**ISSUE: OUTREACH EFFORTS & PUBLIC PARTICIPATION DID NOT JUSTIFY DEIS CONCLUSIONS**

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Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101), and I am writing to make sure that FERC knows that their “outreach efforts” for public participation were not what they led readers of the DEIS to believe.

When FERC staff wrote that one of their reasons for believing their conclusions in this DEIS that, with implementation of measures proposed by Williams/Transco (and not completed to date) as well as recommendations from FERC (again – not completed to date), was that there was “A high level of public participation was achieved during the pre-filing and post-application review processes and helped inform our analysis” (DEIS, page ES-13), I was left speechless. Here are the facts, as presented by FERC in the DEIS (pages 1-6, 1-7):

FERC’s Open Houses (June 2016)

Brooklyn, NY = 15 attendees

Old Bridge, NJ = 25 attendees

Lancaster County, PA – 35 attendees

Franklin Twp., NJ = 250 attendees

Scoping Sessions (September 2016)

Brooklyn, NY = 15 attendees

Old Bridge, NJ = 50 attendees

Quarryville, PA = 10 attendees

Somerset (Franklin Twp.), NJ = 275 attendees

Verbal Statements given at four Scoping Sessions (not in public; given in a separate space to a person who transcribed the comments)

Total = 147

On these, 127 statements were given in Franklin Twp.

(So, I assume that 20 statements in total were given at the three other locations.)

Comments on the FERC docket during Pre-Filing = nearly 2,300 (FERC’s statements in the DEIS do not clarify if these were only during Pre-Filing or also included comments after the Application)

Note: On page 1-8 of the DEIS, FERC staff note that approximately 98% of the comments received pertained to Compressor Station 206 (Franklin Twp.)

Requests to be Intervenors = over 2,000 individuals and organizations (locations were not delineated by FERC)

Thus, there appears to be a true lack of FERC’s diligent outreach effort to elicit public participation in the areas of Pennsylvania, New York and the Raritan Bay area towns in New Jersey (Old Bridge & Sayreville). FERC should have recognized these disparities, which showed very low participation in three of the four impacted areas, after the Open Houses and then made a true diligent effort to reach out to engage folks in the Scoping Sessions that they wrote were to “provide an opportunity for agencies, stakeholders, and the public to learn more about the NESE Project and participate in the environmental analysis by commenting on the issues to be addressed in the EIS.” (DEIS, page 1-7)

Now that FERC has published their DEIS and established a 45-day “comment period” for people to file to become Intervenors and send comments to FERC, I ask: What is FERC doing to right the wrong in their apparent lack of compliance with NEPA regulations?

As a point of clarification regarding FERC’s need to outreach to elicit public participation, I looked at the National Environmental Policy Act’s (NEPA) regulations: “the primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.” (Title 40, Chapter V, Section 1502.1) and “Agencies shall: (a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures.”

(Title 40, Chapter V, Section 1506.6)

Claiming that total numbers show that FERC met its NEPA obligation is both misleading and dishonest.