



LEAGUE OF WOMEN VOTERS®  
OF NEW JERSEY

10/14/2015

Ms. Irene Kim Asbury  
Secretary  
New Jersey Board of Public Utilities  
44 S. Clinton Ave  
Trenton, NJ 08625

Re: In the Matter of the Petition of South Jersey Gas Company for a Determination Pursuant to the Provisions of N.J.S.A. 40:55D-19,"B.P.U.Docket No.G013111049

Dear Ms. Kim Asbury

The League of Women Voters of New Jersey is writing to oppose a 22 mile pipeline in one of New Jersey's largest and most unique areas: the Pine Barrens, which comprises almost 22% of our land area, and is the largest body of open space between Richmond, VA and Boston, MA.

The League is founded on the principles of public participation, good government, and transparency. We are not an environmental organization; we are a public interest organization.

This area comprises 1.1 million acres, and is located in the Kirkwood-Cohansey Aquifer which holds an incredible 17 TRILLION gallons of pure water. Many of our residents have been lucky enough to have hiked, biked or kayaked through this amazing tract.

The League has supported the Pinelands Protection Act since the 1979. The Act, via the Comprehensive Management Plan, acknowledged different management areas of the Pine Barrens, and allows farming, cluster housing, in most of the acreage, with strict environmental standards to protect the aquifer. But several thousand acres are permanently protected from development. And it is through this protected area that the proposed pipeline will travel.

The Comprehensive Management Plan forbids development in forest areas. On several past occasions the Pinelands Commission has denied applications for any kind of construction within forest areas. Since permitting construction of this pipeline is a violation of the Comprehensive Management Plan, granting approval for it sets a dangerous precedent which could be used to open the Barrens for development.

The Act is very clear, and no permission should be granted. In fact, last year the Pinelands Commission, an independent agency charged with protecting the Pinelands, had a tied vote.

But this year, the Executive Director of the Pinelands Commission unilaterally issued a decision without a vote, stating that the pipeline had such unique value to the residents, no vote was necessary. There is no unique value to the residents, and other routes can be planned.

We wish to point out that there is no need for this pipeline between Cumberland County and Cape May County. The route proposed for the pipeline would irreparably destroy a forest area that is protected by the Comprehensive Management Plan for the Pine Barrens. Alternative routes are available that would not inflict such harm on the Pinelands.

The pipeline would deliver natural gas to the B.L. England plant, for the purpose of creating electricity. The claim has been made that this electricity is needed by, and would be delivered to residents within the Pinelands.

The facts are that the B. L. England plant is currently operated only on those occasions when there is extreme weather in New Jersey, such as a prolonged heat wave. Most of the time this facility is off-line. Its output is not missed. The needs of Pinelands residents are fully met by the PJM grid.

The crucial point is that all electricity generated at the B L. England plant is sent directly to the PJM grid and is then distributed by the grid to customers. No electricity goes directly from the B. L. England plant to a private home or individual business within the Barrens. Therefore, no direct benefit is conferred on any resident of the Pinelands on those few occasions when the B. L. England is operational.

The forest cover of the Barrens functions as an effective carbon sink, drawing carbon dioxide out of the atmosphere. However, violating its integrity, as would happen if a pipeline were to destroy the portion through which the proposed pipeline would be built, the carbon sink ability of the whole would be lessened.

We urge the Board of Public Utilities to object to permitting the pipeline along this route, until a vote of the entire Council is taken, and proof is provided of the unique value of this pipeline as well as documentation that this is the only route possible.

Sincerely,

A handwritten signature in cursive script that reads "Nancy F. Hedinger".

Nancy Hedinger, President  
League of Women Voters of New Jersey

cc: Paul Flanagan, Executive Director  
Richard Mroz, President  
Joseph L. Fiordaliso, Commissioner  
Dianna Soloman, Commissioner  
Mary-Anna Holden, Commissioner  
Uprendra Chivukula, Commissioner