



The New Jersey
NATURAL LANDS TRUST

October 21, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Docket# CP15-558

Dear Secretary Bose:

Please accept this comment on behalf of the New Jersey Natural Lands Trust (NJNLT), an independent New Jersey state agency that is in but not of the New Jersey Department of Environmental Protection. As prescribed by law, the NJNLT is governed by an 11-member Board of Trustees, six of whom are representatives of conservation organizations. The New Jersey Legislature created the NJNLT in 1968 as an organization that could accept land donations and ensure their protection in perpetuity by resisting the exercise of eminent domain by public agencies. The New Jersey Legislature specifically gave the NJNLT this authority in response to attempts at that time to condemn and develop preserved property. Another critical mission of the NJNLT is to conserve elements of biodiversity including habitat for rare plant and animal species, and rare ecological communities.

The proposed PennEast pipeline route traverses five NJNLT-managed properties within its Gravel Hill Preserve in Holland Township, Hunterdon County, NJ. The 400-foot pipeline study corridor also includes a portion of the NJNLT's Thomas F. Breden Preserve at Milford Bluffs (also within Holland Township), although PennEast has assured the NJNLT that it has no intention of using any portion of that preserve for construction or staging.

As early as March 2015 the NJNLT requested that PennEast avoid the Gravel Hill Preserve consistent with the NJNLT's statutory purpose as well as the presence of habitat for the state-endangered bobcat and a rare plant, wild comfrey. In addition to avoiding the existing preserve, the NJNLT requested that PennEast also avoid the larger Gravel Hill Project Area. Based on the presence of rare species habitat, the NJNLT Board designated the lands within the Project Area boundary as a high priority for acquisition and inclusion in the Gravel Hill Preserve.

In order to avoid the Gravel Hill Preserve and Project Area, the NJNLT requested that PennEast install the pipeline within county roads that surround the preserve. The enclosed attachment depicts PennEast's current proposed route through Gravel Hill Preserve along with NJNLT's

proposed alternate route. Although PennEast assured the NJNLT that it would consider the road installation alternative, as well as an alternative of co-locating its pipeline within two existing transmission line rights of way, PennEast's September 2015 application to FERC continues to show the pipeline being routed through the NJNLT's Gravel Hill Preserve. Notwithstanding its FERC application, PennEast has advised the NJNLT that it is still studying alternatives including the road installation alternative. However, in recent meetings PennEast's representatives have suggested that FERC discourages the placement of pipelines within roads or that the road installation may be too costly.

FERC has an obligation to ensure that approved projects do not result in significant environmental impacts and that reasonable and feasible alternatives are fully vetted. The NJNLT respectfully submits that property preserved in perpetuity and that supports rare species habitat should not be designated as the preferred route if viable, less environmentally damaging alternatives exist. Portions of the Gravel Hill Preserve that are targeted in the application include a mature forest with a natural understory and a general absence of invasive plant species. If this forest was subject to clearing for the installation of the pipeline, it would detrimentally impact the understory species that thrive on a closed tree canopy and increase the likelihood for the introduction of invasive plant species, thereby permanently altering the integrity of this ecological community. The NJNLT believes that pipeline installation is feasible within the county roads that surround the preserve boundary. This is a rural low traffic area. The NJNLT is not aware of any existing infrastructure within the subject roadways and there appear to be viable options for detours during construction.

Based on these factors, we respectfully request that FERC fully investigate alternatives to the current preferred route that would impact our Gravel Hill Preserve and require PennEast to avoid the NJNLT's Gravel Hill Preserve if a viable, less environmentally damaging alternative is available.

Thank you for the opportunity to provide this comment.

Sincerely,

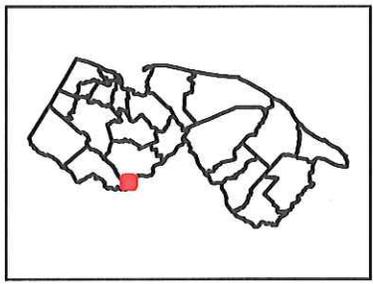


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Rich Boornazian, NJDEP, NHRG
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Robin Madden, NJDEP, NHRG
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NJNLT Proposed Alternate Pipeline Route to Avoid Gravel Hill Preserve and NJNLT Project Areas

New Jersey



Legend

-  PennEast
-  Proposed Pipeline
-  NJNLT Preserve
-  NJNLT Project Area

