

Concern: The NESE Project does not meet the standards for “public interest” noted in N.J.S.A. 13:9B-11, the Freshwater Wetlands Protection Act.

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.

The “public interest in preservation of natural resources” would not be served by the NESE Project.

- There is no public safety and health benefit for people in New Jersey from NESE.
- The NESE Project would not deliver an energy supply to New Jersey.
- Approval of the NESE Project as proposed would ensure decades of increased greenhouse gas emissions, cancer-causing airborne emissions, and risks from aging pipelines that are supposed to be overseen by agencies that are short-staffed.
- Approval of the NESE Project without a recognition of plans of Williams/Transco to rapidly expand their infrastructure to move more gas from the Marcellus Shale region in Pennsylvania through New Jersey would neglect to consider (a) compound and cumulative impacts that threaten the health, safety and economic security of our State, as well as (b) the increase of our long-term dependence on fossil fuels at a time when we have the commitment to transition to clean and renewable sources of energy.
- Basing decisions upon modeling that only looks at the short-term direct impacts by estimating the length of time and spread of turbidity plumes in the water does not account for the compounded, cumulative and long-term direct and indirect impacts from unearthing, suspending and spreading toxins that have been buried beneath the seabed for years. Without truly knowing the **long-term cumulative and secondary impacts** of suspending and re-depositing buried toxins on the seafloor, there being no study or modeling of synergistic impacts from combinations of toxins to different habitats and sea life that are intertwined in the food chain, the impact from construction in the Raritan Bay should be considered to be permanent until proven otherwise.

The “economic value, both public and private, of the proposed regulated activity to the general area” would not be served by the NESE project.

- New Jersey’s Bayshore community relies on income from recreational and commercial fishing, tourism, aquaculture, and the ancillary businesses that support and benefit from these industries. A thorough review of the documents provided to the NJDEP or to FERC has not shown an accurate and comprehensive analysis comparing the anticipated number of jobs for New Jersey residents and revenue for the nine month in-water construction period of the NESE Project in this area to the revenue that would be lost by those who rely on access to New Jersey’s seashore and to clean water.
- Threats to jobs would likely persist for years from damage and pollution caused by construction that will unearth and redistribute toxins from beneath the seafloor that will be ingested by bottom feeders, bury benthic communities, and impact the food chain and habitats for an undetermined period of time.
- Threats to the shore health and economy were also not calculated to account for impacts from climate change driven events. For New Jersey’s coastal communities to be sustainable and resilient, a review of the applications for the NESE Project needs to consider climate change impacts such as ocean acidification and warming as well as sea level rise vulnerabilities seen in risks from flooding, storm surges, shoreline erosion, increases in floodplains, and saltwater intrusion.

For the reasons above, 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,