

Garden State Expansion Project
Docket No. CP15-89-000

Transco filed with FERC a request for approval of its application for a certificate of public convenience and necessity authorizing its Garden State Expansion Project to construct a 30,500 horse power compressor station and related gas infrastructures in Chesterfield, NJ.

These infrastructures will be located in a residential area. The closest home is 150' from this site. There are hundreds of homes and 4 schools within 1-mile of this site. We are not only concerned about safety, but also about possible impacts on our well water, streams and wetlands.

Transco's selection of a site in which it cannot avoid significant wetland impacts to satisfy its minimum needs not only contradicts the requirements of FERC but also of the Freshwater Protection Act. Also, Transco did not provide adequate evidence to rebut the assumption that the proposed activity could be accomplished at another location that would avoid impacts to freshwater wetlands and FERC did not evaluate these alternative sites. It should be understood that Transco's site location selection may be influenced by its purchase of the property. The Freshwater Wetlands Protection Act and the Clean Water Act rely on the 404(b)(1) guidelines to provide guidance regarding the preparation of an alternative analysis. The Freshwater Protection Act at N.J.A.C 7:7A 1.4 defines practicable alternative and clearly states that ***an area not owned by the applicant may be required***. Furthermore, "FERC's Wetland and Waterbody Construction and Mitigation Procedures states in *Section VI.A.6* that applicant's do not locate above ground facilities in any wetland without further justification. To date, Transco's proposed compressor station 203's footprint does not totally avoid wetlands and Transco has not requested a modification from FERC's Procedures. Lastly, the Commission should have required a Full Environmental Impact Study.

Another area of concern is the use of segmentation which is a violation of the National Environmental Policy Act. The following projects including the Garden State Expansion, New Jersey Natural Gas's Southern Reliability Link Pipeline, and the PennEast Pipeline are inextricably linked. NJNG is a 20% partner in PennEast and is getting their 180,000 dekatherms of natural gas from them. PennEast is putting that gas into a Transco substation in Ewing which is part of the Garden State Expansion Project. That same amount of gas will then go to the Garden State Expansion compressor station in Chesterfield and into the Southern Reliability Link gas pipeline, which is the Garden State Expansion project's single customer. The in-service dates for all three projects are virtually identical and will be under construction at the same time. They are clearly being built in concert, one for the other. FERC's ongoing use of the practice of segmentation to advance pipeline projects in pieces to make it easier to overcome regulatory requirements and state reviews and approvals is in violation of the National Environmental Policy Act.

The impacts of these projects in our communities raise serious questions of FERC's review process. Congressional investigation and legislative remedy are needed. The "R" in FERC stands for Regulatory, not Rubber Stamp!

Thank you.