

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: FERC Docket CP 15-558-000

September 12, 2016

I am writing to comment as an intervenor on behalf of Friends of Hopewell Valley Open Space with respect to the PennEast Pipeline Project Draft Environmental Impact Statement.

The DEIS is filled with inaccuracies and deficiencies which point to ineptitude, carelessness and an effort to put this project on a fast track. It is hard to know where to begin, given the short timeframe for review of the 1200 pages but some things do jump out at a reviewer. For instance, please tell us how it was determined that the New Jersey portion of the proposed project lies within the mid-Atlantic coastal plain (page 4-74)? In fact, most of the route through New Jersey passes through the Highlands and the Piedmont Physiographic Province of the state, which aren't mentioned at all in this section. On page 4-101, Stony Brook is listed as an upstream tributary of the Delaware River. Actually Stony Brook is within the Raritan River watershed, not the Delaware. This lack of fact checking is yet another indication of the haste with which the DEIS was released .

Table 4.5.1-1 on page 4-76, in the paragraph regarding Sourland Mountain, states that "no vegetative communities of concern were located in this area during these surveys." In what season(s) were the surveys conducted? Many plants are ephemeral and are only apparent during a brief period. Year-round biological surveys conducted in the past have identified eight rare plant species on the Ted Stiles Preserve at Baldpate Mountain. The proposed route of the pipeline across Baldpate, while it is within the JCP&L easement it is NOT wholly within the cleared right-of-way and would result in clearing of part of the forest. Can you guarantee that no rare plant communities would be harmed? It needs to be made clear that "*adjacent* to existing rights-of-way" is not the same as "*within* existing rights-of-way."

Table 4.5.2-1 on page 4-82 cannot possibly be the result of comprehensive field surveys if they were conducted only in fall 2014 and summer 2015. The surveys did not include the critical spring season, nor winter. The bird list is especially deficient.

Table 4.5.2-2 states that the Baldpate Mountain Important Bird Area is “stopover habitat during migration” for a wide variety of breeding land birds. While it is true that Baldpate serves as stopover habitat, even more significant is the fact that, as part of central New Jersey’s largest contiguous forest, it is critical breeding habitat for a number of neotropical migratory songbirds. Loss of any part of this IBA’s forest would have a negative impact on the species that require this habitat.

On page 4-93 FERC “request’s (sic) that the FWS consider this EIS as the BA”, the Biological Assessment. How can that possibly be considered valid when so many surveys are incomplete or have not been conducted?

My comments in this letter cover only a small part of the DEIS. Given the timing of its release and the short period given for reviewing it, it is unreasonable to expect those who stand to be affected by the pipeline to be able to examine it critically and thoroughly. Maybe that was the point.

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