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September 1, 2016

Honorable Norman Bay, Chairman
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket CP15-558-000 – Proposed PennEast Pipeline Project

Dear Chairman Bay and Members of FERC:

New Jersey Conservation Foundation is an intervener in Docket CP15-558-000 regarding the proposed PennEast pipeline. We offer the following comments regarding the significant impacts that the proposed pipeline would have on regional air quality and increased greenhouse gas emissions.

Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink that reads "Thomas A. Gilbert". The signature is written in a cursive style.

Thomas A Gilbert
Campaign Director, Climate, Energy & Natural Resources



Comments of New Jersey Conservation Foundation on the PennEast Draft Environmental Impact Statement: Air Quality

We offer the following comments in response to the findings below in the Draft Environmental Impact Statement (DEIS):

ES-14 There is also the potential, however, that the Project would contribute to a cumulative improvement in regional air quality if a portion of the natural gas associated with the Project displaces the use of other more polluting fossil fuels.

There is absolutely no evidence presented by PennEast that any portion of PennEast capacity will lead to reduced emissions. The speculation in the DEIS should be removed and it should be clearly stated that PennEast capacity was not purchased by shippers for this purpose. There are only two shippers who have purchased PennEast capacity for use in a natural gas power plant. Talen and NRG have contracted for 10,000 and 50,000 dth/d of capacity respectively; both plants are already running on natural gas and are not replacing coal. Talen is currently adding natural gas-fired generation to two coal plants in PA, but these will connect to Texas Eastern and Transco, and are not located near PennEast. The closest Talen power plants in New Jersey are already running on natural gas.

Furthermore, The DEIS states that construction and operation of the Kidder compressor station will result in emissions of NO_x (nitric oxide and nitrogen dioxide), CO (carbon monoxide), SO₂ (sulfur dioxide), PM (particulate matter), VOCs (volatile organic compounds), CH₂O (formaldehyde), and various other greenhouse gases and HAPs (hazardous air pollutants). **If PennEast won't displace other more polluting fossil fuels, and will result in increased emissions from the Kidder compressor station, then clearly PennEast will negatively impact air quality in the region, not improve it as the DEIS speculates.**

In New Jersey, additional natural gas offers little potential for reducing carbon emissions and has become a primary source of increased emissions. In 2014, carbon emissions from electric generation in New Jersey increased by 17%, driven by increased generation from gas-fired power plants.

PennEast Would Significantly Increase Greenhouse Gas Emissions

The proposed project provides an additional 1.1 bcf/day of capacity to end users. According to the DEIS, this volume of natural gas would release 23.5 million metric tons per year of additional CO₂e.

DEIS: 4-285

“The proposed transmission capacity of the Project is 1.1 million dekatherms per day (MMDth/d). A dekatherm is equal to 10 therms, or 1,000,000 Btus, of heat content. Using the GHG emission factors and global warming potentials published in 40 CFR 98 for emissions of CO₂, CH₄, and N₂O from combustion of natural gas, potential end-use GHG emissions would be 23,500,000 tons per year during the expected lifetime of the Project.”

In addition to end-use GHG emissions, PennEast calculates emissions from the construction phase (34,878 tons) and annual operation phase (274,057 tons annually). PennEast should also be required to calculate the loss of carbon sequestration due to the clearing of forests, accounting for the maturity of the forest as well as acreage.

The Final CEQ Guidance on Greenhouse Gas Emissions Requires Additional Analysis

On August 1st, 2016, the Council on Environmental Quality issued a final memorandum: Final Consideration for Federal Departments and Agencies on consideration of Greenhouse Gas Emissions and effects of Climate Change in National Environmental Policy Act Reviews.

The final CEQ guidance stipulates that federal agencies more fully examine the impacts of projects on greenhouse gas emissions as part of the NEPA review. The DEIS should be revised to fully comply with the final CEQ guidance, including the complete evaluation of life-cycle and cumulative impacts.

As a coastal state, New Jersey has a great deal at stake in terms of the impacts of climate change, including sea-level rise and the devastation caused by more frequent and intense storms. It is imperative that the impacts that PennEast would have on greenhouse gas emissions be fully evaluated.

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