

Concern: Construction of proposed Compressor Station 206 will increase stormwater flooding and compromise habitat for threatened species

For accountability, public participation, and use of science-based decision-making, the following comments are provided for consideration during the current comment period for the January 2020 applications by Williams/Transco for the following permits for the proposed Northeast Supply Enhancement Project: Freshwater Wetlands Individual Permit with Section 401 Water Quality Certification, Flood Hazard Area Individual Permit and Verification, Waterfront Development Individual Permit with Section 401 Water Quality Certification, and Coastal Zone Management Act Consistency Determination. I also ask that you consider all previous comments submitted during the previous commenting periods.

Construction of a stormwater basin at the proposed Compressor Station 206 site does not include complete plans that account for the specific soil type that exists there.

- The groundwater table here is high, and bedrock is found shortly below ground level. Flooding at CS206 could impact the plumes of contaminated groundwater at Higgins Farm Superfund Site – There's no certainty about groundwater mounding & potential modification of contaminated plumes at the Higgins Farm Superfund Site.
- Forests help to address stormwater runoff, and destroying forested land to build the NESE Project would hinder this protection. Removal of 16.6 acres of forested land at the CS206 site creates lost benefit of absorbing stormwater & pollutants. Recovery of forested areas that are not permanently removed could take 50+ years.
- Construction of the NESE Project could reduce the capacity of wetlands to buffer flood flow and control erosion. There was no factual determination by Williams/Transco that their Erosion and Sediment Control Plan would ensure that ground or surface water would not be degraded.
- An inadequately designed stormwater infiltration basin would likely create more stormwater flooding to local communities.

Impacts to the habitat for the threatened Barred Owl as well as protected vernal pool habitats were not adequately assessed or avoided at the proposed Compressor Station 206 site.

- The suitability of the site for barred owl led to reclassification of the onsite wetlands to "exceptional resource value," which required a 150-foot transition area.
- Williams/Transco wrongly claims that the Project's impacts to "exceptional resource value" wetlands are essentially *de minimis* by assuming – without providing any supporting data – that all 381 acres of identified forested wetlands within the contiguous area surrounding the site provide suitable Barred Owl habitat.
- Vernal pools qualify as "critical habitat for fauna and flora" under New Jersey Rules, yet Williams/Transco's environmental and wetlands analysis has not addressed the impacts specific to vernal pools and vernal habitats for either the previously proposed Trap Rock access road or the currently proposed Higgins Farm access road.

For the above reasons, I request that the DEP deny the January 21, 2020 permit applications referenced above, and maintain its authority to protect the environment of New Jersey.

Respectfully submitted,