

TOWNSHIP OF KINGWOOD

Environmental Commission Meeting:
Fourth Tuesday of Each Month – 7:30pm
Municipal Building:
Corner of Rt. 519 & Oak Grove Rd.
Fax: (908) 996-7753



Address Reply To:
Cynthia Keller, EC Secretary
P.O. Box 199
Baptistown, NJ 08803-0199
Phone: (908) 996-4276

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street Northeast, Room 1A
Washington, DC 20426

Re: Docket CP15-558-000 – Proposed PennEast Pipeline Project
Draft EIS fails to adequately address Cultural Resources

September 11, 2016

Dear Ms. Bose,

The Kingwood Township Environmental Commission is submitting these comments in opposition to the proposed PennEast Pipeline Docket CP15-558-000. Kingwood Township Environmental Commission is an intervenor in this matter and Kingwood Township is an impacted landowner on the proposed route. Both the construction and the long term functioning and maintenance of this pipeline would put our surface water at risk and violate the Clean Water Act. It has been demonstrated that there is no need for this pipeline carrying an additional 1.1 million dekatherms per day year-round, which would displace existing sources. In fact, no residents of Kingwood are served by natural gas at all. Instead, we are in effect a net exporter of sustainable solar energy.* We can and do obtain our energy needs from other sources, but we cannot replace our precious surface water.

The draft Environmental Impact Statement (DEIS) released by FERC on July 22, 2016 does not accurately describe Kingwood’s cultural resources or evaluate the potential impacts, therefore it does not fulfill FERC’s NEPA obligation.

5.1.9 Cultural Resources

FERC admits in the first sentence in this section “A sizeable portion of the Project has NOT been investigated for cultural resources.” The paltry figure of the investigation of both archaeological and above ground sites in both states by PennEast is alarming considering the number of miles of historically rich area the PennEast pipeline crosses.

It is encouraging to see that FERC is “recommending” more detailed documentation be performed by PennEast but “REQUIRING” more detail documentation would be a more suitable response. By only recommending documentation the choice is left, without consequence, to the developer.

In one instance, an archaeological site in Kingwood Township, Hunterdon County, NJ, PennEast conducted an archaeological investigation that was so unprofessional and counter intuitive to how investigations of this type are conducted it was appalling. A backhoe was brought in and random pits were dug on a property without respect to the potential findings (photo documentation is available). Less than a half mile away, a Native American site had been excavated in the proper way revealing a rich cultural life in the region.

FERC again should not lightly “recommend” the PennEast not begin construction of the pipeline until any additional reports under section 106 of the National Historic Preservation Act are met, FERC should “REQUIRE” the same.

Thank you for your full consideration of Kingwood Township’s comments.

Sincerely,

The Kingwood Township Environmental Commission

CC: Kingwood Township Committee
Congressman Leonard Lance
Senator Robert Menendez
Senator Cory Booker
Assemblyman John DiMaio
Assemblyman Erik Peterson
Senator Michael J. Doherty
Hunterdon County Freeholders

* Kingwood Township Environmental Commission. 09/25/2015. *Comment of Kingwood Township Environmental Commission on Resource Reports 1, 4, 5, and 10 under PF15-1*. Submittal 20150925-5008 to FERC DOCKET PF15-1. <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13995592>