



PINELANDS PRESERVATION ALLIANCE

Bishop Farmstead, 17 Pemberton Road, Southampton, New Jersey 08088

Phone: 609-859-8860

Fax: 609-859-8804

E-mail: ppa@pinelandsalliance.org

Website: www.pinelandsalliance.org

Pinelands Commission CMP P&I meeting, Aug 28, 2013 Theresa Lettman, Pinelands Preservation Alliance

Officials are here today to tell you about the economics of the plant to Upper Township – but remember there are about 52 other municipalities in the Pinelands. Some 30 of these municipalities have Forest Management Areas. I don't think the Forest Management Area can support them all.

The Plan has management areas where infrastructure is allowed and management areas where it is not permitted. South Jersey Gas knows this. . . they knew it in 2000 in 2004 and even in 2007 when they purchased the B.L. England plant.

In 2000-2001 South Jersey Gas wanted to put a 24 inch pipeline in the Preservation Area of the Pinelands. A June 23, 1998, letter from South Jersey Gas's engineer to the Pinelands Commission states "In addition to the preferred alternative, there are a number of alternatives that have been considered. These alternatives were deemed to not be feasible for environmental, economic and social reasons." - does this sound familiar?

They also wrote things, when considering alternatives along roadsides, such as "This alternative would also impede traffic flow along Evesham Road throughout the duration of construction which would span approximately nine months" and "create considerable traffic delays along a stretch of roadway that is already experiencing capacity".

I found something in the previous South Jersey Gas application, in 2000, that I wanted to read:

*"One of the reasons South Jersey prefers the route being contested is that it is the shortest route from the gas main and distribution point it constructed in the early 1990's. Since the CMP had been in effect for over 10 years by that time, South Jersey [Gas] knew or should have know that any future connection to the gas main could not go through the restricted management areas. Planning that does not take into account the avoidance of the restricted management areas is inappropriate and should not be permitted if the public health and safety does not require the proposed route **and** alternative routes for the pipeline exist." -- this is from the summary of the testimony before the office of Administrative Law by William Harrison, Assistant Director of the Pineland Commission.*

For those of you not on the Commission at the time, the Pinelands Commission denied South Jersey Gas Companies request for the pipeline in the inappropriate management areas and they litigated and lost. The pipeline went along the roadside in the Regional Growth Area.

In 2004, South Jersey Gas lobbied the New Jersey Natural Lands Trust (I serve on the Board) to go through preserved property in Hamilton Township for a gas pipeline. They argued that using the road side route was not feasible because “State Route 50 is an evacuation Route and a busy road with high traffic volume.” And went on to state that “Roadway utilities include overhead powerlines on the north side, water main on the south side” making the route through the NJ Natural lands the best alternative. But in the end the NJNLT Board said no and South Jersey Gas went along a portion of roadway in the Regional Growth area of the Pinelands.

In 2007, they purchased the B.L. England Plant *knowing all the rules* and still went ahead with the purchase. Going through the Forest Management Area of the Pinelands is not permitted by the Pinelands CMP.

You saying “no” will be not be something new to them. They know the rules.