

Concern: The impact of the NESE Project on climate change effects should be considered in light of the threats facing New Jersey as well as the State's goals to reduce greenhouse gases.

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.

Recently, NJ has taken several actions to combat climate change including joining the U.S. Climate Alliance; returning to the Regional Greenhouse Gas Initiative (RGGI); pursuing offshore wind projects; and the signing of the Global Warming Response Act (GWRA). The GWRA requires NJDEP and other agencies to establish interim benchmarks and to take sensible steps forward to achieve our 2050 goals. It requires New Jersey to reduce short-lived climate pollutants like methane (the primary component of natural gas), which can have a dramatic warming effect much greater than carbon dioxide. Within 12 months, DEP will publish a report detailing measures to accomplish the economy-wide goal of the GWRA, and 18 months thereafter, move forward with regulating greenhouse gas emissions to reach our goal.

The NESE project will contribute to greenhouse gas emissions rather than reduce them.

- Construction and operation of the compressor station and pipelines that are part of the NESE Project will increase greenhouse gases in New Jersey that lead to significant weather events and other harmful effects.
- The NESE project will contribute to rather than reduce the negative impacts of climate change on New Jersey residents, water resources, wildlife, and economy.
- Climate change impacts from NESE would threaten the existence of several fragile species already noted to be endangered by the NESE Project, including Atlantic Sturgeon, Winter Flounder, and Clams.
- In addition to threats to health from the toxic emissions from the gas-fired compressor station units, the NESE Project's impact on climate change would also harm our health, security and economy from leaking and burning of natural gas - more significant flooding, hurricanes, heat waves, air and water temperature increases, health risks and the likelihood of infectious diseases and stress, and displacement.
- Climate change-fueled natural disasters have led to exceedingly high costs. Superstorm Sandy destroyed or damaged over 30, 000 properties, cost over \$36 billion, and resulted in 37 deaths in NJ alone. These costs don't even begin to consider the negative impacts to human health, both physical and psychological. The cost of weather/climate-related disasters is mostly borne by taxpayers and people who are directly impacted but not involved in decision-making policies about the production and transportation of carbon-intensive goods.

NESE's Applications & reviews clearly omitted assessing actual greenhouse gas (GHG) emissions, both initially and cumulatively, for the impact on Central New Jersey from Compressor Station 206 (CS206). Methane and nitrous oxide are much worse greenhouse gases than CO₂, especially when we consider the speed with which we need to act. A study published on June 21, 2018 in the journal Science¹ puts the rate of methane emissions from domestic oil and gas operations at 2.3 percent of total production per year, which is 60 percent higher than the current estimate from the Environmental Protection Agency. This much leaked methane would have roughly the same climate impact in the short-term as emissions from all U.S. coal-fired power plants, the authors found.

- Reported emissions estimates for the Solar Mars 100 turbines proposed for Compressor Station 206 are not warranted by the turbine manufacturer, and they were not validated by FERC or NJDEP.

- Williams/Transco has never used Selective Catalytic Reduction (SCR) technology on a Solar Mars 100 before, so the impact on pollution reduction cannot be adequately assessed.

Methane Leaks are not accounted for in the NESE application documents. Numerous studies show that methane leakage has been underestimated in reports by industry.

- There should be an emphasis on measuring methane emissions (not just carbon dioxide) and minimizing these emissions in our state's efforts to reduce greenhouse gas.
- We are in an ozone nonattainment zone, and methane leaks contribute to ozone.

To date, impacts of increased greenhouse gas emissions have not been accounted for by any agency reviewing NESE's application and environmental impact documents.

- FERC declined to weigh climate change in the balance when deciding whether or not to grant Williams/Transco a certificate to proceed, claiming that there is no standard for determining a project's greenhouse gas emissions. However, after their DEIS was released, leading environmentalists and legal authorities informed FERC of available methods for determining potential GHG emissions. Recently, a D.C. Circuit Court affirmed in *Sierra Club v. FERC* that FERC *must* evaluate the impacts of greenhouse gas emission when assessing a project.

While New Jersey and New York are moving quickly to establish our states as leaders in clean renewable energy for use and jobs by enacting ambitious clean energy goals that will lower demand for natural gas by increasing renewables, energy storage, and energy efficiency, the NESE Project threatens attainment of those goals. Clean renewable energy alternatives will reduce the negative impacts of climate change on New Jersey, while the NESE Project will contribute in the short and long term to the negative impacts.

For these reasons, I request that the DEP include impacts of the NESE Project on climate change effects in their deliberations and consequently deny the January 21, 2020 permit applications referenced above. The DEP's denial will thus maintain its authority to protect the environment of New Jersey.

Respectfully submitted,

¹ R. A. Alvarez et al., *Science* 10.1126/science.aar7204 (2018 June 21). Assessment of methane emissions from the U.S. oil and gas supply chain. **Accessed at:** <http://science.sciencemag.org/content/early/2018/06/20/science.aar7204/tab-pdf>