



NEW JERSEY HIGHLANDS COALITION

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Scoping Comments before FERC for Tennessee Gas Pipeline Company's proposed Northeast Upgrade Project

The proposed Northeast Upgrade project is not in the public convenience or necessity as it will only result in the destruction of environmental resources while lining the pockets of the applicant. To address all consequences of this project, including secondary and cumulative impacts, a full Environmental Impact Statement must be completed. That must include examining the impacts to the Delaware River watershed from Marcellus Shale natural gas drilling, which this project will facilitate by creating a superhighway for gas extracted through hydraulic fracturing, and the combined impact of the numerous unnecessary, utility infrastructure projects creating scars across the Highlands region and the Delaware Water Gap National Recreational Area. Segmenting the expansion of the 300 line into the 325 Loop Project and Northeast Upgrade is inappropriate and this agency should examine all resulting impacts from both projects in the NEPA document as both are connected and dependent on the other.

The Coalition is extremely concerned with the impacts this project will have on the Monksville Reservoir and the North Jersey District Water Supply Commission's watershed lands, which provide drinking water to 2.5 million New Jersey residents. Expanding infrastructure for corporate profit while endangering the water supply for state residents is not wise policy or in the public interest or safety.

An alternative in the NEPA document should examine the environmental consequences of investing the billions of capital for this project into repairing old pipes throughout the El Paso pipeline system. The EPA estimates one-third of the contribution of methane to the atmosphere is from leaking natural gas pipeline infrastructure. Methane is a greenhouse gas over 20 times more effective in trapping heat in the atmosphere than carbon dioxide (CO₂). This solution would not only make the existing pipelines more effective by reducing loss to leakage but would decrease the company's contribution to global climate change.

This corporation has already received approval to destroy 230 acres of the Highlands region for the 325 Loop project, enough is enough already. Access to clean drinking water and open space is a public necessity, this project is not.

Kate Millsaps
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