



September 25, 2015

Janice L. Arnett
Environmental Specialist 3
Division of Land Use Regulation
Mail Code 501-02A
P.O. Box 420
Trenton, NJ 08625-0420

**Re: Administrative and Technical Deficiency
CAFRA and Flood Hazard Individual Permits and Freshwater Wetlands GP2
LURP No. 0000-15-0007.1 CAF 150001, FHA15001 and FWW 15001
Project: Southern Reliability Link, a new 29.5 miles 30" gas pipeline
Townships: Chesterfield, North Hanover, Upper Freehold, Plumsted, Jackson, and
Manchester
Counties: Burlington, Monmouth, and Ocean Counties, NJ
(AECOM Project No. 60416786)**

Dear Ms. Arnett:

AECOM, on behalf of New Jersey Natural Gas (NJNG), is submitting this response to comments received in two letters from the New Jersey Department of Environmental Protection (NJDEP) on July 24 and August 7, 2015. The NJDEP comments are re-presented below along with their associated responses. Permit plans have been updated to reflect changes requested in comment letter from New Jersey Department of Environmental Protection (NJDEP); permit plans included with this submittal are the most current set.

In response to the letter received on July 24, 2015:

1. Letters of permission from Burlington, Monmouth, and Ocean Counties, Joint Base Maguire Dix Lakehurst, and any townships whose roads or right-of-ways are utilized by the proposed pipeline. The letters of permission are in lieu of signatures on the LURP application form, for the proposed work on others' property.

NJNG does not have, and is not required to obtain, letters of permission from counties or townships to install the proposed pipeline in their roads and/or rights of way. The Company will be required to obtain permits for roadway excavation. The granting of those permits, however, is ministerial and, by law, may not be unreasonably withheld.

2. Easement agreement or letter of permission from the owners of Block 201, Lot 23 and 22 and Block 200 Lot 1 in Chesterfield Township, as work on these lots directly affect the freshwater wetlands and flood hazard impacts for the project.

Terms and conditions of the project are being negotiated with the landowners through an easement agreement and will be provided when finalized for Block 200, Lot 1.

The pipeline is currently being re-designed to avoid crossing portions of Block 201, Lot 22 and 23 based upon the preserved status of the parcel (See Permit Plans and Table 2 below).

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3. Easement agreements or letters of permission for all private properties traversed or intersected within Manchester Township and CAFRA.

Please find written survey consent from the agent of Block 200, Lot 2 and Block 52.51, Lot 1 in Manchester Township in Attachment A. Terms and conditions of the project are being negotiated with the landowners through an easement agreement and will be provided when finalized.

4. Proof of public notice of the CAFRA application submission in accordance with NJAC 7:7-24.5. Newspaper notice of application submission and availability of application for examination by the public. Proof of the public notice shall specify the date and newspaper in which the notice was published and shall include a copy of the newspaper notice. The notice shall be a display advertisement.

The application shall be deficient pursuant to N.J.A.C. 7:7-24.6 for a minimum of 20 days after notice has been published, and until proof of the public notice is received by the Department.

The applications will remain administratively deficient until Items 1-3 above are provided and item 4 is satisfied as noted. The application shall not be considered complete for public comment period until the application is administratively complete.

In addition to the administrative items detailed above, the following items are technically deficient and must be submitted before the applications can be considered complete for review.

A copy of the affidavit and posting provided by the Asbury Park Press is attached and meets public notice requirements under N.J.A.C. 7:7-24.5 (Attachment B).

5. Provide plans with detailed cross-sectional views of all the stream crossings associated with the proposed pipeline construction in order to ensure the stream crossings (most importantly those labeled as "trenching") comply with permit-by-rule N.J.A.C. 7:13-7.2(c)3. Please note any stream crossing that does not meet the requirements within N.J.A.C. 7:13-7.2(c)3 such as open-cut trench methods will be regulated under N.J.A.C. 7:13-11.9 and additional fees may be required.

Stream crossing plans are attached for review (Attachment C) and Table 1 summarizes stream crossing methods for the proposed project.

Table 1 - Streams Crossed by the NJNG SRL Project

Waterway Name	Municipality	County	Crossing Method	Plan Sheet No.
Stream 01	Chesterfield Twp	Burlington	HDD	2
Stream 02	Chesterfield Twp	Burlington	Trenching	3
Stream 03	Chesterfield Twp	Burlington	Not Crossed	5
Stream 04	North Hanover Twp	Burlington	HDD	6
Stream 05	North Hanover Twp	Burlington	HDD	7
Stream 06	North Hanover Twp	Burlington	Not Crossed	7
Stream 07	North Hanover Twp	Burlington	Trenching	7

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Waterway Name	Municipality	County	Crossing Method	Plan Sheet No.
Stream 08	North Hanover Twp	Burlington	HDD	7
Stream 08a	North Hanover Twp & Upper Freehold Twp	Burlington & Monmouth	HDD	8
Stream 09	North Hanover Twp & Upper Freehold Twp	Burlington & Monmouth	HDD	9
Stream 10	North Hanover Twp & Upper Freehold Twp	Burlington & Monmouth	HDD	9
Stream 11	North Hanover Twp & Upper Freehold Twp	Burlington & Monmouth	HDD	9
Stream 12	North Hanover Twp	Burlington	Not Crossed	9
Stream 13	Upper Freehold Twp & Plumsted Twp	Monmouth & Ocean	HDD	10
Stream 14	Plumsted Twp	Ocean	Not Crossed	10
Stream 15	Upper Freehold Twp & Plumsted Twp	Monmouth & Ocean	Trenching	10
Stream 16	Upper Freehold Twp	Ocean	Trenching	11
Stream 17	Upper Freehold Twp & Plumsted Twp	Monmouth & Ocean	HDD	11
Stream 18	Upper Freehold Twp & Plumsted Twp	Monmouth & Ocean	HDD	12
Stream 19	Plumsted Twp	Ocean	Not Crossed	12
Stream 20	Plumsted Twp	Ocean	Not Crossed	12
Stream 21	Plumsted Twp	Ocean	Trenching	13
Stream 22	Plumsted Twp	Ocean	Not Crossed	13
Stream 23	Plumsted Twp	Ocean	HDD	13
Stream 24	Plumsted Twp	Ocean	HDD	14
Stream 25	Plumsted Twp	Ocean	HDD	15
Stream 26	Plumsted Twp	Ocean	HDD	15
Stream 27	Plumsted Twp	Ocean	Trenching	15
Stream 28	Plumsted Twp	Ocean	Trenching	15
Stream 29	Plumsted Twp	Ocean	Trenching	15
Stream 29a	Plumsted Twp	Ocean	HDD	16
Stream P01	Plumsted Twp	Ocean	Trenching	17
Stream P02	Plumsted Twp	Ocean	Trenching	21
Stream P03	Jackson Twp	Ocean	HDD	22
Stream P04	Jackson Twp	Ocean	Trenching	22

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Waterway Name	Municipality	County	Crossing Method	Plan Sheet No.
Stream P05	Jackson Twp	Ocean	HDD	23
Stream P06	Jackson Twp	Ocean	HDD	23
Stream P07	Jackson Twp	Ocean	HDD	23
Stream P08	Jackson Twp	Ocean	HDD	25
Stream P09	Jackson Twp	Ocean	HDD	25
Stream P10	Manchester Twp	Ocean	HDD	27

6. Provide a Certificate of Filing from the Pinelands.

The Certificate of Filing from the Pinelands is currently undergoing final review by the Pinelands Commission and the approved Certificate of Filing will be forwarded to NJDEP once issued by the Pinelands Commission.

7. Submit two (2) copies of the Phase 1 study of the project area for review by the Historic Preservation Office. As of the date of this letter the documentation discussed in the compliance statement has not been received.

A Phase 1 Archaeological Survey and Historical Architectural Survey Report were submitted to the Historic Preservation Office on September 17, 2015. Copies of these reports have been included in Attachment D.

8. Provide an addendum to the compliance statement addressing the rule for Energy facilities at N.J.A.C. 7:7-15.4.

A review of N.J.A.C 7:7-15.4 Energy Facility as it relates to the proposed project was performed. The following is provided as it relates to sub-sections of N.J.A.C. 7:7-15.4:

- a) The proposed project does not include facilities, plants or operations for the production, conversion, exploration, development, distribution, extraction, processing, or storage of energy or fossil fuels.
- b) The proposed project does not include the siting of energy facilities as defined in (a) above.
- c) The proposed project does not include the construction and operation of coastal energy facilities. Furthermore, the project is not expected to directly or indirectly result in net loss of employment in the State for any single year.
- d) The proposed project does not include Outer Continental Shelf (OCS) oil and gas exploration and development.
- e) The proposed project does not include onshore support bases.
- f) The proposed project does not include platform construction yards or module construction.
- g) The proposed project does not include the repair and maintenance of facilities for vessels and equipment for offshore activities.
- h) The proposed project does not include pipe coating yards.
- i) The proposed project does not include the transportation of hydrocarbons from offshore of the New Jersey coast to existing refineries, oil and gas transmission and distribution systems, and other new oil and natural gas pipelines.

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- j) The proposed project does not include gas separation and dehydration facilities.
- k) The proposed project does not include gas compressor stations.
- l) The proposed project does not include facilities to receive a pig from off-shore facilities. A pig receiving facility is proposed at the end point of the pipeline, along Colonial Avenue. The launcher facility will be located at the start of the line, outside the CAFRA area. The proposed pipeline is for the transportation of natural gas. Pigs are anticipated to be run every 7 years to inspect the pipeline. The pig receiver will be a temporary facility and the receiver will be connected to the system only when required for a pig run.
- m) The proposed project does not include a gas processing plant.
- n) Above ground facilities (a valve setting) are proposed at the end of the pipeline. The above ground facilities are required for connection of the pipeline to the existing NJNG system. Provision will be made for the connection of a temporary pig receiver. A receiver will only be installed when a pig is required to be run along the pipeline. This use is conditionally acceptable and adequate visual, sound and vegetative buffer will be provided.
- o) The proposed project does not include oil refineries or petrochemical facilities.
- p) The proposed project does not include the storage of crude oil, gases and other potentially hazardous liquid substances.
- q) The proposed project does not include tanker terminals.
- r) The proposed project does not include electric generating stations
- s) The proposed project does not include liquid natural gas (LNG) facilities.

9. Revisions to the plans are required to clarify disturbance types and amounts, laydown areas and drill pits, in addition to other items. These revisions are deficiencies, but will be detailed in a separate letter.

Revisions to the plans were detailed in the letter received on August 7, 2015 and are addressed in the responses following:

In response to the letter received August 7, 2015:

1. Provide plans with detailed cross-sectional views of all the stream crossings associated with the proposed pipeline construction in order to ensure the stream crossings (most importantly those labeled as "trenching") comply with permit-by-rule N.J.A.C. 7:13-7.2(c)3. Please note any stream crossing that does not meet the requirements within N.J.A.C. 7:13-7.2(c)3 such as open-cut trench methods will be regulated under N.J.A.C. 7:13-11.9 and additional fees may be required.

Please see response to comment #5 to the letter dated July 24, 2015 above.

2. Per review by the E&T unit, streams identified on the project site plan as "Stream 24" (Lahaway Creek), "Stream 28" (Beaverdam Brook), "Stream 29" (Beaverdam Brook) and "Stream 29a"(Beaverdam Brook) should have 150-foot riparian zones attributed to them. The tributaries within the Pinelands associated with Jumping Brook, Elisha Branch, Gaunts Brook, Middle Ruckels Branch and Manapaqua Brook have 150-foot riparian zones. Be advised the riparian zone must be measured from the top of bank and DLUR regulates the riparian zone in the Pinelands.

The attached plans have been revised to update riparian zone widths per the review by the E&T unit.

3. Please review the following list of blocks and lots. The submitted plans show the limit of disturbance extends onto these lots and blocks. Please verify that each of these lots should be included in the limit of disturbance.

Chesterfield Township, Burlington County:

- B 500 lots 8, 9
- B 502 lots 8.02, 9, 15.02
- B 1000 lot 1
- B 1002 lots 2, 3, 4, and 5.01

North Hanover, Burlington County:

- B 200 lots 2.03
- B 301 lots 3, 4.01, 4.02, 4.03, 5.01, 5.02
- B 400 lots 1, 2 and 3

Upper Freehold, Burlington County:

- B 52 lot 4.05
- B 53 lot12

Plumsted Township, Ocean County:

- B 41 lots 2, 4.02, 4.11, 4.12, 5, 6, 7, 4.11
- B 43 lot 62
- B 44 lots 36, 37.01
- B 77, lot 39
- B 80, lot 5
- B91, lot 1
- B 92, lot 1

Jackson Township, Ocean County:

- B 23601, lot 1 (joint base)

Manchester Township, Ocean County

- B 48, lot 3

Table 2 summarizes parcels crossed by the proposed project. Spatial inaccuracies between municipal boundaries parcel data provided by the NJ Office of Information and Technology show properties to be impacted; however work will be contained to the road right-of-way and will not impact parcels unless noted in Table 2.

Table 2 - Parcels Crossed by Proposed Project*

Block	Lot	Impacted?
Chesterfield Twp		
500	8	No**
500	9	No**
502	8.02	No**
502	9	Yes
502	15.02	No**

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Block	Lot	Impacted?
1000	1	Yes
1002	2	No**
1002	3	No**
1002	4	No**
1002	5.01	No**
North Hanover Twp		
200	2.03	No**
301	3	No**
301	4.01	No**
301	4.02	No**
301	4.03	No**
301	5.01	No**
301	5.02	No**
400	1	No**
400	2	No**
400	3	No**
Upper Freehold Twp		
52	4.05	No**
53	12	No**
Plumsted Twp		
41	2	No**
41	4.02	No**
41	4.11	No**
41	4.12	No**
41	5	No**
41	6	No**
41	7	No**
43	62	Yes
44	36	No**
44	37.01	No**
77	39	No**
80	5	No**
91	1	Yes
92	1	Yes
Jackson Twp		
23601	1	Yes
Manchester Twp		
48	3	

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Block	Lot	Impacted?
<p>*The NJDEP provided the above list of parcels in a letter dated August 7, 2015. The NJDEP requested that the applicant/agent verify the location of the proposed project work in relation to the listed parcels. This list provides details as to the relationship between the parcels and the proposed work areas.</p>		
<p>**Spatial discrepancies exist between parcel data provided by the NJ Office of Information and Technology and survey information collected in the field. Proposed project work will be contained to the road right-of-way and will not impact parcels unless specifically noted.</p>		

4. Pursuant to a request from USFWS, perform swamp pink surveys of all proposed stream crossings along the route. Provide one copy to the USFWS, and one copy to my attention. In addition, provide one copy of the Phase I bog turtle studies to the USFWS and one to my attention.

Swamp Pink, Bog Turtle, Knieskern's Beak Rush, and Northern Long Eared Bat surveys have been completed and can be found in Attachment E. A copy of the survey reports will be submitted to USFWS during the week of September 28, 2015.

5. Revise the plans to include disturbance calculations for wetlands and waters within the Pinelands area. These amounts are to be included in the total to be authorized under the Freshwater Wetlands General Permit 2 (FWWGP2), as the total permanent disturbance within New Jersey must be less than the 0.5 acre limit.

The attached plans have been revised to include disturbance calculations for wetlands and waters within the Pinelands area. Following additional engineering review modifications have been made to the tables submitted on the Permit Plans in June 2015. The tables included in this submission are the most up to date; specifically the tables on the following Permit Plan page numbers 2a, 3a, 6b, 8b, 9b, 10a, 10b, 12b, 22a, 22b, 23b, 24a, 25b, 27a, 28a, 28b and 29a have changed.

6. In accordance with N.J.A.C. 7:13-10.2(b-d), Table C, (k-l), and (r), provide calculations for all riparian zone disturbances, divided into herbaceous, scrub shrub and trees within the limit of disturbance. Permanent removal of trees falls under (r) and requires mitigation. Temporary Scrub Shrub disturbance (replanted with shrubs) uses Table C (k-1). Herbaceous replanted with herbaceous is not counted on Table C.

Please see the Proposed Temporary and Permanent Disturbance within Regulated Areas in the Project Area included on the cover sheet and individual sheets in the permit plans. No areas of scrub shrub will be temporarily or permanently disturbed by the construction of the project.

7. Revise the plans to include or clarify the following items. It may be necessary to change the scale of the submitted plans to include all items noted below.

- a) **Differentiate between paved, herbaceous and wooded areas within the limit of disturbance;**

Hatching & shading has been added to the plans to indicate paved, herbaceous and wooded areas.

- b) **Differentiate between the drill pits, lay down areas, access and construction/equipment staging areas;**

Access roads are not proposed for this project. The majority of the proposed project is located in County and local roads. Access to off-road areas is directly from County and local roads.

Laydown areas will be located on Block 201, Lot 23 and the New Egypt Speedway; threatened & endangered and cultural surveys have been performed and negative findings were determined for both locations.

Drill pits for horizontal direction drilling installation methods are provided on the plans.

c) Indicate where temporary disturbance of woody vegetation is proposed;

Temporary disturbance of woody vegetation is not proposed for this project.

d) Show the permanent easement area, indicating all woody vegetation that is to be removed;

The permanent easement area, indicating all woody vegetation that is to be removed has been added to the plans.

e) Show easements held by others that cross the limit of disturbance on the plans;

Please refer to response comment #3 in this letter above.

f) Revise the plans to add the appropriate riparian zones as discussed above and as required for acid producing soils, measured from top of bank. Indicate and quantify vegetation disturbance in all riparian zones;

The plans have been revised to include the appropriate riparian zones as discussed above and for acid producing soils as appropriate, measured from top of bank. Disturbance to vegetated areas is shown and quantified on the plans. As per direction from NJDEP, stream centerlines were used where stream centerlines were visible on USGS quadrangles and streams were observed as an indiscernible channel through a wetland area.

g) Provide replanting details on the plans;

Please see Erosion and Sediment Control Plan included in Attachment F.

h) Provide details of the environmental protections proposed when trenching a culvert.

Please see Erosion and Sediment Control Plan included in Attachment F.

i) Indicate the soil conservation BMPs proposed for use near wetlands, transition areas, waters and riparian zones on the plans.

Please see Erosion and Sediment Control Plan included in Attachment F.

j) Depict the pipeline connections at the beginning and the end of the project;

The pipeline connections at the beginning and the end of the project are provided on the drawings.

k) Depict all culverts or watercourses within 150 feet of the limit of disturbance;

All watercourses within areas with survey permission are shown on Permit Plans and watercourse outside are shown based upon satellite imagery.

l) Indicate the top of banks for all watercourses rather than the centerline;

Please see revised Permit Plans.

- m) Provide a note on the plans, indicating the source of the "NJDEP WETLAND" delineation;**

A note indicating the source of the "NJDEP WETLAND" has been placed in a separate section on the Permit Plans cover sheet.

- n) Provide a note on the plans, indicating the source of wetland delineation for those areas not labeled as "NJDEP WETLAND";**

A note indicating the source of the areas not labeled as "NJDEP WETLAND" has been placed in a separate section on the Permit Plans cover sheet.

- o) Please verify the location of the limit of disturbance and trenched pipeline on Block 5.02 lot 9, and the proposed location of the pipeline within a watercourse on Block 5.02 lot 16.01. (Sheet 4). Revise as necessary;**

Please see revised Permit Plans and Erosion and Sediment Control Plan in Attachment F.

- p) Add the existing watercourse crossing located at or near pipeline marker 1420+00 and the intersection of Proving Ground and Brome Roads. This stream is a Pinelands stream and tributary to Manapaqua Brook, with a 150 foot riparian zone. (Sheet 26);**

During field assessments the AECOM field team was unable to locate above mentioned stream and determined the stream no longer exists.

- q) Please correct the riparian zones for the streams that drain to the Lahaway. They are drawn at both 150 and at 50 feet on sheet 13.**

The riparian zones for streams that drain to the Lahaway (FW2-NT) were created using the "Draft Technical Manual Flood Hazard Area Control Act Rules, New Jersey Department of Environmental Protection Division of Land Use Regulation, December 2008." Lahaway Creek and its tributaries are Category 2, Non-trout waters with an associated 50-foot riparian zone. No habitat for species critically dependent on water for survival is present adjacent to the subject streams. However, due to the presence of geologic formations with the potential to produce acid-producing soils, portions of the streams that drain to the Lahaway were assigned 150-foot riparian zones as per Section 4.4.2 in the aforementioned guidance document.

If you should have any questions please contact me at (610) 832-3580 or barry.baker@aecom.com.

Sincerely,

AECOM



Barry A. Baker
Impact Assessment and Permitting Department Manager

Cc: Keith Sturn, NJNG
Bryan Pariseault, AECOM

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