

From: Steve Ewing <sewing@woodardcurran.com>
To: "nancy.wittenberg@njpines.state.nj.us" <nancy.wittenberg@njpines.state.nj.us>
CC: "Bethke, Richard (SJG)" <rbethke@sjindustries.com>, Dennis Walsh <dmwals@njpines.state.nj.us>
Date: 12/3/2013 9:46 AM
Subject: South Jersey Gas - National Park Service
Attachments: National Park Service Memo 2-28-13.pdf; National Park Service - Ltr 3-20-13.docx

Hello Nancy,

I contacted the US Army Corps and Peter Romano sent me the attached memo and letter from the National Park Service.

If you have any questions please call or email me.

Steven R. Ewing
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From: Kenney, Paul
To: Romano, Peter T NAP
Cc: Karen Greene - NOAA Federal; Popolizio, Carlo; montoomerie.robert@epa.gov
Subject: Re: 2013-0153 South Jersey Gas - Gas line for B.L. England Power Plant (UNCLASSIFIED)
Date: Thursday, February 28, 2013 8:49:29 AM

Peter,

Thanks for the update and plans on the BL England Pipeline. I really doubt NPS is going to have any issues with the proposed pipeline. Our jurisdiction, and thus our Secretary's Determination, is limited to potential impacts to Cedar Swamp Creek and doesn't include Mill Creek. However, you mentioned that there has been "research completed" with regard to T&E species. I need to see and retain a copy of that T&E research. I also need a project description describing the work to be done. Lastly, I agree with Karen and would like to see the possibility of releases, and what's to be done if there are, addressed,

Once I get these three things, my turnaround on a review will be very quick

1. T&E research w/ conclusion
2. Project Description
3. Releases addressed/w plan

- Thanks

On Wed, Feb 27, 2013 at 9:38 AM, Romano, Peter T NAP <Peter.T.Romano@usace.army.mil> wrote:

Classification: UNCLASSIFIED
Caveats: NONE

Hi all,

Below is information of the above referenced project for NWP 12 Verification.

File Number: 2013-0153
Project Name: South Jersey Gas Pipeline System for Reinforcement and Supply to B.L.
England Power Plant
Applicant/Agent: Woodward & Curran
Waterway: Mill Creek and Cedar Swamp Creek
Municipality: Upper Township
County: Cape May

Project Purpose: The BL England power plant is a 49 year old coal fired power station and the last coal fired operation in the State of New Jersey without modern pollution control equipment. The need and purpose driving this project is the New Jersey mandated requirement for BL England to discontinue using coal as the primary fuel source for production of electricity. Amongst the terms of an Administrative Consent Order with the NJDEP, the facility will repower to a state of the art combined cycle natural gas turbine and refuel an oil burning unit with natural gas. Since there are no gas mains with sufficient capacity near the generating station, South Jersey Gas is proposing to extend a 24" gas pipeline from the closest infrastructure with sufficient capacity to serve BL England. The closest facility is located in Cumberland County.

Project Description/Comments: The proposed pipeline would be positioned, in large part, beneath existing State, county, and municipal roads or road right-of-ways and within a cleared Atlantic City Electric powerline easement leading to the BL England power plant. The total distance for the project is approximately 21.7 miles. The applicant's proposed design of the pipeline only requires USACE

coordination of two (2) tidal water body crossings by Horizontal Directional Drilling (HDD) regulated under Section 10 of the Rivers and Harbors Act. NWP - 12 Utility Line Activity covers the proposed design impacts. With the implementation of HDD there are no proposed discharges of dredge or fill material into waters of the United States. The HDD crossing under Mill Creek would be 49 feet below the bottom elevation and the crossing under Cedar swamp creek would be 41 feet below the bottom elevation.

I am forwarding this additional PCN for review and additional comment. Based on the research completed and the project components it is the opinion of the project manager that the project is likely not to adversely affect any T&E species known to be in the area of the project under USACE jurisdiction. This PCN only covers the coordination for the two (2) tidal water body crossings.

If you require further information please let me know. Your response, either written or by telephone, should indicate whether any project specific comments will be provided. If you can reply within 15 days that would be greatly appreciated.

Regards,

Pete

Peter T. Romano
United States Army Corps of Engineers
Applications Section II
100 Penn Square East, Wanamaker Building
Philadelphia, Pa 19107
(Ofc) 215-656-6729
(Fax) 215-656-6724

Classification: UNCLASSIFIED
Caveats: NONE

Paul Kenney
National Park Service
Partnership Wild & Scenic Rivers
Northeast Regional Office
U.S. Custom House, 200 Chestnut Street
3rd Floor
Philadelphia, PA 19106
(215) 597-5823
F(215) 597-5747



United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Regional Office
U. S. Custom House
200 Chestnut Street, 3rd Floor
Philadelphia, Pennsylvania 19106

L6015(NERO/NWSR)

March 20, 2013

Mr. Peter T. Romano
United States Army Corps of Engineers
Applications Section II
100 Penn Square East, Wanamaker Building
Philadelphia, PA 19107

RE: File # 2013-0153 – B.L. England Project/South Jersey Gas - Pipeline extending from Maurice River Township, Cumberland County, NJ to B.L. England Power Plant, Beesley's Point, Atlantic County, NJ

Dear Mr. Romano:

The above-referenced project crosses the Tuckahoe River and Cedar Swamp Creek, which are protected as designated tributaries of the Great Egg Harbor National Scenic and Recreational River (P.L. 102-536). Such rivers are protected by Section 7(a) of the Wild and Scenic rivers Act. Pursuant to Section 7(a): "no department or agency of the United States shall assist by loan, grant or license or otherwise in the construction of any water resources project that would have a direct or adverse effect on the values for which such river was established."

The National Park Service (NPS) considers water resource projects to include dams, diversions, ditching, bridge, dock, bulkhead and roadway projects involving construction or dredging in the bed or on the banks of the river, utility crossings, bank stabilization projects and other activities that require a Section 404 Permit or other permits from the U.S. Army Corps of Engineers.

The NPS has received the above-referenced permit application regarding a 24" utility gas line crossing the Tuckahoe River along the Rte. 49 bridge, extending along preferred route A3, to and under Cedar Swamp Creek. We have reviewed the South Jersey Gas B.L. England Gas Route Analysis Report & Addendum dated June 18, 2012, the corresponding CAFRA Permit and WFD-GP#2 permit with the NJDEP, and Pinelands Permit Application #2012-0056.001, and we reviewed the Threatened and Endangered Species Habitat Suitability Assessment & Survey Report, by Trident Environmental Consultants, dated 2/4/2013, and the state 1A Cultural Resource Survey performed by Richard Grubb and Associates, dated January 2013.

It is our understanding that there will be no visible impacts from this project to either the Tuckahoe River or Cedar Swamp Creek crossings, and that the pipeline will not be any closer than 41 feet to the bed of either waterbody.

The NPS notes that the Pre-Construction Notification letter dated 2/13/2013, from the applicant's consultant Woodard and Curran, incorrectly states that "none of the above-listed waterbodies have a Federal River Management Plan." Both waterbodies are designated tributaries in the *Comprehensive Management Plan and Environmental Impact Statement For the Great Egg Harbor National Scenic and Recreational River, May 2000*.

As proposed, the activity will not have an adverse effect on the values for which the Tuckahoe River and Cedar Swamp Creek were designated under P.L. 102-536. Should you have any questions regarding the content of this letter, please contact me at (215) 597-5823.

Sincerely,

Paul Kenney,
Manager, Great Egg Harbor Scenic and Recreational River

P:Kenney/C/ GregPerm47
Reading

From: Steve Ewing <sewing@woodardcurran.com>
To: Nancy Wittenberg <Nancy.Wittenberg@njpines.state.nj.us>
Date: 12/5/2013 2:10 PM
Subject: RE: South Jersey Gas - National Park Service

Hello Nancy,

I don't know about the signature, I contacted Peter Romano at the Phila Corps, he emailed them to me just as you see them.

Steven R. Ewing
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-----Original Message-----

From: Nancy Wittenberg [mailto:Nancy.Wittenberg@njpines.state.nj.us]
Sent: Thursday, December 05, 2013 2:08 PM
To: Steve Ewing
Subject: Re: South Jersey Gas - National Park Service

steve:

is there a reason the letter is not signed. I know the Commissioners will ask.

tx

>>> Steve Ewing <sewing@woodardcurran.com> 12/3/2013 9:46 AM >>>
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