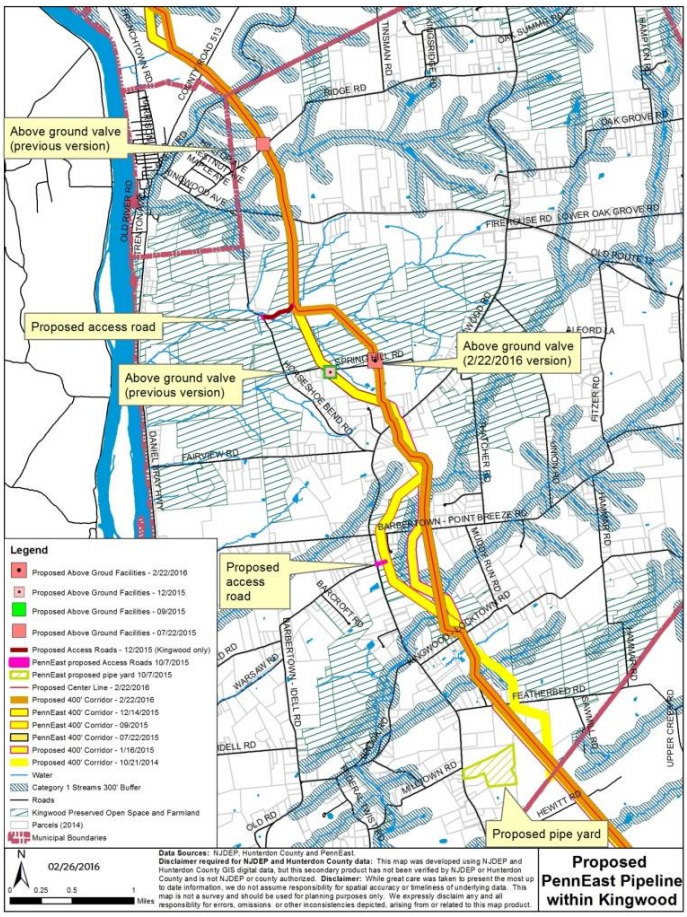
Kingwood Township



Lack of Public Need

- No homes in Kingwood use natural gas. In fact, solar electricity produced within Kingwood's boundaries is double Kingwood's residential electricity use.[1]
- State Development and Redevelopment Plan designated roughly half of the township as Environmentally Sensitive, stating that, "The future environmental and economic integrity of the state rests in the protection of these irreplaceable resources. …. These resources are critically important not only for the residents of these areas, but for all New Jersey citizens."[2]

Ground Water & Geology

- **All residents and businesses in Kingwood rely on well water exclusively**. PennEast says no wells are on the route, but at least 50-60 are in the direct route, and hundreds throughout the township are vulnerable.
- **Contrary to PennEast's assumptions about our ground water, because we have unconfined fractured bedrock aquifer, there IS a connection directly between the surface and our ground water.** In fractured bedrock aquifers, water is scarce; vulnerable to pollution and over withdrawal; wells can be affected at least 0.8 miles from a drawdown or pollution source; wells are already stressed and in jeopardy; there is nowhere else to obtain our water if it is polluted or the water table is lowered. In Kingwood, many wells yield only ½ gpm, therefore a very small additional lowering of the water table would threaten them.
- Blasting (which would be required for the entire length through Kingwood's shallow hard bedrock) and directional drilling (which is supposed to be less impactful) would endanger our aquifer during and after the construction phase.
- In Kingwood, 40% of wells exceed the arsenic standard and PennEast could make this percentage increase, as well as increase the arsenic levels. Arsenic is released from rock on exposure to air; pipeline construction will expose bedrock to air; there is no safe level of arsenic.

Surface Water

- 13 streams crossings in Kingwood (9 C1 and 4 C2); plus many unmapped intermittent stream crossings
- The Federally funded *Lockatong and Wickecheoke Creek Watersheds Restoration and Protection Plan* study and implementation projects revealed significant cause/effect relationships between existing land use(s) and the existing hydrology and water quality of these streams.[3]
- The 2005 EPA approved TMDL for the Lockatong (C1) requires a phosphorus load reduction of 86.9%.[4]
- The 2003 EPA approved TMDLs for Nishisakawick (C1) and Copper Creeks require a reduction of fecal coliform load (with margin of safety) of 77% and 98%, respectively.[5]
- Kingwood's streams are extremely flashy; pipeline construction and permanently compacted soils would increase flashiness, increase flooding, erosion and sedimentation.
- Possible future scouring of the materials surrounding the pipeline at every stream crossing. Both the processes of blasting a trench and directionally drilling below the streambed would likely fracture the

surrounding bedrock. Through freeze/thaw cycles and the inevitable storms and floods, accentuated by the aforementioned flashiness of Kingwood's streams, the pipeline could gradually or suddenly be exposed and damaged by rocks and debris carried by the streams (particularly during high flow events) and result in safety and pollution issues.

Wetlands

- ~ 21 wetlands in Kingwood would be impacted; most are exceptional value; 10 crossings are > $^{1}/_{10}$ mile length; plus many potential vernal pools
- ~ 64 acres of wetlands in Kingwood (using 400' width overlain on 2012 Land Use data[6])
- ~ 66% of the length within Kingwood crosses wetlands and wetland buffers
- "Wetlands remediation" that doesn't remediate the exact location where impacts are occurring will result in loss of wetland function (water quality, water storage and filtration, habitat etc.) and result in violations of the CWA.
- Many Kingwood property owners have received LOIs from NJDEP that state that the wetlands and transition areas (buffers) cannot support development of any kind based upon current NJDEP regulations. Many have been severely fined for wetlands violations. Why should PennEast be permitted to violate the CWA when landowners cannot?

Forests

- ~ 82 acres of forest in Kingwood alone would be lost (using 400' width overlain on 2012 Land Use data[6])
- More than half of the impacted forests in Kingwood are mature forests.

Open Space: Approximately 23% of the route through Kingwood is located on preserved open space and farmland (down from 24% on the original route).

Public Safety: local volunteer emergency services cannot handle a high-pressure pipeline incident

Alternate Routes

Route and alternate route deviations not rigorously selected or evaluated; inconsistent priorities; at least 5 different routes within Kingwood have been presented to date. Some examples:

- 1/2015 route compared to 12/2014 - more wetlands impacted
- 12/2015 route compared to 9/2015 – more wetlands and open water, less open space, straight through septic systems and wells
- 2/2016 route compared to 12/2015 – less open space but includes a newly impacted preserved farm; straight through a pond required for fire protection; straight through the heart of a world-class Olympic equestrian facility

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[1] Comment sent to FERC from Kingwood Township Environmental Commission on Resource Reports 1, 4, 5, and 10 under PF15-1 http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20150925-5008).

[2] NJ State Development and Redevelopment Plan. 2011. http://www.nj.gov/state/planning/plan.html

[3] NJ Water Supply Authority. http://www.raritanbasin.org/lockwick.html

[4] NJDEP, Division of Watershed Management. *State of New Jersey Nonpoint Source Report 2004-2006*. http://www.nj.gov/dep/watershedmgt/DOCS/NJ NPS Report 2004-2006 8-24-06.pdf

[5] NJDEP, Division of Watershed Management. *Total Maximum Daily Loads for Fecal Coliform to Address 28 Streams in the Northwest Water Region*. 2003. http://www.epa.gov/waters/tmdldocs/NJ-2003-Fecal Coliform-28 Streams Northwest Region.pdf

[6] NJDEP. 2015. *Land Use/Land Cover 2012 Update, Edition 20150217 Subbasin 02040105 - Middle Delaware-Musconetcong (Land_lu_2012_hu02040105)*. http://www.nj.gov/dep/gis/listall.html.