



**West Amwell Township**  
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The Township of West Amwell had submitted scoping comments to FERC for the proposed PennEast pipeline, docket# PF15-1-000.

PennEast responded to these comments on 3-13-15. There were very serious omissions in this report.

**Excluded and not addressed** by PennEast were West Amwell's scoping comments on:

Rare threatened and endangered species: the Sourland Mountain:

*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.*

*The Sourland Mountain region may be the last refuge of some complex plant communities that once flourished in central New Jersey. Sixteen plant species that are either endangered or of special concern in New Jersey have been documented in the region to date.*

Rare threatened and endangered species in the Natural Heritage Priority Site (Goat Hill). A map was provided.

*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). Any disturbance to the natural environment of this area should be absolutely prohibited.*

## Preserved natural areas and farmland/Open Space and Lands conserved with public funds: the Sourland Mountain:

*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.*

*Because of its extreme environmental importance, the Sourland Mountain should not be disturbed in any way.*

## Preserved natural areas and farmland/Open Space and Lands conserved with public funds.

### Preserved Lands

*The taxpayers of the State of New Jersey, Hunterdon County, West Amwell Township as well as foundations and individual donors and landowners have invested an estimated 40 million dollars to permanently preserve our farmland and woodlands in perpetuity.*

*West Amwell is a small rural community and has worked very hard to preserve our farms and forests. The proposed pipeline will render our farmland unfit for crop production, as it is documented that the soils are never the same because of the construction and the pipeline continuously warms the soil. The proposed pipeline will do irreparable damage to our forests as clear cutting will change the delicate balance of the forest interior; fragmentation of the forest results in loss of habitat and the introduction of invasives and new predators.*

*The Open Space Committee of West Amwell Township has preserved over 5500 acres for the present and future residents. I strongly oppose the construction of a 36" pipeline through our preserved farms and preserved forests. This totally disregards the will of the people, the environment and the Master Plan of West Amwell.*

### Drinking water quality:

*Most of the streams in West Amwell are tributaries of the Delaware River. The Delaware River is designated as a National Wild and Scenic River.*

*The Alexauken Creek is the principal surface water body in West Amwell, draining 15.12 square miles including 28.64 stream miles and 52.31 lake acres. It has been classified by the State of New Jersey as a Category 1*

*waterbody based on its connection to the federally protected Delaware River, its value as habitat for threatened and endangered species and the relatively undeveloped nature of its watershed.*

*Pipeline construction activities result in impacts affecting water resources, including: erosion and sedimentation, loss of riparian vegetation, forest and habitat loss and fragmentation, and cumulative impacts. In addition, these negative impacts are irreparable. The Alexauxen Creek and its tributaries are protected from degradation.*

*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).*

*A PennEast proposed pipeline route, which potentially co-locates with the electric transmission lines, comes dangerously close (within 200 feet) of 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 impact on the stream. It also appears to cross near or through the United Water Company water treatment plant.*

*The proposed PennEast pipeline cuts right through the arsenic hot spot where it can 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.*

*The diabase intrusions in the Township are an important part of our geology and the groundwater supply of the residents of West Amwell. Pipeline intrusion would very much compromise the groundwater supply for our residents.*

## Wetlands

*NJDEP wetland mapping indicates that 1,146 acres of wetlands exist in West Amwell Township. The predominant wetland type is deciduous/mixed forest, composing 90.02 percent of the total acreage of wetlands at 1,042.13 acres. They are located primarily on the Sourland Mountain, along stream corridors, and in isolated pockets throughout the Township.*

*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 Mountain is extremely low.*

*A large percentage of wetlands are in the Sourland Mountain. This is another reason why the mountain should not be crossed by the PennEast pipeline.*

## Federal Clean Water Act regarding the Category 1 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.*

## Blasting.

*Blasting through the hard, dense diabase rock formations of West Amwell during pipeline construction will seriously cause these fractures to shift and/or be blocked. Our wells and our water supply will be seriously impacted. An explosion of the pipeline would destroy the wells and water supply of the residents of the Township both nearby and at a distance, as these fractures containing groundwater can travel for a great distance. We are dependent on water from these fractures.*

## Local Ordinances.

*The Township has taken considerable efforts to protect our forests, unique geologic formations, water resources, wetlands, thin soils, and wildlife. To that end, the Township has preserved over 5500 acres of farmland and forests. Additionally, the Township has adopted ordinances to protect our streams, soils, rock formations, woodlands, critical areas, and rural character.*

## Sensitive Areas (Sourland Mountain Region).

***The Sourland Mountain is the last and only contiguous forested area in central New Jersey. (Figure 1)***

*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.*

*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.*

*The Sourland Mountain region may be the last refuge of some complex plant communities that once flourished in central New Jersey. Sixteen plant species that are either endangered or of special concern in New Jersey have been documented in the region to date.*

*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.*

*Because of its extreme environmental importance, the Sourland Mountain should not be disturbed in any way.*

### Steep Slopes

*Very steep slopes are documented on the Sourland Mountain, another reason to not cross and violate this esteemed forested ridge. Pipeline construction will irreparably damage this unique ecosystem. The pipeline should not destroy this major and last unique forested area in central New Jersey.*

### Watershed Impacts

*The proposed routes of the PennEast pipeline will disrupt/contaminate the Alexauken Creek and its buffers and its watershed numerous times. Buffers for the Alexauken Creek are 300 feet on either side of the midline. This Category 1 waterway is protected under NJDEP’s Surface Water Quality Standards in conformance with the Federal Clean Water Act.*

*Pipeline construction activities result in impacts affecting water resources, including: erosion and sedimentation, loss of riparian vegetation, forest and habitat loss and fragmentation, and cumulative impacts. In addition, these negative impacts are irreparable. The Alexauxen Creek and its tributaries are protected from degradation.*

### Geology – Diabase Intrusions and Sills

*The Sourland Mountain/Ridge 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. (Figure 2)*

*The diabase formation is the poorest source of groundwater. The rock has virtually no permeability. Because this formation is relatively young compared to other formations, it has not been subjected to folding and faulting that allow groundwater to move toward the surface. In addition, surface water generated by rainfall and snow runs off rapidly with virtually no opportunity for infiltration. Conditions created by the diabase formation have also metamorphosed portions of the adjacent geologic formations, resulting in similar conditions in these areas.*

*Diabase was formed by magmas (molten rock) and is dense and hard. These dense, hard, and poorly fractured crystalline rocks have a thickness ranging from 1,200 to 1,300 feet. Dense hard rock will create a major problem with blasting.*

*That diabase rock has no intergranular openings, it therefore has no primary porosity for transmitting water. Groundwater storage and transmittal depend on the secondary porosity or the openings between blocks of impermeable rock. These openings are typically associated with fractures from faults or found near joints or along bedding planes. “Depending on the proximity to regional or local fault systems and the brittleness of the rocks, the spacing between these vertical to near vertical joints will range from fractions of an inch to several tens or hundreds of feet. In some areas, the joints serve to interconnect fractured beds and in others, the beds interconnect the joints”. (Evaluation of Groundwater Resources of West Amwell Township, Matthew Mulhall, PG, M2 Associates, 2003).*

*Blasting through the hard, dense diabase rock formations of West Amwell during pipeline construction will seriously cause these fractures to shift and/or be blocked. Our wells and our water supply will be seriously impacted. An explosion of the pipeline would destroy the wells and water supply of the residents of the Township both nearby and at a distance, as these fractures containing groundwater can travel for a great distance. We are dependent on water from these fractures.*

*Since the primary source of drinking water for Township residents is groundwater, the Township of West Amwell has protected its valuable groundwater resources for current and future residents and businesses. Township officials understand that the protection of water quality and quantity is critical to supporting public health and quality of life. They also understand that protection of these resources is not only critical for their own citizens but also for other citizens of New Jersey and Pennsylvania located downstream of the West Amwell community.*

*The diabase intrusions in the Township are an important part of our geology and the groundwater supply of the residents of West Amwell. Pipeline intrusion would very much compromise the groundwater supply for our residents.*

*“Future development must reflect land use considerations that preserve the quality and availability of West Amwell’s limited groundwater resources”. – (2012 Natural Resource Inventory for West Amwell.)*

The scoping period was “to solicit comments on the scope of the environmental review for the Project from interested stakeholders.”

West Amwell Township spent considerable time and resources preparing the scoping comments and expressing our specific concerns. It appears that they were ignored or just not read by PennEast. It is not possible for PennEast to prepare a

comprehensive Environmental Impact Statement when the scoping period comments were mostly disregarded.

Of the comments that PennEast did respond to, most did not address specific issues and concerns. They were boilerplate and stock responses.

The “interested stakeholders” were treated very unfairly and not in accordance with the regulations:

“Pursuant to Section 157.21(f)(9) of the Commission’s regulations, 18 C.F.R. § 157.21(f)(9) (2014), PennEast submits, in Appendix A hereto, its response to comments posted to the above-referenced docket.”

Thank you for your consideration.

George Fisher, Mayor, West Amwell Township

Cathy Urbanski, Chair, West Amwell Township Environmental Commission