

September 11, 2016

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

RE: PennEast Pipeline Company, LLC (“PennEast”) –
PennEast Pipeline Project: FERC Docket No. CP15-558-000

Dear Ms. Bose,

On behalf of the Lehigh Valley Monthly Meeting of the Religious Society of Friends (LVMM) I submit this letter in regard to the Commission’s Draft Environmental Impact Statement for the proposed PennEast pipeline project. As LVMM has previously noted, it retains significant concerns about the pipeline project. These concerns are set forth more at length below.

A Second Minute to the Federal Energy Regulatory Commission by Lehigh Valley Monthly Meeting of the Religious Society of Friends in Northampton County, Pennsylvania. Commonly called Quakers.

In the first comment period we offered compelling reasons why the PennEast Pipeline should not be built. Since our advice has not been heeded and the Federal Energy Regulatory Commission (FERC) staff has published a Draft Environmental Impact Statement (DEIS) recommending that the PennEast project should move forward, we now challenge that recommendation for a number of reasons, and raise questions we feel should be addressed.

1. The DEIS comment period is too short. The DEIS is nearly 1200 pages of text, tables and maps. FERC has worked on the DEIS since January 2015. We, the public, are given only 45 days to read and analyze this document before composing a meaningful response.
2. The Public Comment Meetings were held in private and only a few weeks after the DEIS was published. Those who commented were heard by only a stenographer with an audio recorder and not everyone who gathered to comment. This arrangement made a sham out of the proceedings. A public comment is meant to be heard by the public.
3. The PennEast alignment bisects the third largest population center in Pennsylvania.
4. Many of our Members, Attenders and their families live in Bethlehem and the area served by Bethlehem’s public water system. The watershed for this system is crossed by the proposed PennEast alignment. One feeder stream to the

Wildcreek Reservoir is planned to be crossed using the “dry crossing” technique. This is not acceptable because it exposes the Bethlehem Authority water supply to an undue risk of contamination.

5. The Erosion and Sediment Control Plans (Appendix E2) were not included in the DEIS. Since much of the proposed alignment crosses forested steep slopes this vital information should be available for comment. Storm water is the single most important issue when dealing with the quality of water in natural streams. How will storm water be controlled during construction and more importantly in the days, months and years following the completion of this proposed pipeline?
6. Since a blasting plan is not included we do not know how the 462 structures located within fifty feet of the proposed work areas will be protected.
7. Invasive plants are a concern. Will there be a plan to minimize their spread and will we be given a chance to comment?
8. Bird surveys are not included. Are they being done and will we have an opportunity to comment when they are made available? Will construction be halted during migration periods?
9. If compost filter socks are used to control erosion will the sock material be cotton or hemp that can actually bio-degrade? How will the erosion control structures be maintained?
10. Threatened or endangered species will need protection. If surveys are incomplete, how will this be accomplished?
11. Will the appropriate County Conservation Districts be notified and included in the inspections?
12. When Exceptional Value Streams are crossed how will the continued water quality be assured? Will the streams be sampled before, during and after construction to prove their water quality is maintained?
13. There is not a contingency plan for repair of the actual pipe. The most vulnerable places for the pipe itself are often in the most sensitive environments, either wetlands or riparian areas. How will repair be accomplished without disturbing these habitats a second time?

The LVMM regrets that more time was not available to comment fully on the shortcomings and omissions of this document. We believe that proper study of the problem would reveal answers that do not include the continued extraction, transportation and burning of natural gas or any other form of fossil carbon. The resources dedicated to this project would be better applied in the development of renewable energy sources.

The Lehigh Valley Monthly Meeting of the Religious Society of Friends at the business meeting of September 11, 2016 agreed to file the above minute with the Federal Energy Regulatory Commission.

On behalf of the Lehigh Valley Monthly Meeting of the Religious Society of Friends,
Edward Morgan, Clerk

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