

Joint Base McGuire-Dix-Lakehurst's Response to Draft Environmental Assessment Public Comments

Comment Number	Public Comment Category	Key Topics	Commenter Information	Response
1	Air Quality	<p>New Jersey Department of Environmental Protection (NJDEP) recommends that construction projects involving non-road diesel construction equipment operating in a small geographic area over an extended period implement the following measures to minimize the impact of diesel exhaust:</p> <ol style="list-style-type: none"> 1. All on-road vehicles and non-road construction equipment operating at, or visiting, the construction site shall comply with the three minute idling limit, pursuant to New Jersey Administrative Code (N.J.A.C.) 7:27-14 and N.J.A.C. 7:27-15. Consider purchasing "No Idling" signs to post at the site to remind contractors to comply with the idling limits. 2. All non-road diesel construction equipment greater than 100 horsepower used on the project for more than ten days should have engines that meet the United States Environmental Protection Agency (USEPA) Tier 4 non-road emission standards, or the best available emission control technology for that application and is verified by the USEPA or the California Air Resources Board (CARB) as a diesel emission control strategy for reducing particulate matter and/or nitrogen oxide (NOx) emissions. 3. All on-road diesel vehicles used to haul materials or traveling to and from the construction site should use designated trucks routes that are designed to minimize impacts on residential areas and sensitive receptors. 	10	<p>New Jersey Natural Gas (NJNG) will implement the required conditions and best management practices (BMPs) identified in the NJDEP's response to minimize the impact of diesel exhaust.</p>

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2	Alternatives Analysis	The commenters are concerned that the United States Air Force (USAF) must consider other available alternatives besides a natural gas transmission pipeline in order to address a critical need for energy reliability on Joint Base McGuire-Dix-Lakehurst (JB MDL). The commenters suggest collecting and storing a portion of the natural gas already supplied to JB MDL for use in emergency situations or in case of a supply interruption. The commenters also suggest USAF investigate wind turbines, solar arrays, cogeneration plants and direct service natural gas pipeline as alternatives. The commenters are also concerned that the Draft Environmental Assessment (EA) does not adequately examine the no-build alternative.	1, 7, 11, 78, 91, 331, 442-444	The intent of the Draft EA is not to analyze energy alternatives at JB MDL. As stated in Section 1.2 of the Draft EA, the EA has been prepared to document the potential for environmental impacts associated with the Proposed Action of granting an easement to NJNG for the construction, operation and maintenance of a natural gas pipeline segment on JB MDL. Reference Section 2 of the Draft EA for a description of alternatives assessed, and Section 2.2 for an account of specific screening criteria. The alternatives outlined in Section 2 and analyzed in Section 4 of the Draft EA are appropriate and sufficient for the Proposed Action.
3	Alternatives Analysis	The commenters are concerned that the Draft EA and proposed Finding of No Significant Impact (FONSI) were predetermined before the potential alternatives and environmental impacts were analyzed.	1	The conclusions of the Draft EA and proposed FONSI / FONPA (Finding of No Practicable Alternative) were prepared in good faith with no predeterminations. The USAF's FONSI/FONPA (reference Attachment 2) reflects the sustainable design, construction and operational BMPs outlined in Section 2.3.3 of the Draft EA. Facts and analyses contained in Section 4 of the Draft EA provided the basis of the FONSI/FONPA and allowed the USAF to conclude that the Proposed Action would not result in significant environmental impacts. Please reference the USEPA's concurrence with the USAF's FONSI/FONPA in their letter received May 3, 2017.
4	Alternatives Analysis	The commenter is concerned that NJNG has not discussed potential alternate methodologic approaches to horizontal directional drilling (HDD).	6	As discussed in Section 2.3.2 of the Draft EA, several alternate construction techniques were investigated including stove-pipe method, drag-section method, HDD and conventional bore. Horizontal directional drilling is a proven technology used to avoid disturbances that would otherwise occur with trenching methods.

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5	Climate Change	The commenter is concerned that the Draft EA disregards the effects of climate change and its cumulative effects, and that the analysis of greenhouse gas (GHG) emissions and climate change is significantly flawed.	7, 11, 78, 442-444	As discussed in Section 5.1 of the Draft EA, in general, the cumulative impacts analysis follows the processes recommended by the Council on Environmental Quality (CEQ) under the National Environmental Policy Act (NEPA) (1979 and 1997) and the regulations at Title 40 of the Code of Federal Regulations (CFR) Part 1508.7. Cumulative impacts to climate change were determined by analyzing the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions that occur within the same timeframe and vicinity of the Proposed Action. Direct and indirect impacts to climate change and GHG emissions are analyzed in Section 4.3 and Section 5.2.2 of the Draft EA. Section 4.3.1 of the Draft EA lists a series of measures considered BMPs to reduce emissions from construction. In addition, NJNG would implement the required conditions and BMPs identified in the NJDEP's May 2, 2017 response to minimize the impact of diesel exhaust.
6	Coastal Zone Management Plan	The commenter is concerned that the project is inconsistent with New Jersey's Coastal Zone Management Plan.	7	The portion of the Project that is proposed on JB MDL and subject to the analyses presented in the Draft EA is located outside of the coastal zone, and thus, is not subject to New Jersey's Coastal Zone Management Plan. On February 24, 2017, the NJDEP granted NJNG a Coastal Area Facility Review Act (CAFRA) Individual Permit, for the portions of the proposed Southern Reliability Link (SRL) natural gas transmission pipeline located off JB MDL and within CAFRA jurisdiction. This permit was authorized under, and in conditional compliance with, the Coastal Zone Management Rules, N.J.A.C. 7:7-1.1 et seq. (as amended through June 20, 2016). This approval shows compliance with New Jersey's Coastal Zone Management Plan and its authorizing statutes for the portions of the Project that are located within the coastal zone.

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7	Contamination	The commenters are concerned that the pipeline could provide a conduit for which contamination could run along.	1, 5	JB MDL will handle any contamination via the Comprehensive Environmental Response Compensation and Liability Act (CERLA) process. In addition, NJNG would backfill trenches with the same soil that was removed so soil characteristics would not be altered. Therefore, the proposed SRL pipeline would not affect contamination in these areas.
8	Cultural and Historic Resources	The commenter is concerned that the project will negatively impact cultural sites.	5	No architectural or archaeological resources would be adversely affected as a result of the proposed SRL project on JB MDL. New Jersey's Historic Preservation Office (HPO) determined in their response letter dated December 12, 2016 that there will be No Adverse Effects of Historic Properties within the Area of Potential Effect. The Delaware Tribe of Indians and Delaware Nation concurred that no cultural resources will be affected as a result of the proposed project (see Appendix A of the Draft EA). As a result, the NJDEP determined in their response letter dated May 2, 2017 that no historic properties will be adversely affected by the proposed project, and no further cultural resource consideration is necessary for this portion of the project. As noted in the Draft EA, if archeological sites or cultural artifacts are inadvertently discovered during ground disturbing activities, NJNG would cease all disturbance activity and contact JB MDL Installation Cultural Resource Manager, who would take necessary actions pursuant to the base Integrated Cultural Resources Management Plan.
9	Cultural and Historic Resources	NJDEP commented that New Jersey's HPO previously determined that there would be no historic properties adversely affected by the proposed project. As a result, no further cultural resource consideration is necessary for this portion of the project.	10	Agency comment noted. If archeological sites, and/or cultural or Native American artifacts are inadvertently discovered during ground disturbing activities, NJNG would cease all disturbance activity and contact the JB MDL Installation Cultural Resource Manager, who would take necessary actions pursuant to the base Integrated Cultural Resources

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				Management Plan.
10	Purpose and Need of Proposed Action	The commenters are concerned that the Draft EA improperly segments the NEPA analysis and ignores and violates required energy procurement procedures. The commenter gives the example that if JB MDL were to eventually require additional infrastructure in order to bring the gas down to a usable pressure, such as a regulating station, that infrastructure must be considered, and the impacts evaluated, as part of the Draft EA.	1	A new Section 5.4 entitled "Connected Actions" has been included in the Draft EA which details temporary and permanent disturbances within regulated areas of the entire 29.5-mile long SRL project. As discussed in Section 5.4, the Proposed Action on JB MDL would be part of the larger NJNG SRL project that would extend beyond JB MDL. There is currently no plan for any additional physical infrastructure on JB MDL with respect to this Project. As constituted, the Project meets the USAF's purpose and need by providing redundancy in the NJNG distribution system in the same manner as any other NJNG customers in the region.
11	Cumulative Impacts	The commenter is concerned that the Draft EA fails to look at the secondary and cumulative impacts of new developments along the coast.	7	Please reference Section 5 of the Draft EA for development projects included in the cumulative impact analysis. Development projects outside of the studied Region of Influence are beyond the scope of this EA.
12	Cumulative Impacts	The commenter is concerned cumulative impacts were not addressed with regards to air pollution.	7	Please reference Section 5.2.2 of the Draft EA for a cumulative impact analysis of air quality and GHGs.
13	Cumulative Impacts	The commenter is concerned the cumulative impacts analysis does not address waterbodies and open spaces along the proposed SRL.	7, 314	Please reference Section 5.2.4 of the Draft EA for a cumulative impact analysis of water resources. Please reference Section 5.2.1 of the Draft EA for a cumulative impact analysis of land use.
14	Cumulative Impacts	The commenter is concerned that the cumulative impact analysis for Alternative 1 should address that were the entire route of the project to not be built, waterbodies and open spaces would not be impacted.	7	Please reference Section 5.3 of the Draft EA for an analysis of cumulative impacts under Alternative 2 (i.e. the No Action Alternative).
15	Decision to be Made	The commenters are concerned that any action by the USAF to grant NJNG an easement to accommodate the SRL project is premature because (1) the approval of the SRL by the New Jersey Board of Public Utilities (NJ BPU) is currently under appeal and is pending in the Superior Court, Appellate Division; (2) NJNG	1, 7	Comment noted. JB MDL's decision regarding the Proposed Action is not tied to the approvals noted by the commenters.

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		has not obtained road opening permits from affected municipalities and counties; and (3) there has been no Pinelands Commission approval of the project.		
16	Environmental Impact Statement	The commenters are concerned that a full Environmental Impact Statement (EIS) is warranted per the USAF's Environmental Impact Analysis Process due to the substantial environmental controversy around the Project regarding the potential adverse environmental impacts of the SRL project; the contamination of the site; and the Pinelands being a United Nations Biosphere Reserve.	1, 3, 11, 7, 18-32, 34-39, 41-74, 78-79, 81-131, 133-134, 137-265, 267-355, 357-441, 446-451	The Proposed Action considered cumulatively with other projects at JB MDL would not result in significant environmental impacts. Accordingly, an EIS is not required. Please reference the USEPA's response letter to the Draft EA, dated May 3, 2017, upon which the USEPA concurs with the USAF's finding of no significant impact.
17	Environmental Impacts	The commenters are concerned that the Draft EA failed to consider the potential environmental impact of additional equipment necessary for JB MDL to directly connect to the SRL project.	1	There is currently no plan for any additional physical infrastructure on JB MDL with respect to this Project. As constituted, the Project meets the USAF's purpose and need by providing redundancy in the NJNG distribution system in the same manner as any other NJNG customers in the region.
18	Federal Law	The commenters are concerned that the Draft EA does not meet the standards for an EA under Federal Law. First, the EA fails to make a FONPA for that portion of the pipeline that will be located in wetlands and floodplains. Second, it appears the project sponsor, NJNG, defined the scope of the EA and there is no indication that Air Force review and approved the scope of the inquiry as required under federal law. Finally, there is no indication that the EA was reviewed and approved at the major command (MAJCOM) level.	1, 8, 9	The USAF worked together with NJNG to identify and review the preferred alternative and easement corridor for the proposed pipeline segment. USAF personnel defined the scope of the Draft EA and reviewed it appropriately. The FONPA is included within the FONSI (reference Attachment 2).
19	HDD	The commenter is concerned that the Draft EA does not properly examine the impacts of HDD including digging up along the stream buffers and disturbing the vegetation.	7, 79, 443-445	Use of HDD construction techniques is a widely accepted construction method employed to avoid wetland and surface water impacts. This includes boring a distance from the feature to be avoided in order to ensure minimization of adverse effects. Vegetation impacts are thoroughly addressed in the Draft EA (see Section 4.6).

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				The proposed pipeline segment through JB MDL would not result in any permanent floodplain impacts. Proposed temporary disturbances in the floodplains would be restored to pre-existing grade, and no net fill in the floodplains is proposed. Construction and restoration would be conducted in accordance with BMPS outlined in Section 2 and Section 4 of the Draft EA, the SESC Plan that Ocean County Soil Conservation District approved on November 25, 2015 (Soil Conservation District #17519) and the New Jersey Pinelands Commission Comprehensive Management Plan.
20	FONSI	The commenters are concerned that the USAF failed to issue the complete unsigned FONSI as required by Federal regulations.	1	A copy of the unsigned FONSI / FONPA is attached to this response to public comment (reference Attachment 2). JB MDL went beyond the minimum requirements by making the complete Draft EA available to the public for a 45-day review period, solicited public comments, and considered those comments prior to determining that a FONSI/FONPA was appropriate and making it available to the public.
21	FONSI	The Environmental Protection Agency concurs with the USAF's FONSI.	2	Concur.
22	HDD- Missing Information	The commenters are concerned that the geotechnical material provided is not sufficiently complete to allow for advancement and permitting of the project. Missing information includes 1) laboratory geotechnical analysis of soils; 2) adequate assessment of inadvertent return risk; 3) assessment of potential degradation of surface resources in the event of inadvertent returns; 4) remedial plan addressing pipeline accessibility in the event of pipeline failure or PIG identification risk; 5) discussion of external pipeline corrosion and stress corrosion	6, 7	NJNG has conducted geotechnical and subsurface investigations along the pipeline route in accordance with Federal standards to aid in the design of HDD activities. An Inadvertent Return Plan (IRP) has been prepared for use during construction of the proposed SRL project. The IRP addresses the means by which an inadvertent return could occur, measures taken to minimize the potential for an inadvertent return and actions to be taken should an inadvertent return occur. NJNG is required to follow all regulatory requirements for the pipeline, as laid out by the United States Department

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		cracking; and 6) adequate documentation of emergency response planning.		<p>of Transportation's Pipeline & Hazardous Materials Safety Administration (PHMSA) and the NJ BPU. NJNG's Transmission Integrity Management Plan (Appendix B to the Draft EA) includes a regular assessment of pipeline safety to minimize the risks to the safe operation of their system. Their pipeline monitoring includes:</p> <ul style="list-style-type: none"> • Annual leak survey of the pipeline • Monthly physical patrol of the pipeline route • Bi-monthly monitoring of the cathodic protection systems protecting the pipeline from corrosion and assessing the integrity of its protective coating • Continuous monitoring of the pipeline's operation via their gas control operations center, staffed 24 hours per day, 7 days a week • Installation and annual inspection of pipeline valves that can be operated remotely from NJNG's gas control room • Periodic internal inspections using in-line inspection devices to identify various pipe abnormalities along the entire route • Installation of pipeline markers along the route to alert the public of its existence • Participation in the New Jersey One-Call System to ensure communication with excavators about the location and safe excavating practices near natural gas pipelines • The assignment of NJNG personnel to stand by on site during all third-party excavations in the immediate vicinity of the pipeline to ensure safe excavation practice <p>The information provided to the permitting agencies has been accepted as adequate to allow for advancement and permitting of the project.</p>
23	HDD – Missing Information	The commenter is concerned that NJNG has provided limited or no geotechnical data specific to a number of planned HDD traverses.	6	
24	HDD – Missing Information	The commenter is concerned that NJNG has provided no data submissions documenting soil material classifications obtained via sieve and hydrometer analyses.	6	
25	HDD Failure	The commenter is concerned that the NJNG's Geotechnical Data Report was not available for review.	6	
26	HDD Failure	The commenter is concerned that NJNG has not adequately addressed an emergency mitigation plan.	6	
27	HDD – Pipeline Corrosion	The commenter is concerned that the known acidic groundwater conditions and high	6	Geotechnical investigations have been conducted and evaluated to determine pipeline coating materials that

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		oxygen content along the SRL pipeline route will contribute to high external pipe corrosion rates. The commenter is concerned that NJNG hasn't provided detailed discussion of applicable pipeline coating materials including what will be used and why they are needed for subsurface geochemical conditions present.		meet site conditions along the planned route and that comply with Federal standards. Please reference Section 2.3.2 of the Draft EA for a description of pipeline coating materials. In addition, cathodic protections would be installed, monitored constantly, and inspected regularly in accordance with NJNG's Integrity Management Plan.
28	HDD – Pipeline Corrosion	The commenters are concerned that NJNG's submission lacks a hydrogeologic assessment of groundwater.	6, 12	Groundwater flow on JB MDL Lakehurst Area has been documented as part of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) program for many years. The installation of a 30-inch diameter pipeline in the vadose zone is not expected to impact groundwater flow. The portions of the pipeline that would be located in groundwater under wetlands are insignificant in size when compared to the depth and extent of both the wetlands and the Kirkwood-Cohansey Aquifer.
29	Pinelands Comprehensive Management Plan Compliance	The commenters are concerned that the proposed pipeline and easement violate the Pinelands Comprehensive Management Plan and its authorizing Federal and State statutes.	11, 8, 9, 65, 78, 83, 373, 442-444	The Executive Director of the Pinelands Commission issued a Certificate of Filing for the proposed SRL project on December 9, 2015 (Application #2014-0045.001). The Certificate of Filing will be reviewed and voted on by the full Pinelands Commission Board, which will determine Project conformance with the Pinelands Comprehensive Management Plan.
30	Plants, Wildlife and Habitat	The commenters are concerned that the proposed project could cause harm to native species of plants and animals.	3, 5, 7, 18-355, 357-441, 446-451	The United States Fish and Wildlife Service (USFWS) (letter dated May 4, 2017), and NJDEP (approval DLUR #0000-15-0007.1 CAF150001 and FWW15001, dated February 24, 2017) have provided a detailed review of the proposed SRL project and have recommended the use of specialized equipment, BMPs and timing restrictions to protect and minimize impacts to plants, animals, threatened and endangered species, and their associated habitats within the Project area. NJNG is required to comply with conditions outlined in permit approvals.
31	Plants, Wildlife and Habitat	The commenter is concerned that methane gas released into the aquatic environment can lead to permanent damage and mortality to aquatic organisms, even when they are exposed to extremely low concentrations relative to the solubility of methane in water.	12	
32	Threatened &	The commenter is concerned that the review	11, 7, 12, 40, 67	

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	Endangered Species	of impacts to habitat and threatened and endangered species is flawed and incomplete. The current route of the pipeline threatens habitat of listed species.		There is a low potential for gas releases associated with the Project. Based on NJNG's experience, any releases will be identified and repaired immediately and subsequently short term and localized. NJNG has several protocols in place to address any leaks as part of their Transmission Integrity Management Plan – the primary of which is through periodic leak surveys with methane detection equipment. Other methods are periodic physical surveys of the pipeline route, monitoring of the cathodic protection system that prevents corrosion, monitoring of third party construction activity near the pipeline, and in-line inspections of the pipeline to ensure its integrity. In the highly unlikely event that a leak is found on a transmission facility, NJNG's policy is to address any such abnormality immediately without hesitation.
33	Procurement	The commenters are concerned that there is no mention of the procurement and purchasing process undertaken by the Department of Defense and/or JB MDL regarding the SRL and its natural gas service to the installation. The commenters are concerned that proper protocols for entering into energy supply contracts have not been followed.	1	The procurement process is not required to be analyzed in the EA process. All procurement will be accomplished in accordance with Federal Acquisition Regulations and Defense Federal Acquisition Regulations as applicable. No additional procurement of natural gas is anticipated from the installation of this pipeline at this time. The pipeline is a redundant link to ensure that there is supply for JB MDL in times of emergency, or failure of the northern pipelines. The current purchase agreements were properly vetted.

34	Purpose and Need of Proposed Action	The commenters are concerned that the Draft EA does not discuss or analyze how JB MDL will physically benefit from or be serviced by the SRL Project following installation of the pipeline. The commenters note that the SRL project does not provide infrastructure that has the capability to directly service any portion of JB MDL.	1, 7, 8, 9, 67, 136	Please reference Section 1.2 of the Draft EA for a description of the purpose and need of the Proposed Action. The purpose of the USAF's Proposed Action is to improve energy resiliency and supply assurance for JB MDL in the event that the current natural gas pipeline which services JB MDL fails. As described in Chapter 2 of the Draft EA, the proposed SRL project would create a second supply line that would be serviced by a second major natural gas supplier. These improvements would add needed redundancy to NJNG's system, and therefore, improve the resiliency and supply assurance of the natural gas system that serves JB MDL.
35	Purpose and Need of Proposed Action	The commenters are concerned that there is no evidence that the Proposed Action is needed for JB MDL or will improve energy resiliency and supply assurance for JB MDL. The commenters note that natural gas supplies are already provided by Public Service Enterprise Group (PSEG).	1, 7, 8, 9, 71, 78, 96, 114, 224, 364, 442-445	
36	Purpose and Need of Proposed Action	The commenters are concerned that the Draft EA does not discuss how the installation of the SRL through JB MDL would resolve or address the critical system deficiency of natural gas supply to JB MDL.	1, 7, 8, 9	
37	Purpose and Need of Proposed Action	The commenters are concerned that the real reason that this route is proposed through JB MDL is for NJNG to get a military exemption from the Pinelands Comprehensive Management Plan.	7, 8, 9	
38	Purpose and Need of Proposed Action	The commenter is concerned that SRL is sized intentionally larger than it needs to be for customer purposes and that a significant portion of the project's benefit is profit making and will not be realized by customers.	8, 9	The NJ BPU is the entity that determines whether a project is sized appropriately and meets its intended purpose to customers.
39	Purpose and Need of Proposed Action	The commenter is concerned that were NJNG and South Jersey Gas to merge, since South Jersey Gas is already connected to the interstate pipeline system, the SRL would become a redundant connection at the southern end of the NJNG system.	8, 9	The NJ BPU is the entity that must consider any possible merger of utilities. Speculation on potential future actions by NJNG are not part of this action are not subject to review in this EA.

40	Restoration	The commenter requests information on restoration including methods used and post-construction monitoring. In addition, the commenter wants to know what specific actions will be taken to ensure a healthy native ecosystem in disturbed areas.	7	All restoration would be conducted in accordance with the Ocean County Soil Conservation District approved Soil Erosion and Soil Control (SESC) Plan (Soil Conservation District #17519, certification date: November 25, 2015) and the Landscaping and Revegetation guidelines of the New Jersey Pineland Commission's Comprehensive Management Plan as discussed in Section 2.3.4 the Draft EA.
41	Routing	The commenters are concerned that the USAF did not consider a route alignment which runs outside of JB MDL that would provide the same energy service and reliability as granting an easement to NJNG for the SRL.	1, 7	The intent of the alternatives analysis within the Draft EA is not to analyze route alignments outside of JB MDL. As stated in Section 1.2 of the Draft EA, the EA has been prepared to document the potential for impacts associated with the Proposed Action of granting an easement to NJNG for the construction, operation and maintenance of a natural gas pipeline segment on JB MDL. The alternatives analyzed within the Draft EA are appropriate and sufficient for the Proposed Action. If a route was considered completely off base, then there would be no Federal Action. In the absence of a federal action, NEPA would not apply.
42	Routing	The commenter is concerned that the USAF officials decided to allow the SRL project to be routed through JB MDL because of the \$50,000 annual revenue stream from NJNG.	8, 9	The purpose and need of the proposed action is adequately discussed in Section 1.2 of the Draft EA.
43	Safety	The commenters are concerned that the proposed SRL project would run through portions of JB MDL where unexploded ordnances (UXOs) have not been mapped and that putting a gas pipeline in the middle of an army base is dangerous.	5, 7	JB MDL has determined that "use caution" areas exist within the Proposed Action area. JB MDL BMPs would be implemented prior to and during construction to train construction teams to recognize UXOs and to follow steps necessary to maintain safe working conditions. Although it is not anticipated that UXOs would be encountered, Section 2.3.3 of the Draft EA describes UXO safety measures to be implemented prior to and during construction activities, including a UXO expert available during construction activities. Section 2.2 of the Draft EA discusses screening criteria for selection of the preferred route which included avoiding UXO 'sweep required' areas. In their correspondence letter dated May 2, 2017, the NJDEP concurred that the SRL pipeline is proposed in areas where no known UXOs exist.

44	Safety	The commenter is concerned that the Draft EA fails to consider and evaluate the special conditions on a busy military base in which the proposed pipeline would operate, conditions which increase the chances of pipeline failures, leaks and explosions.	11, 78, 442-444	The USAF worked together with NJNG to identify and review the preferred alternative and easement corridor for the proposed pipeline segment. Please reference Section 1.3 and Section 2.2 of the Draft EA which discusses screening criteria for selection of the preferred route included avoiding areas used for military training and operations. As discussed, activities proposed during construction and operation of the proposed pipeline would not be in conflict with JB MDL operations.
45	Safety	The commenter is concerned with the proximity of a natural gas high pressure transmission pipeline to homes and local businesses. The commenter notes that the proposed pipeline would run closer to homes and local businesses than JB MDL itself ruled out for its own residential areas.	8, 9, 11	The United States Department of Transportation's PHMSA regulation, Title 49 CFR Part 192 sets standards for the design and operation of natural gas pipelines. Pipeline location, as it pertains to proximity to dwellings, is addressed in both the design and pipeline integrity sections of this regulation.
46	Safety	Comments were received on concerns of constructing a gas pipeline close to residences and public buildings.	8, 9, 11	<p>In 49 CFR Part 192 - Subpart C (Pipe Design), the regulation addresses the proximity to buildings intended for human occupancy by specifying four different class locations dependent on dwelling density. Each class requires a different design factor to be applied to the pipe design formula. These factors range from Class 1 (rural), which will allow the operator to use a maximum of 72% of the total design pressure of the pipe, to Class 4 (densely populated), which will allow the operator to use a maximum of 40% of the total design pressure of the pipe. In general, for a given operating pressure, pipe used in Class 4 locations require use of pipe with a thicker wall thickness and stronger grade steel than that used in Class 1 locations. In addition, the N.J.A.C. for pipeline design requires intrastate pipelines to be designed to a Class 4 designation. As such, the proposed SRL pipeline is designated as Class 4 and qualifies to operate in a densely populated/urban environment.</p> <p>In 49 CFR Part 192 - Subpart O (Gas Transmission Pipeline Integrity Management), pipeline operators are required to determine which segments of its transmission systems are designated as a High Consequence Area (HCA) as part of its Integrity Management Plan. HCA's are identified</p>

			<p>either by class location, or by calculating a Potential Impact Radius (PIR) and determining which sections of the pipeline have identified sites within that area. A PIR is defined as “the radius of a circle within which the potential failure of a pipeline could have significant impact on people or property.” Using the PHMSA formula to calculate PIR ($PIR = 0.69 \times (p \times d^2)^{0.5}$, where PIR = Potential Impact Radius (in feet); p = maximum allowable operating pressure (in pounds per square inch); d = nominal pipeline diameter (in inches), and 0.69 is a constant applicable to natural gas), NJNG has determined that the impact radius is 556.2 feet.</p> <p>Once a segment of a pipeline is determined to be in a HCA, it is subject to increased risk identification analyses, operational monitoring, and integrity assessments. NJNG has chosen to designate its entire transmission pipeline system as an HCA, and as such, the proposed SRL pipeline is subject to all of the most stringent requirements of this section of the regulation.</p> <p>Furthermore, the N.J.A.C. requires additional standards in excess of the Federal regulation. In addition to the Class 4 designation requirement noted above, it requires transmission pipeline operators to: implement inspection patrols on a monthly basis to identify any activities that may affect the integrity of the pipeline; requires the minimum installation depth of the pipe to be 48 inches instead of 36 inches to minimize the risk of third party incidents; requires for the installation of additional warning tape above the pipeline to warn any excavators of the presence of the facility; and requires additional pipe pressure testing requirements.</p> <p>NJ BPU regulates pipeline projects in proximity to residences and businesses. By Order dated January 27, 2016, the NJ BPU authorized the construction of the SRL pipeline along the proposed route pursuant to N.J.A.C. 14:7-1.4, subject to certain conditions.</p>
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47	Socioeconomics	The commenter is concerned how NJNG will guarantee that all supplies and workers would be local or regional and how many jobs will be created.	7, 117	NJNG would use local labor and supplies to the extent practicable and available. For example, NJNG typically uses local labor unions when staffing projects similar to the SRL Project. In addition, local asphalt plants are typically used to provide asphalt for projects like the SRL Project. This likely use of local and regional labor and supplies, plus the anticipated per diem costs (local restaurants, fuel, etc.) will contribute to the positive benefits to the local communities by the Project.
48	Soil & Groundwater Contamination	Commenters are concerned with contaminated soil conditions within proposed SRL project area and that construction would disturb these areas and lead to further contamination of soil and groundwater. More rigorous environmental studies are needed.	4, 5, 7, 14, 15, 16, 17, 43, 67, 80, 111, 117, 132, 135, 176, 197, 216, 224, 226, 317, 334, 351, 352, 356, 405, 438, 442-445	Reference Section 4.4.1 and Section 4.5.1 of the Draft EA in which soil and groundwater contamination are discussed, respectively. The USAF will continue to follow CERCLA guidance in its systematic approach for addressing perfluorinated chemicals (PFCs) on JB MDL. Section 4 of the Draft EA states that, "In the event that groundwater is encountered within contaminated areas, NJNG would stop work, the groundwater would be sampled, and if contaminants were present, JB MDL Restoration Program Manager would be contacted, who would then notify NJDEP, and the contaminated water would be disposed of appropriately," which is acceptable to the NJDEP Site Remediation and Waste Management Program (SRWMP). Please reference the NJDEP's correspondence letter dated May 2, 2017 upon which the NJDEP concurs that the pipeline is proposed in areas where no contaminated soil will be encountered.
49	Soil & Groundwater Contamination	The commenters are concerned that the Draft EA does not adequately address the portions of the SRL Project that would run through Superfund sites.	5, 7	
50	Soil & Groundwater Contamination	The commenter is concerned that the Draft EA ignores issues of soil and groundwater contamination that have recently come to light at the Base, and downplays long-standing contamination problems.	11, 3, 4, 5, 7, 18-32, 34-39, 41-74, 78-79, 81-131, 133-134, 137-265, 267-355, 357-441, 446-451	
51	Safety, Soil & Groundwater Contamination	The commenter is concerned that methane gas released from the proposed pipe could accumulate at significant concentrations within the subsurface sediments and produce subsurface lateral gas movement. The commenter is concerned that there is potential for released methane gas to migrate substantial distances laterally or even downward vertically into groundwater and/or surface water. The commenter is concerned that the pipeline is located in the aquifer and in the event of a natural gas leak; some dissolved methane would be transferred into	12, 11	NJNG is required to design, construct and operate the SRL natural gas pipeline in a manner that meets or exceeds applicable standards. Periodic inspections discussed in Response to Comment #22 are intended to prevent and detect early any leaks. In the unlikely event a leak were to occur, leaks would be isolated by the use of automated valves so any releases are minimized. Methane gas would not accumulate at significant concentrations and move laterally in the subsurface. Since natural gas is lighter than air, it would rise through the porous soils found throughout JB MDL to the atmosphere and dissipate.

		groundwater and hydraulically connected / proximate surface waterbodies.		
52	Soil Quality; Safety; Water Quality; Remediation	<p>The NJDEP agrees with conclusions found within the Draft EA consisting of the following:</p> <ul style="list-style-type: none"> • The pipeline is proposed in areas where there is no soil contamination. • The pipeline is proposed in areas where there is no unexploded ordnance. • There is groundwater contamination in some areas, however, the contamination is 50 to 70 feet below ground surface and the pipeline will not be deeper than 20 feet below ground surface, so contaminated ground water will not be encountered. • The EA states that in the unlikely event that contamination is encountered it will be managed appropriately, which is acceptable to DEP/SRWMP. 	10	Concur.
53	Threatened & Endangered Species	<p>The USFWS comments on the following:</p> <ol style="list-style-type: none"> 1. Long-eared Bat - Applicant is exempt from any liability associated with the take of the Long-eared bat. 2. Bog Turtle – Applicant agreed to bury the gas line in the road bed; truck away road bed material; and avoid stockpiling the material onsite. Applicant will implement all best management practices, including vacuums and sand bags to control unlikely occurrences of an inadvertent return. Applicant will install a double-silt fence at every wetland crossing designated as bog turtle habitat in the Landscape Mapping project. The Service requests a copy of any contingency plan that is finalized for protection of bog turtles. 3. Swamp Pink – Service recommends a 	13	The required conditions and BMPs identified in the USFWS response will be implemented. All ERRATA provided by USFWS will be incorporated into the Final EA.

		<p>contingency plan in areas of populations and where horizontal directional drilling is proposed. The applicant should have all necessary equipment onsite in place to control the unlikely occurrence of an inadvertent return. The Service also recommends installing a double-silt fence along the swamp pink wetland.</p> <ol style="list-style-type: none"> 4. Knieskern's Beaked-Rush – Applicant will conduct work within an existing road and agreed to implement the appropriate equipment, double silt fence, and other BMP's along wetlands with suitable habitat for this species. 5. Migratory Birds – Applicant will not conduct tree clearing between March 1 and August 15 and will specify timing restrictions on their permit plans. A general seasonal restriction shall be included from April 1 to August 31. 6. Pollinators – The Service encourages JB MDL to include milkweed and other suitable native plant species in any proposed planting plans. 7. ERRATA – Update the Services' mailing address on pages 9-1 and 9-3. On page 4-9, it is stated that no trees will be removed from March 1 to August 15 whereas the opposite is stated on page 4-1. Please correct statement on page 4-1. 		
54	Water Quality	The commenter is concerned pollution from runoff will contaminate the waterways.	7	Reference Section 2.3.3, Section 3.4 and Section 4.4 of the Draft EA for a discussion of sustainable design, construction and operational BMPs the Proposed Action would incorporate to comply with the laws, regulations, executive orders, instructions, and policies that apply to JB MDL. A SESC Plan has been developed and approved for the proposed SRL project and consists of drawings that identify BMPs to minimize accelerated erosion and sedimentation before, during, and after earth disturbance

				activities. Construction and restoration of the construction areas would be conducted in accordance with the SESC Plan that Ocean County Soil Conservation District approved on November 25, 2015 (Soil Conservation District #17519) and the New Jersey Pinelands Commission Comprehensive Management Plan.
55	Water Quality	The commenters are concerned that the Proposed Action will contaminate fresh drinking water supplies.	3, 4, 5, 12, 7, 18-32, 34-74, 78-79, 81-131, 133-134, 137-265, 267-355, 357-441, 446-451	The Proposed Action would not contaminate fresh drinking water supplies or result in changes to water quality. Please reference the NJDEP's comment letter dated May 2, 2017 upon which NJDEP and NJDEP's Division of Fish and Wildlife (NJDFW) agree with the conclusions found in Section 4.5.1 of the Draft EA stating, "No adverse impacts to surface water, groundwater aquifers, wetlands, streams or water courses, water-recharge function, or surface water and groundwater quality are anticipated as a result of [the Proposed Action]."
56	Water Quality	The commenter is concerned that the heat from the pipeline itself will change the water quality.	7	
57	Water Quality	The commenter is concerned that the Draft EA fails to address or acknowledge water contamination risks in accordance with the proposed engineering design of the pipeline link. The commenter request pipeline failure scenarios are considered, including worst case scenario.	12	See Response to Comments #45 and 46.
58	Water Quality	The commenter requests established engineering cross-sections that accurately depict nearby surface waterbodies, wetland and underlying water table aquifers during lower and higher season conditions, as well as the section of the project along which will be buried within the aquifer be provided to facilitate independent outside review.	12	This is beyond the scope of an EA. NJNG is planning to construct and operate the pipeline in accordance with applicable standards and BMPs. NJDEP (approval DLUR #0000-15-0007.1 CAF150001 and FWW15001, dated February 24, 2017) has provided a detailed review of the project and have recommended the use of specialize equipment, BMPs and timing restrictions to protect and minimize impacts to regulated resources within the project area.
59	Water Quality	The commenter is concerned that the proposed pipeline would constitute a continuous risk to water within the Pinelands during its operation that would increase over time as the pipeline ages.	12	See Response to Comment #51.
60	Water Quality,	The NJDEP SRWMP and NJDFW comments on	10	Comment noted.

	Habitat; Terms and Conditions of Easement	<p>the following sections of the Draft EA:</p> <ul style="list-style-type: none"> • Section 4.5.1 – SRWMP agrees that no adverse impacts to surface water, groundwater aquifers, wetlands, streams or water courses, water-recharge function, or surface water and groundwater quality are anticipated as a result of implementation of Alternative 1 (the Proposed Action). • Section 4.6.1 – NJDFW agrees that implementation of Alternative 1 would result in minor, short-term disturbance of existing vegetation and wildlife during site preparation and construction. • Section 1.4 – NJDFW agrees that the USAF will decide on whether to enter into an easement agreement with NJNG and allow for the construction, operation, and maintenance of a 30-inch pipeline segment on JB MDL. The USAF will also decide on the duration, terms, and conditions of the easement. 		
61	Water Resources	The commenters are concerned that the SRL project's effect on groundwater supplies will subsequently affect wetlands and surface waters.	5, 33, 78, 442-444	NJNG does not anticipate that groundwater would be redirected from its respective watershed as a result of the Project. Groundwater removed during dewatering activities would be discharged back to the watershed of origin, replenishing groundwater levels via infiltration. As a result, the proposed Project is not anticipated to have an effect on groundwater supplies and subsequent wetland and surface waters levels. The SESC Plan, which details NJNG's dewatering plan, was reviewed and approved by the Ocean County Soil Conservation District (Soil Conservation District #17519, certification date: November 25, 2015).
62	Water Resources	The commenter is concerned that the Draft EA fails to account for the fact that significant portions of pipe trench excavation will be below the water table and within the aquifer.	11, 12	The pipeline may be located below the water table where the crossing of a regulated waterbody could not be avoided using conventional trenching techniques. In these areas, NJNG would install the pipeline using HDD

				drilling or jack and boring techniques, thus avoiding impacts to the regulated waterbody on JB MDL. The pipeline would be installed at a depth of between 17 to 20 feet in locations where HDD methods are utilized. In the approximate 10.5-miles (55,234-feet) of JB MDL's easement, only 1.13-miles (5,972-feet) would be installed via HDD. Thus, a significant portion of the pipeline would not be installed below the water table, and the 30-inch pipeline would have minimal impact on the top of the 150-foot deep aquifer.
63	Water Resources	The commenter is concerned that the pipeline crosses New Jersey Category One designated waters and associated wetlands and habitat, many of which carry anti-degradation criteria.	7	The on-base portion of the Project which is the subject of the Draft EA, does not cross any New Jersey Category One designated waters and/or associated wetlands and habitat. As a result, no impacts to Category One resources would occur on JB MDL. Reference Section 2.3.2 of the Draft EA which identifies proposed construction methods which significantly minimize impacts to wetlands, floodplains and streams. NJDEP (approval DLUR #0000-15-0007.1 CAF150001 and FWW15001, dated February 24, 2017) have provided a detailed review of the project and have recommended the use of specialize equipment, BMPs, restoration and timing restrictions to protect and minimize impacts to regulated resources, inclusive of waters, wetlands and associated habitat within the Project area. NJNG is required to comply with conditions outlined in permit approvals.
64	Water Resources	The commenter is concerned that the NJDEP's mapped floodplains are no longer accurate and cannot be used for analysis.	7	As discussed in Section 4.5.1 of the Draft EA, NJDEP issued NJNG a Flood Hazard Applicability Determination dated September 16, 2016 stating that a Flood Hazard Area Permit is not required for the proposed SRL Project. Based on the NJDEP's review, the Proposed Action meets the standards at N.J.A.C. 7:13-7.36 (37)(38).
65	Water Resources	The commenter is concerned with mitigation of wetlands.	7	For the on-base portion of the Project which is the subject of the Draft EA, NJNG would HDD under wetlands. As a result, impacts to wetlands would be avoided and no

				wetland mitigation would be required on JB MDL. For the off-base portion of the Project, which is not the subject of this EA, NJDEP granted NJNG a Freshwater Wetlands General Permit #2 and Water Quality Certificate (approval FWW15001 and DLUR #0000-15-0007.1) on February 24, 2017 which outlines wetland mitigation conditions for the project. NJNG is required to comply with the wetland mitigation conditions outlined in these permit approvals.
66	Water Resources	The commenter is concerned with the projects' potential to shift stream beds.	7	For the on-base portion of the Project which is the subject of the Draft EA, NJNG would HDD under streams. As a result, impacts to streams, such as potential streambed shifts, would be avoided on-JB MDL. Implementation of NJNG's approved SESC Plan will further protect water resources from degradation and erosion on and off-JB MDL. Construction and restoration would be conducted in accordance with County approved SESC Plans and the New Jersey Pinelands Commission Comprehensive Management Plan.
67	Air Quality / Human Health	The commenter is concerned that people will get sick from pipeline fumes.	33	Please reference Section 4.3.1 of the Draft EA. Operation and maintenance of the pipeline through JB MDL would have minimal to no impacts to air quality and therefore no significant impacts to health.
68	Safety - Traffic	The commenter is concerned that the proposed project is routed along Route 539, which is a highly used road for people traveling to the shore during the summer. The commenter is concerned that the proposed project would present a significant fatality risk during high traffic periods. The commenter is concerned that installation of the project will affect commute times.	112, 398, 445	A Maintenance of Traffic Plan to minimize traffic disturbances in Ocean County, including on JB MDL, has been filed with Ocean County for their review and approval. The purpose of the plan is to minimize impacts to the traveling public by re-directing them away from the construction area as much as possible. Police officers and/or certified traffic control personnel would direct the movement of traffic safely through and/or around these areas. This also protects the safety of the construction personnel during pipe installation. Upon completion of construction, the roadways would be restored. Vehicle traffic would not be affected following completion of construction by the operation of a below grade pipeline.

69	Impacts to Local Infrastructure	The commenter is concerned that heavy construction equipment will negatively impact municipal roads and farm land.	32, 117	Restoration requirements in local road opening permits are regulated by the respective permitting agencies. Roads would be returned to an acceptable condition after construction so no permanent impacts would result. Similarly, farm land temporarily disturbed during construction would be restored in accordance with the county soil conservation district requirements and BMPs, resulting in no significant impacts.
70	HDD	The commenter is concerned NJNG has not conducted the testing required to develop stability and risk analyses and, thus, assess environmental assessments should HDD failure occur.	6	See Response to Comment #23.
71	Contamination	The commenter is concerned that digging deep trenches for the gas pipelines could cause the contamination plume to migrate.	7	See Response to Comment #50.
72	Water Resources	The commenter is concerned that drilling under streams violates Surface Water Quality Standards.	7	See Response to Comment #55.
73	Safety	The commenter is concerned that the pipeline could fail, leak or explode.	11, 12, 26, 40, 78, 132, 176 334, 351, 438, 442-445	See Response to Comments #45 and 46.