

II. INTEREST OF PETITIONER

In support of its motion to intervene, MCPC Mission Statement provides that:

The aims of the Mercer County Park Commission shall be to provide recreation for all persons of all ages and creeds; to meet the recreational need as it exists and as it changes with the times; to serve, promote, encourage, and stimulate interests in leisure time activities for the benefit of the common wealth; to satisfy the general public at minimal cost with maximum recreational facilities, in keeping with the governmental functions; to preserve open space for the conservation of natural, historic, and scenic areas; to assist in programs dedicated to the preservation of wildlife; to participate in soil and water conservation projects; and to provide areas, facilities, personnel, finance, program, administration, and leadership to the betterment of man and woman.

The MCPC currently oversees the following parks and recreation areas:

1. Abbott Marshlands
2. Baldpate Mountain
3. Herrontown Woods Arboretum
4. Howell Living History Farm
5. John A. Roebling Memorial Park
6. Mercer County Park
7. Mercer Meadows
8. Millyard Park
9. South Riverwalk Park

It's facilities include:

1. Arm and Hammer Park at Waterfront Park
2. Docks on the Delaware
3. Equestrian Center
4. Festival Grounds
5. Golf Courses (4)
6. Ice Skating Center
7. Mercer County Park Marina and Boathouse
8. Picnic Areas
9. Tennis Center
10. The Historic Hunt House

The MCPC's Environmental concerns include:

1. Deer management
2. Nature programs
3. Open space
4. Stewardship
5. Summer nature camp
6. Volunteer opportunities

The citizens of Mercer County have repeatedly and overwhelmingly approved referenda supporting open space and farmland preservation, largely for the purpose of environmental protection. Bolstered by that support, and the accompanying funding provided through Mercer County's open space tax, MCPC, together with Mercer County, and the municipalities within the County's borders, have made great strides in the acquisition and preservation of open space, woodlands and farmland, thereby ensuring future generations will have the opportunity to enjoy said natural resources.

The PennEast Project presents a threat to these preserved natural, cultural and historic resources. In addition, environmentally sensitive ecosystems found in lands included in and adjacent to MCPC property are potentially located within the Project's pathway. It follows that the interests of the Mercer County residents are best served through the participation of the public entity in the present matter, so as to ensure that the achievements obtained through the MCPC's preservation efforts are neither compromised nor diminished by the Project.

It is in the public interest that the MCPC takes part in this proceeding.

III. CONCLUSION

Wherefore, the Mercer County Parks Commission respectfully requests that the Commission grant its Motion to Intervene as a party with full rights to participate in all further proceedings.

Respectfully submitted,

Dated: October 14, 2015

/s/ R. David Blake _____
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