



Pinelands Preservation Alliance

Objections to the Joint Base McGuire-Dix-Lakehurst Environmental Assessment for the Southern Reliability Link Pipeline

Pinelands Preservation Alliance (PPA) finds the following defects in the Environmental Assessment:

- 1. The Air Force should conduct a full Environmental Impact Statement review for this project,** because the Environmental Assessment does not address and resolve several key environmental harms and risks which the pipeline would bring, and there is intense public opposition to this very large development.

Federal regulations provide that “substantial environmental controversy concerning the significance or nature of the environmental impact of a proposed action” triggers the preparation of an Environmental Impact Statement. 32 CFR 989.16. The proposed pipeline easement clearly meets this standard for a more detailed review.

- 2. The Joint Base does not need the pipeline.** The Air Force has determined that existing natural gas supplies to the Joint Base are adequate. New Jersey Natural Gas only provides gas to the Lakehurst Section of the Joint Base. The Air Force states that the natural gas systems of all three sections of the Base are “considered adequate” and that “supply capacity is not considered an issue for future growth” (Final Installation Development Environmental Assessment, 2014). New Jersey Natural Gas has stated in The Environmental Assessment only *speculates* that the Lakehurst Section of the Base *might* have some *undefined* use for more gas at *some unstated time* in the future.

- 3. The proposed pipeline and easement violates the Pinelands Comprehensive Management Plan and its authorizing federal and state statutes.**

First, Pinelands rules permit development in the Joint Base only if it is “associated with the function” of the Joint Base itself. See N.J.A.C. 7:50-5.29(a). In this case, the pipeline just uses the Joint Base as a path from one side of the Pinelands to the other and is not genuinely associated with the function of the Base:

- The pipeline is not specifically designed to serve or even capable of serving the Joint Base in particular. New Jersey Natural Gas has repeatedly stated in its regulatory submissions that the pipeline will have no connection to any facility on the Base along its path.
- The Joint Base is just one of hundreds of thousands of New Jersey Natural Gas customers and uses only a tiny fraction of the gas NJNG delivers through its distribution network. In fact, the Lakehurst Section could at most use *less than fourth-tenths of one percent* of the pipeline’s capacity.

Second, the pipeline route through the Joint Base lies in the Pinelands Preservation Area established by the federal and state statutes as the most precious natural resource area. The pipeline would violate the Pinelands rule that new development on the Joint Base must be located only in the Pinelands *Protection Area* wherever feasible, and *not* in the Preservation Area as it is proposed to do. See N.J.A.C. 7:50-5.29(a). A pipeline that was truly designed to serve the Joint Base could be located in the Protection Area portion of the Base.

4. The Environmental Assessment ignores issues of contamination that have recently come to light at the Base, and downplays long-standing contamination problems.

The pipeline will be embedded in the Kirkwood-Cohansey aquifer (the groundwater), but the Air Force failed to conduct or require any specific studies of the soil contamination, groundwater contamination, geology and water table along the proposed pipeline route.

Instead, the Environmental Assessment relies on limited, pre-existing studies of just the Superfund sites along the route, while erroneously implying the pipe will not be embedded in the groundwater. Even for the Superfund sites, the EA fails to cite any current data on the presence or concentrations of contaminants in the shallow and middle levels, and relies instead on vague references to out-of-date and inconsistent well tests.

The Air Force has begun to recognize that there are widespread contamination plumes in soil and groundwater on and flowing out of the Joint Base in addition to the existing Superfund sites. However, the Environmental Assessment includes no discussion at all on these contamination issues. For example, it simply ignores the issue of PFOAs in surface and ground waters.

The failure to conduct any specific evaluation of soil and water contamination along the pipeline route means that the Environmental Assessment's claim that the pipeline route will not touch any contamination issues is unjustified and unreliable.

5. The Environmental Assessment does not address the risks of pipeline leaks to natural resources and the people and facilities on the Joint Base. These risks are confirmed by the record of natural gas transmission pipeline accidents kept by the federal Pipeline and Hazardous Materials Safety Administration and press coverage. Such risks include:

- Explosions are common in the United States and are at least as common among new as among old pipelines. Many explosions are due to failures that cannot be detected by the operator's maintenance survey methods.
- Pipeline leaks of methane gas.
- Pipeline leaks of liquid methane.

6. The Environmental Assessment fails to consider the impacts that trenching and Horizontal Directional Drilling (HDD) could have on wetlands and streams, because the Air Force did not conduct or require any specific evaluation of the geology and hydrology of the pipeline route.

Both trenching and HDD could pierce clay lenses and change the behavior of groundwater on which nearby wetlands and streams rely. Only by studying the specific hydrogeology of the proposed route can the impacts of the pipeline be predicted.

7. The Environmental Assessment fails to consider and evaluate the special conditions on a busy military base in which the proposed pipeline would operate, conditions which increase the chances of pipeline failures, leaks and explosions. These conditions include at least the following:

- The stress caused by the takeoff and landing of jet aircraft along the portion of the route that lies directly at the edge of a jet taxiway.
- The stress caused by heavy road usage by vehicles, including heavy-duty military vehicles.
- The fact that the pipeline will be submerged in highly acidic groundwater and buried in acidic soil.
- The groundwater in which the pipeline will sit is likely also to contain toxic chemicals due to soil and water contamination at the Joint Base.

8. The alternatives analysis of the Environmental Assessment is deficient. The alternatives analysis not only assumes that a pipeline is the only way to achieve the purpose and need of the action, but that the entrance and exit points within the Joint Base are predetermined. There is no justification for doing so, and this decision clearly prejudices the outcome of the analysis.

The objective analysis of alternatives is supposed to be a key, rigorous part of an Environmental Assessment, and the one used here does not come close to meeting that standard. Any claimed benefits to the Joint Base could be achieved by a wide variety of alternatives, including different routes for a new pipeline within or outside the Joint Base, LNG storage on the Joint Base in the unproven eventuality that existing gas supplies to the Base was cut off, and conversion to sustainable energy production. In fact, the Joint Base is currently constructing a large solar generating facility to serve the Base energy needs, a fact that the Environmental Assessment just ignores.

An objective analysis would show that, if the pipeline were actually associated with the functions of the Joint Base, it would certainly not have to be built across the Base or along the proposed route.

9. The analysis of greenhouse gas emissions and climate change is significantly flawed. The analysis accounts for neither the end use of the natural gas transmitted by the pipeline nor leaks along the route. The Environmental Assessment dismisses releases from the valves as fugitive,

negligible emissions without a citation for that claim. Methane leakage is a growing field of research, and recent studies indicate that methane leaks are substantial. It is essential that the Environmental Assessment include the end use of the gas and the leaks along the route in the climate change analysis.