**TO:** Matthew Resnick **COPIES VIA EMAIL TO:**

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**REGARDING:**

APPLICANT: Transcontinental Gas Pipe Line Company LLC

PROJECT: Northeast Supply Enhancement (NESE) Project

FILE NUMBERS: NJDEP File No. 0000-01-1001.3 FWW 180001 Individual Permit

NJDEP HEARING DATE: 11/5/18

**FROM:**

Full Name:

Full Address:

Under the Freshwater Wetlands Protection Act Rules, NJDEP must address whether the NESE Project is in the “public interest.” Under these rules, NJDEP must consider, among other factors, whether the “public interest in preservation of natural resources” is being served by a project.

Additionally, 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.

Furthermore, 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.

**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.**

1. There is an incomplete and sparse comparison of electric motor-driven to gas-fired compressor units as a reasonable alternative method – Williams/Transco used remote sensing and did not document any consultation with PSEG about transmission line route possibilities.
2. There is an incomplete and misleading analysis of alternative sites for Compressor Station 206. The final five sites that were considered by Williams/Transco as possibilities all contained wetlands, but combining several neighboring parcels would have had less impact on wetlands than the chosen site.
3. The impacts to over 20 acres of wetland associated with the FWW permit demonstrate that Williams/Transco has failed to provide sufficient factual support for NJDEP to determine that the Project is in the public interest.
4. New York’s need for the gas is not as great as the NESE plans to deliver, and actually it would deliver more than twice as much additional natural gas to NYC than it needs, even if National Grid achieves their goal of converting all residential and commercial buildings use of oil to gas.
5. There is no public safety & health benefit for people in New Jersey from NESE.
6. The NESE Project would not deliver an energy supply to New Jersey.

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.