



The New Jersey  
NATURAL LANDS TRUST

December 17, 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 (NJDEP). This comment responds to PennEast's Responses to NJDEP filed with FERC on December 14, 2015.

The proposed PennEast pipeline route traverses NJNLT-managed properties within its Gravel Hill Preserve in Holland Township, Hunterdon County, NJ. 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 both the Gravel Hill Preserve and Project Area, the NJNLT requested that PennEast install the pipeline within county roads that surround the preserve as depicted on the attached map. Hunterdon County has advised NJDEP that, as a general rule, it has no objection to pipelines being installed within county roads. Although PennEast assured the NJNLT that it would consider the road installation alternative to avoid impacting preserved land, its December 14, 2015 comments indicate that it is "focused on maximizing [use of] existing cleared utility lines and agricultural fields within the preserve." PennEast has provided nothing to the NJNLT to suggest that it has fully evaluated the county roadway alternative. PennEast further indicates that a "detailed alternatives evaluation assessing how PennEast plans to avoid or minimize potential impacts to State lands, including the use of existing utility corridors and roadways, will be provided to the NJDEP in the permit applications as required." PennEast's plan to only share its alternatives analysis upon the submission of permit applications is new and contrary to what has been promised to the NJNLT since March 2015. The NJNLT is concerned that PennEast's new plan to provide its alternatives analysis towards the end of the process greatly limits a full vetting of the reasonable and feasible alternatives to avoid impacts to preserved land, land that was preserved in perpetuity with the confidence and support of New Jersey taxpayers.

FERC has an obligation to ensure that reasonable and feasible alternatives are fully reviewed so that approved projects do not result in unnecessary environmental impacts. The NJNLT respectfully submits that preserved property that supports rare species habitat should not be designated as the preferred route if viable, less environmentally damaging alternatives exist. As stated in earlier submissions to FERC, 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 any route proposed by PennEast that that would impact the Gravel Hill preserve and require PennEast to avoid the NJNLT's Gravel Hill Preserve if a viable, less environmentally damaging alternative is identified.

Thank you for the opportunity to provide this comment.

Sincerely,



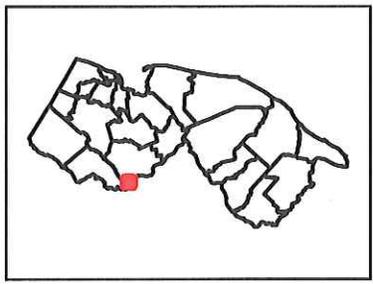
Michael Catania  
Chair

Enclosure

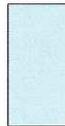
c: Medha Kochhar, FERC  
Anthony Cox, PennEast  
Jeff England, PennEast  
Marilyn Lennon, PS&S  
Ruth Foster, NJDEP, PCER  
Rich Boornazian, NJDEP, NHRG  
Lynn Fleming, NJDEP, SFS  
Robin Madden, NJDEP, NHRG  
Robert Cartica, NJNLT

**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

