads and railroad crossings, must be installed with a minimum cover of **36 inches in normal soil (24 inches in consolidated rock)** [emphasis added]."⁴⁰ Roughly half of the proposed pipeline route through Kingwood has very shallow depth to bedrock, and according to the preceding statement, the pipeline would be only 18" deep (24" below roads), increasing the safety risks from surface activities such as farming or downed power lines (as occurred in the previously mentioned near-disaster in Kingwood which required the emergency evacuation of the entire elementary school). A quick perusal of incidents in the news shows that the one-call system and pipeline markers are ineffective in preventing frequent, and sometimes tragic, incidents.

A Mainline Valve station is planned in Kingwood, and this increases the risks in our township of intentional and unintentional "fugitive emissions" gas leaks. It appears that meaningful research and

³⁵ PennEast Pipeline Project Resource Report 11: Reliability and Safety FERC Docket No. PF15-1-000, Pre-Filing Draft, page 11-1

³⁶ http://www.nj.com/hunterdon-county-democrat/index.ssf/2015/04/gas_leak_evacuates_kingwood_twp_school_this_mornin.html, accessed 7/9/2015

³⁷ http://www.nj.com/hunterdon-county-democrat/index.ssf/2015/01/gas_leak_closes_multiple_roads_in_holland_township.html, accessed 7/9/2015

³⁸ <http://www.phmsa.dot.gov/about/mission>, accessed 7/9/2015

³⁹ PennEast Pipeline Project Resource Report 11: Reliability and Safety FERC Docket No. PF15-1-000, Pre-Filing Draft, page 11-7

⁴⁰ PennEast Pipeline Project Resource Report 11: Reliability and Safety FERC Docket No. PF15-1-000, Pre-Filing Draft, page 11-3

monitoring on such leaks is lacking industry-wide, and EPA acknowledged that estimates from 1996 drastically underestimated the scale of the problem.^{41,42} Therefore, it is disingenuous to ignore our concerns with statements like, “routine maintenance and proper construction of the pipeline will **substantially reduce fugitive emissions** from the equipment [emphasis added]” and that methane and ethane are “Not emitted, unless through leaks of above ground components (Valves, flanges, etc.).”⁴³ While PennEast plans to remotely monitor pressure in the pipelines, we question whether this would detect fugitive emissions, and if such leaks are detected, what leak level is acceptable to PennEast? How much natural gas may be released, intentionally or accidentally, during maintenance or incidents? We request that in addition to simply monitoring pressure, PennEast should be required to use other monitoring technologies, such as optical gas imaging instruments, organic vapor analyzers (OVA), toxic vapor analyzers (TVA) and infrared laser beam illuminated instruments or acoustic leak detection instruments and to take appropriate measures to immediately stop all leaks.

In addition, “Table 11.3-1 High Consequence Areas Crossed by the Pipeline Facilities, by County” is blank and “Appendix11-A Pipeline Class” and “Table 11A-1 Pipeline Class Locations” are completely missing. Clearly, we need this information in order to more fully comment and will need adequate time to do so, once that information is received.

Finally, no mention is made in this report, which is supposed to address safety, about special safety considerations during construction and operation of locations where the natural gas pipeline would cross the existing Buckeye gasoline pipeline, which Resource Report 8 says occurs at mile marker 90.7 and 90.8. Is there only one crossing of the two? How close are the two at other locations? In addition, what are the safety considerations during construction and operation related to overhead power lines? The lack of detail in addressing safety issues for all aspects of construction, post construction and maintenance offers an astoundingly incomplete report.

Conclusion

PennEast’s Resource Reports are full of inaccuracies and incomplete information and analyses. They erroneously conclude that impacts, if any, are insignificant. They failed to adequately address issues raised during the scoping process. They failed to justify economic benefits that would exceed the economic impacts. Mitigation plans are inadequate to prevent impacts to our environmental resources critical to our local economies.

PennEast repeatedly states that impacts have been “minimized,” however closer examination reveals that the pipeline route plows through without regard for our forests, farms, C-1 streams, exceptional value wetlands, threatened and endangered species habitats, and vulnerable surface and ground water resources. Instead of drawing a straight line between arbitrary beginning and endpoints for their proposed pipeline, with only nominal regard for the sensitive resources they would be impacting, PennEast should be required to begin their planning process from scratch, determining beginning and endpoints based on whether or not there is a need for more natural gas in New Jersey, and then actually using the criteria they claim to have used (i.e. avoiding preserved open space, wetlands, forests, etc.).

⁴¹ USEPA. 2010. Greenhouse Gas Emissions Reporting From The Petroleum And Natural Gas Industry Background Technical Support Document, <http://www.epa.gov/ghgreporting/documents/pdf/2009/Background-TSD-posted-4-12-10-EPA-HQ-OAR-2009-0923-0027.pdf>

⁴² Howarth, R. W., R. Santoro, and A. Ingraffea. 2011. Methane and the greenhouse gas footprint of natural gas from shale formations. Climatic Change Letters, DOI: 10.1007/s10584-011-0061-5 http://www.eeb.cornell.edu/howarth/publications/GHG_update_April_11_2011.pdf and Howarth, R. W., R. Santoro, and A. Ingraffea. 2012. Venting and leakage of methane from shale gas development: Reply to Cathles et al. Climatic Change. doi:10.1007/s10584-012-0401-0. http://www.eeb.cornell.edu/howarth/publications/Howarthetal2012_Final.pdf

⁴³ PennEast Table 1: FERC Scoping Meeting Comments and Fed/State/Local Agency Comments Posted January 13 – March 20, 2015

We ask FERC to recognize that, while the public might *desire* cheap energy in the short term (and cheaper energy is in no way guaranteed by this pipeline), the public *needs* clean water and clean air now and forever. New Jersey's State Development and Redevelopment Plan declares that, "**The future environmental and economic integrity of the state rests in the protection of these irreplaceable resources** [emphasis added]." ⁴⁴ While PennEast attempts to masquerade their *want* of profits as a public good, the public *needs* greenhouse gases to be reduced now for long-term benefits. Therefore, we ask that you deny Docket 15-1-000 the certificate of public convenience and necessity that they desire, because this new pipeline is *not* what the public needs.

Thank you for your consideration of Kingwood Township's comments.

Sincerely,



Deborah J. Kratzer
Chair, Kingwood Environmental Commission

CC: Kingwood Township Committee
Kingwood Planning Board
Kingwood Board of Health
Congressman Leonard Lance
Senator Robert Menendez
Senator Cory Booker
Assemblyman John DiMaio
Assemblyman Erik Peterson
Senator Michael J. Doherty
Hunterdon County Freeholders
John Gray, Acting Director, NJDEP Office of Permit Coordination and Environmental Review
Frank J. Cianfrani, Chief Regulatory Branch, U.S. Army Corps of Engineers
Steve Tambini, Executive Director, Delaware River Basin Commission
Barbara Rudnick, P.G. NEPA Team Leader, EPA Region III
Medha Kochhar, Project Manager, FERC
Sean Sparks, Tetra Tech EC, Inc.
Anthony C. Cox, PennEast Pipeline Company, LLC

⁴⁴ New Jersey State Planning Commission. 2001. NJ State Development and Redevelopment Plan. <http://www.state.nj.us/state/planning/spc-state-plan.html>. Page 34.

Document Content(s)

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