



c/o Delaware River Greenway Partnership (DRGP)  
PO Box 15, Stockton, NJ 08559  
[www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org)

---

November 6, 2020

David Kovach  
Manager, Project Review  
Delaware River Basin Commission (DRBC)  
25 Cosey Road  
P.O. Box 7360  
West Trenton, NJ 08628-0360

Dear Mr. Kovach,

*RE: Opposition to PennEast Sectioned Submissions  
Response to July 17, 2020 PennEast Package to DRBC*

The National Wild and Scenic Rivers System was created by Congress in 1968 (Public Law 90-542; 16 U.S.C. 1271 et seq.) to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The Lower Delaware Wild & Scenic River Management Council (LDW&S), a part of the National Wild and Scenic Rivers System, focuses on the area of the Delaware River south of the Delaware Water Gap and north of Trenton. Our Council is comprised of nonprofits and governmental entities from New Jersey and Pennsylvania including municipalities, counties, and the states themselves. DRBC has representation as well.

As background, our Management Plan requires the evaluation of projects that may impact the river corridor. Refer to <https://lowerdelawarewildandscenic.org/index.php/resources/documents/lower-delaware-wild-and-scenic-management-plan>.

The Lower Delaware Wild & Scenic River Management Council is particularly concerned about the far reaching impacts of the proposed PennEast Pipeline. Construction may negatively impact all six goals of our management plan: water quality, natural resources, historic resources, recreation, economic development, and open space preservation.

With that said, we are strongly opposed to how PennEast is bifurcating the regulatory approval process. It is our opinion that all submissions, especially any environmentally related matters, be examined as a single submission for the entire length of the project in Pennsylvania and New Jersey. The consideration of separate project proposals, for individual sections, fails to recognize the full effect of and alternatives to all phases of the proposed Pipeline. Since each project segment cannot stand alone, the entirety of the proposed Pipeline must be examined in all regulatory submissions.

The LDW&S Management Council supports DRBC's mission and authority to oversee the whole Delaware River Watershed. Therefore, a complete and comprehensive approach to evaluating the proposed PennEast Pipeline is requested.

Sincerely,  
*Richard Dodds*  
Chairman

cc: Steve Tambini, DRBC, Executive Director  
Peter Eschbach, DRBC, Director of External Affairs & Communications  
Stacey Mulholland, DRBC, Government Affairs Lead  
Sarah Bursky, NPS, Community Planner/Rivers Manager & Liaison to Lower Delaware Wild & Scenic