



# NEW JERSEY HIGHLANDS COALITION

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## **Comments on the Federal Energy Regulatory Commission's Environmental Assessment of Tennessee Gas Pipeline's Compressor Station expansion in W. Milford and Wantage, New Jersey.**

On behalf of the New Jersey Highlands Coalition, I submit these comments concerning the Federal Energy Regulatory Commission's (FERC) Environmental Assessment for Tennessee Gas Pipeline's proposal to develop two polluting and dangerous gas compressors in the Highlands region of New Jersey.

### **Risks to Drinking Water:**

The Highlands in New Jersey provide some or all of the water relied upon by over 6.2 million people – more than 70% of population in New Jersey. The Monksville and Wanaque Reservoirs together provide drinking water for 3.5 million New Jersey residents. The site proposed for Compressor 327 is within 2000' of these critical water resources, and adjacent to a Category 1 Exceptional Value Stream. Construction and on-going operation of the proposed facilities can lead to severe pollution from chemicals leeching into groundwater, local streams and the reservoir. Because of this enormous risk, we ask that FERC fully evaluate the major risks to the water supply for millions of NJ residents from this project.

### **Conflicts with State Law in New Jersey and New York:**

FERC failure to consider foreseeable indirect climate change impacts means it failed to determine the TGP's compliance with the *Global Warming Response Act* (GWRA) in New Jersey, which recognized the need for climate action by the New Jersey Legislature. This law directs the NJ Department of Environmental Protection to assess the state's greenhouse gas emissions and in collaboration with other state agencies, present recommendations for reducing greenhouse gas emissions 80% below 2006 levels by 2050. Additionally, this proposal is in violation of the *Climate & Communities Protection Act* (CLCPA) in New York, the state set to receive the gas from this project and in which it will be combusted. This act requires an 85% reduction in greenhouse gas emissions by 2050, 70% renewable energy by 2030, and 100% zero-emission electricity by 2040. FERC must fully consider both these Acts, and reconcile the facts that these state laws require industry and government to work towards rapid and drastic decarbonization across all sectors. However, gas utilities and FERC consistently pay little regard to these legal requirements when proposing and reviewing new energy infrastructure.

### **Failure to Consider Indirect Emissions is in Violation of NEPA:**

FERC provides no reasoning as to why indirect upstream and downstream impacts are outside of the scope of this Environmental Assessment. The purpose of this proposal is to supply additional gas to customers downstream for combustion for

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heating and cooling in a specified distribution service territory. This is more than ample information for FERC to provide more analysis on the full scope of environmental impacts resulting from expanding the transmission capacity of these facilities. In omitting adequate analysis of this element of the proposal, FERC contravenes its own policies to give greater consideration to environmental justice and equity concerns associated with pipeline proposals.

**The air quality analysis is flawed due to narrowed scope:**

The Commission is advised to abandon this Environmental Assessment and complete a more thorough Environmental Impact Statement that fully analyzes the entire scope of this project. The air quality analysis performed by FERC in this report is deficient because it does not consider the indirect effects of the project, namely the downstream combustion of the gas facilitated by the increased compression capacity. FERC's failure to consider these emissions means that a large portion of the emissions increase resulting from this project will be neither be accounted for, or regulated despite clear federal requirements to assess these impacts.

**Risks to Public Health:**

FERC has not adequately addressed the major risks to public health associated with these new and expanded compressor stations. Volatile organic compounds (VOCs) and fine particulate matter are released from compressor stations during blowdowns and accidents. Short-term exposure to these compounds can cause eye and respiratory tract irritation, headaches, dizziness, allergic reactions, nausea, memory impairment, and asthma. Long-term effects of exposure to these compounds can result in loss of coordination and damage to the liver, kidney, and central nervous system. Many VOCs are known carcinogens, and benzene specifically is associated with childhood leukaemia. FERC must incorporate the health risk to local residents associated with increased exposure to VOCs and particulate matter connected to these facilities.

**Public Safety Concerns:**

Compressor stations like those proposed in W. Milford and Wantage are prone to rupture, leakage, fire and explosions. In this recent Environmental Assessment FERC fails to evaluate the impacts that accidental fires or explosions, and the environmental and public health impacts that would have. The likelihood of incidents is much greater in a pipeline system with portions over 65 years old. FERC must consider the major risks associated with these compressors, and the increased pressure forced through an aging pipeline system. Preparedness and capacity of local first responders to respond to accidents, explosions, and forest fires should also be a component of this assessment.

**Insufficient Alternatives Analysis:**

FERC has provided insufficient analysis of potential alternatives by refusing to look at a broader spectrum of actions that would meet the evaluation criteria given in the report. If FERC continues to omit non-gas alternatives to address heating, cooling, and electricity demand, the agency risks perpetuating fossil fuel dependency, even as the impacts of the climate crisis become evident, and the best science calls for urgent reductions in greenhouse gas emissions.

Sincerely,  
**Julia Somers**  
Executive Director  
**New Jersey Highlands Coalition**