

Why Williams' Garden State Expansion (GSE) Freshwater Wetlands Permit Should Be Rejected

- 1. Williams failed to meet NJDEP standards for obtaining a Freshwater Wetlands Individual Permit.**
 - GSE, as proposed, would cause an excessive amount of destructive impacts to 4.7 acres of wetlands. Williams did not meet its requirement to show that no other alternative sites would cause less harm to wetland ecosystems.
- 2. There are less harmful alternatives.**
 - Less harmful alternative sites exist, which involve fewer wetlands impacts.
 - Williams indicated in their own analysis that none of the alternative sites they superficially considered and dismissed contained wetlands.
- 3. Williams' Impact Analysis was incomplete.**
 - Williams' application fails to provide a comprehensive analysis of wetland impacts.
 - Williams' selection of this particular wetlands site causes impacts to regulated resources, including wetlands and waters, which are avoidable. The New Jersey Department of Environmental Protection (NJDEP) should reject this freshwater wetlands permit due to Williams' failure to even attempt to comply with the regulations.
- 4. Water Quality Standards were ignored.**
 - Williams did not even mention compliance with New Jersey's water quality standards in their compliance statement.
 - Williams' failure to discuss dewatering and other impacts to the existing use of Sucker Run in its Individual Permit application does not satisfy the requirements of the Freshwater Wetlands Protection Act (FWPA).
- 5. NJDEP is required to determine 'public interest' independently.**
 - NJDEP cannot substitute FERC's Certificate of Public Convenience and Necessity for its own determination of 'public interest' as required under the FWPA.
 - The FWPA's regulations define "the public interest" very differently than FERC's regulations, and include the public's interest in the preservation of natural resources.
 - GSE has no independent utility. It is designed to deliver gas to the proposed Southern Reliability Link pipeline that energy experts say is not needed and would do little to improve reliability.
- 6. The project is segmented.**
 - New Jersey Natural Gas' (NJNG) Southern Reliability Link (SRL) and Williams' Garden State Expansion are inextricably linked. The impact of both should be reviewed as a single and complete project. SRL does not meet the NJDEP requirement of an "independent utility".
 - Both the proposed GSE and SRL applications should be revised to more accurately discuss the impacts of both projects. This should be easily accomplished since the wetland applications for both GSE and SRL were coincidentally conducted by the same firm, AECOM.

**GSE is an *unnecessary risk* to our communities
and environment; it's not needed!**

Make your voice heard!

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