

June 15, 2020

Commissioners
Delaware River Basin Commission
25 Cosey Road
P.O. Box 7360
West Trenton, NJ 08628

Re: DOCKET NO. D-2017-009-2, DELAWARE RIVER BASIN COMMISSION, Delaware River Partners LLC, Gibbstown Logistics Center, Dock 2, Greenwich Township, Gloucester County, New Jersey

Dear Commissioners,

We, the undersigned organizations, represent hundreds of thousands of members committed to defending our communities and the Delaware River Watershed from degradation and pollution. New Fortress Energy/Delaware River Partners' proposed export terminal on the Delaware River at Gibbstown, New Jersey, is being reconsidered by you, as the voting members of the DRBC, with a final vote in the coming weeks on the fate of the proposal. We collectively urge you to vote not to allow the Gibbstown Logistics Center to be expanded with a second dock (Dock 2) that will include the export of Liquefied Natural Gas (LNG) and potentially triple activity at the terminal, substantially increasing the project's damaging footprint and harmful environmental impacts.

We submit that, based on review of the materials submitted to the Delaware River Basin Commission (DRBC) by the applicant, this project will have substantial negative impacts on the Delaware River, its water quality, its habitats, and the species that live in and depend on the River, Estuary and Bay. Endangered species such as Atlantic sturgeon and shortnose sturgeon, wildlife and special aquatic life are threatened by the terminal wharf and dredging. One of the last natural areas of this part of the river will lose its most valuable attributes. It will also threaten the health and safety of communities in the region, including adjacent Gibbstown and Greenwich Township, as well as the Pennsylvania communities of Tinicum Township and the environmental justice communities of Chester, which have had no say in project permitting.

We submit that the initial decision made by DRBC to approve the project did not adhere to the agency's own regulations and mandated responsibilities. The Dock 2 expansion is substantially lacking in critical information about the export of LNG and related operations at the site; the assessment of risks associated with perpetual, round-the-clock LNG and natural gas liquids (NGLs) handling and direct transloading onto ships at this site; and how prevention of toxic contamination will be accomplished. How the development of Dock 2 will affect the highly contaminated site that was owned by DuPont as an explosives manufacturing plant for over 100 years is a glaring unknown that has not been independently assessed by DRBC. With the recent disclosure of water pollution problems at the site, technical evidence forewarns us that current site pollution may get worse due to project disturbances there because this site is still undergoing cleanup of extensive contamination.

This Docket is also lacking in holistic analysis; for the risks to be properly assessed there must be a comprehensive examination of the impacts from beginning to end. So far, there has been no analysis of the dangers for the communities in Delaware and New Jersey. The coastal communities that line the Delaware estuary and bay depend economically on fishing, harvesting seafood and tourism. Will residents feel safe or tourists want to watch birds next to huge shipping vessels exporting hazardous and potentially explosive LNG and NGLs overseas? Also not considered by DRBC were the unprecedented implications for public safety and health in the region and the risks imposed on NJ and PA communities along the 200+-mile transportation route that LNG-carrying trucks and rail cars would traverse. The impacts of the industrialization of rural Wyalusing Township, Bradford County on the Susquehanna River in North Central Pennsylvania where New Fortress's LNG processing plant is being built must also be considered, as should the fracking that will be induced to supply the plant. Since the Federal Energy Regulatory Commission and the Pipeline Hazardous Material and Safety Administration have abdicated responsibility to oversee this project, there is no agency experienced in these highly risky cargoes that will be regulating operational protocols. Our organizations are calling on you to right the wrongs that the DRBC's rushed decision in 2019 has caused and stop this proposal so a comprehensive analysis can be done, before danger turns to catastrophe.

Additionally, it is critical that DRBC consider the impacts of the Gibbstown project on climate change. We are opposed to the development and continued reliance on fracked gas to meet energy needs. We support the replacement of fracking with truly clean, renewable energy sources that will benefit public health, our environment, and our economy and will battle climate change by reducing greenhouse gas emissions. DRBC has this year recognized the negative effects of climate change on water quality and healthy habitats in the Delaware River Basin. Extracting, transloading and transporting this gas will result in emissions of methane and burning it will add to carbon dioxide levels. Methane is the most powerful of greenhouse gases over a 20-year period – 86 times more efficient at trapping heat than carbon. It is essential we do what we can here to prevent these emissions so that we are part of the solution to the climate crisis and not part of the problem.

In closing, we the undersigned diverse and geographically distributed organizations rely on you, the Commissioners of the DRBC, to make decisions regarding our watershed and water resources that are formed by comprehensive, scientifically based and technically sound information, seen through the perspective of the entire Delaware River Basin. We submit that this requires a vote against the expansion of the Gibbstown Logistics Center and the proposed Dock 2 LNG and NGL export terminal. We respectfully request you vote NO on the reconsideration approval of the docket for this project.

Submitted by:

Delaware Riverkeeper Network
Environment New Jersey
Food & Water Action
EMPOWER NJ
New Jersey Sierra Club

Coalition Against the Pilgrim Pipeline - NJ
Don't Gas the Meadowlands Coalition
Clean Water Action New Jersey
198 methods
2002
350 Philadelphia
350 Pittsburgh
350 NJ-Rockland
A SMART Collaboration LLC
Already Devalued and Devastated Homeowners of Parsippany
Baltimore, MD Phil Berrigan Memorial Chapter Veterans For Peace
Berks Gas Truth
Better Path Coalition
Beyond Extreme Energy
BlueWaveNJ
Breathe Easy Susquehanna County
Bucks County Concerned Citizens Against the Pipelines
Bucks Environmental Action
CAPP
CAPP NY
Catskill Mountainkeeper
Center for Coalfield Justice
Central Jersey Coalition Against Endless War
Central Jersey Environmental Defenders
Citizens For Water
Citizens United for Renewable Energy (CURE)
Clean Air Council
Clean Ocean Action
Clean Water Action New Jersey
Climate Justice
ClimateMama
CNY Solidarity Coalition Climate Justice Committee
Coalition Against the Pilgrim Pipeline - NJ
Coalition to Ban Unsafe Oil Trains
Coalition to Protect New York
Compressor Free Franklin
Concerned Citizens of Lebanon County
Concerned Citizens of Rural Broome County
Cooper River Indivisible
CPYN
Damascus Citizens For Sustainability
Delaware Riverkeeper Network
Delaware Sierra Club
Delawareans for Environmental Safety

Don't Gas the Meadowlands Coalition
Don't Gas the Pinelands
EcoJustice Working Group Thomas Merton Center
Eco-Poetry.org
Edgmont Community Safety Coalition
Elmirans and Friends Against Fracking
EMPOWER NJ
Environment New Jersey
Environmental Health Project
Food & Water Action
FracTracker Alliance
Franciscan Response to Fossil Fuels
Friends of the Earth
Gas Free Seneca
Green America
Green Party of NJ
Haiti Solidarity Network NE
Indivisible Lambertville/New Hope
Indivisible NJ 5
JFK DEMOCRATIC CLUB FRANKLIN - SOMERSET COUNTY
L&R
Lancaster Against Pipelines
League of Women Voters of Delaware
Lebanon Pipeline Awareness
Love Leitrim - Ireland
Main Line Interfaith Green Group
Marcellus Outreach Butler
Marcellus Protest
mothers for environment
MoveOn.org Hoboken RESIST
New Jersey PACE
New Jersey Sierra Club
New Jersey Student Sustainability Coalition
New Jersey Tenants Organization
New Paltz Climate Action Coalition
New York Communities for Change (NYCC)
NJ Campaign Against Fossil Fuel Expansion
NJ Forest Watch
NJ Sierra Club, Hudson County Group
NJ Skylands Sunrise Hub
NJ State Industrial Union Council
NJ Student Sustainability Coalition
NJ Sustainability Coalition
North Jersey Sierra Group

Northern NJ NOW
Not Here Not Anywhere
NYC Grassroots Alliance
NYH2o
Orange Residents Against Pilgrim Pipelines
Our Revolution Ocean County
PA Senator Katie Muth
Partnership for sustainability
PennEnvironment
PennFuture
People Demanding Action NJ
People for a Healthy Environment
People Over Pipelines
Physicians for Social Responsibility Pennsylvania
Pinelands Preservation Alliance
Possible Planet
Preserve Giles County
PROJECT COFFEEHOUSE
Protect Northern PA
Protect PT (Penn-Trafford)
Ramapough Mountain Indians
Raritan Headwaters
Responsible Drilling Alliance (RDA)
RHS Environmental Club
Save RGV (formerly SAVE RGV from LNG)
Save the Pine Bush
Schuylkill Pipeline Awareness
Seneca Lake Guardian
ShaleshockCNY
Sierra Club
Sierra Club Atlantic Chapter
Sierra Club Southeastern Group
SOMA Action
Stop the Algonquin Pipeline Expansion (SAPE)
Sullivan Alliance for Sustainable Development
Surfrider Foundation South Jersey Chapter
Sustainable South Jersey
UU Faith Action
Veterans Service Corps VSCamerica.org
Westfield 20/20
Westmoreland Marcellus Citizens' Group