

West Amwell Township
150 Rocktown Lambertville Road
Lambertville, NJ 08530

August 22, 2016

Honorable Norman Bay, Chair
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:

We are West Amwell Township Committee, Commission, and Board members and are Intervenor on the proposed PennEast project docket CP15-558-000. We are commenting on the PennEast Draft Environmental Impact Statement (DEIS).

The DEIS provides no construction plans for 32 of New Jersey's most pristine Category One streams including the Alexauken Creek in West Amwell Township and does not provide plans for HDD (horizontal directional drilling) or for minimizing impacts to riparian buffers.

The DEIS has not addressed the impacts of construction on water quality regarding the Alexauken Creek and the federally protected Delaware River.

The DEIS does not address any wetland mitigation yet claims that the soil, hydrology, and vegetation of areas disturbed from construction can be restored to pre-construction conditions.

Almost all of the residents in the township and most along the proposed route have private wells, yet the DEIS claims that there are only 2 wells within 150 feet of PennEast's proposed route in NJ. Blasting along the proposed route could seriously disrupt ground water flow to wells. The DEIS does not address this.

The DEIS also does not address safety, impacts on the fragmentation of the Sourland Mountain, threatened and endangered species, geology, migratory birds, and cultural resources. Plans for construction and mitigation are absent or ongoing.

By FERC's determination there are 79 omissions in the DEIS. The following sections of the DEIS, by FERC's admission, are incomplete: geology, water and wetlands, vegetation and wildlife, threatened, endangered and species of special status, land use, recreation, and visual resources, cultural resources, and air quality and noise. 70% of field survey data is missing for New Jersey.

Yet, In the Executive Summary of the DEIS, FERC states: "...the Project would not have significant impacts on geologic resources ...the Project is not expected to significantly impact groundwater, surface water, or wetland quality or quantity during construction or operation ...overall impacts on land use and visual resources would be adequately minimized."

FERC has drawn premature conclusions about the proposed pipeline's impacts on the residents and the environment with minimal supportive field data, ongoing/requested construction plans, mitigation plans, and overall impacts. This information is required under the National Environmental Policy Act, (NEPA) to be in the DEIS. The issuance of this DEIS contradicts NEPA) 42 U.S.C. 4321, et seq. **The overarching goal of NEPA is to "insure that environmental information is available to public officials and citizens before decisions are made. . . [and] [t]he information must be of high quality."** 40 C.F.R. 1500.1(b)

For the safety and health of the residents and the protection of the environment of West Amwell, we urge FERC to reconsider your issuance of this DEIS at this time and withdraw the DEIS. FERC has an ethical and legal responsibility to receive all the necessary factual data to evaluate this project **before** reaching any conclusions.

Please respond to the concerns of West Amwell Township in writing.

Thank you.

Zachary T. Rich, Mayor

Stephen Bergenfeld, Committeeman

Robert E. Tomenchok Jr., Chair, Planning Board

James J. Cally, Board of Health; Planning Board

Cathy Urbanski, Chair, Environmental Commission; Open Space Committee

Joan Van der Veen, Environmental Commission

David Beaumont, Environmental Commission; Finance Committee

Janice Zuzov, Environmental Commission

David Clapp, Environmental Commission

