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August 10, 2016

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Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

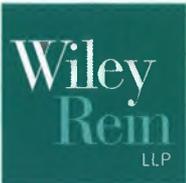
Re: PennEast Pipeline Project Hearing Process
FERC Docket No. CP15-558

Dear Ms. Bose:

I am writing on behalf of Homeowners Against Land Taking-PennEast (HALT) to reiterate HALT's support of the August 1, 2016 submission by Delaware Riverkeeper Network and multiple other organizations, including HALT, regarding the hearing process selected for the Draft Environmental Impact Statement (DEIS) for the PennEast project (FERC Docket No. CP15-558). HALT is a non-profit organization comprised of more than 300 homeowners in New Jersey's Hunterdon and Mercer Counties and several counties in Pennsylvania whose homes, farms, and livelihoods are directly threatened by PennEast's proposed pipeline. HALT's members, as impacted homeowners, have a significant interest in ensuring the DEIS addresses all of the potential environmental, economic, property, recreational, historical, and cultural impacts from the project and that the DEIS consider all possible alternatives. HALT's members are in a unique position to provide comments on the DEIS because they live in and are thus very familiar with the impacted areas.

The hearing procedures selected for the DEIS are unacceptable and will limit HALT members' participation, and public participation generally, if not revised. The following are the flaws in the hearing process and HALT's proposed solutions:

- A 45-day comment period, during peak vacation months, is wholly inadequate, especially considering the DEIS is 1174 pages long. HALT requests FERC extend the period to a minimum of 120 days to ensure the public has a full opportunity to comment. Failure to do so will leave many in the public unable to provide valuable comments on a project that will potentially have severe impacts on local communities.
- The public hearings are scheduled too early into the 45-day period, at only 24/25/26 days into the period. This limits the public to only 23-25 days to review the DEIS and develop responses before the hearings. This will lead



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to underdeveloped comments, which deprives the public of a meaningful opportunity to comment. The hearings should be scheduled 100 days into the proposed 120-day period to provide sufficient time for review prior to the hearings.

- HALT strongly objects to the public hearing format, which we understand to be individuals speaking to stenographers rather than speaking in a group setting. This format deprives the public of the ability to support each other's views and to gather information from each other regarding the impacts. It prevents the public from building off of each other's comments, which in turn prevents FERC from seeing the big picture, rather than just fragmented individual comments. If the format is only private comments to a stenographer, then it is neither "public" nor a "hearing" as understood by NEPA. We request FERC clarify what the format will be and ensure comments are made in a group setting with ample time for each individual to participate.
- The locations for the hearings are not sufficiently accessible. Several of the locations are hard to find, have insufficient space, have insufficient parking, and are too far from impacted communities, all of which will limit participation. FERC must select locations that are larger and more closely located to all citizens potentially impacted by the project.
- FERC failed to clearly identify the deadline for comments. The DEIS states the deadline is September 5 whereas the Notice says the deadline is September 12. This inconsistency prevents the public from planning when and how to develop and submit comments. It also likely will cause the public to submit untimely comments because of confusion regarding the date. While HALT strongly urges FERC to extend the deadline, if FERC insists on the shorter comment period, it must at a minimum clearly state when the period ends.

The multiple flaws in the hearing process limit participation by HALT members, and the public as a whole, in the DEIS comment period. This deprives HALT members of their rights and deprives FERC of information vital to completing the NEPA process. Establishing a hearing process that limits participation also jeopardizes HALT members' properties, drinking water, air quality, and many other environmental and cultural resources by preventing FERC from making a fully



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informed decision on PennEast's application. HALT requests FERC immediately address and resolve the problems outlined above.

Best regards,

A handwritten signature in blue ink that reads "R. Steven Richardson".

R. Steven Richardson