

September 8, 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 – Updated and Resubmitted**

Dear Governor Murphy, Governor Cuomo, Governor Carney and Governor Wolf,

We, the undersigned 133 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 reject Hearing Officer Kelly's recommendation and vote NO on the approval of Dock 2.

Submitted by:  
198 methods  
2002  
350 NJ-Rockland  
350 Philadelphia  
350 Pittsburgh  
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  
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 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  
Frack Action  
FracTracker Alliance  
Franciscan Response to Fossil Fuels  
Friends of the Earth  
Gas Free Seneca  
Green America  
Green Justice Philly  
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  
Mark Ruffalo, board member of Catskill Mountainkeeper  
mothers for environment  
MoveOn.org Hoboken RESIST  
Natural Resources Defense Council - NY  
New Jersey March for Science  
New Jersey PACE  
New Jersey Sierra Club  
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 - Ireland  
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  
Safety Before LNG - Ireland  
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