

Date:

Catherine R. McCabe, Acting Commissioner
NJ Department of Environmental Protection
401 East State Street
7th Floor, East Wing
PO Box 402
Trenton, NJ 08625-0402

Ruth W. Foster, PhD., P.G., Acting Director
NJ Department of Environmental Protection
Office of Permit Coordination and Environmental Review
401 East State Street
PO Box 420
Trenton, NJ 08625

Re: (1) Opposition to the Northeast Supply Enhancement (NESE) Project; and
(2) Note that the Permit Application materials, available for review at NJDEP and the Municipal Centers of Franklin Township & Old Bridge, do not afford an opportunity for working people to review them; and
(3) Request for two (2) public hearings by NJDEP pertaining to the following applications of Transcontinental Gas Pipeline Corporation to NJDEP that pertain to construction of pipeline and Compressor Station 206:

FLOOD HAZARD AREA PERMITS: Application received by NJDEP on June 23, 2017
PI Number, Activity Number: 0000-01-1001.3-FHA170001 (verification of construction)
PI Number, Activity Number: 0000-01-1001.3-FHA170002 (individual permit - construction)

FRESHWATER WETLANDS PERMIT: Application received by NJDEP on June 23, 2017
PI Number, Activity Number: 0000-01-1001.3-FWW170001 (individual permit - construction)

COASTAL WETLANDS PERMIT: Application received by NJDEP on July 10, 2017
PI Number, Activity Number: 1200-17-0006.1-CSW170001 (permit – construction)

WATERFRONT DEVELOPMENT PERMITS: Application received by NJDEP on July 10, 2017
PI Number, Activity Number: 1200-17-0006.1-WFD170001 (individual permit – in-water construction)
PI Number, Activity Number: 1200-17-0006.1-WFD170002 (individual permit – upland construction)

Dear Commissioner McCabe and Director Foster:

I am writing to express my strong opposition to the Northeast Supply Enhancement project (NESE) and urge you to do everything in your power to stop it. Some of my reasons for opposing this are:

- Williams/Transco has a long history of safety violations that have led to fires/explosions and leaks with loss of lives, illnesses, injuries and damaged land and buildings.
- There is potential danger from increased capacity and velocity of gas through aging Class 1 and Class 2 pipelines in densely populated residential neighborhoods, with many elementary schools, day cares, places of worship and adult communities nearby.
- At Trap Rock Quarry, mining and processing activities include blasting with dynamite. There are no reported studies, or a plan from Williams/Transco, about the impact of tremors on the stability of the compressors over time for decades. Concerns are that the ongoing blasting could destabilize the gas-powered compressor turbine units and cause fire/explosion with resulting added emissions of toxins.
- The pipeline includes some segments that are over 50 years old, and corrosion or cracks in them can lead to gas escapes (explosions/fires). Adding increased gas along lines may add stress, and this combination (added compression + older pipelines) has led to dangerous explosions/fires.
- The site for the proposed compressor station has a high water table, is on Carters Brook, and run-off of pollutants is of concern.
- In the State's Water Supply Plan, Trap Rock Quarry is considered a potential reservoir site after they stop mining in 2040. There is concern that the continued emission of toxins over time would pollute this water resource.
- Gas-powered compressors emit many toxins as part of routine operations, and these include known carcinogens as well as respiratory irritants. Particulate emissions are mostly at the point where natural gas is burned (i.e., at the gas-fired compressor unit). Particulate Matter can get deep into lungs and carries other toxic chemicals. Modeling has shown that it can travel 2.5 to 6 miles away.
- At the NJ Buddhist Vihara (NJBV), walking meditation is a common practice, and there is a weekend Dhamma School where children engage in activities outdoors. Noise and toxic emissions would interfere with the rights of the Monks and congregants to practice their religion. The NJBV serves as both a place of worship and a cultural center for those of Sri Lankan heritage and the community-at-large. The Samadhi Buddha statue here is the largest and tallest in the Western Hemisphere, and it was designated as a Cultural Landmark by Franklin Township.
- Construction and operations would interfere with breeding, food sources and navigation of wildlife.

- Construction in the Raritan Bay would impact benthic habitat and marine mammals.
- The feeding habitats and nesting grounds of birds on State and Federal Endangered and Threatened Species list by the Raritan Bay would be affected by construction.
- There would be a negative impact on recreational boating/fishing and commercial fishing to communities along the Raritan Bay that include, but are not limited to, a potential to cripple businesses dependent upon seasonal visitor access to the Bay.
- Adding natural gas facilities and pipelines does not support the missions of NJ and NY to decrease reliance on fossil fuels and transition to renewable energy sources while also increasing energy efficiency, and it can exacerbate intense future weather impacts on New Jersey.

The Federal Energy Regulatory Commission (FERC) published their Draft Environmental Impact Statement (DEIS) on March 23, 2018, and information pertaining to studies and analyses, impacts, alternatives, that is available to the public on the FERC docket for this project, is currently incomplete. This cannot be considered to be a document that facilitates public involvement until FERC obtains and publishes the information that they note is missing and provides independent analyses of impacts that considers this information.

I recognize that the NJ Department of Environmental Protection oversees and enforces water quality and wetlands protections under the federal Clean Water Act, and you must determine the impacts of construction and operation of the components of the proposed NESE project. States have the authority and responsibility to protect their waters and wetlands from damaging projects under the federal Clean Water Act. Federal courts recently upheld New York’s denial of water quality permits for the proposed Constitution Pipeline, and FERC did not overrule that decision.

One intent of this letter is to ask the NJDEP to schedule two (2) separate hearings pertaining to these permit applications in the two impacted areas of New Jersey (Raritan Bay area - Middlesex and Monmouth Counties, and Franklin Township - Somerset County with nearby Middlesex and Mercer County residents).

The letter from Williams to Mr. Jones (June 22, 2017) regarding their Request for Flood Hazard Area Individual Permit and Verification, and Freshwater Wetlands Individual Permit with 401 WQC (FERC Accession Number: 20170630-5374, File Number: 32242385) noted the following: *Given the significant public interest in the Project, as evidenced by the numerous commenters and intervenors in the FERC proceedings, Transco recommends that NJDEP consider holding a public hearing in connection with its various permit applications. Transco notes that the Freshwater Wetlands Protection Act regulations provide for a 30-day hearing request period after publication of notice of the application, during which time interested parties may request that the Department hold a public hearing. N.J.A.C. 7:7A-12.4(a).*

As I am sure you are aware, citizens requested these hearings by sending over 375 letters to NJDEP with copies to FERC within 30 days after the permit applications were published in the NJDEP Bulletin on July 5, 2017. Hundreds more letter with this request for hearings were submitted after August 5, 2017.

I trust that the professionals at NJDEP are carefully reviewing the permit applications and responses from Williams/Transco to NJDEP’s deficiency letters as well as the DEIS that was prepared by FERC. I am counting on you to ensure that (1) You hold Williams/Transco fully accountable to New Jersey’s laws and regulations protecting our water and other natural resources; (2) You do anything possible to increase access for public review of the application documents that include the large maps and plans; and (3) You provide the public in each impacted area separate hearings, with ample advance notice of the scheduled hearings, so that people can express their concerns about Williams/Transco’s NESE applications for permits to NJDEP.

Sincerely,

Name: _____ Signature: _____

Address: _____

Town/City: _____ State: _____ Zip: _____

eMail: _____

copy to:
 Kimberly D. Bose, Secretary - Federal Energy Regulatory Commission - 888 First Street, NE - Washington, D.C. 20426 **Re: CP17-101**