



West Amwell Township
150 Rocktown Lambertville Road
Lambertville, NJ 08530-3203
609 397-2054
www.westamwelltp.org
July 30, 2015

Comments to FERC for the proposed PennEast pipeline, docket# PF15-1-000.

West Amwell Township has become increasingly concerned that PennEast still has not adequately addressed our scoping comments of 2/20/2015 and our 3/26/2015 rebuttal to PennEast's response to scoping comments of 3/13/15. Our crucial observations/comments which need to be thoroughly addressed include:

1. The Sourland Mountain Region

The importance of the Sourland Mountain Region has been totally ignored by PennEast in their reports, in fact in several instances they refer to it as the Sourland Conservancy. *The Sourland Mountain is the last contiguous forest of the Piedmont Plains region of central New Jersey.* The Sourland region encompasses a complex ecosystem of forest, wetlands and grasslands. Its mosaic of habitats is home to an incredibly rich diversity of animal and plant species, many rare or endangered. The forest is especially important as a breeding area for migratory songbirds from Mexico, Central and South America, particularly those who nest only in large wooded areas. Fragmentation of this forest will result in loss of habitat and loss of diversity.

Removal of the forest, even in small patches, can have impacts extending up to 1,000 feet in all directions and creates an "edge effect," where the deep woods habitat of the interior forest is fragmented and breeding bird habitat is threatened by increased nest predation. Many Sourland region species rely on both the quantity and the quality of the forest and understory, and will disappear as the forest becomes fragmented and degraded.

The proposed routes of the pipeline through the Sourland Mountain will invade the habitats of threatened and endangered species protected by the Federal Endangered Species Act, such as the bald eagle, the wood turtle, the long tailed salamander, the Indiana bat, the American Kestrel, and various plants and other animals protected by federal and state law. Bald eagles and nesting bald eagles have been sighted in and around the Lambertville (United Water Company) reservoir, which is located in West Amwell. Over 90 percent of the Sourland Region is habitat for threatened and endangered species.

PennEast has indicated that their re-route in January 2015 to co-locate the pipeline within an existing electrical power line ROW would substantially lower the environmental impact the pipeline would have, and that as such they adequately addressed our concerns regarding the Sourlands.

However, this is highly misleading and the construction plans published by PennEast show that they are not truly co-locating. Due to requirements of JCP&L, PennEast must build the pipeline a substantial distance from the high voltage towers, and the entire construction ROW must be contained to the same side of the towers. The end result is that the construction ROW will expand the existing cuts in the Sourland region from approximately 100'-125' to 225'-250'. An increase of this magnitude will increase erosion potential dramatically and make the existing fragmentation impact far worse than we have today.

Because of its extreme environmental importance, the Sourland Mountain Region should not be disturbed in any way. The PennEast proposals within the Sourland Mountain Region are not acceptable.

2. Rare, threatened, and endangered species in the Natural Heritage Priority Site (Goat Hill)

Goat Hill has been designated as a Natural Heritage Priority Site. Goat Hill is the westernmost boundary of the Sourland Mountain. It is a steep, woody diabase hillside and the site contains three state endangered plant species (NJDEP).

With the January 2015 re-route the pipeline is now comes within a mere 500 yards of the Natural Heritage Priority Site.

Any disturbance to the natural environment of this area and its surroundings should be absolutely prohibited. This includes potential run-off from the PennEast proposed construction site to the Natural Heritage Priority Site, and potential impacts from blasting. PennEast cannot propose pipeline construction so close to Natural Heritage Priority Site.

3. Drinking water quality

Swan Creek and its tributaries feed the United Water Company Reservoir, the Delaware and Raritan Canal, and the Delaware River, drinking water sources for the city of Lambertville (population close to 4,000 residents) and New Jersey and Pennsylvania communities downstream (number of residents in the millions).

The January 2015 proposed route comes dangerously close to the United Water Company reservoir, with serious potential to contaminate the water supplies for Lambertville and downstream, during construction and after. It also crosses Swan Creek, with considerable negative impacts on the stream.

NEPA regulations require that PennEast makes reasonable efforts to avoid impacts such as this, yet there is no indication from their scoping responses that they have made any effort to avoid the United Water Reservoir. It is not acceptable for construction and potential blasting to be done so close to the reservoir.

PennEast has further indicated in their resource reports that they will be using the dam-and-pump method on all waterways being crossed by the project with the exception of the Lehigh River, Susquehanna River, Delaware River, and Moore's Creek. Category One waterways such as Alexauken Creek within West Amwell will be breached via dam and pump. We do not find this acceptable and find this further evidence that PennEast is not taking environmental impacts seriously in this project.

The proposed PennEast pipeline also cuts right through the arsenic hot spot where it has the potential to do the most damage to the drinking water supplies of the inhabitants. Wells in West Amwell have been documented to contain arsenic.

Our drinking water supplies do not need to be further contaminated with arsenic.

4. Wetlands

Wetlands play a particularly important role on the Sourland Mountain Ridge and are a valuable part of the ecosystem. In addition to acting as headwaters, wetland systems capture and retain precipitation, slowly releasing it into the ground and recharging aquifers. This is critical as recharge on the Sourland Mountain is extremely low. We find no evidence in the resource reports or scoping responses that PennEast is actively avoiding wetlands.

Residents on the Mountain and in most of the Township depend on groundwater for their water supply. Wetlands should be avoided.

5. Federal Clean Water Act regarding the Category One Alexauken Creek

West Amwell has worked very hard to protect the Alexauken Creek and its tributaries and to protect the quality of our water. The Federal government has provided over \$800,000 to restore and protect the Alexauken Creek. The proposed pipeline's contamination and irreparable destruction is in direct opposition to the intent of the Federal Clean Water Act. This Category One waterway is protected under NJDEP's Surface Water Quality Standards in conformance with the Federal Clean Water Act. As mentioned in section 3 PennEast not only plans on crossing Alexauken creek, it plans to do so with the dam-and-pump method, which is completely unacceptable.

The Alexauken Creek should be avoided.

6. Steep Slopes

Very steep slopes are documented on the Sourland Mountain Region. Pipeline construction will irreparably damage this unique ecosystem. The proposed January 2015 re-route has the pipeline going through many steep slopes in the township, and we see no evidence in the resource reports or scoping comments that PennEast is avoiding steep slopes.

The pipeline should not impact in any way this major and last unique forested area in central New Jersey.

7. Diabase Intrusions and Sills and the Effects of Blasting

The Sourland Mountain/Ridge/Region is the most prominent topographic feature within the Township and is underlain by diabase rock. The largest diabase sills are encountered beneath Sourland Mountain. Two large linear sills are directly connected to Sourland Mountain. One of these sills parallels and is directly north of Rocktown- Lambertville Road and the second one trends to the southwest from Wilson Road to Mount Airy. Two smaller sills have also been mapped in the Township. The first one is located north of South Hunterdon Regional Elementary School in West Amwell and the second intersects the border with Lambertville. The diabase formation is the poorest source of groundwater. The rock has virtually no permeability. Well water is obtained through fractures in the rock.

This is an extreme concern for West Amwell Township as blasting through diabase can affect the water quality and the wells in the entire township.

According to **Managing Social and Environmental Issues due to Blasting Operations (Sushil Bhandari and Sheetal Jain, Academia.edu)**:

“Blasting fumes, in some cases leaching of chemicals in the blast holes, and polluting ground water are some of the undesired events associated with blasting which collectively affect the surrounding environment adversely.”

“The risks associated with blasting are wide ranging and some are quite unique”:

Damage to buildings

Damage to rock slopes

Damage to buried pipes

Damage to water wells and aquifers

Ground vibration effects

Impact on animals

Fines

Water pollution

Fumes and gasses

Dust

Reduction of agricultural land, soil and air pollution, reduction of crop yields

West Amwell's water supply is primarily from private wells in a diabase formation which is the poorest source of groundwater. We do not wish to compromise/contaminate/lose our precious water. Pollution and disruption of our water supply will not be tolerated.

Additionally:

1. West Amwell agrees with Kingwood Township that PennEast should be prepared to

Monitor all the wells in the Township – not just those on the properties where the proposed pipeline is sited. The monitoring, conducted for a minimum of 10 years, should consist of pre and post construction depth to water, well capacity, and recharge reports.

If any wells are negatively affected by the construction of the pipeline, West Amwell Township requires PennEast to make whole those property owners that are affected, by methods including but not limited to drilling new wells, providing potable water in perpetuity, or fee simple purchase of the property at rates based on the past 10 year high.

Monitoring must be done by certified hydrologists who report to the Township and are paid for by PennEast.

The same monitoring and making whole should also be done for all septic systems within the township.

2. July 2015 proposed route

The proposed July 2015 route now comes close to South Hunterdon Elementary School in two places. It is 500 yards to the Southwest, and the changed Lambertville lateral is 800 yards to the Northwest. Boxing in our elementary school on two sides in such close proximity is not acceptable to us.

The route is still under 250 yards from Hewitt Park, a township-owned recreation facility that is used year round for youth sports. This is unacceptable.

West Amwell remains against the proposed pipeline as it will decimate our cultural, environmental, and rural heritages, will permanently disrupt the lives and homes of our residents, and will benefit no one except the private-for-profit PennEast LLC.

Thank you.

George Fisher, Mayor, West Amwell Township

Cathy Urbanski, Chair, West Amwell Township Environmental Commission

