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REGARDING:

APPLICANT: Transcontinental Gas Pipe Line Company LLC
PROJECT: Northeast Supply Enhancement Project
FILE NUMBERS: NJDEP File No. 0000-01-1001.3
FWW 180001 Individual Permit
NJDEP HEARING DATE: 11/5/18

**Issues with the Freshwater Wetlands Individual Permit Application
for the Northeast Supply Enhancement Project**

The NESE Project does not give anything to New Jersey, and it does not forward State goals to move toward renewable energy. Looking at science, research, prior experiences with pipeline projects, and a need for Williams/Transco to follow the letter of New Jersey's regulations, the application for a Freshwater Wetlands Individual Permit should be denied by the NJDEP.

This hearing was scheduled before the Freshwater Wetlands Permit Application was declared to be "complete for review" by the NJDEP. Therefore, at a time when the NJDEP publishes notice that the Application is "complete for review" in the DEP Bulletin, the public should be given at least an additional thirty (30) days to provide comments that would be seriously considered by the NJDEP before any decision is made on the Freshwater Wetlands Individual Permit application. The 90-day timeframe for making a decision should not start until Williams/Transco has provided the NJDEP all requested documents, the NJDEP determined that the application is technically complete, and the public is given an opportunity to provide comments after the application is declared to be "complete for review".

Additionally, the public should be provided with easy access to the transcribed and written comments provided to the NJDEP at this November 5, 2018 hearing, along with comments sent to the NJDEP during the designated comment period that ends on November 20, 2018.

The Freshwater Wetlands Individual Permit Application is not complete, and it does not meet all requirements from New Jersey's Freshwater Wetlands Protection Act Rules or the Stormwater Management rules. Under the Freshwater Wetlands Protection Act Rules, the Freshwater Wetlands Individual Permit Application must also comply with the Stormwater Management rules.

- 1. APPLICATION IS NOT COMPLETE FOR REVIEW:** The NJDEP issued deficiency letters detailing missing information that needs to be provided in sufficient detail before the application is considered to be technically complete. Plans need to be redesigned to be in compliance with stormwater management rules according to the NJDEP's September 27, 2018 letter.
 - NJDEP has issued deficiency letters to Williams/Transco for their June 19, 2018 permit applications on July 18, 2018 and September 12, 26, and 27, 2018. These letters from July 18 and September 12 that identify information needed by the NJDEP to consider the application to be technically complete and, therefore, complete for review.
- 2. APPLICATION DOES NOT COMPLY WITH THE STORMWATER MANAGEMENT RULES:** Both the Compressor Station 206 and Madison Loop are considered to be "major developments" under the Stormwater Management rules. Thus, no Freshwater Wetlands Permit can be issued until the entire NESE Project complies with the Stormwater Management rules.

- Measures to address stormwater management for Compressor Station 206 have not yet been found to be acceptable to the NJDEP, and therefore, the full application cannot be considered to be in compliance with these Stormwater Management rules.
- The proposed bioretention basin(s) for the Compressor Station 206 are likely never to pass requirements since this site has a high water table & bedrock is hit at a shallow level. The plans for the bioretention basin(s) proposed at the Compressor Station 206 site still require considerable re-design to be considered acceptable under these rules. Additionally, until this is reviewed and approved, there is no way to tell if there could be significant impacts to water quality during construction or following completion of the project.
- The NESE Project must not violate the Flood Hazard Area Control Act, N.J.S.A. 58:16A-50 et seq., or implementing rules at N.J.A.C. 7:13 **[N.J.A.C. 7:7A-10.2(b)(10)]**, and in accordance with N.J.A.C. 7:7A-2.7, the Freshwater Wetlands component is part of the NESE Project that, in its entirety, does not comply with the Stormwater Management rules at N.J.A.C. 7:8. **N.J.A.C. 7:7A-10.2(b)(15) 7:7A-2.7 Stormwater management** - If a project requires an individual permit under this chapter and the project in its entirety (that means the whole project, not just the portions within wetlands or transition area) meets the definition of “major development” at N.J.A.C. 7:8-1.2, then the project shall comply in its entirety with the Stormwater Management rules at N.J.A.C. 7:8.

3. WILLIAMS/TRANSCO HAS NOT PROVIDED DOCUMENTATION FOR OWNERSHIP OR AGREEMENT TO USE ALL PARCELS OF LAND – THE AREA NEEDED FOR THE SUCTION/DISCHARGE AND TIE-IN PIPING AT COMPRESSOR STATION 206

- Williams/Transco has not obtained an agreement to use Block 5.02, Lot 23 for the suction & discharge and tie-in piping for compressor Station 206, and this does not meet requirements for a copy of the deed and/or other legal documents pertaining to the site, listed as an additional requirement for an individual permit at N.J.A.C. 7:7A-16.9(1). This site has wetlands, and documentation from Williams/Transco indicates that they are still “in negotiation” with Trap Rock Quarry/Stavola for an agreement to expand their ROW on this property.

The NESE Project is NOT IN THE PUBLIC INTEREST and does not preserve our natural resources. THERE IS NOT A COMPELLING NEED for it according to the Freshwater Wetlands Protection Act Rules.

Under the Freshwater Wetlands Protection Act Rules, NJDEP must address whether the NESE Project is in the “public interest.”

According to the Freshwater Wetlands Protection Act Rules, N.J.A.C. 7:7A, “compelling public need” means that “based on specific facts, the proposed regulated activity will serve an essential health or safety need of the municipality in which the proposed regulated activity is located, that the public health and safety benefit from that there is no other means available to meet the established public need.”

N.J.A.C. 7:7A-10.2(b) stipulates conditions that must be met before the NJDEP could issue a Freshwater Wetlands Individual Permit. This Application does not meet all of these requirements. For example -

- 1. NEED FOR THE NESE PROJECT IS NOT CLEAR. New York’s need for the gas is not as great as the NESE plans to deliver. Even if National Grid converted all residential and commercial heating units from oil to gas, the NESE would deliver twice as much gas as would be needed.**

- The NJDEP must consider the relative extent of the public and private need for the proposed regulated activity as part of its “public interest” review. **N.J.A.C. 7:7A-10.2(b)(12)(ii)**
- The NESE Project does not provide for the safety or health of anyone in New Jersey, and it does not serve any existing need of the residents in New Jersey.
- The NESE Project would not deliver an energy supply to New Jersey.
- Given that it is an interstate pipeline project, however, the NJDEP should consider all information from New York about whether or not there is a legitimate need for this Project that would compel consideration of the destruction of wetlands as well as the long-term damaging risk to the safety and health of residents, workers and visitors in New Jersey. Only accepting the agreement that National Grid agreed to purchase all transported gas that, initially, was said to be needed for the beginning of the 2019-2020 heating season, is not justification that should meet the review criteria of the NJDEP for “compelling public need”. At this point, Williams/Transco has adjusted their proposed schedule and now says that they hope to be ready to deliver gas for the 2020-2021 heating season. Additionally, reports indicate that New York does not need this amount of additional natural gas (*see below*), and adding natural gas infrastructure does not help New York or New Jersey reach their goals of higher renewable energy sources. New York’s need for the gas is not as great as the NESE plans to deliver. Even if National Grid converted all residential and commercial heating units from oil to gas, the NESE would deliver twice as much gas as would be needed.
 - ▶ According to ICF International’s 2012 report for the NYC Mayor’s Office of Long-Term Planning and Sustainability, conversion of New York City’s boilers would require a maximum increase of National Grid’s gas supply by 6%. Source: http://www.nyc.gov/html/om/pdf/2012/icf_natural_gas_study.pdf, yet the NESE Project would increase National Grid’s capacity by more than 64%.
 - ▶ In comments to FERC on May 14, 2018, National Grid noted that they only need approximately a 10% increase in natural gas to cover both New York City and Long Island: “Over the next ten years, Peak Day gas demand in the National Grid NY and National Grid LI service territories is expected to grow by more than ten percent due to the continued conversion of oil-fired heating systems to run on natural gas as well as increased demand from new construction customers. Furthermore, in assessing the adequacy of its current gas supply portfolio, National Grid has identified a need for additional gas supply beginning in the 2019/2020 heating season in order to support this customer demand growth in downstate New York.” (FERC Accession No. 20180514-5995)

2. NESE DOES NOT PRESERVE NATURAL RESOURCES.

- The NJDEP must consider the public interest in preservation of natural resources and the interest of the property owners in reasonable economic development as part of its “public interest” review. **N.J.A.C. 7:7A-10.2(b)(12)(i)**
- NESE provides more harmful impact to the regions where freshwater wetlands and transition areas will be impacted than the potential economic value, put forth as including short-term jobs and tax revenues.

3. CONSIDERATION OF ALTERNATE METHODS – AN ELECTRIC MOTOR-DRIVEN COMPRESSOR – WAS NOT COMPREHENSIVE. There is an incomplete & sparse comparison of electric motor-driven to gas-fired compressor units as a reasonable alternative method – They used remote sensing & did not document any consultation with PSEG about transmission line route possibilities.

- The NJDEP must consider the practicability of using reasonable alternative locations and methods, to accomplish the purpose of the proposed regulated activity where there are unresolved conflicts as to resource use as part of its “public interest” review. **N.J.A.C. 7:7A-10.2(b)(12)(iii)**
- In their Alternative Analysis section of the application, Williams/Transco provided their assumptions about impacts and emissions if they planned for an electric motor-driven compressor as Compressor Station 206 in which they used aerial photography to develop a possible route for the transmission lines without documentation of any consultation with PSEG. Additionally, their comparison of emissions was only for NO_x, SO₂ and CO₂. From a natural gas-fired compression station, there are many more caustic chemical airborne emissions. Thus, such a comparison should be viewed with skepticism, and Williams/Transco should be required to provide a more valid plan for comparison. The importance of considering an electric vs. a gas-fired compression station is relevant in terms of noise and airborne pollutants that could impact wetlands and water sources in the area, and it is also an important consideration in terms of safety risks.
- The Natural Gas Act does not prevent states from providing safety and environmental impact information to FERC, which FERC must consider in its Certificate order and must document in compliance with the National Environmental Policy Act (NEPA).

4. WILLIAMS/TRANSCO DID NOT COMPREHENSIVELY CONSIDER ALTERNATE LOCATIONS FOR COMPRESSOR STATION 206 TO LESSEN IMPACT ON WETLANDS.

- The NJDEP must consider the practicability of using reasonable alternative locations and methods, to accomplish the purpose of the proposed regulated activity where there are unresolved conflicts as to resource use as part of its “public interest” review. **N.J.A.C. 7:7A-10.2(b)(12)(iii)**
- **N.J.A.C. 7:7A-10.3(b)** notes: There shall be a rebuttable presumption that there is a practicable alternative to a non-water dependent activity in a freshwater wetland or in a special aquatic site, which alternative does not involve a freshwater wetland or special aquatic site, and that such an alternative would have less of an impact on the aquatic ecosystem.
- **N.J.A.C. 7:7A-10.3(c)(1)** requires that, to rebut the above-stated presumption, the project purpose could not be accomplished by using one or more other sites that would avoid or reduce the adverse impact on an aquatic ecosystem.
- Williams/Transco wrote that this could not happen, and they did not provide a comprehensive assessment to support this assertion. In contrast, Princeton Hydro presented other options for combining other adjoining parcels that, separately, met Williams/Transco’s second tier criteria for acceptable locations the Compressor Station 206 that would have less impact on wetlands and would move the proposed compressor station farther from residences if parcels 8 and 27 were combined. In the May 2018 report by Princeton Hydro are details about faulty assumptions made by Williams/Transco about these parcels by their use of remote sensing for the parcels.

- There is an incomplete analysis of alternative sites for Compressor Station 206, and some parcels, next to one another, would have had less wetlands impacts and had fewer nearby residences. Williams/Transco provided a manipulated false choice by finally considering sites that all contained wetlands.

THE NESE PROJECT WILL HAVE DIRECT AND INDIRECT IMPACTS ON WETLANDS AND TRANSITION AREAS.

The NESE Project will have both direct and indirect impacts to wetlands during construction and over the lifetime of the Project if it is built. Constructing the Madison Loop and Compressor Station 206 could have indirect impacts on the public water supply, propagation of fish & wildlife, recreation, and businesses. The integrity of the aquatic resources and degradation is at risk from potential discharges into the wetlands from construction as well as from potential leaks if NESE becomes operational.

The overall NESE Project is expected to impact a significant amount of wetland in New Jersey – over 41 acres, including approximately 20 acres of forested wetland. In addition, the NESE Project will remove 35.3 acres of upland forest, and the impacts on forested uplands will be long term or permanent because trees would take up to 50 years or longer to become reestablished and would not be allowed to become reestablished directly over the pipeline.

Construction could reduce the capacity of wetlands to buffer flood flow & control erosion. There was no factual determination by Williams/Transco that their erosion & sediment control plan would ensure that ground or surface water would not be degraded.

Williams/Transco understates the severity of potential impacts to wetlands from construction in that clearing/disturbance of vegetation could temporarily affect the wetlands' capacity to buffer flood flows and/or control erosion. Water quality could be affected from changes in temperature, biochemistry or water chemistry, increased turbidity and sedimentation, and/or release of fuels or lubricants. Additionally, Williams/Transco noted that recovery of forested wetlands could take up to 30 years or more.

Williams/Transco should provide a thorough, factually-based analysis as set forth in the 404(b)(1) Guidelines for each impacted wetland and State Open Water that includes a discussion as to why the impacts to each regulated area cannot be avoided or minimized. In order to objectively make a determination of impacts, a thorough characterization of each wetland and transition area that is anticipated to be impacted by project activities must be performed. In the absence of this type of analysis, it is simply not possible to realistically assess impacts or to determine whether an impacted area can be adequately mitigated.

The site selection for Compressor Station 206 did not consider the possible combining of adjacent lots of other identified potential parcels that would have less impact to wetlands and be farther from residences.

1. WILLIAMS/TRANSCO DID NOT FIRST ATTEMPT TO AVOID WETLANDS.

- Under the Freshwater Wetlands Protection Act Rules, Williams/Transco was required to first AVOID wetlands, preserve our natural resources, and address the probable individual and cumulative impacts on public health and fish and wildlife.
- The Madison Loop is planned to cross eighteen (18) wetlands. Of these, six (6) are classified as “exceptional” resources, two (2) are “ordinary”, and ten (10) are “intermediate”.
- Of the sites considered for Compressor Station 206, the final “acceptable” sites all have wetlands. It appears that the process used to choose the current site was a manipulated false choice.

2. CONSTRUCTION COULD CREATE CONDITIONS FOR ALGAL BLOOMS.

- Potential sediment disruption from construction in & around Cheesequake Creek could increase the potential for growth of harmful algal blooms (HABS).
- In FERC's Accession No. 20180725-5235 (response to 7/10/18 request # 15 - *Evaluate and discuss the potential for Project activities to increase the occurrence and frequency of conditions conducive to the growth of harmful algal blooms in the Project area and surrounding waters.*), on pp. 36 – 38, Williams/Transco noted that “sediment disruption from the construction in and around the inland tidal wetland areas of the Madison Loop adjacent to Cheesequake Creek, will be significantly reduced by largely conducting the work above mean high water. The utilization of an HDD to cross Cheesequake Creek will further reduce sediment disruption and minimize the potential for HABS associated with construction to enter the onshore portion of the Project.” However, there were no studies or modeling presented that could justify this assertion.

3. DRILLING FLUID RELEASE COULD CONTAMINATE WETLANDS AND WATER SOURCES.

- Horizontal Directional Drilling (HDD) would impact the wetlands on the Madison Loop. Workspaces at HDD entry and exit points have the highest likelihood of inadvertent releases of drilling fluids and, as an example, the HDD entry at MP 11.48 is in an “exceptional resource value wetland” within 30-feet of a tidal stream. In the span of the Madison Loop from MP 11.30 to 11.67, Williams/Transco lists this area as a Community Wellhead Protection Area. At this MP, an estuarine wetland, dewatering would likely be needed, and it is not clear if the use of timber mats for the heavy equipment would minimize compaction significantly enough to avoid difficulty in revegetation. Dewatering exacerbates compaction.
- Additionally, HDD failures are known to happen, as was found with Williams/Transco's Leidy to Long Island Expansion Project in NJ.

4. THE MADISON LOOP WOULD CROSS OR BE VERY CLOSE TO SEVERAL TOXIC SITES WITH CONTAMINATED GROUNDWATER OR SOIL, AND THE APPLICATION IS MISSING SOIL AND GROUNDWATER ANALYSES IN THESE AREAS.

- The Madison Loop is planned to be constructed in areas with known toxic groundwater and/or toxic soils, and this was detailed in submissions to FERC by Williams/Transco. Along the Madison Loop, construction in/near contaminated sites includes the following sites that were identified in FERC documents. However, only the Global Sanitary Landfill and the E.I. Dupont Denemours & Co. sites were referenced in the Freshwater Wetlands Permit Application.
- According to **7:7A-16.7(a)(10)**: In addition to meeting the requirements at N.J.A.C. 7:7A-16.2, an application for an authorization under a general permit, for an individual permit, or for a transition area waiver shall include the following material, in the number and format specified in the appropriate application checklist: If a site is known or suspected to be contaminated with toxic substances, and if the Department requests it, a laboratory analysis of representative samples of the soil or sediment on the site;
- There is no clear indication in the Freshwater Wetlands Application that Williams/Transco provided laboratory analyses of the soils or sediments at these sites or that the NJDEP required them for consideration.

► **Road Depot Garage Area 3-1 near MP 9.5**

There is potential to encounter contaminated groundwater since this site flows southeast toward the HDD location. Williams/Transco noted that the groundwater is 45-feet below ground surface (bgs) at MP 9.60 and 55 to 71-feet bgs at MP 9.74, but nothing was reported for MP 9.5. They also note that the Parkwood Village HDD maximum depth is 60 to 80-feet bgs, and that was part of their reasoning for not expecting to encounter contaminated groundwater. Parkwood Village HDD is planned from MP 9.86 to 9.43. This does not include workspace to support this activity.

- **Global Sanitary Landfill** is less than 0.1-mile south of MP 10.13 to 10.38 of the Madison Loop. This site is an NJDEP Classification Exception Area (CEA) which also acts as a Well Restriction Area (WRA) where there are groundwater restrictions to 25-feet bgs (upper zone) and, depending on contamination depths, to 150-feet bgs (lower zone). Contamination was found in both the lower and upper water-bearing zones in this area. Though Williams/Transco does not expect to find contaminated water here, trenching is planned to approximately 8-feet bgs for the Madison Loop in this area, and the water table here was noted to be 4-feet. Additionally, Williams/Transco noted that they may need dewatering activities here. No HDD activity is proposed from MP 10.13 to 10.38. Without providing any investigative reports about the potential to find contaminated groundwater during construction, Williams/Transco only wrote that they would follow their Unanticipated Discovery of Contamination Plan, Materials Management Plan & General Groundwater Remediation Clean-up permit (BGR).

- **E.I. Dupont Denemours & Co.** site is listed to be at 250 Cheesequake Road in Sayreville, 1.2 miles northwest of the Madison Loop. Here, groundwater is known to contain VOCs and metals, so there is a possibility for soil contamination according to Williams/Transco.

Part of the Madison Loop is in an NJDEP Classification Exception Area (CEA) and Well Restriction Area (WRA) for this site from MP 9.20 to 10.31. Dupont has an active NJDEP CEA/WRA in the area of the Madison Loop, so Williams/Transco wrote that there could be contaminated groundwater here, too. The CEA restricts groundwater use to 150-feet bgs (eastern area) and to 190-feet bgs (western area). Of note, cleanup activities of Dupont continue to be underway, and the Madison Loop would cross these areas. Additionally, MP 10.08 was identified by Williams/Transco in their FERC Application as an “exceptional wetlands resource” since it drains into an FW2 waterway. The only proposed HDD activity in this area is for Cheesequake Road (MP 9.28 to 8.92) and Parkwood Village (MP 9.86 to 9.43). Note: In FERC’s draft Environmental Impact Statement, on page 4-27, FERC noted that Williams/Transco needed to consider potentially contaminated groundwater that was recently found during construction of the LNYBL-Loop C pipeline (part of the New York Bay Expansion Project) between MP 10.0 and 10.4.

- **Morgan Ordance Depot**, between Route 35 and Cheesequake Road near Ernston Road in Sayreville is 0.3 miles north of MP 11.10 of the Madison Loop. Williams/Transco has stated that there could be soil contamination from this site in part of the Madison Loop from Route 9 to the Raritan Bay.

5. MADISON LOOP IS PLANNED TO GO THROUGH AREAS WITH ACID-PRODUCING CLAY SOIL.

- Construction of the Madison Loop is planned to be through an area with acid-producing clay soil, and exposing this soil to the air produces sulfuric acid. There will be difficulty stabilizing and restoring these sites, some of which have steep slopes, in soils with a pH near 3.
- Failure to stabilize areas adjacent to wetlands would result in impacts from sediment long after the Project is completed. This could then impact downgradient wetlands and surface waters.
- Additionally, it should be noted that low pH soils are more corrosive to pipelines.
- In their June 14, 2018 report, Princeton Hydro noted:

*The underlying geology of the part of New Jersey in which the Madison Loop is proposed to be built is a concern as the area is underlain by a geologic formation that possesses pyritic clays. These sulfide-bearing marine and estuarine sediments are potential **acid-soil producers**. The development of acid-sulfate soils occurs when sulfide minerals, such as pyrite, oxidize upon exposure to air. These materials are exposed through erosion or, anthropogenically, through earth-moving activities. Once these acid-producing clays are exposed to the air, they are difficult to stabilize due to the inability of plants to establish in soils with a pH near 3. The exposure of these acid-producing clays to air as a result of project activities will complicate restoration efforts and slope stability, which in turn may impact downgradient wetlands and surface waters. If HDD borings pass through acid-producing clay deposits, any discharges into wetlands or wetland transition areas will be far more significant as it relates to the severity of the impact. We are also concerned about the integrity of the pipe and other infrastructure elements of the pipeline that may pass through acid-producing clays.*

Failure to stabilize areas adjacent to wetlands would result in impacts to the wetlands associated with sedimentation long after the Project is completed. The FWW IP and Waterfront Development & Wetlands Act of 1970 IP applications to the NJDEP avoid inclusion of any level of detail or science which would inform an analysis of environmental impacts and instead rely on an unsupported, rhetoric-based approach to mitigation.

6. POTENTIAL DAMAGE TO WETLANDS FROM HDD

- Horizontal Directional Drilling (HDD) would impact the wetlands on the Madison Loop. These HDD entry & exit points have the highest likelihood of drilling fluid releases, and one HDD entry point is in an “exceptional resource value wetland” area – Milepost 11.48. Soil compaction from construction vehicles is made worse by dewatering, and dewatering would likely be needed at this site. Additionally, HDD failures are known to happen, as was found with Williams/Transco’s Leidy to Long Island Expansion Project in NJ.

7. RECOVERY OF FORESTED WETLANDS COULD TAKE 50+ YEARS.

THE NESE PROJECT WOULD HARM OR CHANGE HABITAT FOR THREATENED AND ENDANGERED SPECIES.

N.J.A.C. 7:7A-10.2(b) stipulates conditions that must be met before the NJDEP could issue a Freshwater Wetlands Individual Permit. This Application does not meet all of these requirements. Specifically, it does not comply with the requirement that the NESE Project “will not destroy, jeopardize or adversely modify a present or documented habitat for threatened or endangered species; and shall not jeopardize the continued existence of a local population of a threatened or endangered species.” **[N.J.A.C. 7:7A-10.2(b)(3)]**

MADISON LOOP GOES THROUGH FORAGING & NESTING HABITAT FOR THREATENED & ENDANGERED SPECIES.

1. Wetlands along the Madison Loop have suitable foraging habitats for the bald eagle, osprey & black-crowned night-heron.
2. Wetlands along the Madison Loop have suitable nesting habitats for the bald eagle and osprey.
3. As far as we know, Williams/Transco has not completed the requested nesting survey for any area where they plan to cut down trees or destroy habitat for threatened or endangered species.
4. Construction would alter vegetation, increase exposure to wind, light & temperature fluctuations, and fragment habitat.
 - Williams/Transco provided documentation of foraging or habitats for threatened or endangered species on the Madison Loop. The Application did not include information about surveys for nests or all responses from NJDEP that would permit construction in this area unless certain timing restrictions are adhered to. In Appendix E of the Freshwater Wetlands Individual Permit Application (Correspondence), it was noted that the USFWS recommended completing a raptor nest survey before any construction at the proposed Compressor Station 206 or Madison Loop; Williams/Transco planned to survey for nesting raptors in March 2018; and NJDEP recommended doing so in April/May 2018 since no tree clearing was proposed until October 2018. Williams/Transco’s contracted group (E&E) wrote that they would ask for an extension of the end of tree clearing to be allowed through March 31, 2019 instead of February 28 if no nests were found. There are not any publically viewable documents about any surveys or agreements about timing restrictions.
 - In their Freshwater Wetlands Individual Permit Application, Williams/Transco noted that the Madison Loop will impact wetlands that are suitable foraging habitats for bald eagles and the black-crowned night-heron along with suitable foraging and nesting habitats for osprey. In a submission to FERC (6/1/18), Williams/Transco also noted that there are suitable nesting habitat for the bald eagle in areas of the Madison Loop. On page 4-19, Williams/Transco noted in their FWW-IP application that alterations to habitat functions provided by the wetlands will result in changes such as vegetation composition and structure, increased exposure to wind, light and temperature fluctuations, and new habitat fragmentation. They also noted that permanent conversion of wetlands could potentially alter flood storage capacity of wetlands, particularly in floodplain wetlands. The value of the lost vegetation and trees in the wetlands was minimized and not comprehensively detailed in the application.

Respectfully submitted by the Steering Committee of the Franklin Township Task Force on Compressor Station 206 & NESE:

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