

January 12, 2017

Sean Earlen
Chair
New Jersey Pinelands Commission
15 Springfield Road
New Lisbon, New Jersey 08064

Dear Chairman Earlen,

We are writing to express our continuing concern with the pending proposal to approve a natural gas pipeline across the Pinelands Forest Area by South Jersey Gas. We first wrote to the Pinelands Commission in December 2013, prior to the Commission's January 2014 vote not to approve the project through an intergovernmental memorandum of agreement. Now that the project has returned to the Commission, and is proposed for the same route through the Forest Area, we wish to remind the Commission of these concerns and to renew our request that the Commission not approve the proposed route.

We share a deep commitment to the Pinelands as one of New Jersey's most precious resources, and to the Pinelands Comprehensive Management Plan as the nation's most successful program to save vulnerable natural resources in the context of a crowded and vibrant state. As we observed three years ago, the proposal would compromise the integrity of the Pinelands CMP and serve to encourage future development contrary to the vision the CMP sets out for growth and conservation in the Pinelands. Because the development is materially unchanged, this concern is equally true today as it was in 2014.

Our concerns are magnified by the fact that the Commission staff correctly determined in 2014 that the project violated the Comprehensive Management Plan, then, after the Commission vote in 2014, simply reversed that determination in order to advance its approval. This kind of inconsistency, if endorsed by the full Commission, undermines public confidence in the Pinelands Commission, further undermining the integrity of the entire Pinelands protection program.

We understand that a rationale can always be constructed to approve a major development such as this one. We wish to stress, however, that the Pinelands program will only work over the long term if the CMP is implemented consistently and in a manner that respects the underlying goals and intentions of the Pinelands Protection Act and CMP. The framers of the Act and CMP understood that infrastructure like the proposed pipeline has multiple impacts on land use patterns, natural resources like the Kirkwood-Cohansey aquifer, and the pressures that will be brought to bear over time to use that infrastructure where it

exists. The exact nature and timing of those impacts are impossible to calculate precisely today, or to control in the future. For this reason, the CMP specifies that this kind of infrastructure may not be built in the Forest Area unless it truly is required to serve the needs of people already living in the Pinelands. On any interpretation, this pipeline running across the Pinelands Forest Area does not meet that standard.

For these reasons, we urge the Commission not to approve the pipeline development as proposed.

Sincerely,

A handwritten signature in cursive script that reads "Brendan T. Byrne". The signature is fluid and somewhat stylized, with a long horizontal stroke at the end.

Brendan T. Byrne

A handwritten signature in cursive script that reads "Thomas H. Kean". The signature is bold and has a distinctive loop at the beginning.

Thomas H. Kean

A handwritten signature in cursive script that reads "Christine Todd Whitman". The signature is clear and legible.

Christine Todd Whitman

A handwritten signature in cursive script that reads "James J. Florio". The signature is elegant and well-written.

James J. Florio