



## South Jersey Gas Pipeline for BL England Plant

### Preliminary Summary of Objections to Proposed Pinelands Forest Area Route

1. The proposed route through the Pinelands Forest Area violates the Pinelands Comprehensive Management Plan (CMP). The CMP permits such public service infrastructure in the Forest Area only when it is “intended to primarily serve the needs of the Pinelands.” NJAC 7:50-5.23. There is no exception for pipes run along or under roads.

The BL England plant primarily serves electricity demand outside the Pinelands, where the great majority of the residences and businesses in the region are located.

This restriction was placed in the CMP for good reasons. If the rules can simply be ignored whenever a utility company wants to do something that violates the rule, then the credibility and permanence of the CMP is damaged.

2. The Pinelands Commission must defend the integrity of the Pinelands or risk larger, cumulative harms in the future. The Pinelands was created in part in response to plans to construct off-shore drilling platforms and run transportation pipes across the Pinelands to refineries on the Delaware. The drilling did not happen forty years ago, but it may happen in the future. Similarly, proposals for Liquefied Natural Gas (LNG) terminals along the Jersey shore continue to be pressed, raising the possibility that pipes would be proposed across the Pinelands to transport LNG. If a large wind turbine system is constructed off the Jersey Shore as currently under study, then there will almost certainly be efforts to construct new, large-scale transmission infrastructure to cross the state – and the Pinelands will be an easier target if the Pinelands Commission suspends the Forest Area protection rules for linear infrastructure. And we do not know today what other ways businesses or government may want to use the Pinelands as a corridor in the future.
3. This kind of pipeline can cause environmental damage to the Pinelands, because the construction and maintenance of these pipelines damages forests and roadside habitats through which the pipeline passes. For example, the proposed SJ Gas route would cross at least two populations of threatened or endangered plants. Experience shows that theory does not match practice when companies claim construction can be done without

harming natural resources, as the abuse of Pinelands road shoulders has shown time and again.

4. There are alternatives to the proposed pipeline route. Even if one assumes it is necessary to bring natural gas to the BL England plant, there is no necessity to run the pipeline through the Pinelands Forest Area. There are power plants directly to the north in Atlantic County, so it should be possible to run the supply pipeline outside the Pinelands Area or, at least, in the right of way of the Garden State Parkway, where it will not impinge on the interior forests of the Pinelands.