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FEDERAL ENERGY
REGULATORY COMMISSION

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August 11, 2016

Kimberley Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket CP15-558-000 – Proposed PennEast Pipeline Project

Dear Ms. Bose:

I am writing this letter on behalf of the Sourland Conservancy, an intervenor in this proceeding. The Sourland Conservancy's mission is to protect, promote and preserve the unique character of the Sourland Mountain region, through which the proposed PennEast Pipeline will cut a devastating path. The Conservancy is located in Hopewell, NJ in Mercer County. The Sourland Mountain region lies, within Somerset, Hunterdon and Mercer Counties.

The Sourland Conservancy endorses the comments by Cliff Wilson filed to FERC on February 26, 2015. The excerpt from his comments, below, contains important information to be taken into consideration during the EIS:

Impact on the Endangered Sourland Forest

The Sourland Mountain region is a particular focus of preservation efforts in New Jersey. Though the entire area is only about 90 square miles in size, it is home to the largest contiguous forest in Central New Jersey. This forest, just west of the heavily developed corridor connecting New York City with Philadelphia, almost miraculously remains a vibrant natural ecosystem, home to numerous species of animals and plants, both common and rare. It is an important stopover and breeding ground for migrating birds, and is a popular recreation resource for people, who retreat to the Sourlands for hiking, horseback riding, birding, bouldering, hunting and fishing, among many other activities.

Unfortunately, the Sourland Forest is in trouble; indeed it will die off completely over the next century if action is not taken to save it. Development is an ongoing threat. The Sourlands are fairly well protected from large-scale development; all of the municipalities in the Sourlands recognize the environmentally sensitive character of the mountain, and have in place zoning and other regulations to prevent wholesale

development. Rather, the threat is now from smaller-scale development – a new cul-de-sac here, a big solar array there, a new gas pipeline through the heart of the forest. This is the threat of “death by a thousand cuts.”

A second principal threat to the forest comes from a grotesque overpopulation of deer. While mature trees in the forest are largely healthy, the forest itself is slowly dying because deer destroy virtually every sapling. Thus, there are no healthy young trees to replace mature trees that, sooner or later, meet the fate of all living things. The most recent head count puts the deer population in parts of the Sourlands at more than 200 per square mile. For comparison, the population density that would permit forest regeneration is variously estimated to be between five and 15 deer per square mile.

These two problems are interrelated. Development fragments the forest, reducing the habitat for many species but increasing the preferred habitat for deer. Deer are an edge-of-woods creature, and each new cut through the woods creates more edge. A pipeline through the woods is particularly damaging in this regard, since it creates the maximum amount of new edge. Even planting a large number of new trees elsewhere in the Sourlands would not compensate for the damage done.

The Sourland Conservancy and other environmental organizations believe we can turn back these threats and are working hard to save the Sourland Forest. We ask that FERC take a particularly hard look at the impact of the proposed PennEast pipeline on the already endangered Sourland Forest. When an ecosystem is teetering on the edge of viability, even a modest new stress can be fatal.

I liken the Sourland Forest to a young patient in critical condition, with a team of doctors working diligently to save her life. In walks her dentist, who wants to remove a wisdom tooth. While this procedure may be routine for a patient in good health, it is clearly unwise to attempt on this patient at this time. She and her doctors need FERC to appropriately regulate the dentist.

PennEast certainly appears to be as clueless as the dentist in this analogy. At a large public information session, representatives of the Sourland Conservancy separately asked more than a dozen representatives of the company their thoughts on protecting the Sourlands; only one even recognized the name, and that was the extent of her knowledge about the area. It seems the company’s planning methodology was to draw a straight line on a map and then see who screams.

Finally, I would like to address the question of NIMBYism. I have been advised not to argue the importance of the Sourland Forest, as that would amount to NIMBYism. I wholeheartedly disagree. The Sourland Forest is a unique and critically important environmental asset. Indeed, in highly developed Central New Jersey, any remaining natural area with a functioning ecosystem is worthy of the highest degree of protection.

It is important for FERC to recognize the scarcity of such resources in Central New Jersey. Degradation of a tiny forest might not mean very much in Wyoming or rural Maine or even Pennsylvania. But here, in one of the world's most heavily developed population centers, it means everything. Despite the clear will of the people of New Jersey and the heroic efforts of countless environmentalists, is Central New Jersey to be left with no natural areas whatsoever?

I believe the pipeline project is a very bad idea and should be killed. There is no shortage of natural gas in New Jersey; if the PennEast consortium wishes to export its fracked Pennsylvania gas, it must figure out a way to do so without damaging some of New Jersey's most fragile and important ecological resources.

Cliff Wilson

Finally, It is clear from the DEIS that thousands of pages of comments already submitted are being ignored. I am expecting a written response to my comments.

Sincerely,

A handwritten signature in black ink that reads "Caroline Katmann". The signature is written in a cursive, flowing style.

Caroline Katmann
Executive Director
Sourland Conservancy

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