



Ringwood Environmental Commission 2021 Annual Report

Prepared for the Ringwood Mayor and Borough Council

Thomas Conway | Chair | 02/01/2022



Summary and Overview

The Ringwood Environmental Commission met virtually for all of 2021. Covid-19 has presented many obstacles for all, but we were able to make some progress on issues related to water this year.

Outside of the focus on water, we also delivered two proposed ordinances to the Council. We completed the Ringwood Library Trail in October.

The Commission continues to monitor various pests that harm our environment and the Spotted Lanternfly is the most recent pest to invade the area.

A meeting with the lakes of Ringwood was helpful, but did not have any carry-through. We continue to have members from Ringwood's three largest lake communities, so the water issue will be in focus again.

The Tennessee Gas Pipeline expansion is actively resisted in Ringwood. The Chairperson attended Ringwood Council Meetings, Town Halls, County Meetings, and led a grass-roots effort with the Green Team to resist this project.

The Superfund site in the Borough is active again. The Commission worked early in the year to raise concerns at public meetings, focusing on increased communication with the community and insisting on background checks for workers. Once the work began, a member was brought into the Borough part time to assist the Borough manager with the contractors. The Commission has dropped the site as an agenda item for OU2 (surface) and will continue to monitor the resolution for OU3 (groundwater).

Appendices

- Appendix A - Superfund Documents
- Appendix B - TGP Compressor Station Upgrade
- Appendix C - Library Trail
- Appendix D - Commission Documents



Commission Actions

Most Commission actions are presented in the meeting minutes. This section will highlight some of the accomplishments of the Commission. Virtual meetings are holding up the efficiency of the Commission as errors and oversights have increased.

Vision, Mission, Values, and Objectives

The Commission continues with a set of Vision, Mission, Values and Objectives. These are intended to guide the current and future Commissioners to make sure our actions are aligned to the goals of the Environmental Commission. These were established and voted on early in the year. They can be found on the Borough website, as well as in Appendix D.

Plan Reviews

Commissioners adjusted to the virtual environment by reviewing plans as they were received from the Borough. Comments were added when necessary and sent back to the Board of Adjustment for Review. We intend to keep this setup going in the future, assuming the Borough is agreeable to sending emails ahead of scheduled meetings.

Letters

The Commission wrote two letters to the Council after a vote. These concerned a septic ordinance and the James Drive Treatment Plant. They are in appendix D.

Resolutions

Two resolutions were proposed and sent to the Council. The first was concerning the Tennessee Gas Pipeline upgrade and is covered more fully in the next section. The second resolution was concerning the Forestry Steward Plans proposed by the state. They are in appendix D.



Chair's Report

I will switch to the first person for this section. It is my personal belief that transparency is paramount for a local government to function at its peak level. In appointing me as Chair, the Mayor has given me wide latitude to learn and connect with others to promote Ringwood's interest. In this section I will detail the activities I undertook using the office to which I have been assigned. All legal functions, such as plan reviews and spending money, are voted on by the Commission; there are many functions that are handled by the Chair alone. The following is a brief summary of the actions I have taken in 2021.

Superfund Activities

The Ringwood Mines Superfund Site is the biggest Environmental Issue in Ringwood. Joe Kulak and I attended the meetings in early 2021 and raised concerns via letters. These can be view in Appendix A.

Our focus was on resident safety. Various inconsistencies in the EPA plan (RECON) were raised and addressed. This back and forth went on until construction began in the Autumn.

Frankly, the start of construction was a mess. Fences were removed and work began. I travelled through the site without signage or barriers to let me know I should not be in a certain spot. This was raised with the EPA and no action was taken.

Pictures were taken and sent without action. **These same issues were raised with the Borough and we began to get results!** After a few tense weeks, the fencing, signage and general rules (like cleaning tires) were being conducted and the Borough deserves the credit for forcing RECON to take their own safety precautions seriously.

While the results were good, having too many different groups giving input became confusing and I backed away from the site as a duty of the Environmental Commission. All communication now goes through proper Borough channels and I stay involved as a citizen only. Since the Commission has a member that is now working with the Borough for this very purpose, we have decided to focus on the future of the site and allow the Borough to manage the ongoing effort.

2021 was a warm up. 2022 will see the work on the most toxic area, Peter's Mine. I will monitor and observe, knowing the Borough will be fast and uncompromising in their effort to make sure all safety protocols are followed.



Tennessee Gas Pipeline (TGP) Compressor Expansion

TGP is trying to fool the area. They have created a false need in New York to get the approval to expand the capacity of their pipeline that runs through the forests of New Jersey and the Highlands area in general. This need is contradicted by the stated goals of New York, yet it has been very difficult to get political leaders to follow through on their climate pledges. I am happy to state that Ringwood passed an ordinance to resist the pipeline and thank the Mayor and Council for their courage to pass this resolution.

At many other levels of government, union interests have persuaded representatives to stay mum on the project. This is unfortunate as TGP is simply looking to get expanded capacity today knowing that the Northeast politicians will soon announce a ban on additional capacity. While we wait for the politicians to make their big announcement, the environment will suffer and TGP will make a large profit once capacity gets tight and they can sell all the unused capacity they currently have and will gain from this expansion.

The ground is shifting quickly under this issue, so nothing is certain.

As Chair, I sent two letters to the FERC comment site and created a template for other interested parties to use to write their own unique letters.

Lake Meeting in 2021

We invited the Ringwood Lakes to send representatives to our Autumn meeting. While it was helpful to have the lakes share their experiences from the 2021 season, we did not have any concrete plans to follow up or hold regular meetings.

The Princeton Hydro report was discussed, but we do not have any plans to apply for grants at this time. The lakes will continue to work together to explore opportunities for the Borough through watershed management.

Ringwood Library Trail

This is my favorite accomplishment in 2021. In early 2020, we identified the Library Trail's viewpoint and set a cleanup for the area. Covid-19 killed the plan.

In early 2021, after 15 months of talks, we got the verbal OK from the NJDWSC to allow the trail to terminate on their land. Key to this approval was the fact that the area was already heavily used and trashed by the current users. By making this a public trail, the people conducting illegal activities will eventually relocate to a quieter spot. We received the green light.



Due to Covid-19, group activity was still discouraged. My wife and two children filled in as we cleaned up the trail. Over the course of 18 months of cleanup, we disposed of a dozen bags of garbage, various chairs, and cushions.

The battle escalated when a sofa showed up at the viewpoint. **The Borough was extremely helpful in removing not one, but two sofas from the area.** This really sent the right message and only two incidents of trash have occurred since the trail opened.

By April, we had everything in place and the trail was constructed in less than a week (20 hours). Tape markings were replaced with paint in the fall and then finally trail markers donated by the New York New Jersey Trail Conference (NYNJTC). Three NYNJTC volunteers also hiked the trail and gave feedback on its construction and future expansion.

We waited for the foliage of summer to fill in before any final markings. By early fall everything was in place and we had a ceremony to open the trail. I was happy to be joined by the Mayor and a fellow Commissioner on the first hike.

A brochure was created and given to the library for interested hikers. The trail has seen heavy use since it first opened and I hope it will be an example for future trails.

Spotted Lanternfly

A new threat emerged in Ringwood this year. The Spotted Lanternfly is annoying, but should not pose the same risk to trees as Gypsy Moths and the Ash Borer Beetle.



Ringwood Environmental Commission Annual Report

Appendix – A



Ringwood Environmental Commission

Ms. Webster:

Please find a list of questions and concerns about the Ringwood Mines Superfund Site RAWP. As discussed, we will review further and get any additional information to you by Monday, 2/1/2021. Thank you for the opportunity to air these concerns and your willingness to make sure the plans are as protective as possible for our neighbors that live on this Superfund site.

1. Public Safety and Security Issues - Large construction equipment moving to and from the site and securing the site after work hours to avoid safety risks to the public and nearby residents. Need to consider temporary fencing and signage to keep hikers, hunters and others out of the hazard zones.

Consider monitoring the site during off hours and weekends with a security firm conducting periodic patrols.

Additional fencing should be added around all sites. Currently, fencing is entirely missing in some areas, especially around OU2. In other area, including the opening to Peter's Mine, access gates are open and some portions of fencing have been cut open. Separately, we remain concerned that deep mine openings and associated mine buildings are completely open. In some cases, a person could easily stumble down over 100 feet if they get lost and do not realize they are in close proximity to the old mine workings.

2. Construction Truck Traffic – There is concern about large dump trucks creating a public safety hazard. Need to have designated safe truck routes and speed limits to avoid steep hills. Special consideration should be given to public school bus routes during school hours as there are no sidewalks in the area so children will have to share the roadway with construction vehicles.

3. Peter's Mine Pit (PMP) - Concern about the dewatering of the contaminated pond water above the PMP mine and to ensure it is properly treated before discharge to ground. How do we ensure the contaminated water is tested and treated properly?

4. Peter's Mine Pit (PMP) – Please investigate the expected water flows after remediation. Our concern is that with 50 gallons per minute coming from the mine, a cement plug in the airshaft will cause the water to take an alternative route to the surface. If it emerges up gradient of the existing homes, we could be facing an immediate disaster that threatens the health and lives of the residents. It seems there are too many unknowns about the pollution source in Peter's Mine and the flow of water in the area to give assurance that the cement plug will not introduce new problems.

5. Managing Outside Contractors - There is concern about safely managing a large number of outside contractors to avoid public safety hazards and serious onsite accidents. Recommend mandatory sign-in for every site visit and safety orientation training for all subcontractors and visitors. RECON should designate a person with this responsibility.

6. Communications Updates to Ringwood Residents – Please recommend establishing a RECON Site Communication Plan to ensure timely updates and testing results are communicated to residents on a periodic basis. And posting results on the EPA or Ringwood website.

7. Community Involvement – Please consider community and nearby resident involvement by establishing a trusting relationship based on communicating the facts, transparency and involvement, e.g. site tours, website updates, special meetings, if necessary.

8. Compliance with EPA and Safety regulations - Concern that shortcuts and lack of compliance with all Federal and State environmental, Health and safety regulations are being followed in a short time frame with strict financial constraints. Recommend periodic safety, health, and environmental inspections by independent parties or contractors. We do not expect the general contractor to audit themselves.

9. Ringwood Environmental Commission Involvement - Recommend involving the Ringwood Environmental Commission in this very important and complex project to ensure extra resources are available to help booster lean township resources. Some expert and excellent professional resources are available on the Ringwood Environmental Commission team.

Note: This is not a complete list of issues or concerns since more time is needed to review the 1,279 page RECON RAWP report. We expect to send additional updates.

Thank you again for taking the time to review the concerns of the Ringwood Environmental Commission.

Regards,
Joe Kulak, CSP (retired)
Commissioner, Ringwood Environmental Commission

Thomas Conway
Chair, Ringwood Environmental Commission



RE: Ringwood Superfund Site OU-2 RAWP
Ringwood Environmental Commission Comments

Monday, February 1, 2021

Ms. Webster:

Thank you for the opportunity to air these concerns and your willingness to make sure the plans are as protective as possible for our neighbors that live on this Superfund site.

We reviewed the plan as it pertains to OU2. We have heard that this work will also include the remediation for OU3, but that is not covered in this document. Therefore, our comments are only in reference to the plans for OU2.

Please note that multiple references are made to design drawings, especially Design Drawing PMP-3 and Design Drawing D-4. They do not appear to be in the document.

Below is our list of questions and concerns about the Ringwood Mines Superfund Site RAWP.

1. Public Safety and Security Issues

- a. Large construction equipment moving to and from the site and securing the site after work hours to avoid safety risks to the public and nearby residents. Need to consider temporary fencing and signage to keep hikers, hunters and others out of the hazard zones.
- b. Consider monitoring the site during off hours and weekends with a security firm conducting periodic patrols.
- c. Additional fencing should be added around all sites. Currently, fencing is entirely missing in some areas, especially around OU2. In other area, including the opening to Peter's Mine, access gates are open and some portions of fencing have been cut open. Separately, we remain concerned that deep mine openings and associated mine buildings are completely open. In some cases, a person could easily stumble down over 100 feet if they get lost and do not realize they are in close proximity to the old mine workings.

2. Construction Truck Traffic

- a. There is concern about large dump trucks creating a public safety hazard. Need to have designated safe truck routes and speed limits to avoid steep hills.
- b. Special consideration should be given to public school bus routes during school hours as there are no sidewalks in the area so children

will have to share the roadway with construction vehicles. While school bus routes are in the plans, we would like to see large signage indicating the hours of school bus routes.

- c. Some parts of the plan call for a 5mph speed limit while others call for a 15mph speed limit. It is not clear if these are contradictory or indicated for different parts of the work area.
3. Peter's Mine Pit
 - a. Concern about the dewatering of the contaminated pond water above the PMP mine and to ensure it is properly treated before discharge to ground. How do we ensure the contaminated water is tested and treated properly?
 - b. The area has been identified as a source of 1,4 -Dioxane (likely a human carcinogen) in the PMP pond and groundwater. The RAWP does not address 1,4 - Dioxane treatment in the PMP area. Is the PMP pond and groundwater going to be tested for 1, 4 - dioxane? If discovered again, how is it going to be dealt with and treated. We know that normal geo filters and activated carbon do not work. We recommend developing a plan for detecting and treating 1,4 - dioxane in the PMP.
 - c. On page 36 of the pdf document, it states "There is no documentation indicating that listed hazardous wastes were disposed of in the PMP Area." This seems absurd. O'Connor Trucking has specifically said they dumped sludge into Peter's mine and the testing done onsite shows the highest concentrations of pollutants in those results.
 - d. How are the VOC's from the PMP's saturated soil after dewatering the pond going to be treated and residents protected? Will air monitoring stations be installed directly around the PMP remediation area to alert residents, workers and visitors of real-time chemical exposure hazards? At the same time, perimeter air monitors are stationed around the entire site.
 4. Managing Outside Contractors and Communication with Same
 - a. There is concern about safely managing a large number of outside contractors to avoid public safety hazards and serious onsite accidents. Recommend mandatory sign-in for every site visit and safety orientation training for all subcontractors and visitors. RECON should designate a person with this responsibility.
 - b. Please recommend establishing a RECON Site Communication Plan to ensure timely updates and testing results are communicated to residents on a periodic basis. And posting results on the EPA or Ringwood website. This should include a quick process to relay any safety violations to the residents immediately; especially air monitoring alerts.
 - c. The plans clearly lay out that any worker onsite can give a stop work order if they observe a violation. What is the process if a Borough employee or local resident observes a safety issue?
 5. Compliance with EPA and OSHA regulations
 - a. Concern that shortcuts and lack of compliance with all Federal and State environmental, Health and safety regulations are being followed in a short timeframe with strict financial constraints. Recommend

periodic safety, health, and environmental inspections by independent parties or contractors. We do not expect the general contractor to audit themselves.

- b. We recommend a complete list of Material Safety Data Sheets be made available at the site for all potential chemical and hazardous substances that have been identified at the site, only 3 MSDS's (lead, arsenic, benzene) are included in the RAWP. Missing a number of MSDSs including 1,4 -dioxane, chloroethane, cadmium, trichloroethane, PCB's, etc.
 - c. Water detention basins are designed on the 25-year stormwater information. We would like to know if this is the old designations or if it has been updated recently to include the increased major events and global warming. Ringwood has experienced a number of events in the past 10 years that exceed 25-year storms, including 100-year storms. We recommend exceeding the 25-year stormwater guidance and designing larger stormwater basins. This should be of critical importance due to the proximity to the Wanaque reservoir.
 - d. Where is the weigh station going to be located? This is mentioned in the document, but is not reflected on any map.
6. Environment and Endangered Species
- a. The Endangered Species inspections should have already been conducted in October. Where are those results? Also, is it appropriate to only conduct one round of inspections in October when the spring season is the most robust for many species?
 - b. Habitat Best Management Practices Manual is referenced in pages 1178-1179, but is not included. How do we get a copy of this document?
 - c. Clearing and Grubbing are indicated to happen between March 1st and April 15th. This contradicts that endangered species concerns that no clearing should take place between March 15th and June 15th. We would like to see the timeline match the endangered species constraints. Especially in OCDA where clearing is not slated to begin until March 15th.
 - d. On page 1260 (SECTION 32 92 19 – Seeding and Planting), phosphorous is indicated as part of the fertilizer mix for turf grass. The NJDEP does not allow phosphorous in fertilizers unless a soil test indicates a need for it. They also require 20% of the mix to be slow-release nitrogen. This should be updated in the document or a reference to the soil test should be given.
7. Community Involvement
- a. Please consider community and nearby resident involvement by establishing a trusting relationship based on communicating the facts, transparency and involvement, e.g. site tours, website updates, special meetings, if necessary.
 - b. **Involve the Ringwood Environmental Commission in this very important and complex project to ensure extra resources are available to help booster lean Borough resources. Some expert**

and excellent professional resources are available on the Ringwood Environmental Commission team.

Thank you again for taking the time to review the concerns of the Ringwood Environmental Commission.

Regards,
Joe Kulak, CSP (retired)
Commissioner, Ringwood Environmental Commission

Thomas Conway
Chair, Ringwood Environmental Commission



RE: Ringwood Superfund Site OU-2 RAWP
Ringwood Environmental Commission Concerns on Response to RAWP Comments

Monday, April 19, 2021

Mr. Gowers:

Thank you for the opportunity to express our concerns on the response to our comments on the Ringwood Superfund Site OU-2 RAWP.

Response to Concern 1.A

1. Thank you for partially addressing our concern. The language "fencing will be maintained" does not address the fact that entire sections of fencing are missing or severely damaged. Fencing needs to be repaired in addition to maintaining the functional sections. Language similar to the response to 1.C should be in this response.
2. What barrier do you intend to use to block ATV access and how will those barriers be removed after construction?

Response to Concern 1.B

1. Please acknowledge that one of the primary reasons for selecting this remedy and the original full removal was the stated opinion that fencing would be inadequate to keep trespassers out of OCDA. Why is that not acknowledged in the work plan?
2. Will cameras cover the entire perimeter of fencing?
 - a. What type of cameras will be used?
 - b. How will they be connected to the network?
 - c. Where will the actual monitoring take place?
3. What is the plan if the cameras do detect activity at the site during off hours? Who will respond?

For the protection of the residents and the work equipment onsite, consider having security there 24/7 during the construction phase. Considering the scope of work, it is very possible that there are additional sinkholes and dangers during construction that local residents will be unaware of. Considering the cost savings of the current plan, this extra level of protection could save lives with little added cost.

Response to Concern 2.A

Page 225 of 1279 should be updated to 15 MPH to avoid the conflict with the answer stated in your response. That page details the Vendor Orientation for the

delivery trucks and states "Speed limit on SITE is 5 MPH." The information should be consistent across all documents to be clear and unambiguous.

Response to Concern 2.C

The conflicts were made clear above. Please update page 225.

Response to 3.A

1. The Arcadis drawings from 2009 clearly indicate drums and paint sludge located beneath the waterline. We do not believe any action was taken to remediate this since that report came out. We have attached the images from the report. Please amend your response to remove the uncertainty in it. There are known drums and paint sludge below the waterline and the response should not falsely claim that there may be none. This is a known fact.
2. You should definitely anticipate moving a larger volume of water than can simply be pumped out at the site. When this water is brought up from the ground it is critical that the responses to section 1, security, also be addressed by doing everything possible to prevent humans from coming into contact with this water. Please include a plan for having to move the additional water that you are not anticipating or explain why the attached drawings are not taken into consideration.

Response to 3.B

Considering the scope of sludge and drums below waterline as described above, how will you be able to lower the water table while the water stays onsite? This seems akin to pumping water out of a sink onto a drying rack that drains back into the sink. If there is a place that can be saturated enough to take up this water, how do we know that some of it will not travel outside the area and downstream? 1,4 dioxane is very water soluble, so it will travel wherever the water goes.

Response to 3.C

Considering the years of water testing, it is frankly callous to even mention that there is no documented dumping of hazardous wastes. We know that much of the dumping in the area was illegal, so the mention of a lack of documents does not seem to have any point. The material is there, what is the purpose of mentioning that you are not aware of any documentation? How does this statement fit into the precautions that will be taken and what influence does it bear on this document?

Response to 3.D

Thank you for the detailed response. Is there any consideration given for changes in wind direction overnight? The plan seems to only account for activities during work hours, but the potential for pumping water 24/7 could release contaminants throughout the night.

Response to 4.B

Again, we would like a detailed plan on how the information will be communicated to the community. Details on the transmission of information as well as where information will be posted for residents to review. We appreciate the intention of communication, but would like to know the specific channels that will be used. Community meetings would go a long way to easing the unknowns that will add stress to an already difficult situation for the residents.

Response to 4.C

1. To be clear, is your response to be interpreted that residents and Borough employees cannot give a stop work order if they identify a major issue?
2. When "communicated immediately to the provided points of contact" what happens to the concern from there and how quickly can the point of contact issue a stop work order?

Response to 5.A

1. Thank you for the response. How many projects has de maximis and RECON worked on together? Their close relationship does call into question the effectiveness of de maximis to objectively oversee RECON. Tetra Tech is owned by de maximis, so there is also a connection.
2. Is the scope and frequency of the Army Corps of Engineers oversight known?

Response to 5.B

We will look forward to reviewing the updated section 8.2.

Response to 5.C

Does the evaluation discussed in this response include the possibility that Peter's Mine area will be pumping water onsite? We still do not understand how the water will be kept onsite while lowering the water table, let alone how a significant storm would not wash that water offsite.

Response to 5.D

The Peter's Mine site appears maxed out with all the staging areas given in the plan. Providing room for trucks to navigate through the weigh station up there seems difficult. It will also cause unnecessary travel deeper into the community from the Canon Mine site and the OCDA sites. Please consider a weigh station location that does not necessitate additional travel into the heart of the community.

Response to 6.A

1. Where are the results of the endangered species inspections?
2. Will they be made public?

Response to 6.B

We will look forward to receipt of the Habitat Best Management Practices Manual. Please provide an ETA for receipt of this.

Response to 7.A

As stated above, the community should be made aware of those specific modes of communication of information. A communications hub would be ideal so that curious residents have a resource to look back on. Currently, it seems mailings are the only source of information.

The Commission would be happy to host an online resource for residents to be able to review documents.

Thank you again for allowing the Ringwood Environmental Commission to share concerns. This has been a helpful exchange of ideas and we appreciate the consideration given in the responses. By working together, we can assure that the maximum effort is made to minimize the impacts on the residents, their children, and the environment.

Regards,

A handwritten signature in blue ink, appearing to read "Thomas Conway". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas Conway
Chair, Ringwood Environmental Commission



RE: Ringwood Superfund Site OU-2 RAWP
Ringwood Environmental Commission Response to RAWP May 18, 2021 Comments

Thursday, June 17, 2021

Mr. Gowers:

Thank you again for the opportunity to express our concerns on the response to our comments on the Ringwood Superfund Site OU-2 RAWP.

Hazardous Waste

In response to our quest 3.c. (*page 26 of pdf document 618291.pdf*) de Maximus maintains that no listed hazardous wastes were disposed in the PMP area. Does the EPA agree with this conclusion?

Regardless of the above, it is well documented and acknowledged by the EPA and NJDEP that hazardous waste, materials and chemicals exist in the PMP area. **All workers, visitors, contractors should be informed and made well aware of this per OSHA's standards.**

Air Monitoring for Residents

The upwind and downwind descriptions of air monitoring do not fit the site. The worksite is in a deep valley surrounded by hills. Winds often swirl 360 degrees during almost any wind direction. The continued repetition of monitoring stations being setup downwind by residents is misleading. There is no way to establish downwind and upwind locations in the actual implementation. The swirling winds and known changes of direction overnight should at least be acknowledged.

We suggest enhanced perimeter air monitoring stations be considered based on the unpredictable behavior of the air currents in the PMP area.

Communication

The EPA has not included or proposed a robust communications plan to the Ringwood community. We are very concerned about this and have volunteered the Ringwood Environmental Commission to assist and made other suggestions to improve communications to the community.

Can the Ringwood Environmental Commission communicate directly with the Army Corps of Engineers during the project? Some residents are not comfortable communicating through a single channel with the EPA.

We would appreciate the opportunity to help create a two-way, comprehensive community communication plan for the residents.

Missing Number for NJDEP Contact

The emergency contact list (Section M, Table 2-2) is missing a number for the NJDEP case manager, Dylan Zaliwski.

Thank you again for allowing the Ringwood Environmental Commission to share concerns. It is our goal that the maximum effort is made to minimize the impacts on the residents, their children, and the environment.

Regards,

A handwritten signature in blue ink, appearing to read 'Thomas Conway', with a stylized flourish at the end.

Thomas Conway
Chair, Ringwood Environmental Commission



Ringwood Environmental Commission Annual Report

Appendix – B

**Tennessee Gas Pipeline
Company's
"East 300 Upgrade"**

**West Milford Compressor
Station "CS 327"**

**Project Summary and
Dangers to Ringwood and
New Jersey**

Prepared for Ringwood Borough Council

By Thomas Conway

Chair, Ringwood Environmental Commission

Date: January 29,2021

INTRODUCTION AND BACKGROUND

In June, 2020, Tennessee Gas Pipeline Company (TPG) filed with the Federal Energy Regulatory Commission (FERC) to build a new fracked gas compression station (CS 327) along its pipeline in West Milford at 960 Burnt Meadow Road. It is also looking to significantly expand the existing compression station in Wantage (CS 325).

According to the filing¹, the gas is intended for customers in Westchester County, NY. According to Consolidated Edison (ConED):

*The East 300 Upgrade Project is a product of this creative thinking because it is designed and narrowly-framed to meet our customers' needs while being mindful of the state's clean energy goals.*²

Their filing specifies the three areas of Westchester county that will receive the gas:

BEGINNING DATE	ENDING DATE	METER	METER NAME	INTERCONNECT PARTY NAME	COUNTY	ST	ZONE	R/D	LEG	METER-TQ
Beginning Date	Ending Date	Meter	Meter Name	Interconnect Party Name	County	State	Zone	R/D	Leg	Meter-TQ
Defined Above	Defined Above	TBD	TBD	TBD	TBD	PA	4	R	300	110,000
Defined Above	Defined Above	420093	White Plains	CECONY	Westchester	NY	5	D	300	80,000
Defined Above	Defined Above	420477	Knollwood	CECONY	Westchester	NY	5	D	300	20,000
Defined Above	Defined Above	420344	Rye	CECONY	Westchester	NY	5	D	300	10,000

New York State recognizes the dangers of fracking to the environment and specifically drinking water. Governor Andrew M. Cuomo has announced legislation in the FY 2021 Executive Budget to make New York's fracking ban permanent. When presenting this ban, he said:

*New York's leadership on hydraulic fracturing continues to protect the environment and public health, including the drinking water of millions of people, and we must make it permanent once and for all. In the five years since fracking was banned, we have proven that it was in fact, not the only economic option for the Southern Tier. The region has since become a hotbed for clean energy and economic development investment through programs like 76West and Southern Tier Soaring, creating new good-quality jobs that pave the way for further growth.*³

NY DEC Commissioner Basil Seggos said:

Governor Cuomo has detailed the biggest and boldest environmental agenda in the nation, and the permanent ban of hydrofracking is a critical

¹ https://elibrary.ferc.gov/eLibrary/idmws/file_list.asp?accession_num=20200630-5546

² FERC Docket No. CP20-493-000 Comments in Support of Consolidated Energy Company of New York, Inc.

³ <https://www.governor.ny.gov/news/governor-cuomo-announces-legislation-make-fracking-ban-permanent-included-fy-2021-executive>

*part in ensuring the protection of water quality, transitioning from fossil fuels, and continuing our role as a climate leader.*⁴

Apparently this talk of leading the nation with its environmental agenda stops at the border of New York State as ConEd is looking to expand NY's use of fracked gas by exploiting the purpose of FERC to deliver fracked gas from PA through NJ. While NY seeks to protect its citizens, environment and clean water, PA and NJ are expected to take on these very same risks to meet the lack of supply caused by these measures. Further, New York State enacted the Climate Leadership and Community Protection Act ("Climate Law"), which seeks to achieve "net zero" greenhouse gas ("GHG") emissions by 2050. The Climate Law requires the State to cut GHG emissions to 85 percent below 1990 levels by 2050 and offset the remaining 15 percent through other measures. Details of the plan are not due for another three years on January 1, 2024. Without concrete plans, ConEd would like to move forward supplying greenhouse gas emitting fuel at the expense of NY's neighbors.

*Con Edison will not presume what the ultimate regulations and mandates will look like when they are completed years from now. What is known, however, is what the law did not alter, i.e., it did not alter Con Edison's obligation to serve those customers that request gas service.*⁵

As New York brags about being a world leader in green technology and reducing its greenhouse gas emissions, PA and NJ are expected to supply the very energy source that NY is rejecting to save its own soil and water. This is wrong and unethical.

It is time we stand up as a community and reject another Highlands-approved exemption to big business. While the residents of Ringwood and other Highlands communities suffer under the development restrictions meant to protect the drinking water of our state, NY and TPG continue to use this watershed as a highway for fracked gas. In Ringwood and neighboring towns, we have already seen TPG break its promises by failing to replant the new pipeline that was put in less than 10 years ago. Now they seek to add pressure to the pipeline to satisfy NY's failed clean energy initiatives allowing their politicians to save face.

To add insult to injury, the new compressor station will be located within a few hundred yards of the Monksville Reservoir. Right next to the site is a C1 stream (Hewitt Brook) that flows right into the Monksville Reservoir and consequently into the Wanaque Reservoir, a water source for over 3 million NJ residents. A C1 stream category means that it cannot degrade its water quality. The C1 category is supposed to protect critical habitat, stream buffers and keep out pollution discharge of sewage and other sources. C1 also requires higher standards for stormwater.

The Highlands has already allowed this to proceed under Exemption #11, which is the "routine maintenance and operations, rehabilitation, preservation, reconstruction, repair or

⁴ <https://www.governor.ny.gov/news/governor-cuomo-announces-legislation-make-fracking-ban-permanent-included-fy-2021-executive>

⁵ FERC Docket No. CP20-493-000 Comments in Support of Consolidated Energy Company of New York, Inc.

upgrade of public utility lines, rights-of-way, or systems, by a public utility, provided that the activity is consistent with the goals and purposes of the Highlands Act”.

Ringwood has nothing to benefit from this action. Our water, roads, wildlife and air quality will be impacted by this project. Only NY stands to benefit while blatantly breaking its empty promises on climate leadership.

Over pressurized pipelines have a history of incidents. From 2006 to 2017, according to the Pipeline and Hazardous Materials Safety Administration’s failure reports, TGP had 111 "significant incidents" with their pipelines, resulting in \$89,815,380 in property damage and 19 federal enforcement actions.⁶

In the Highlands of New Jersey, we are dealing with a massive influx of the Emerald Ash Borer beetle. In Ringwood specifically, we are seeing ash trees fall by the hundreds with each major weather event. This is leaving the forests with piles of dead wood. The perfect recipe for a pipeline accident to turn into a full-fledged forest fire. This is not business as usual, this is an extreme situation and adding a potential spark to this plague should be resisted across all governmental departments.

Ringwood needs to take a stand and say “no” to this project. It is time the Highlands Act stops being used to benefit other states while crippling the industry and residents of its own region. It’s time we stand up and stop allowing interstate businesses to exploit this protection to their own advantage. After many years of continual abuse, it should be clear that the Highlands Act is powerless to stop these forces. It is up to the citizens and their local and state governments to make sure the Highlands Protection Act lives up to its name.

Please pass the attached ordinance and help send the message that enough is enough. Ringwood is tired of being exploited and bearing the risks so that other states can hypocritically tout their own environmental leadership. This is our land and if we do not stand up to this exploitation, it will only continue. History has already proven that many times.

⁶ PHMSA Operator Information, Tennessee Gas Pipeline Company, Operator ID:19160, at https://primis.phmsa.dot.gov/comm/reports/operator/OperatorIM_opid_19160.html?nocache=769#_Incidents_tab_2, accessed 2018.01.08.

AN ORDINANCE OF THE MUNICIPAL COUNCIL OF THE
BOROUGH OF RINGWOOD IN THE COUNTY OF
PASSAIC, STATE OF NEW JERSEY, OPPOSING THE
PROPOSED CONSTRUCTION OF COMPRESSION TURBINES
ON THE TENNESSEE GAS PIPELINE IN WEST MILFORD, NJ.

WHEREAS, Tennessee Gas Pipeline Company, L.L.C. (“TGP”) has applied to the Federal Energy Regulatory Commission (“FERC”) for a “Certificate of Public Convenience and Necessity” and to the NJ Department of Environmental Protection for a Highlands Act exemption, air pollution permits, freshwater wetlands permits, stormwater management permits, and other permits required for its proposed “East 300 Upgrade Project”¹; and

WHEREAS, this project includes the construction of a 11,107 horsepower gas compression station (“Compressor 327”) at 960 Burnt Meadow Road, Township of West Milford, Passaic County, New Jersey²; and

WHEREAS, this project will significantly increase the amount and pressure of gas transported through the pipeline from Pennsylvania through New Jersey to Westchester County, New York³, much of this pipeline is 65 years old and beyond its useful life, and sections of which run near homes, businesses, and critical infrastructure in Ringwood and West Milford; and increases the risk of leaks and catastrophic explosions, which can result in property destruction and deaths when they occur; and

WHEREAS, according to Pipeline and Hazardous Materials Safety Administration (“PHMSA”) failure reports, from 2006 to 2017 TGP had 111 significant incidents with their pipelines, resulting in \$89,815,380 in property damage and 19 federal enforcement actions⁴ and such incidents may escalate as pipelines age; and

WHEREAS, the proposed Compressor 327 in West Milford is located in the Highlands Preservation Area, an exceptional natural resource which provides drinking water to more than half of the state of New Jersey⁵ and this project is near two major reservoirs, protected wetlands, and a Category 1 Exceptional Value Stream, and construction and ongoing operation of these proposed industrial facilities can lead to groundwater pollution from chromium, benzene and hydrocarbons⁶; and

WHEREAS, in addition to normal operational emissions associated with gas-fired compressor stations, other sources of periodic emissions include planned and unplanned blowdowns, leaked gas (“fugitives”) and accidents, as well as leaks of volatile organic compounds (“VOCs”) removed from the gas stream and stored on site including hydrogen sulfide, mercury and other contaminants; and

WHEREAS, VOCs present at compressor stations include nitrogen dioxide, ethyl benzene, benzene, ethane, methanol, naphthalene and toluene; short term exposure to these chemicals can cause eye and respiratory tract irritation, headaches, dizziness, visual disorders, fatigue, loss of coordination, allergic skin reaction, nausea, and memory impairment; long-term effects include loss of coordination and damage to the liver, kidney, and central nervous system; and many

VOCs are known carcinogens,⁷ and benzene specifically is associated with childhood leukemia⁸; and

WHEREAS, in addition to VOC pollution, Particulate Matter (PM) released from compressors also poses a significant health concern and can interact with airborne VOCs increasing their impact; PM of 2.5 mm may pose the greatest threat to the health of nearby residents, and inhalation affects both the respiratory and cardiovascular systems causing decreased lung function, aggravated asthma symptoms, and nonfatal heart attacks and high blood pressure⁹; and

WHEREAS, natural gas is primarily made up of methane, a significant contributor to climate change, and is released during planned and unplanned blowdowns, and found to leak at every stage of the supply chain¹⁰; and

WHEREAS, a flash fire at the Williams Transco gas compressor in Branchburg, NJ in 2013 caused two workers to be hospitalized and injuries to 13 others¹¹; and

WHEREAS, TGP's 300-line project, completed in November, 2011 seriously damaged Lake Lookover in Hewitt, NJ and Bearfort Waters in West Milford including the siltation and destruction of waterways through mudslides, increased flooding and impacts to drinking water wells¹²; and

WHEREAS, during construction at the Williams Transco compressor station in Roseland NJ in 2013, the company conducted a “blow-down” of the facility, and released large amounts of gas and other chemicals into the local community, forcing an emergency evacuation of the nearby Roseland Elementary School¹³; and

WHEREAS, in 2013 a 12,000-horsepower compressor station came online across the New York border from Wantage in Minisink New York, and has caused serious health impacts to residents including nosebleeds, headaches, rashes, and respiratory, gastrointestinal, and neurological symptoms¹⁴; and

WHEREAS, the proposed TGP projects are within one mile of important natural and recreational resources, including two state parks, a state park trail, and a Wildlife Management Area, including the Monksville Reservoir, Long Pond Ironworks State Park, Highlands Trail and Wanaque Wildlife Area¹⁵; and

WHEREAS, the Municipal Council of the Borough of Ringwood has a principal responsibility to protect the health and safety of its residents, visitors, and businesses; and

NOW, THEREFORE, BE IT RESOLVED that Municipal Council of the Borough of Ringwood, County of Passaic, State of New Jersey, in the interest of protecting its residents and businesses opposes construction of Compressor 327 station and TGP’s attempt to exempt its activities from the Highlands Preservation Act; and

BE IT FURTHER RESOLVED, that the Municipal Clerk shall forward this Resolution to FERC, President Joe Biden, Senators Cory Booker and Robert Menendez, Congressman Josh

Gottheimer, Governor Phil Murphy, New Jersey Department of Environmental Protection Acting Commissioner Shawn M. LaTourette, Highlands Council Chairman Carl Richko, North Jersey Water Supply Commission Chairman Howard L. Burrell, State Senator Gerald Cardinale, Assemblyman Robert Auth, Assemblywoman Holly T. Schepisi and County Director Pasquale Lepore.

LINDA M. SCHAEFER, MAYOR

NICOLE LANGENMAYR, RMC
MUNICIPAL CLERK

Introduced: February 16, 2021
Adopted: February 16, 2021
Effective: February 16, 2021

¹ https://elibrary.ferc.gov/eLibrary/idmws/file_list.asp?accession_num=20200630-5546

² https://elibrary.ferc.gov/eLibrary/idmws/file_list.asp?accession_num=20200630-5546, East 300 Upgrade Application (June 30, 2020) pp. 5-6.

³ https://elibrary.ferc.gov/eLibrary/idmws/file_list.asp?accession_num=20200630-5546, East 300 Upgrade Application (June 30, 2020) pp. 3-4.

⁴ <https://www.phmsa.dot.gov/safety-reports/pipeline-failure-investigation-reports>

⁵ <https://www.nj.gov/njhighlands/act/faq/>

⁶ <https://www.energy.gov/sites/prod/files/2014/08/f18/Addendum.pdf>, p. 27.

⁷ EPA. An introduction to indoor air quality: volatile organic compounds.

http://www.epa.gov/iaq/voc.html#Health_Effects

⁸ Marlyn T. Smith “Advances in understanding benzene health effects and susceptibility. Annual Review of Public Health. 2010; 31:133-48, p. 133.

⁹ <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>

¹⁰ <https://pubs.acs.org/doi/10.1021/acssuschemeng.6b00144>

¹¹ https://www.nj.com/somerset/2013/05/multiple_injuries_reported_at.html

¹² <https://www.njherald.com/article/20130414/NEWS/909021406>

¹³ https://www.nj.com/essex/2013/06/roseland_gas_compressor_station_faces_opposition_group_protests_constructi_on_at_council_meeting.html

¹⁴ <https://www.recordonline.com/article/20151008/NEWS/151009420>

¹⁵ The Monksville Reservoir is located 2,000 feet west of the new Compressor 327; Long Pond Ironworks State Park is 0.01 mile southeast of the Compressor 327; Highlands Trail, a part of Long Pond Ironworks State Park, is 290 feet south of the new Compressor 327; and Wanaque Wildlife Area is 0.90 mile northeast of the new Compressor 327.

Thomas Conway
Chair, Ringwood Environmental Commission
60 Margaret King Avenue
Ringwood, NJ 07456

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St., N.E., Room IA
Washington, DC 20426

Monday, March 22, 2021

Dear Secretary Bose:

I am writing to express my opposition to Tennessee Gas Pipeline (TGP) Company's application to build a new Compressor Station (CS327) in the Highland Council's Protected Region of West Milford. The proposed site sits right on top of the Monksville reservoir and adjacent to a C1 stream that feeds into the Wanaque Reservoir, a drinking source for over 3 million New Jersey residents.

I have two comment sections in this correspondence. The first is a general comment on the project and the second is specifically in response to the Environmental Assessment published on 2/19/2021.

General Comments

According to the filing, the gas is intended for customers in Westchester County, NY. As per Consolidated Edison (ConED):

The East 300 Upgrade Project is a product of this creative thinking because it is designed and narrowly-framed to meet our customers' needs while being mindful of the state's clean energy goals.

New York State recognizes the dangers of fracking to the environment and specifically drinking water. Governor Andrew M. Cuomo has announced legislation in the FY 2021 Executive Budget to make New York's fracking ban permanent. When presenting this ban, he said:

New York's leadership on hydraulic fracturing continues to protect the environment and public health, including the drinking water of millions of people, and we must make it permanent once and for all. In the five years since fracking was banned, we have proven that it was in fact, not the only economic option for the Southern Tier. The region has since become a hotbed for clean energy and economic development investment through programs like 76West and Southern Tier Soaring, creating new good-quality jobs that pave the way for further growth.¹

NY DEC Commissioner Basil Seggos said:

¹ <https://www.governor.ny.gov/news/governor-cuomo-announces-legislation-make-fracking-ban-permanent-included-fy-2021-executive>

Governor Cuomo has detailed the biggest and boldest environmental agenda in the nation, and the permanent ban of hydrofracking is a critical part in ensuring the protection of water quality, transitioning from fossil fuels, and continuing our role as a climate leader.²

Apparently this talk of leading the nation with its environmental agenda stops at the border of New York State as ConEd is looking to expand NY's use of fracked gas by exploiting the purpose of FERC to deliver fracked gas from PA through NJ. While NY seeks to protect its citizens, environment and clean water, PA and NJ are expected to take on these very same risks to meet the lack of supply caused by these measures.

New York State enacted the Climate Leadership and Community Protection Act ("Climate Law"), which seeks to achieve "net zero" greenhouse gas ("GHG") emissions by 2050. The Climate Law requires the State to cut GHG emissions to 85 percent below 1990 levels by 2050 and offset the remaining 15 percent through other measures. Details of the plan are not due for another three years on January 1, 2024. Without concrete plans, ConEd would like to move forward supplying greenhouse gas emitting fuel at the expense of NY's neighbors.

Con Edison will not presume what the ultimate regulations and mandates will look like when they are completed years from now. What is known, however, is what the law did not alter, i.e., it did not alter Con Edison's obligation to serve those customers that request gas service.³

As New York brags about being a world leader in green technology and reducing its greenhouse gas emissions, PA and NJ are expected to supply the very energy source that NY is rejecting to save its own soil and water. This is wrong and unethical.

The new compressor station will be located within a few hundred yards of the Monksville Reservoir. Right next to the site is a C1 stream (Hewitt Brook) that flows right into the Monksville Reservoir and consequently into the Wanaque Reservoir, a water source for over 3 million NJ residents. A C1 stream category means that it cannot degrade its water quality. The C1 category is supposed to protect critical habitat, stream buffers and keep out pollution discharge of sewage and other sources. C1 also requires higher standards for stormwater.

New York and New Jersey are independently working on climate plans to reduce greenhouse gas emissions. This project contradicts those intentions. The building of homes powered by fracked gas will certainly increase greenhouse gas emissions in New York. New Jersey will also see an increase in greenhouse gas emissions due to the increased pressurization of the pipeline. Methane, the primary ingredient in natural gas, is a significant contributor to climate change. Methane is released during planned and unplanned blowdowns and found to leak at every stage of the supply chain.⁴ Increasing the pressure will increase the amount of methane that is leaked.

Across the Highlands, we have already seen TGP break its promises by failing to replant the new pipeline that was put in less than 10 years ago. While the sections of the pipeline near roadways have functioning gates and native vegetation thriving from regular watering; the interior of the forest is littered with broken gates (allowing increased, illegal ORV traffic), dead plantings from lack of water and invasive weeds. In some areas it is so bad they have to spray pesticides.

² <https://www.governor.ny.gov/news/governor-cuomo-announces-legislation-make-fracking-ban-permanent-included-fy-2021-executive>

³ FERC Docket No. CP20-493-000 Comments in Support of Consolidated Energy Company of New York, Inc.

⁴ <https://pubs.acs.org/doi/10.1021/acssuschemeng.6b00144>

TGP's 300-line project, completed in November, 2011 seriously damaged Lake Lookover in Hewitt, NJ and Bearfort Waters in West Milford including the siltation and destruction of waterways through mudslides, increased flooding and impacts to drinking water wells.⁵

West Milford and neighboring towns use a mix of professional police and volunteer first responders. It is not clear how these volunteers will be trained to assist in the event of a severe incident. Response time will be critical to keep any breach of the site from compromising the reservoir. It will be New Jersey volunteers that will have to respond in the event of a disaster. These disasters occur regularly and you only need to go back to 2013 to reference the flash fire in Branchburg, NJ at the Williams Transco gas compressor that caused two workers to be hospitalized and injuries to 13 others.⁶

Northern New Jersey is seeing the Emerald Ash Borer Beetle eat its way through the forests. This beetle is killing ash trees by the thousands. Already, the forest floor is littered with dead trees. Increasing pressure to a flammable gas that runs through the forests littered with kindling is a recipe for disaster. If nothing else, TGP should detail how it will manage the compressor and transfer stations all along its pipeline route to make sure an incident does not spark a regional disaster.

Please do not approve this pipeline expansion project. The environmental risks are high and the homes that are projected to be built are in a state that has an aggressive climate plan that will make this upgrade unnecessary quickly, if not before the project is complete. Westchester County, NY has other options for energy and this expansion goes against the New York Climate Plan.

Comments on the Environmental Assessment

TPG is looking to start construction by March 1, 2022. While this date comes before the NJ date to protect some nesting species on April 1, I don't see how this date can work with the Eastern small-footed bat. This timeline puts all tree clearing during the time that the EA says, "minimal tree clearing would occur during the winter or early spring months."

In the pipeline expansion around 2012, TGP promised to use environmental inspectors, like this project (page 5), but when those inspectors raised concerns they were reassigned to less important areas. Is there a way to make sure the EI's can be freed of interference from TGP and allowed to do their job properly?

There is a C1 stream near this property that flows into the reservoir. It would be an extra safety measure to install a book downstream of the site to make sure any accidental discharges can be contained before the stream enters open water. (Page 8)

It is not clear what the two new personnel would be needed for at CS 327 (page 9). Since they will be offsite, it is also confusing on why six additional personnel would need to be relocated. Considering local emergency services (many of whom are volunteers) will respond to an emergency at CS 327, more detail on the roles of these additional and relocated personnel would be appreciated.

The construction schedule allows for "extended construction hours" (page 9) for almost any condition. This could be a major inconvenience for the neighboring residents and a more detailed plan on how they will be notified should be provided. It also states here that March 1st is the earliest construction will start. This again

⁵ <https://www.njherald.com/article/20130414/NEWS/909021406>

⁶ https://www.nj.com/somerset/2013/05/multiple_injuries_reported_at.html

puts the tree clearing in conflict with species concerns. It is not clear if this timeline also includes the necessary work for utilities to be run to the site.

TGP (page 16) discusses using certain barriers to prevent erosion. Based on their performance since the 2012 pipeline expansion, these barriers have not been maintained. Is there a plan on the inspection and maintenance of these mitigation measures?

After the 2012 pipeline expansion, many of the plantings were left to die. Only sections of the pipeline near roadways were given water and help. The interior sections are barren and with the canopy wide open, they are filled with invasive species. Some areas are so bad that they need to be treated with pesticides. Considering CS 327 is in close proximity to a reservoir that serves over 3 million residences; TGP should develop a more descriptive plan with goals and penalties that extend to the complete revegetation around their facility. Simply following a BMP (page 18) has already proven ineffective. This is especially important knowing that toxic chemicals may be released in a "blowdown."

There is no mention of vernal pools in the area of CS 327. These pools provide a critical habitat for some species in the area. Considering the dozens of acres that are planned to be affected after the project, please consider adding vernal pools to the EA or as an amendment.

It is reckless to conclude that Monksville Reservoir is used for "recreational fishing" (page 26). Monksville Reservoir flows directly into the Wanaque Reservoir. This is a drinking water resource for 3 million people and TGP should not minimize this fact in any section. This fact should be a priority in all sections of their plan.

The noise plan of CS 327 is way beyond what is currently experienced in that area. (Page 29) To claim that there is no new or novel noise impact is misleading. The current activity in the area is sporadic and mainly occurs during weekday business hours. Nocturnal creatures will most certainly feel a change in noise levels. This should be corrected in the EA and not glossed over.

The pipeline work from 2012 is littered with weeds. The assurances on page 29 are not enough. TGP should have a more detailed plan that acknowledges the failures made almost a decade ago that still scar our land.

The bats of concern may be adversely affected. I have personally observed a large nesting area under the roadway bridge just east of the project. Extra care should be taken to locate and classify nearby bat areas. An independent review of nearby hibernacula should be conducted.

The discussion of noise (page 36) is not what the reality is on the site. The EA seems to assume a level of noise based on the zoning of the area. There is very light traffic in this area and the noise level is quite low. The construction of CS 327 will greatly increase not only the intensity of noise, but also the frequency. A "blowdown" will be louder than anything in the area, except for occasional blasting.

The mention of "minimal tree clearing would occur during the winter or early spring months" contradicts the projects timeline of starting in March and having everything cleared by April 1.

Where does the \$658,570 amount in property taxes for CS 327 come from? Is there a guarantee that West Milford will receive that amount in taxes?

The EA references the West Milford noise ordinances. Specifically, construction and demolition work is only to be performed between 7AM and 6PM on weekdays and 9AM and 6PM on weekends (page 69). This contradicts

the hours referenced on page 9. Work hours should be updated and the ONLY reason for afterhours work would be emergencies as specified in West Milford's code.

Page 70 also fails to take into account the restrictions on noise based on the West Milford Ordinance. This attempt to expand the reasons beyond emergencies to include: "weather conditions, site conditions, specialized construction techniques, emergency, or other atypical circumstances may necessitate nighttime work or extended hours" should be updated to match the local ordinance.

Where are the "field personnel" located that would respond to an emergency at CS 327? (Page 77)
How is 375,200 gallons of water going to be moved to an "approved disposal facility"? (Page 83)

On page 94, a discussion of alternatives begins. It is odd that there is no mention of New York State's Climate Plan. The energy is being used to help new development in New York. New York has a plan to reduce greenhouse emissions aggressively. If New York follows its plan, this additional capacity may never be needed. Clarification from New York about its energy future should be requested.

The EI's hired (page 102) should be independent of TGP and not allowed to have their assignments changed by TGP. Let's avoid mistakes that were made in the last expansion.

An important point that needs to be considered with more care is the proposed timeline. At CS 327, compressing all clearing between March 1 and April 1 will create a pressure to skip requirements or lose many months. This timeline is too tight to ensure the proper steps are taken to follow the plan, work during approved hours, and allow for unexpected events. It is very possible the area is snow covered for much of this time. A plan that allows for some unexpected events should be crafted.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas Conway".

Thomas Conway
Chair, Ringwood Environmental Commission



Ringwood Environmental Commission

Thomas Conway
Chair, Ringwood Environmental Commission
60 Margaret King Avenue
Ringwood, NJ 07456

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St., N.E., Room IA
Washington, DC 20426

RE:
Draft Environmental Impact Statement
OEP/DG2E/Gas Branch 4
Tennessee Gas Pipeline Company, L.L.C.
East 300 Upgrade Project
Docket No. CP20-493-000

Wednesday, August 11, 2021

Dear Secretary Bose:

I am extremely disappointed in the format of the document that your Commission has called the “Draft Environmental Impact Statement.” The bulk of this document is a rehash of the Environmental Assessment done last year and comments made regarding the same. My comments will be focused on the failure to adhere to the format and information required in the Code of Federal Regulations PART 1502—ENVIRONMENTAL IMPACT STATEMENT.

Before I get to my comments, I must state that **I am deeply upset by the personal attack against my position in Ringwood.** Instead of stating my title in Ringwood, “Chair of the Environmental Commission”, you state, “who identified himself as the chair of the ‘Ringwood Environmental Commission.’” My position is on the public record and your attempt to degrade my comments using a personal attack are uncalled for and demean the entire process. Your snipe also demonstrates the lack of effort in this document since a simple search would have confirmed my position. I may not be a life-long, paid bureaucrat like many of your Commission, but I give a considerable amount of my time, without pay, to assist my Borough when dealing with large companies attempting to violate the Highlands Act and endanger our natural environment. Your attempt to demean my position is especially appalling considering the crimes that Ford committed in our Borough resulting in a decades-long designation as a Superfund site. At that time, similar bureaucrats did not do their job to prevent the dumping of toxic waste on a Native American community in Ringwood. **I hope further communication will be absent of personal attacks against anyone who holds a volunteer position.**

I may not have the expertise of some members of your Commission, but I have lived on the trails around the existing pipeline and have witnessed the broken promises of Tennessee Gas Pipeline in the past. What I lack in theoretical training I more than make up for with on-the-ground experience. I realize that most people involved would like to just have this come to pass with a minimal effort, but I am duty bound as the Chair of the Ringwood Environmental Commission to make sure everything possible is done to minimize the threats to our

small Borough. We had hope that the Highlands Act would ease this burden, but Tennessee Gas Pipeline has cleverly found a way around the spirit of the Act with the Utility loophole.

This “Draft Environmental Impact Statement” does not seem to follow the format posted on the EPA website (<https://www.epa.gov/nepa/national-environmental-policy-act-review-process>). A Summary of the EIS is completely missing and instead a summary of the EA is included.

Your cover page is missing elements outlined in the Code of Federal Regulations Part 1502.11, including the name, address, and telephone number of the person at the agency who can supply further information; one-paragraph abstract; and due date for comment submission.

This document seems to be a justification for the decision that has already been made. This goes against the Code of Federal Regulations Part 1502.2 (g):

Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.

The “Affected Environment” section is a summary of the EA without any further depth. The outline on the EPA site indicates a more rigorous review. The Environmental Consequences also appear to be solely taken from the EA.

The regulatory requirements for an EIS are more detailed and rigorous than the requirements for an EA.

The “Alternatives” section is merely a paragraph that only considers alternatives in the pipeline’s existing right of way. There is no mention of other pipelines or methods of transport. Also missing is the alternative of conforming to New York’s Climate Plan to reduce emissions, including grants to allow homes to use electricity to meet all their heating and cooking needs. This is required by Code of Federal Regulations Part 1502.16(a)(5):

Possible conflicts between the proposed action and the objectives of Federal, regional, State, Tribal, and local land use plans, policies and controls for the area concerned. (§1506.2(d) of this chapter)

There are many alternatives and a simple, single paragraph reflects the complete lack of effort on your part to look beyond the existing pipeline right of way. Additional discussion of alternatives (Submitted Alternatives) is solely in response to comments, not from the Commission.

Alternatives: Consideration of a reasonable range of alternatives that can accomplish the purpose and need of the proposed action.

With so little information on the alternatives to the project, your dismissive, single sentence in the Alternatives statement, “Although all of the alternatives we evaluated appear to be technically feasible, none provide a significant environmental advantage over the proposed Project” appears to fall far short of Code of Federal Regulations Part 1502.9 (b):

At appropriate points in the draft statement, the agency shall discuss all major points of view on the environmental impacts of the alternatives including the proposed action.

With so little consideration given to alternatives, it is clear why you don’t comply with Code of Federal Regulations Part 1502.14 (a) and (b).

Aside from the formal rules and regulations governing this process, I hope there is some room for common sense before this unneeded project is allowed to continue. This project contradicts the stated intentions of the Climate Plan of the State of New York. Code of Federal Regulations Part 1502.16(a)(5) seems to indicate that a more in-depth discussion be had on the contradiction with New York's Climate Plan, as well as the changes proposed by President Biden. Clearly, this plan flies in the face of both and more information would help remove the concern that the expansion is unnecessary. Please explain how New York can move forward with its Greenhouse Gas reduction goals when this project would represent 7.1 percent of New York's 2050 goal. Clearly there is a conflict between this project and New York's Climate Plan. The Code of Federal Regulations Part 1502.16(a)(5) requires an explanation for this conflict.

A big carrot stated in Tennessee Gas Pipeline's documents and a presentation to the public in the Spring of 2021 is the large amount of revenue (a moving target) that West Milford will receive from a property tax increase. While the Commission may not have authority over the matter, it should at least verify public promises made to West Milford by Tennessee Gas Pipeline. To avoid this altogether seems to allow Tennessee Gas Pipeline to renege on yet another false promise they made while selling this project to the general public. The citizens have a right to know the future revenue amount if Tennessee Gas Pipeline is going to use it to sway opinion. A proposed agreement between Tennessee Gas Pipeline and West Milford promises a certain amount, but those provisions are subject to West Milford agreeing to any project changes without any objections or even deliberation. The arrogance of tying a property tax payment to the speedy resolution of any change in plans is unbelievable. The property tax amount has basically become a bribe to make sure West Milford does nothing to get in their way. Does FERC endorse such clauses in agreements between corporations and small towns?

Thank you for the opportunity to comment again. I hope that future replies to my comments will be free of demeaning references to my title and position in the Borough of Ringwood. I look forward to the revision of the document that your Commission has called the "Draft Environmental Impact Statement" to better fit the spirit and requirements of a true Draft Environmental Impact Statement under the Code of Federal Regulations PART 1502—ENVIRONMENTAL IMPACT STATEMENT.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas Conway". The signature is fluid and cursive, with a large initial "T" and "C".

Thomas Conway
Chair, Ringwood Environmental Commission

TGP Compressor Station Talking Points (CS 327)

This document is designed to allow the public to quickly craft a letter to oppose Tennessee Gas Pipeline's (TGP) proposed compressor station CS 327 in West Milford. It is divided into sections to allow people to choose the specific areas that they would like to include in their letter. While mass form letters are effective, letters that are unique will gather more attention and will avoid rules that allow mass letters to be combined into one comment. Unique letters also allow the individual to customize their response to what matches their own priorities.

You should include the paragraph in Section 1 or draft a similar paragraph to open the letter. Then choose a paragraph from each subsection in Section 2 or focus on an entire subsection. Finally, Section 3 suggests a closing paragraph based on the audience and includes the contact information.

Please feel free to use mail, email, or web response for submitting these. You can also call your elected officials and their office will note the issue. If you have submitted a letter through a form response, such as the Action Network, it will have already gone to many officials and you should consider using a paper letter to increase the impact.

1. STATEMENT IN FIRST PARAGRAPH

This is your introduction to the subject and call for action. Please include this. Feel free to identify yourself in an introductory sentence.

I am writing to express my opposition to Tennessee Gas Pipeline (TGP) Company's application to build a new Compressor Station (CS327) in the Highland Council's Protected Region of West Milford. The proposed site sits right on top of the Monksville reservoir and adjacent to a C1 stream that feeds into the Wanaque Reservoir, a drinking source for over 3 million New Jersey residents.

2. PARAGRAPH SAMPLES TO CONSIDER FOR YOUR LETTER

These paragraphs can be copied and pasted as is or you can feel free to use them as a guide for your own letter. I have included sources, but those are not necessary when sending the letter.

2.1. NEW YORK'S EXPLOITATION OF NEIGHBORING STATES DESPITE THEIR OWN CLIMATE GOALS

2.1.1. The Beneficiaries of the Project are New Home Owners in Westchester County, NY
According to the filing¹, the gas is intended for customers in Westchester County, NY. As per Consolidated Edison (ConED):

¹ https://elibrary.ferc.gov/eLibrary/idmws/file_list.asp?accession_num=20200630-5546

The East 300 Upgrade Project is a product of this creative thinking because it is designed and narrowly-framed to meet our customers' needs while being mindful of the state's clean energy goals. ²

Their filing specifies the three areas of Westchester county that will receive the gas:

BEGINNING DATE	ENDING DATE	METER NAME	METER NAME	INTERCONNECT PARTY NAME	COUNTY	ST	ZONE	R/D	LEG	METER-TQ
Beginning Date	Ending Date	Meter	Meter Name	Interconnect Party Name	County	State	Zone	R/D	Leg	Meter-TQ
Defined Above	Defined Above	TBD	TBD	TBD	TBD	PA	4	R	300	110,000
Defined Above	Defined Above	420093	White Plains	CECONY	Westchester	NY	5	D	300	80,000
Defined Above	Defined Above	420477	Knollwood	CECONY	Westchester	NY	5	D	300	20,000
Defined Above	Defined Above	420344	Rye	CECONY	Westchester	NY	5	D	300	10,000

2.1.2. NY has Already Rejected this Form of Energy

New York State recognizes the dangers of fracking to the environment and specifically drinking water. Governor Andrew M. Cuomo has announced legislation in the FY 2021 Executive Budget to make New York's fracking ban permanent. When presenting this ban, he said:

New York's leadership on hydraulic fracturing continues to protect the environment and public health, including the drinking water of millions of people, and we must make it permanent once and for all. In the five years since fracking was banned, we have proven that it was in fact, not the only economic option for the Southern Tier. The region has since become a hotbed for clean energy and economic development investment through programs like 76West and Southern Tier Soaring, creating new good-quality jobs that pave the way for further growth. ³

NY DEC Commissioner Basil Seggos said:

Governor Cuomo has detailed the biggest and boldest environmental agenda in the nation, and the permanent ban of hydrofracking is a critical part in ensuring the protection of water quality, transitioning from fossil fuels, and continuing our role as a climate leader. ⁴

Apparently this talk of leading the nation with its environmental agenda stops at the border of New York State as ConEd is looking to expand NY's use of fracked gas by exploiting the purpose of FERC to deliver fracked gas from PA through NJ. While NY seeks to protect its citizens, environment and clean water, PA and NJ are expected to take on these very same risks to meet the lack of supply caused by these measures.

² FERC Docket No. CP20-493-000 Comments in Support of Consolidated Energy Company of New York, Inc.

³ <https://www.governor.ny.gov/news/governor-cuomo-announces-legislation-make-fracking-ban-permanent-included-fy-2021-executive>

⁴ <https://www.governor.ny.gov/news/governor-cuomo-announces-legislation-make-fracking-ban-permanent-included-fy-2021-executive>

2.1.3. NY's Climate Law will Make this Upgrade Unnecessary

New York State enacted the Climate Leadership and Community Protection Act ("Climate Law"), which seeks to achieve "net zero" greenhouse gas ("GHG") emissions by 2050. The Climate Law requires the State to cut GHG emissions to 85 percent below 1990 levels by 2050 and offset the remaining 15 percent through other measures. Details of the plan are not due for another three years on January 1, 2024. Without concrete plans, ConEd would like to move forward supplying greenhouse gas emitting fuel at the expense of NY's neighbors.

Con Edison will not presume what the ultimate regulations and mandates will look like when they are completed years from now. What is known, however, is what the law did not alter, i.e., it did not alter Con Edison's obligation to serve those customers that request gas service.⁵

As New York brags about being a world leader in green technology and reducing its greenhouse gas emissions, PA and NJ are expected to supply the very energy source that NY is rejecting to save its own soil and water. This is wrong and unethical.

2.2. HIGHLANDS PROTECTION AND ENVIRONMENT

2.2.1. Highland Act's Restrictions on Residents

While the residents of Ringwood and other Highlands communities suffer under the development restrictions meant to protect the drinking water of our state, NY and TGP continue to use this watershed as a highway for fracked gas. Since the gas is planned to allow Westchester County to continue development while New Jersey bears the increased risk of transporting this fuel, it is especially appalling to Highlands residents to see their region put at risk so a state that has banned fracking can grow its development using this very same fuel.

2.2.2. Highlands Exemption #11

The Highlands has already allowed this to proceed under Exemption #11, which is the "routine maintenance and operations, rehabilitation, preservation, reconstruction, repair or upgrade of public utility lines, rights-of-way, or systems, by a public utility, provided that the activity is consistent with the goals and purposes of the Highlands Act".

It is hard to fathom how an upgrade for a fracked gas line to feed a state that will not allow this environmentally harmful practice is "consistent with the goals and purposes of the Highlands Act." Instead, it appears that an exemption designed to make sure the existing residents could receive proper utilities is being exploited to turn the Highlands Region into a dangerous energy super highway. If we do not stop this expansion now, when will it end?

2.2.3. Threat to Reservoir

The new compressor station will be located within a few hundred yards of the Monksville Reservoir. Right next to the site is a C1 stream (Hewitt Brook) that flows right into the Monksville Reservoir and consequently into the Wanaque Reservoir, a water source for over 3 million NJ residents. A C1 stream category means that it cannot degrade its water quality. The C1 category is supposed to protect critical

⁵ FERC Docket No. CP20-493-000 Comments in Support of Consolidated Energy Company of New York, Inc.

habitat, stream buffers and keep out pollution discharge of sewage and other sources. C1 also requires higher standards for stormwater.

2.2.4. Greenhouse Gas Emissions

New York and New Jersey are independently working on climate plans to reduce greenhouse gas emissions. This project contradicts those intentions. The building of homes powered by fracked gas will certainly increase greenhouse gas emissions in New York. New Jersey will also see an increase in greenhouse gas emissions due to the increased pressurization of the pipeline. Methane, the primary ingredient in natural gas, is a significant contributor to climate change. Methane is released during planned and unplanned blowdowns and found to leak at every stage of the supply chain.⁶ Increasing the pressure will increase the amount of methane that is leaked.

2.3. TGP ISSUES AND GENERAL PIPELINE ISSUES

2.3.1. TGP's Broken Promises

Across the Highlands, we have already seen TGP break its promises by failing to replant the new pipeline that was put in less than 10 years ago. While the sections of the pipeline near roadways have functioning gates and native vegetation thriving from regular watering; the interior of the forest is littered with broken gates (allowing increased, illegal ORV traffic), dead plantings from lack of water and invasive weeds. In some areas it is so bad they have to spray pesticides.

TGP's 300-line project, completed in November, 2011 seriously damaged Lake Lookover in Hewitt, NJ and Bearfort Waters in West Milford including the siltation and destruction of waterways through mudslides, increased flooding and impacts to drinking water wells.⁷

2.3.2. TGP's Terrible Safety Record

According to Pipeline and Hazardous Materials Safety Administration ("PHMSA") failure reports, from 2006 to 2017 TGP had 111 significant incidents with their pipelines, resulting in \$89,815,380 in property damage and 19 federal enforcement actions⁸ and such incidents may escalate as pipelines age.

2.3.3. Pipeline Dangers – General TGP Accidents

Over pressurized pipelines have a history of incidents. From 2006 to 2017, according to the Pipeline and Hazardous Materials Safety Administration's failure reports, TGP had 111 "significant incidents" with their pipelines, resulting in \$89,815,380 in property damage and 19 federal enforcement actions.⁹

2.3.4. Pipeline Dangers – VOC's Released into the Air

Sources of periodic emissions include planned and unplanned blowdowns, leaked gas ("fugitives") and accidents, as well as leaks of volatile organic compounds ("VOCs") removed from the gas stream and stored on site including hydrogen sulfide, mercury and other contaminants. VOCs present at compressor stations include nitrogen dioxide, ethyl benzene, benzene, ethane, methanol, naphthalene and toluene;

⁶ <https://pubs.acs.org/doi/10.1021/acssuschemeng.6b00144>

⁷ <https://www.njherald.com/article/20130414/NEWS/909021406>

⁸ <https://www.phmsa.dot.gov/safety-reports/pipeline-failure-investigation-reports>

⁹ PHMSA Operator Information, Tennessee Gas Pipeline Company, Operator ID:19160, at https://primis.phmsa.dot.gov/comm/reports/operator/OperatorIM_opid_19160.html?nocache=769#_Incidents_tab_2, accessed 2018.01.08.

short term exposure to these chemicals can cause eye and respiratory tract irritation, headaches, dizziness, visual disorders, fatigue, loss of coordination, allergic skin reaction, nausea, and memory impairment; long-term effects include loss of coordination and damage to the liver, kidney, and central nervous system; and many VOCs are known carcinogens,¹⁰ and benzene specifically is associated with childhood leukemia.¹¹

2.3.5. Pipeline Dangers – Particulate Matters

Particulate Matter (PM) released from compressors also poses a significant health concern and can interact with airborne VOCs increasing their impact; PM of 2.5 mm may pose the greatest threat to the health of nearby residents, and inhalation affects both the respiratory and cardiovascular systems causing decreased lung function, aggravated asthma symptoms, and nonfatal heart attacks and high blood pressure.¹²

2.3.6. Pipeline Dangers – Unmanned Operation

Compressor and Transfer Stations are often unmanned relying on remote monitoring technology to give the operators status updates. If a problem is found by a local resident for the neighboring Mahwah transfer station, they have to call a number in Texas to report the issue. This increases the response time to any particular problem and poses an even greater risk to nearby residents and the watershed.

2.4. LOCAL ISSUES

2.4.1. First Responders

West Milford and neighboring towns use a mix of professional police and volunteer first responders. It is not clear how these volunteers will be trained to assist in the event of a severe incident. Response time will be critical to keep any breach of the site from compromising the reservoir. It will be New Jersey volunteers that will have to respond in the event of a disaster. These disasters occur regularly and you only need to go back to 2013 to reference the flash fire in Branchburg, NJ at the Williams Transco gas compressor that caused two workers to be hospitalized and injuries to 13 others.¹³

2.4.2. Emerald Ash Borer Beetle

Northern New Jersey is seeing the Emerald Ash Borer Beetle eat its way through the forests. This beetle is killing ash trees by the thousands. Already, the forest floor is littered with dead trees. Increasing pressure to a flammable gas that runs through the forests littered with kindling is a recipe for disaster. IF nothing else, TGP should detail how it will manage the compressor and transfer stations all along its pipeline route to make sure an incident does not spark a regional disaster.

¹⁰ EPA. An introduction to indoor air quality: volatile organic compounds.
http://www.epa.gov/iaq/voc.html#Health_Effects

¹¹ Marlyn T. Smith “Advances in understanding benzene health effects and susceptibility. Annual Review of Public Health. 2010; 31:133-48, p. 133.

¹² <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>

¹³ https://www.nj.com/somerset/2013/05/multiple_injuries_reported_at.html

3. CONCLUSION

The conclusion will vary depending on the content one chooses from the above. Every conclusion should have a clear call to action. Please feel free to use one of the following samples, but the more original your own conclusion, the less likely your correspondence will be grouped with others.

3.1. GOVERNOR MURPHY

Your climate goals for New Jersey are a critical part of our state's future. While there are many obstacles to overcome, **please consider preventing the New Jersey Department of Environmental Protection from issuing any further permits to allow the expansion of TGP's pipeline**, including the addition of a compressor station in West Milford. The Highlands Region was preserved to safeguard New Jersey's water and this expansion goes against everything that Act is supposed to stand for.

3.1.1. Contact Info

Website: <https://www.nj.gov/governor/contact/all/> (Choose: Environment – Pollution and Contamination)

Phone: 609-292-6000

Mail: Office of the Governor, PO Box 001, Trenton, NJ 08625

3.2. FERC COMMENT SITE

Please do not approve this pipeline expansion project. The environmental risks are high and the homes that are projected to be built are in a state that has an aggressive climate plan that will make this upgrade unnecessary quickly, if not before the project is complete. Westchester County, NY has other options for energy and this expansion goes against the New York Climate Plan.

3.2.1. FERC Link

Docket Number: CP20-493-000

Tips:

- (1) Set up your letter in a separate file.
- (2) When it is complete, copy it.
- (3) Open the link and then paste the letter in the comment section.

<https://ferconline.ferc.gov/QuickComment.aspx>

3.3. GOVERNOR CUOMO

Thank you for making New York's climate goals some of the best in the nation. Please consider your neighbors when looking to fulfill your energy needs for your state. Tennessee Gas Pipeline (TGP) Company's application to build a new Compressor Station (CS327) in the Highland Council's Protected Region of West Milford seems to contradict everything contained in New York's Climate Action Plan. You are essentially asking Pennsylvania and New Jersey to extract and ship fracked gas to fuel Westchester County's expansion. While it will take time for New York to realize its climate goals, an easy step to getting there would be to require all new housing to conform to the green energy goals

outlined in your plan. This would eliminate the need for NJ and PA to expand fracking extraction and transport and put our own natural resources at risk.

3.3.1. Contact Info

Website: <https://www.governor.ny.gov/content/governor-contact-form>

Phone: 518-474-8390 (9-5)

Mail: The Honorable Andrew M. Cuomo

Governor of New York State

NYS State Capitol Building

Albany, NY 12224

3.4. NY DEPARTMENT OF PUBLIC SERVICE

This is an online form to add comments to NY's case. You can use Section 3.3 for a final paragraph.

Tips:

(1) Set up your letter in a separate file.

(2) When it is complete, copy it.

(3) Open the link and then paste the letter in the comment section.

<http://documents.dps.ny.gov/public/Comments/PublicComments.aspx?MatterCaseNo=20-01785>

Sample Letters

The following letters need the highlights portions changed to reflect your information and to add the points from above.

[Your Name]
[Your Address]
[Your City, State and Zip]
[Optional: Your email]
[Optional: Your phone]

Office of the Governor
PO Box 001
Trenton, NJ 08625

Dear Governor Murphy:

I am writing to express my opposition to Tennessee Gas Pipeline (TGP) Company's application to build a new Compressor Station (CS327) in the Highland Council's Protected Region of West Milford. The proposed site sits right on top of the Monksville reservoir and adjacent to a C1 stream that feeds into the Wanaque Reservoir, a drinking source for over 3 million New Jersey residents.

[Insert sections from above]

Your climate goals for New Jersey are a critical part of our state's future. While there are many obstacles to overcome, **please consider preventing the New Jersey Department of Environmental Protection from issuing any further permits to allow the expansion of TGP's pipeline**, including the addition of a compressor station in West Milford. The Highlands Region was preserved to safeguard New Jersey's water and this expansion goes against everything that Act is supposed to stand for.

Sincerely,
[Your Name]

[Your Name]
[Your Address]
[Your City, State and Zip]
[Optional: Your email]
[Optional: Your phone]

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

I am writing to express my opposition to Tennessee Gas Pipeline (TGP) Company's application to build a new Compressor Station (CS327) in the Highland Council's Protected Region of West Milford. The proposed site sits right on top of the Monksville reservoir and adjacent to a C1 stream that feeds into the Wanaque Reservoir, a drinking source for over 3 million New Jersey residents.

[Insert sections from above]

Thank you for making New York's climate goals some of the best in the nation. Please consider your neighbors when looking to fulfill your energy needs for your state. Tennessee Gas Pipeline (TGP) Company's application to build a new Compressor Station (CS327) in the Highland Council's Protected Region of West Milford seems to contradict everything contained in New York's Climate Action Plan. You are essentially asking Pennsylvania and New Jersey to extract and ship fracked gas to fuel Westchester County's expansion. While it will take time for New York to realize its climate goals, an easy step to getting there would be to require all new housing to conform to the green energy goals outlined in your plan. This would eliminate the need for NJ and PA to expand fracking extraction and transport and put our own natural resources at risk.

Sincerely,
[Your Name]

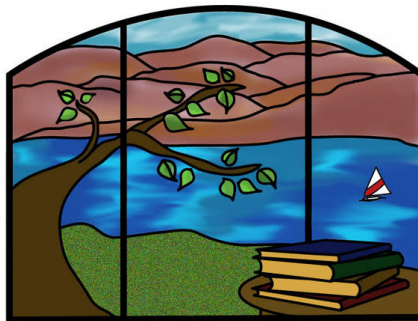


Ringwood Environmental Commission Annual Report

Appendix – C



**From October
through February,
the viewpoint offers
the best sunset view
in Ringwood.**



Ringwood Public Library

30 Cannici Drive

Ringwood, NJ 07456

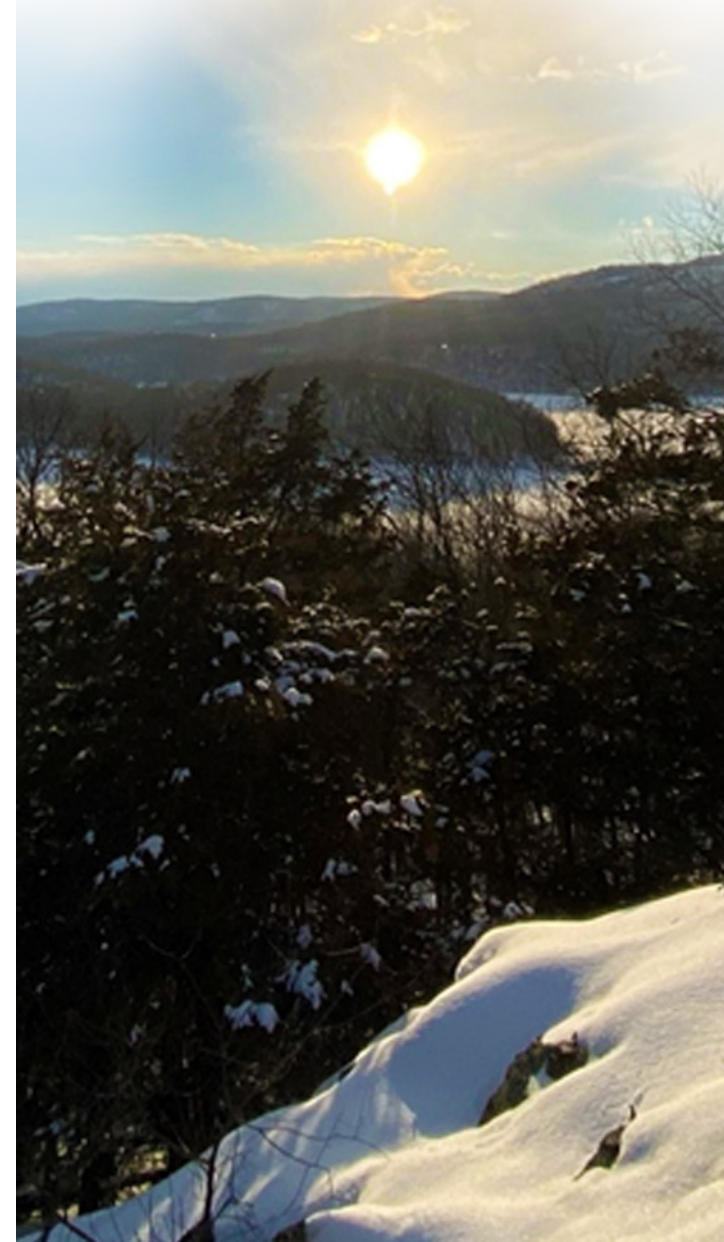
(973) 962-6256

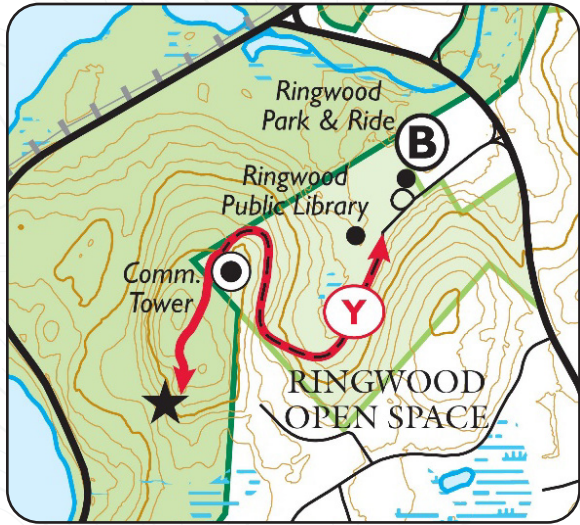
Parker@ringwoodlibrary.org

www.ringwoodlibrary.org



RINGWOOD LIBRARY TRAIL





BE PREPARED FOR ANYTHING

Even on a short hike like this one, people should carry some essentials as conditions can change quickly on the mountaintop. Be sure to wear or pack the following:

- Water
- Sturdy Shoes
- Windbreaker or Jacket
- Flashlight (for sunset hikes)
- Snack (especially for kids)
- Camera
- Bug Repellant (spring through fall)

BEGINNER'S GUIDE TO TRAIL SIGNS

The Ringwood Library Trail is the perfect hilly trail to start hiking. For kids, the playground at the beginning offers an attractive destination. Adults can utilize the library or walk down the road to a pair of eateries. It is also conveniently located next to the Ringwood Park and Ride; one of the few trails in the county to be accessible from public transportation.

The first sign for most trails consists of three markers. This indicates the beginning or end of a trail.

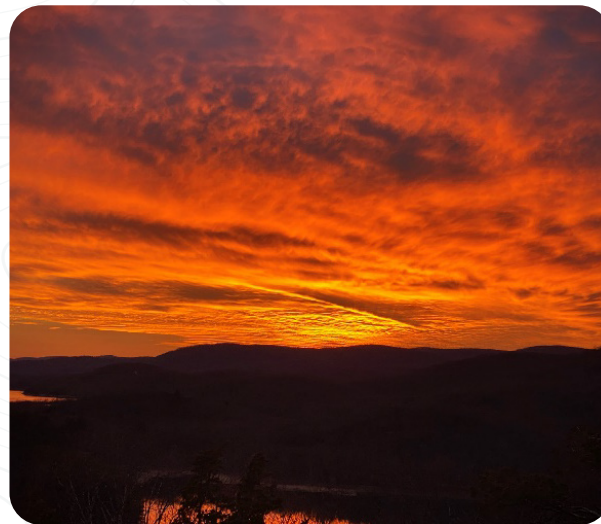
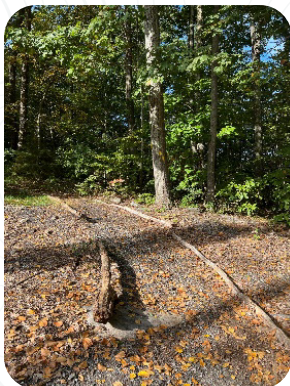


THE TRAIL

The trail starts at the gated woods road by the walkway to the playground. It follows the road uphill for about 500 yards to the cell tower near the top of the hill.



From here, look to the right of the cell tower to continue on the trail into the woods. The trail becomes a single-track path for the next 300 yards to the viewpoint.



The most common marker is a single mark indicating a mostly straight route to the next marker(s).

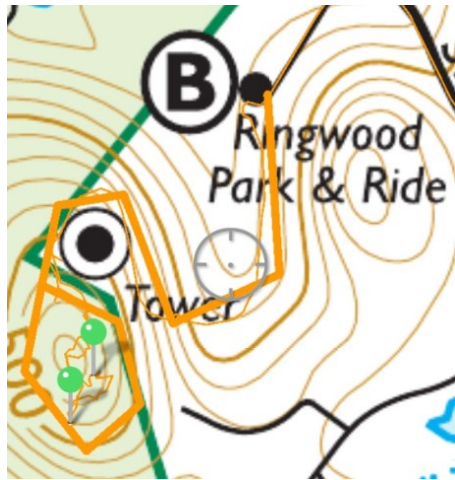
Two markers in a diagonal position indicate a turn ahead. In this photo, the top is to the left of the bottom marker indicating a left turn coming up.



Ringwood Library Trail Summary

The Borough of Ringwood and the Ringwood Environmental Commission would like to build a trail that leads from the library to a scenic viewpoint on NJDWSC land. We intend for this trail to allow families and community members to have an easy hike that highlights the beauty of the area. The library will be able to host informative learning sessions and then the attendees can immediately venture out to the woods. This will also be one of the few trailheads in Passaic County to be accessed by public transportation (bus route).

Trail Overview



The trail starts at the Ringwood Library and follows an existing service road up to a cell tower. From the tower, hikers would follow a short loop to take advantage of a scenic viewpoint of the reservoir.

The trail would provide Ringwood with its only trailhead in its business district. Conveniently located by the library as well as the park and ride, this trail would be a popular spot for residents looking to add a short adventure to their time in the business district. In addition, with a playground at the base of the trail, we hope this will encourage parents to involve their young kids in this relatively short and easy hike.

Community Benefits

- Establishing a formal hiking trail to help mitigate the trash and waste left at the vista.
- Providing a destination trail to encourage out-of-town visitation.
- Allows bus transportation to a hiking trailhead. These options are very limited in the county.
- It can serve as an exciting project to spur local environmental involvement and serve as a central gathering spot for interested residents.
- It will allow environmentally friendly programs at the library to incorporate short field trips into the outdoors.

Timeline and Budget Summary

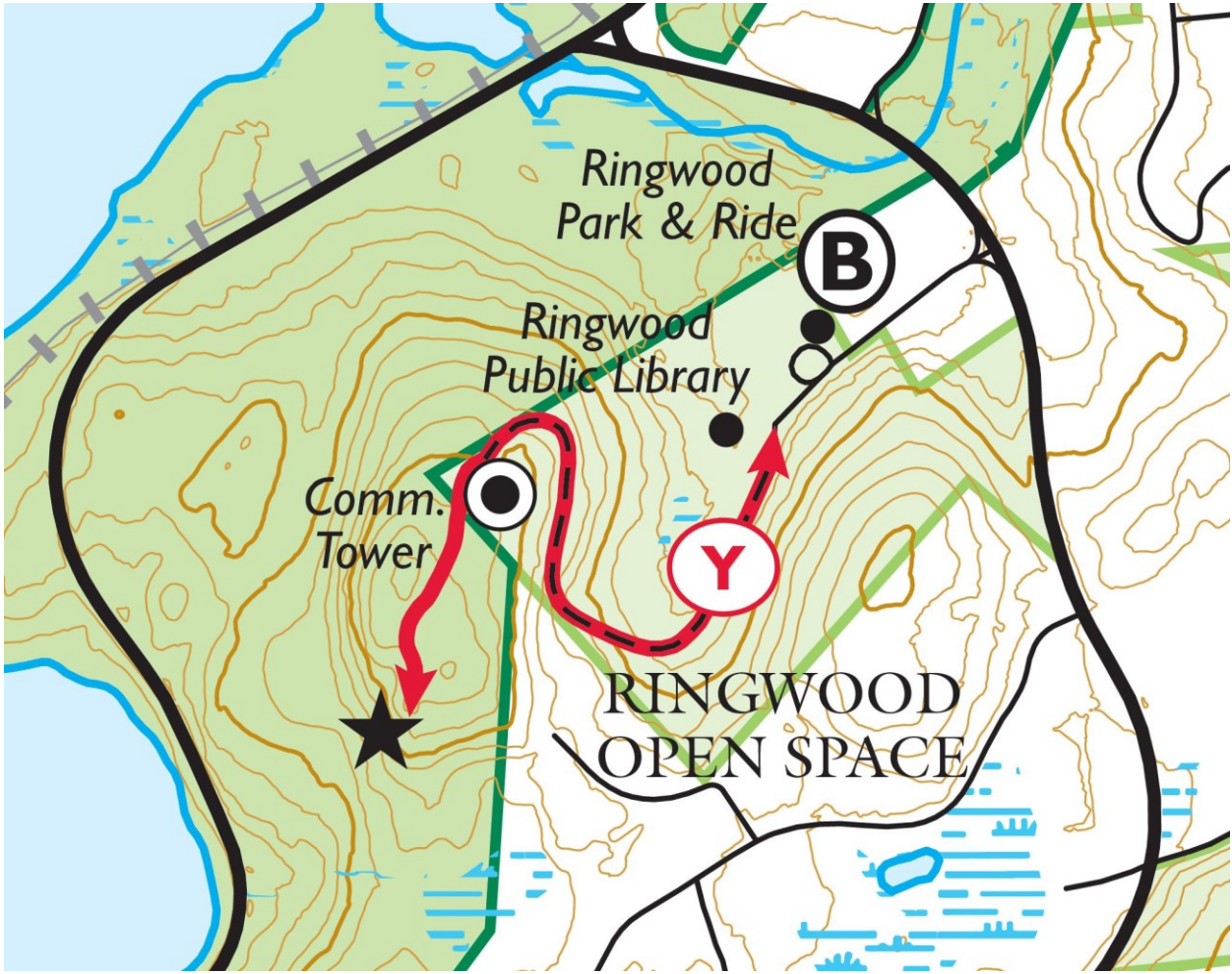
- The major cost will be conducting the trail building workshops with local volunteers. The Environmental Commission is working on an ANJEC grant to cover most of this cost and private funds have been committed to cover the rest.
- With timely approvals, cleanup and trail construction can start in April with a June opening for the trail.

Ringwood Library Trail Views





Ringwood Library Trail Location





Ringwood Environmental Commission Annual Report

Appendix – D

2021 Vision, Mission, and Values

The Environmental Commission adopted the following at its February 20, 2020 meeting. By having a clear vision, we know the general direction we all want to move in, no matter how impossible it is. The key is to move *forward toward something*. Once we know where we want to be in the future, we follow a mission. The mission explains what we need to do *now* to achieve the vision. The last step in defining an organization is the list the values that we hold close to our purpose. It is what we believe in and defines how we are supposed to conduct ourselves.

Vision Statement

Promoting a clean, healthy and well-protected environment supporting a diversity of species while allowing people to connect with nature.

Mission Statement

To protect and improve the quality of our land, water, and air by advising the Borough of Ringwood on actions and policies of sustainability. Through education and outreach, the Commission seeks to inspire our community to incorporate environmentally responsible practices.

Values

1. We are a trusted, independent and authoritative advocate for the environment.
2. We make objective decisions based on the best available scientific evidence and information.
3. We make a difference by working with others to build trust, networks and partnerships to deliver effective outcomes.

Objectives

1. Organize events to promote environmental awareness.
2. Maintain the environmental and ecological stability of the Borough of Ringwood by advising on environmental concerns and issues affecting the borough.
3. Enhance decision-making by the local government by ensuring that environmental policies are integrated into all plans and projects.
4. Provide guidance to residents on invasive species.
5. Promote and organize clean up events in the Borough and its parks.



Ringwood Environmental Commission

2021 Areas of Focus

The following areas of focus were agreed on during the February, 2020 meeting of the Ringwood Environmental Commission. Please review and decide if you would like to continue or move to another area.

Pests – Tom

Looking to update the 2019 document and get it over to the borough. The state survey and local observations predict a lighter Gypsy Moth infestation compared to 2019. An update of the 2019 document is all we plan to do.

Superfund Site – Rich & Joe

Rich is on the CAG and Joe will focus on analyzing the EPA documents.

Recycling Liaison – Tim

This is up in the air since Cesar left. Scott sent letter late. Can we get communication?

Grant Coordinator – Anne & Tim

1. We need to have a relationship with Lisa Plevin at the Highlands Council. She can help with those grants.
2. Seek grants to help protect our forests.

Lake Coordinator – Paul & Jim

When will the Borough-wide study come out and can we get access to it?

Other Focus Possibilities

- Trail Oversight
- Environmental Resource Inventory
 - The Highlands does this for Ringwood now. We need to reach out to them and make sure we are part of the process.
 - Need to include Ringwood's history in the next ERI.
- Clean Up Coordinator
- Storm Water Management
- Tree Ambassador

- Outreach

Clean Up Coordinator – Tom & Tim

Ringwood Environmental Commission

October 2021 Bulletin – Spotted Lanternfly

Ringwood is host to dozens of invasive species. The Ringwood Environmental Commission works with local and state resources to identify the species that have the greatest effect on our borough and especially the homeowners. The last three years we have focused on gypsy moths and the emerald ash borer beetle. A new threat in our area is the spotted lanternfly.



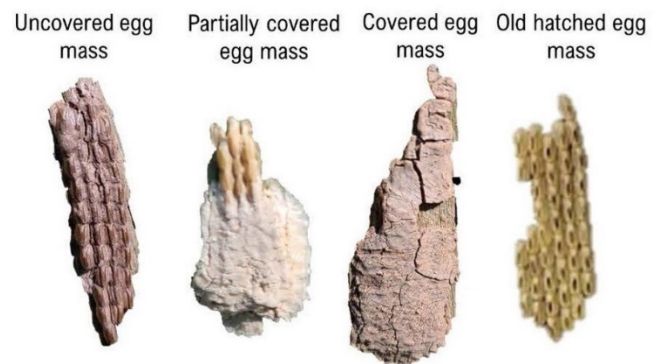
Background

The Spotted Lanternfly (SLF) is an invasive, non-native planthopper that spread rapidly since it was first identified in Pennsylvania in 2014. While the bug is harmless to humans and animals, it can cause extensive damage to plants. This is due to its propensity to consume more sap than it can handle and excreting the majority of it. This secretion, known as "honeydew," can cause mold to grow or attract other insects, causing severe damage to the tree. The SLF's population can increase to the point where it becomes a nuisance similar to a gypsy moth infestation.

Currently, half the state's counties are under quarantine, but Passaic county has not reached that designation yet. This insect is spreading rapidly and the experts recommend some steps to take now to help slow the spread.

Steps to Take

In the autumn, the SLF will deposit egg masses on trees. Homeowners can scrape these off and double bag them for disposal. Alternatively, the egg masses can be destroyed with alcohol, bleach or hand sanitizer.



If you see adult SLFs, it is recommended to stomp on them. You can also protect your trees by contacting a local tree expert to assist with banding or pesticide application.



More Information or to Report a Sighting
<https://www.nj.gov/agriculture/divisions/pi/program/pests-diseases/spotted-lanternfly/>

Hotline: 1-833-422-3284 (4BADBUG)

WHEREAS, the New Jersey State Assembly has introduced Bill A4843, which would require local governments to write Forest Stewardship Plans for all forests in their ownership that had been acquired for conservation or recreation; and

WHEREAS, the Forest Stewardship Plans would need to be researched, developed and submitted by a trained Forester and the Borough at the Borough's expense; and

WHEREAS, the Borough of Ringwood is already under financial pressure due to the Highlands Act and the consequent devaluation to its largest landholder, the North Jersey District Water Supply Commission; and

WHEREAS, Assembly Bill A4843 amounts to an unfunded mandate, which is prohibited by the New Jersey Constitution; and

WHEREAS, the financial pressure caused by this unfunded mandate could force the Borough to engage heavily in the logging industry to fund the mandate; and

WHEREAS, logging in our forest can expose our ecosystems to invasive plant and insect species, and risk degrading our soil and water quality; and

WHEREAS, logging would compromise the recreational experiences in our forests, which is an attractive feature to many Borough residents and supports our home values; and

NOW, THEREFORE, BE IT RESOLVED that Municipal Council of the Borough of Ringwood, County of Passaic, State of New Jersey, in the interest of protecting its natural resources, opposes Assembly Bill A4843, as it is written, and further opposes the imposition of any unfunded mandate, especially one such as A4843, which would adversely affect the fiscal and environmental health of the Borough of Ringwood.

BE IT FURTHER RESOLVED, that the Municipal Clerk shall forward this Resolution to Governor Phil Murphy, New Jersey Department of Environmental Protection Acting Commissioner Shawn M. LaTourette, our interim State Senator, Assemblyman Robert Auth, and Assemblywoman Holly T. Schepisi.



Ringwood Environmental Commission

July 19, 2021

Ref: Letter of Collaboration for Dr. Lucia Rodriguez-Freire

Dear Program Director and Panel Reviewers,

If the proposal submitted by Dr. Rodriguez-Freire entitled **CAREER: Harnessing plant-microbe interactions to control PFAS environmental fate** is selected for funding by the NSF, it is my intent to collaborate and/or commit resources as detailed in the Project Description or the Facilities, Equipment or Other Resources section of the proposal.

Sincerely,



Thomas Conway
Chair, Ringwood Environmental Commission

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Ringwood, NJ 07456



Ringwood Environmental Commission
60 Margaret King Avenue
Ringwood, NJ 07456

Mayor and Council
60 Margaret King Avenue
Ringwood, NJ 07456

July 29, 2021

Dear Mayor and Council:

The Ringwood Environmental Commission serves as an advisory body for the Mayor and Council. A Commissioner recently brought a motion to raise our concern about the James Drive treatment plant. This motion was carried unanimously.

It is our understanding that a plan to address the concerns about the James Drive treatment plant, especially the concerns relayed by the EPA and the NJDEP, has been changed due to a recent Council action. It would be unfortunate for the Borough's reputation and trust to be damaged as a result of any citations for non-compliance. Worse yet, any fines leveled for non-compliance would be paid at the expense of the Borough's taxpayers.

Seeing as the Princeton Hydro Watershed Report issued earlier this year identifies septic loading as a major source of nutrients in our Borough's lakes, we urge the Council to urgently seek a way to improve the plant and make sure it is functioning at top capacity.

This is especially important given the 10-year storm that hit Ringwood on July 12, 2021. The speed and amount of rain caused many suspended solids and nutrients to get washed into our lakes, leading to some very high readings afterward. Given the increase in storm events over the recent years, the Borough must do all it can to make sure waste facilities and septic systems are functioning properly, well maintained and up to modern standards.

Thanks in advance to your attention to this matter and for safeguarding our forests and lakes.

Sincerely,

Thomas Conway
On Behalf of the Ringwood Environmental Commission



Ringwood Environmental Commission

Ringwood Environmental Commission
60 Margaret King Avenue
Ringwood, NJ 07456

Ringwood Board of Health
60 Margaret King Avenue
Ringwood, NJ 07456

Wednesday, December 15, 2021

Dear Ms. Kirby and the Board of Health:

At our meeting on December 9, 2021, the Ringwood Environmental Commission unanimously voted to recommend the Board of Health and the Borough of Ringwood adopt a resolution to protect our streams, lakes and groundwater by enhancing our septic regulations.

Across the world and particularly New Jersey, Harmful Algae Blooms (HABs) are threatening our water; both for consumption and recreation. Ringwood has many homes in lake communities and those lakes provide value to property owners. Ringwood is also home to the reservoir that serves over 3 million of our fellow state residents.

The recent watershed analysis of Ringwood's lakes conducted by Princeton Hydro identified septic systems as a major source of the nutrient loading that leads to HABs. If we do not take action now, we will most likely encounter lake warnings and closures which will affect the lives of our residents and consequently their property values. This issue is out of the reach of private lakes and only the Borough can force homeowners to properly maintain their septic systems.

We kindly ask for your consideration concerning two main enhancements of our septic ordinance:

1. Require all septic system owners to pump their system at a minimum of every five years. Three-year pumping is common among North Jersey lake communities and has been done most recently in Sparta for the Lake Mohawk watershed.
2. As an alternative, we suggest creating an ordinance to require septic system maintenance every three years. This should include a complete inspection of the system and any recommendation to pump would need to be fulfilled within a set period of time.

Thank you in advance for your consideration of the above and your continuing actions to protect the health of our Borough.

Sincerely,

Thomas Conway
On Behalf of the Ringwood Environmental Commission

CC: Scott Heck, Borough Manager
CC: Ringwood Mayor and Council