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January 20, 2017

New Jersey Pinelands Commission
P.O. Box 359
New Lisbon, New Jersey 08064

Dear Chairman Earlen and members of the Commission:

I write to express my concerns regarding the pending application by South Jersey Gas Company for the development of a gas main across the Forest Area of the New Jersey Pinelands to serve the B.L. English electric generating facility. It is my understanding that the Commission will act on this application in the very near future.

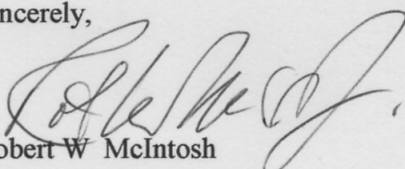
I write with a great deal of concern for the wellbeing of the Pinelands and a great deal of knowledge and insights into the workings of the Comprehensive Management Plan. From January of 1979 until June of 1981 I served as the Northeast Regional Director of the Department of the Interior's Heritage, Conservation, and Recreation Service. During that period the Comprehensive Management Plan's (CMP) was developed and subsequently approved by U.S. Secretary of the Interior Cecil Andrus in January 1981. My office was directly responsible for providing technical assistance to the Commission, preparing and approving the federally required environmental impact statement, and providing the briefings and documentation necessary to secure the Secretary's approval of the CMP. Later, as an Associate Regional Director for the Northeast Region of the National Park Service I served as the Secretary of the Interior's appointed member to the Commission from 1995 until 2010.

The application before you proposes the development of a gas main through the ecologically sensitive Forest Area. The stated purpose of this proposed gas main is to serve an electrical generating plant. Since the electrical generating plant does not and will not primarily provide electrical service needs in the Pinelands National Reserve one cannot argue that the proposed gas main will service those needs. The CMP amendments in the late 1980s stipulate that infrastructure development in the Forest Area must primarily provide service needs in that same area.

The Commission's approval of the proposal development will damage the long-standing integrity of the Commission's compliance with the CMP. May I also encourage the Commission to carefully examine all possible ramifications on the integrity of the CMP that may result from the approval of this project, and in the future, on the nationally and internationally significant resources of the Pinelands National Reserve.

In short, the proposed gas main development does not comply with the legal requirements of the CMP and therefore does not meet the necessary standard for approval.

Sincerely,


Robert W. McIntosh