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May 4, 2018

Via: eFiling

Ms. Kimberly D. Bose, Esq.
Secretary
Federal Energy Regulatory Commission (FERC)
888 First Street NE, Room 1A
Washington, DC 20426

**Re: Northeast Supply Enhancement Project (NESE)
Draft Environmental Impact Statement (DEIS)
FERC Docket No. CP17-101-000**

Dear Madam Secretary Bose:

I am the Mayor for the Township of Montgomery located in Somerset County in the State of New Jersey. The Township of Montgomery is an Intervenor in the above-reference matter and herein, on behalf of the Township, I provide our objections, comments and concerns with respect to the March 23, 2018 Draft Environmental Impact Statement (DEIS) for the Northeast Supply Enhancement Project (NESE). On May 3, 2018, the Montgomery Township Committee, the governing body, passed a resolution concerning NESE and we enclose and incorporate it by reference to the Comments below. See, **Exhibit A** attached.

Montgomery is a thriving community of over 23,000 citizens with a rich history, excellent schools, diverse recreational opportunities and a collective commitment to preserving open land and protecting natural resources. The community has successfully merged rural and suburban lifestyles in a cosmopolitan region. Located in the southern portion of Somerset County – six miles from Princeton University and roughly halfway between New York City and Philadelphia – the Township is an historic 32 square mile community with an agricultural heritage. It lies in the Millstone River Valley west of the river and east of the Sourland Mountains. There are several hamlets within the Township: Blawenburg, Harlingen, Belle Mead, Skillman, Dutchtown and Zion. Original settlers of Montgomery were mainly farmers, including those of Dutch, Flemish and Huguenot origins, among others. Montgomery played a prominent role in the Revolutionary War, and indeed may be named after Richard Montgomery, a brigadier general who served with Benedict Arnold on the expedition of 1775 against Canada.

Turning to the NESE, the Township of Montgomery has significant concerns with the proposed Compressor Station 206 (“CS206”) which is slated to be located 1.45 miles due east from the closest border of Montgomery; 1.73 miles northeast from the closest residential area of Montgomery; and 2.09 miles east-southeast from Stonebridge, a retirement community in Montgomery. See, **Exhibit B** attached.

We note that our neighbor, Intervenor Franklin Township, has filed its comments regarding its objections and concerns to the DEIS generally and to CS206, specifically. We hereby support and join those objections and concerns.

The Township of Montgomery submits its additional objections and concerns as follows:

Exclusion of New Jersey as a Cooperating Agency:

The Township of Montgomery expresses its strong objection and concern that New Jersey was excluded from cooperation and consultation. Thus, for this very reason, the Township purposefully copies this letter to the Office of the Governor and the New Jersey Department of Environmental Protection. The DEIS was prepared with the assistance of cooperating agencies including the U.S. Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (USACE), and the City of New York. The DEIS defines a cooperating agency as another agency participating in the National Environmental Policy Act (NEPA) process that has jurisdiction by law over all or part of a project and/or one that has special expertise with respect to environmental issues associated with a project. Cooperating agencies are intended to have a substantial role in the environmental analysis according to their particular jurisdiction or expertise. Certainly New Jersey and the NJDEP qualify as a cooperating agency. The DEIS failed to include New Jersey, nor providing a rationale for not doing so.

The lack of transparency and failure to include indispensable agencies is a fundamental disqualifier of the DEIS.

Lack of Meaningful Public Participation:

The Township of Montgomery is further concerned about the lack of due process afforded to its and other citizens. Nearly 2,300 written comment submissions were filed. Approximately 98 percent of all comments received were regarding CS206 and were filed by residents, government officials, elected representatives, and other

stakeholders near the proposed compressor station. The DEIS describes numerous public participation concerns, such as, “Commenters contend that our use of a 0.5-mile radius to identify potentially affected landowners around proposed Compressor Station 206 was insufficient; that the number, location, and format of scoping sessions limited attendance and comment; and that the time allowed for filing comments was too brief.” The DEIS concludes that, “In response to these concerns, we note that our environmental mailing list complies with 18 CFR 157.6.”

We find this response wholly insufficient and request that the public comment be extended and additional scoping meetings and information sessions specific to CS206 be provided.

Compliance with Other Federal Programs:

DEIS states that studies regarding the following will be completed at another time, and results listed in the final report:

- Complying with the Endangered Species Act;
- Complying with section 106 of the National Historic Preservation Act;
- Completing the General Conformity process, where the Transcontinental Gas Pipe Line Company would be responsible for directly offsetting all construction emissions in the New Jersey-New York-Connecticut Air Quality Control Region.

It is unclear how meaningful public input will be obtained for these reviews, and by not including final review findings in the DEIS, the public has been prevented from providing meaningful comment in relationship to the overall DEIS. This is unacceptable and objectionable.

Air Quality:

Significant concerns regarding the health impacts of emissions on the local community are noted, with respect to both proposed routine emissions during normal operations and compressor blowdown events. On page ES-13, the DEIS states: "Long term impacts on air quality and noise would result from the operation of Compressor Station 206." Specific air quality concerns are noted below:

- Representative ambient air quality data: Ambient air quality data was gathered from Elizabeth, Philadelphia, East Brunswick and North Brunswick, and the DEIS failed to consider ambient air quality in the vicinity of proposed CS206, with specific relationship to cumulative air quality effects during blasting events at the nearby quarry.
- New Jersey Department of Environmental Protection (NJDEP) air permit: An NJDEP air permit was applied for on January 4, 2017, with an "anticipated receipt date" of September 7, 2017. No further details were noted in the DEIS regarding the status of the application or extent of NJDEP review, comments or concerns.
- Possible exceedance of NJ Hazardous Air Pollutants (HAP) standards: There is no clear information found in the report regarding exceedances of NJ HAP standards during blowdown events. The DEIS seems to imply that NJ HAP levels are exceeded, but the project could still obtain a permit, since NJ requires only technology-based controls for permit approval. Regardless of whether the project can obtain a permit, we request the DEIS detail the level and extent of NJ HAP exceedances during blowdown events.

- Lack of Health Assessment Review: The DEIS states that NJ requires “State of the Art” (SOTA) regulatory requirements in their air permitting program but fails to discuss the health impacts of emissions (both routine and HAP during blowdown) that may exceed NJ HAP standards, even with SOTA technology. A Health Assessment Review would ideally investigate this issue and provide the level and degree of HAP exceedance during normal operation as well as blowdown events and evaluate the short- and long-term health impacts on the local community, including members of the community who are at increased risk to air emissions such as the young, the elderly, or those with chronic health conditions. As discussed *infra*, the Stonebridge Retirement Community is located just 2.09 miles west-northwest of the proposed site.
- Offset Mitigation will not occur in local community: Emissions of NOx would equal or exceed 100 tons per year. Transco has indicated it intends to pursue a direct offset mitigation strategy by sponsoring projects at the Port Authority, to include modernizing electric cargo-handling equipment at NJ/NY ports, providing power at Liberty Cruise Terminal, and replacing trucks. We fail to see how these improvements mitigate the health impacts to the local population resulting from CS206.

Thus, along with Franklin Township, the Township of Montgomery demands that a health impact assessment as well as a long-term contamination potential assessment of the surrounding area for the proposed Compressor Station 206 be conducted and made public for comment and review prior to finalizing the Environmental Impact Statement or granting any further approvals.

Climate Change:

The DEIS concludes that, "Construction and operation emissions from the NESE Project would increase the atmospheric concentration of GHGs, in combination with past and future emissions from all other sources, and contribute incrementally to future climate change impacts." We request that the climate change impacts of this proposal be significantly weighted when considering alternatives to CS206.

Alternatives Analysis:

Key aspects of the alternatives analysis were either missing or not fully addressed. The DEIS fails to provide a rationale as to why the use of renewable sources of energy or energy conservation and efficiency programs could be viable project alternatives. Further, in the evaluation of the use of electric motor-driven compressor units, rather than the natural gas-fired turbines, a clear comparison was not provided regarding the extent of HAP emissions during normal operation and blowdown of this alternative, versus the natural gas-fired turbines.

Property Values:

While several studies were cited for gas pipeline transmission routes and property values, fewer studies were presented regarding compressor stations and property values. The DEIS concludes: "We acknowledge that it is reasonable to expect that property values may be impacted differently based on the setting and inherent characteristics of each property." Property devaluation is a significant concern, and we request that mitigation measures for such potential losses be explored within the communities impacted.

Conclusion:

For the foregoing reasons, the Township of Montgomery respectfully requests that the Federal Energy Regulatory Commission take into consideration and address all concerns and objections enumerated herein. Clearly, significant environmental analyses and mitigation evaluations are lacking or have been neglected. It is incumbent upon FERC to rectify these shortcomings and protect our citizens from the dangers inherent in this proposed project. An Environmental Impact Statement that does not include analysis of health or environmental impacts of chemical emissions from proposed Compressor Station 206 cannot be recognized as a legitimate environmental impact statement.

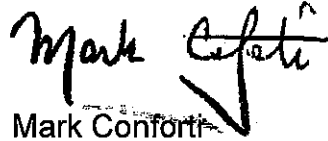
Montgomery Township strenuously urges FERC to conduct a thorough and comprehensive **Health Impact Assessment** of the proposed Williams-Transco Compressor Station 206 emissions comprehensively addressing health and environmental impact for the immediate areas, as well as long-term contamination potential for the reservoir site on the Trap Rock Quarry.

Montgomery Township opposes the construction and operation of proposed Compressor Station 206 as there has not been an adequate assessment of the potential detrimental health impacts from construction and operations of the proposed Compressor Station 206 on the residents, business and houses of worship situated near the site.

Montgomery Township requests FERC to require continuous air sampling at the site of the proposed Compressor Station 206 before and during construction, as well as

ongoing for the lifetime of the compressor station's operation and make publicly available real time updates of air sampling on the internet.

Respectfully submitted,



Mark Conforti
Mayor of the Township of Montgomery

Enclosure

cc: Phil Murphy, Governor of New Jersey
Catherine McCabe, Acting Commissioner, New Jersey Department of Environmental Protection
United States Senator Cory Booker
United States Senator Robert Menendez
United States Congresswoman Bonnie Watson Coleman
United States Congressman Leonard Lance
New Jersey Senator Christopher Bateman
New Jersey Senator Bob Smith
New Jersey Assemblyman Joseph Danielson
New Jersey Assemblyman Joseph Egan
New Jersey Assemblyman Andrew Zwicker
New Jersey Assemblyman Roy Frieman
Montgomery Township Environmental Commission
Franklin Township
All parties on the Intervenor Service List

TOWNSHIP OF MONTGOMERY
SOMERSET COUNTY, NEW JERSEY

RESOLUTION #18-5-112 - OPPOSING THE CONSTRUCTION AND OPERATION OF A COMPRESSOR STATION TO CONNECT TO WILLIAMS-TRANSCO'S PIPELINE IN FRANKLIN TOWNSHIP, SOMERSET COUNTY, NJ

WHEREAS, Residents of Montgomery Township live in close proximity to the proposed Williams-Transco Compressor Station 206 adjacent to the Trap Rock Quarry in Franklin Township, Somerset County, New Jersey; and

WHEREAS, Williams-Transco plans to install a greenfield natural gas fired 32,000hp Compressor Station 206 at said site in Franklin Township; and

WHEREAS, The Trap Rock Quarry, adjacent to proposed Compressor Station 206, has been identified as a future reservoir site; and

WHEREAS, The Federal Energy Regulatory Commission (FERC) issued a Draft Environmental Impact Statement (DEIS) on March 23, 2018 for proposed Compressor Station 206; and

WHEREAS, FERC acknowledges receiving comments requesting FERC to perform a Health Impact Assessment for proposed Compressor Station 206 in the Executive Summary (pages ES-5 to 7), Environmental Analysis (page 4-292) and in the Conclusions and Recommendations (page 5-20) of the DEIS; and

WHEREAS, The FERC online database does not reflect FERC as having performed a single Health Impact Assessment in the past twelve (12) years; and

WHEREAS, Estimated emissions from proposed Compressor Station 206 have not been validated by FERC; and

WHEREAS, FERC has not indicated that it reviewed recent developments and studies correlating natural gas fired compressor emissions with direct health hazards and, further, has conducted no current health impact assessments on such emissions; and

WHEREAS, The ambient air sampling that was completed for the Williams-Transco Northeast Enhancement Supply Project used stations that are not proximate to the proposed site for Compressor Station 206 in Elizabeth, North Brunswick, and East Brunswick New Jersey and in Philadelphia PA, and each only measured specific components; and

WHEREAS, There was no local assessment of air quality emissions that included the airborne pollutants from the mining operations of Trap Rock Quarry in combination with the anticipated emissions from proposed Compressor Station 206; and

WHEREAS, The DEIS does not detail the environmental or health impact of proposed Compressor Station 206's emissions; and

WHEREAS, FERC is soliciting input from the public and stakeholders; and

WHEREAS, The Township Committee of the Township of Montgomery urges FERC to require a comprehensive Health Impact Assessment to identify and analyze immediate and long-term health impacts and contamination potential from proposed Compressor Station 206's emissions; and

WHEREAS, The DEIS does not provide clear information to the public regarding exceedance of Hazardous Air Pollutants (HAP) above the State of New Jersey's published levels during the blowdown events at proposed Compressor Station 206, nor a health assessment regarding the impact of the HAP upon citizens of the affected local communities; and

WHEREAS, The DEIS fails to provide for appropriate offset mitigation strategy for local emission of NOx, and instead appears to allow Williams -Transco to provide such offset in the location of the New York New Jersey port, which is remote from affected local communities; and

WHEREAS, The State of New Jersey was erroneously excluded as a "Cooperating Agency" during the preparation of the DEIS, a cooperating agency being defined in the DEIS as "another agency participating in the NEPA process that has jurisdiction by law over all or part of a project and/or one that has special expertise with respect to environmental issues associated with a project. Cooperating agencies are intended to have a substantial role in the environmental analysis according to their particular jurisdiction or expertise." (p.1-3); and

WHEREAS, The DEIS fails to include a complete analysis of compliance with the following federal programs: Endangered Species Act, Section 106 of the National Historic Preservation Act, and completion of the General Conformity process, and the failure to include a discussion of the final findings does not allow the public to review and comment on these aspects of the analysis in the DEIS; and

WHEREAS, The DEIS fails to provide meaningful public participation in recognition of the fact that of the nearly 2,300 written submissions filed, approximately 98 percent were regarding Compressor Station 206; and

WHEREAS, The DEIS further fails to meaningfully address commenters' contentions that the radius to identify affected landowners was insufficient, the scoping sessions were limited, and the time allowed for filing comments was too brief and, instead, merely states "In response to these concerns, we note that our environmental mailing list complies with 18 CFR 157.6" (p. 1-8); and

WHEREAS, The DEIS acknowledges, "Construction and operation emissions from the NESE Project would increase the atmospheric concentration of GHGs, in combination with past and future emissions from all other sources, and contribute incrementally to future climate change impacts..." (p.4-366).

TOWNSHIP OF MONTGOMERY
SOMERSET COUNTY, NEW JERSEY

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NOW, THEREFORE, BE IT RESOLVED On this 3rd day of May 2018, by the Township Committee of the Township of Montgomery, County of Somerset, State of New Jersey, as follows:

1. An Environmental Impact Statement that does not include analysis of health or environmental impacts of chemical emissions from proposed Compressor Station 206 cannot be recognized as a legitimate environmental impact statement.
2. The Montgomery Township Committee opposes the construction and operation of proposed Compressor Station 206 as there has not been an adequate assessment of the potential detrimental health impacts from construction and operations of the proposed Compressor Station 206 on the residents, business and houses of worship situated near the site.
3. The Montgomery Township Committee strenuously urges FERC to conduct a thorough and comprehensive Health Impact Assessment of the proposed Williams-Transco Compressor Station 206 emissions comprehensively addressing health and environmental impact for the immediate areas, as well as long-term contamination potential for the reservoir site on the Trap Rock Quarry.
4. The Montgomery Township Committee requests FERC to require continuous air sampling at the site of the proposed Compressor Station 206 before and during construction, as well as ongoing for the lifetime of the compressor station's operation and publicly available real time updates of air sampling on the internet.
5. The Montgomery Township Committee urges its representatives of the United States Congress, United States Senate and New Jersey Legislature to oppose the Northeast Supply Enhancement Project that includes the proposed Compressor Station 206.
6. The Township Clerk is directed to provide a true copy of this resolution to US Senators Cory Booker and Robert Menendez, Congresswoman Bonnie Watson Coleman, Congressman Leonard Lance, NJ Senators Christopher Bateman and Bob Smith, and NJ Assemblymen Joseph Danielson, Joseph Egan, Andrew Zwicker and Roy Frieman.

CERTIFICATION

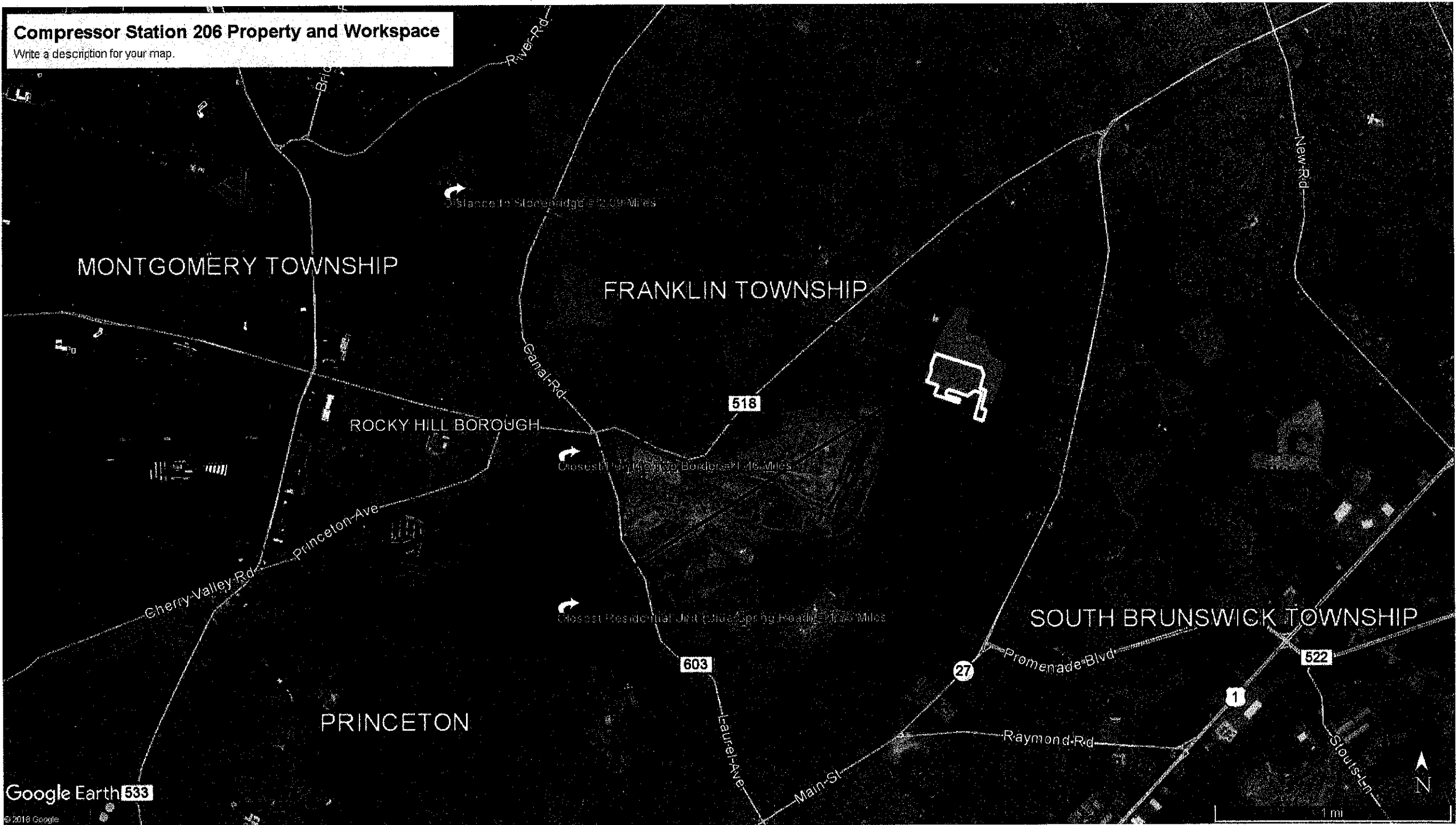
I HEREBY CERTIFY THE ABOVE TO BE A
TRUE COPY OF A RESOLUTION ADOPTED BY THE
TOWNSHIP COMMITTEE OF THE TOWNSHIP OF
MONTGOMERY AT A MEETING HELD

May 3, 2018


Deputy Township Clerk

Compressor Station 206 Property and Workspace

Write a description for your map.



MONTGOMERY TOWNSHIP

FRANKLIN TOWNSHIP

ROCKY HILL BOROUGH

PRINCETON

SOUTH BRUNSWICK TOWNSHIP

Distance to Stonebridge #2 0.09 Miles

Closest to NJ/PA Border #1 1.46 Miles

Closest Residential Unit (wide Spring Road) #1 1.73 Miles