*Date*

Ms. Irene Kim Asbury  
Secretary, Board of Public Utilities  
P.O. Box 350  
Trenton, NJ 08625-0350

**Re:** In the matter of the petition of South Jersey Gas Company for a determination pursuant to the provisions of N.J.S.A., 40:55D-19, B.P.U. Docket No. GO13111049

Dear Ms. Asbury,

I am writing to urge the Board of Public Utilities not to grant the petition in this matter. The Pinelands National Reserve is protected by federal and state legislation which expressly prohibits projects like this. If you approve this petition you are setting a precedent that cannot be undone that would adversely impact generations of people who seek out the Pinelands for recreation, solace and for its unique habitats.

This petition must be denied for the following reasons:

1. Construction of the proposed pipeline violates the Pinelands Comprehensive Management Plan (CMP), which bars the use of the Pinelands Forest Area as a transit route for such infrastructure development, unless it is "intended to primarily serve the needs of the Pinelands." N.J.A.C. 7:50-5.23. The South Jersey Gas pipeline does not satisfy this restriction.
2. **The Board of Public Utilities cannot waive the duly-adopted and certified municipal land use provisions which are authorized and required by the National Parks and Recreation Act of 1979, the New Jersey Pinelands Protection Act, and the Pinelands Comprehensive Management Plan.**Because the ordinances in question are required by the Pinelands regulations, they are not subject to waiver via the Municipal Land Use Law.  Where there is a conflict, the Pinelands CMP requirements override the Municipal Law Use Law.
3. The state Pinelands Commission already made the determination that the pipeline route violates the Pinelands Comprehensive Management Plan, and chose not to provide an exemption from those rules, in January 2014.
4. The construction of the pipeline on the proposed route is not “reasonably necessary for the service, convenience and welfare of the public.” The pipeline will exclusively provide gas to the BL England power plant, and alternative routes to reach the plant are available. The pipeline as proposed will also bring a range of environmental harms that are contrary to the public welfare.

Sincerely,