

PennEast Pipeline Company, LLC
One Meridian Boulevard, Suite 2C01
Wyomissing, PA 19610



August 31, 2016

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

Re: PennEast Pipeline Company, LLC, Docket No. CP15-558-000
Responses to DEIS Recommended Conditions

Dear Ms. Bose:

On July 22, 2016, the Federal Energy Regulatory Commission (Commission) Staff issued its Draft Environmental Impact Statement (DEIS) for PennEast Pipeline Company, LLC's (PennEast) Project. The DEIS included recommended conditions requesting that PennEast provide certain information and develop specified mitigation measures by the end of the DEIS comment period on September 12, 2016 (Recommended Condition Nos. 15, 19, 20, 26, 32, 42, 43, 45, 53, and 54). PennEast hereby submits its responses to these recommended conditions contained in the DEIS (Responses). PennEast has enclosed a Table of Contents for this filing identifying all materials provided herewith.

Pursuant to Section 385.2010 of the Commission's regulations, 18 C.F.R. § 385.2010 (2015), PennEast is contemporaneously serving copies of the Responses to persons whose names appear on the Official Service List in this proceeding.

Should you have any questions concerning this filing, please contact me at (610) 406-4322.

Sincerely,
/s/ Anthony C. Cox
Anthony C. Cox
PennEast Pipeline Company, LLC,
By its Project Manager
UGI Energy Services, LLC

cc: Medha Kochhar (FERC)
All Parties of Record

Responses to Draft Environmental Impact Statement Recommended Conditions

August 31, 2016

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Draft Environmental Impact Statement

FERC Staff's Recommended Mitigation

Recommended Mitigation Item 15

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary the results of its ongoing evaluation of potential presence of working and abandoned mines near the proposed crossing of the Susquehanna River. The evaluation shall include documentation of coordination with the Pennsylvania Bureau of Abandoned Mine Reclamation, and shall identify any specific design or mitigation measures. (*Section 4.1.5.4*)

Response to Recommended Mitigation Item 15

PennEast Pipeline Company, LLC (PennEast) has provided herein as Attachment 1 a memorandum documenting the ongoing investigation of historic coal workings near the location where the proposed PennEast Pipeline Project (Project) will cross the Susquehanna River. The memorandum summarizes past and ongoing communications between PennEast and the Pennsylvania Department of Environmental Protection (PADEP) Bureau of Abandoned Mine Reclamation. It also summarizes PennEast's work in gathering, reviewing, and completing a thorough investigation of this area via inspection of historical mine records and records of past remediation activities. The memorandum also reviews how completed investigations have supported Project planning and pipeline routing to avoid historic mine features, including shifting specific Project components to avoid certain mine features.

Recommended Mitigation Item 19

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary documentation to identify any special construction procedures that will be implemented to minimize impacts on C-1 streams. PennEast shall provide documentation of consultation with appropriate federal and state agencies regarding C-1 streams, including identification of any agency recommendations and PennEast's responses. (*Section 4.3.2.2*)

Response to Recommended Mitigation Item 19

PennEast has identified the following special construction procedures that would be implemented to minimize impacts on Category 1 (C-1) streams: dry-crossing with reduced workspace, trenchless, and trenchless with a travel lane for construction equipment crossing of the waterbody. These procedures are described herein.

PennEast is proposing to minimize impact to C-1 waterbodies and associated riparian zones by locating temporary workspace in actively disturbed areas that have had been permanently or periodically cleared, cut, or otherwise altered. Where the riparian zone could not be avoided entirely, or where the riparian zone was not already located in an actively disturbed area, PennEast will reduce the workspace to 75 feet in width, and relocate additional temporary workspace (ATWS) areas to upslope or into actively disturbed areas, where practicable.

Dry-Crossing

The dry-crossing method would be utilized if streams are located within valleys, or vertical depressions, which are not conducive for trenchless technology. A dry-crossing will consist of reducing the workspace through the waterbody to a width of 60-feet. This width will be extended through the waterbody and will allow for excavation of the trench materials and placement of a timber mat bridge for equipment crossing. The workspace outside the waterbody will have a total width of 75 feet on both sides of the waterbody until actively disturbed areas are encountered. For a dry-crossing, PennEast will place ATWS for the waterbody crossing in the actively disturbed areas where practicable, and limit the forest clearing to no more than 75 feet wide between the waterbody and actively disturbed areas. Any workspace inside the waterbody will not exceed 60 feet in width. See Figure 1M of Attachment 2 for a typical workspace configuration for dry-crossings of C-1 waterbodies.

Trenchless; Trenchless with a Travel Lane

As part of the Clean Water Act Section 401 and 404 permit pre-application process, PennEast gave a presentation entitled “Trenchless Construction Methods” at the New Jersey Department of Environmental Protection’s (NJDEP) offices on April 27, 2016. The presentation was intended to provide information on the practical application of trenchless construction methods for gas pipeline installation; a copy of this presentation is included in Attachment 3. PennEast has evaluated considerations for trenchless crossing methodology for each C-1 waterbody crossed by the Project. In most cases, PennEast will implement a trenchless crossing where practicable. However, where site constraints are not favorable, PennEast will cross the waterbody with reduced workspace limits by use of a dry-crossing method, as described above.

Where terrain, pipeline alignment, and access to the workspace dictate, PennEast will utilize a trenchless crossing method (either utilizing a conventional bore or horizontal directional drill [HDD]) to cross the waterbody. This special construction procedure will not require tree clearing or workspace within the waterbody. PennEast will also minimize forested clearings to a 75-foot wide (total) workspace, where practicable. ATWS will be placed in actively disturbed areas. PennEast will utilize access to the workspace from both sides of the waterbody to avoid the need for tree cutting and timber mat bridge placement for travel lane logistics.

In some cases, PennEast will cross the waterbody using the trenchless method, but will cut trees and install a travel lane/equipment bridge to cross the waterbody with mainline construction equipment. This will be a result of limited access to workspace on both or either side of the waterbody. PennEast would limit tree cutting activities within the waterbody to a total width of 25 feet. The timber mat bridge would be removed should a rain event cause excessive flooding of the waterbody. See Figures 1N and 1P in Attachment 2 for a trenchless crossing without a travel lane/equipment bridge and a trenchless crossing with a travel lane/equipment bridge, respectively.

Although PennEast is committed to crossing C-1 waterbodies using either the boring and/or trenchless crossing methods, the construction contractor may employ a travel lane to locate the pipe, dig down to it, and install that portion to the mainline directly adjacent to it in the event that equipment encounters unforeseen issues during installation.

Recommended Mitigation Item 20

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary proposed crossing methods for all waterbodies, including those with contaminated sediments. The proposed method shall ensure that the potential suspension of sediments during construction shall be avoided or minimized to the greatest extent possible so as not to change bioavailability of any potential contaminants present. PennEast shall include documentation of consultation with pertinent agencies and identify any recommended minimization measures. (Section 4.3.2.2)

Response to Recommended Mitigation Item 20

PennEast filed in Attachment 2-2 of PennEast's May 16, 2016 Response (May Data Response) to FERC's Environmental Information Request, issued April 29, 2016 (April Data Request) its proposed crossing methods for all waterbodies in table 2A-1 (Pennsylvania Waterbodies Crossed by the Project Workspace) and 2A-2 (New Jersey Waterbodies Crossed by the Project Workspace). PennEast also provided the proposed crossing method for each impaired waterbody in a revised table 2.3-12 (Impaired Waterbodies Crossed by Pipeline Facilities) in Attachment 2-7 of the May Data Response. The crossing methods listed in table 2.3-12 correspond with those listed for the same waterbodies in table 2A-1 and table 2A-2. Of the 19 impaired streams listed in table 2.3-12, four (4) may contain contaminated sediments related to mercury and two (2) may contain contaminated sediments related to polychlorinated biphenyl (PCBs). The proposed pipeline crossing methods for all waterbody crossings include dry crossings (cofferdam, flumed, or dam and pump), conventional bore, or HDD. PennEast is not proposing any wet crossings, which will avoid or minimize the potential suspension of contaminated sediments. The specific crossing methods for streams that may contain contaminated sediments are described below.

HDD Crossings and Related Agency Consultation

PennEast proposes to cross four (4) of the six (6) impaired streams that may contain contaminated sediments using HDD: Wild Creek/Beltzville Lake, Pohopoco Creek/Beltzville Lake, Lehigh River, and Delaware River. By using this trenchless crossing technique, direct impacts to the stream and river bottoms should be avoided and contaminated sediments that could adversely impact water quality should remain undisturbed. In the event that an inadvertent release occurs within the waterbody during HDD construction, PennEast will implement its Inadvertent Release and HDD Contingency Plan

and dispose of any potentially contaminated mud or sediment at an approved facility capable of accepting PCBs or mercury. PennEast addressed the impaired statuses of the three (3) waterbodies located in Pennsylvania and the Pennsylvania portion of the Delaware River crossing as part of the Environmental Assessments contained in PennEast's Joint Permit Applications (JPAs) with the Pennsylvania Department of Environmental Protection (PADEP) and the United States Army Corps of Engineers (USACE), submitted on February 5, 2016. PennEast also submitted site-specific crossing drawings and its Inadvertent Return and HDD Contingency Plan with the JPAs. At this time, PennEast has not received technical comments on the JPAs.

The New Jersey portion of the Delaware River crossing will require a Flood Hazard Area Control Act (FHACA) Individual Permit application. The proposed HDD crossing methodology will be discussed with the NJDEP as part of the pre-application process for the Project's Clean Water Act Section 401 and 404 permits. Mitigation measures for dealing with contaminated sediments in the event of inadvertent returns will be addressed for the FHACA application, and will be in accordance with NJDEP's Linear Construction Technical Guidance document.

Dry-Ditch Method (Open Cut; Dam & Pump-Around) Crossings and Related Agency Consultation

The remaining two (2) streams that may contain contaminated sediments are the Susquehanna River and Jacobs Creek. These waterbodies will be crossed using cofferdams and the dam and pump method, respectively. By implementing dry crossing techniques, the workspace will be isolated from the stream during construction as stream flow is diverted or pumped around the workspace. Stream flow will only be restored once the crossing is constructed and the stream beds and banks are restored. Isolating these areas from stream flow will minimize suspension of any contaminated sediment during construction.

Prior to construction, PennEast will sample sediment within the proposed workspace at the Susquehanna River. The samples will be collected, sent to an approved laboratory, and analyzed for PCB concentration. In the event that PCBs are found to be present within the Project area, PennEast will consult with the appropriate agencies to determine whether the level of concentration present would warrant PennEast to take additional precautions to prevent releasing PCBs into the water column. PennEast presented this sampling plan in the Environmental Assessment submitted to the PADEP and USACE in PennEast's Luzerne County JPA. PennEast also submitted a site-specific crossing plan with its Luzerne County JPA.

Prior to construction, PennEast will sample sediment within proposed Jacob's Creek workspace. The samples will be collected, sent to an approved laboratory, and analyzed for potential contaminated sediment. In the event that contamination is identified in the workspace, PennEast will consult with the appropriate agencies to determine whether the level of concentration present that would warrant PennEast taking additional precautions to prevent releasing the contaminated sediment into the water column. PennEast will discuss the proposed Jacob's Creek crossing with the NJDEP as part of the pre-application process for the Project's Clean Water Act Section 401 and 404 permits. Mitigation measures for dealing with contaminated sediments if encountered will be addressed in the FHACA application, in accordance with NJDEP's Linear Construction Technical Guidance document.

Recommended Mitigation Item 26

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary the special construction methods that it will implement during construction in extremely saturated wetlands. If additional workspace is required at the saturated wetlands along the pipeline alignment, PennEast shall identify these in a table and provide site-specific justification for the additional workspace. (*Section 4.4.2*)

Response to Recommended Mitigation Item 26

As identified in Section 4.4.2 of FERC's Draft Environmental Impact Statement (DEIS), PennEast is aware that extremely saturated soils have been identified in the wetland immediately south of Interstate 80 (wetland 102314_JC_002_PSS). Based on this information and the results of preliminary exploratory geotechnical investigation, PennEast intends to cross this wetland using the HDD method. PennEast is developing a proposed crossing design based on the remaining geotechnical investigations. Since PennEast intends to cross this wetland using an HDD, no additional workspace is required at the saturated wetlands along the pipeline alignment.

At this time, PennEast is not aware of any other wetlands with extremely saturated soils. Should additional wetlands be identified, PennEast will utilize either the HDD or "push-pull" techniques, depending on the surrounding geotechnical conditions and topography. PennEast described the HDD installation technique in Resource Report 2, Section 2.3.2.2 of its September 24, 2015 Certificate Application Filing (September 2015 Application). The push-pull technique is described herein.

Push-Pull Technique

PennEast may cross extremely saturated (or "inundated") wetlands using the push-pull technique. The push-pull technique is used in large wetland areas where sufficient water is present for floating the pipeline in the trench and grade elevation over the length of the push/pull area. It will not require damming to maintain adequate water levels for pipe floatation. Push-pull techniques involve pushing the prefabricated pipe from the edge of the wetland or pulling the pipe with a winch from the opposite bank of the wetland into the trench. During implementation of this technique, initial clearing within the wetland will be minimized. The width of the right-of-way (ROW) cleared will be limited to only that necessary to install the pipeline.

Grading in inundated wetlands will be held to a minimum and generally will not be necessary due to the level topography and the absence of rock outcrops in such areas. Timber mats may be placed over existing vegetation where grading is not required. Trees and brush will be cut at ground level by hand, with low ground pressure equipment, or with equipment supported by timber mats. PennEast will not use dirt, rock, pulled tree stumps, or brush rip-rap to stabilize the travel lane and sediment barriers will be installed prior to grading, as needed, to protect adjacent wetland areas.

The trench for a push-pull installation, will be excavated using amphibious excavators (pontoon mounted backhoes) or tracked backhoes (supported by fabricated timber mats or floats). The excavated material will be stored adjacent to the trench (if possible). If storage of excavated material next to the trench is not possible, the material will be temporarily stored in one of the following locations: (1) in upland areas of the ROW as near to the trench as possible; (2) in construction vehicles; or (3) transported to an approved off-site staging location until needed for backfilling. The pipe will be stored and welded at staging areas (push-pull sites) located outside the wetland. Floats may be attached temporarily to give the pipe positive buoyancy.

After floating the pipe into place, these floats will be cut and the negatively buoyant pipe will settle to the bottom of the ditch. This operation will be repeated, with pipe sections fabricated, pushed into place, and welded together, until the wetland crossing is complete. The excavated material will then be placed over the pipe to backfill the trench and wetland restoration will take place.

Recommended Mitigation Item 32

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary the measures or changes that it will implement to the Project's design in order to ensure that the Project is consistent with the FWS requirement to avoid all bat hibernacula by at least 0.25 mile. PennEast shall also provide documentation of the consultation with the FWS on this restriction. (*Section 4.6.1.1*)

Response to Recommended Mitigation Item 32

PennEast continues to coordinate with the United States Fish and Wildlife Service (USFWS) Pennsylvania Regional Office (PA) and the Pennsylvania Game Commission (PGC) regarding bat concerns. PennEast held a teleconference with Ms. Pamela Shellenberger, USFWS (PA), on August 15, 2016. During this call, PennEast requested the USFWS' input on the status of their impact review for bats and discussed avoidance and minimization measures related to the known hibernacula. Related correspondence with the USFWS on this issue, including a summary of the most recent telecommunication, is provided in Attachment 4. Ms. Shellenberger noted that the USFWS now has the additional information that it requested in a May 2016 communication. There are two (2) primary areas of potential concern relative to bat hibernacula: Tunnel 34 and the Durham Caves (#1 and #2).

Tunnel 34

After reviewing PennEast's maps and figures provided, Ms. Shellenberger concurred that the Project's work area is outside of the 0.25-mile buffer for bat hibernacula. It does not appear that there are any underground mines or caves that could affect bats, based on the database information. Ms. Shellenberger stated her intent to consult with PGC with respect to this hibernaculum and its underground extent. With respect to tree clearing, no impacts are anticipated here, and the Project is expected to comply with the USFWS's finalized rule under section 4(d) of the Endangered Species Act of 1973 (Final 4(d) Rule), effective February 16, 2016, regarding protections for the northern long-eared bat. PennEast continues to coordinate with the USFWS regarding potential minimization measures, which may include seasonal restrictions on drilling, boring, or blasting in this vicinity (i.e., activities would need to take place outside of the hibernation season, which is expected to be November 1 through March 31 based upon the summer roosting season), vibration monitoring, and, if access is available, temperature/humidity monitoring before, during, and after construction to assess potential underground impacts to the hibernacula.

Durham Caves

The USFWS is assuming that northern long-eared bats are present in the Durham Caves, regardless of outside factors (i.e., white-nose syndrome). Tree clearing is not expected to impact the Durham Caves, as the proposed HDD work area and pipeline is primarily within an active agricultural field, and would be in compliance with the Final 4(d) Rule. USFWS concurs that existing farming activities may cause certain levels of vibration within the Durham Caves and will likely request monitoring, as noted above, to assess existing levels and compare to construction vibration data in order to determine impact or effect. Per their request, PennEast will provide USFWS with reports of seismology studies conducted near the hibernacula. In addition, PennEast is assisting with coordination with property owner(s) relative to background information about the caves.

To support a finding that the Project is not likely to adversely affect the northern long-eared bat in the bat hibernacula located within 0.25 mile of the Project work area, PennEast continues to coordinate with USFWS regarding potential minimization measures, which may include seasonal restrictions on blasting, drilling, or boring, as described above, as well as vibration monitoring, and, if access is available, temperature/humidity monitoring before, during, and after construction to assess potential underground impacts to the hibernacula. PennEast will file with FERC the construction and mitigation measures that it will implement in order to ensure that the Project is consistent with USFWS requirements. PennEast will also provide further documentation of the consultation with USFWS on these restrictions.

Recommended Mitigation Item 42

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary any route adjustments, workspace modifications, or mitigation measures developed through PennEast's ongoing consultations with landowners regarding the following planned and/or pending projects:

- a) Fields at Trio Farms Subdivision;
- b) Huntington Knolls, LLC Housing Development; and
- c) Hopewell Township Emergency Services Facility.

PennEast shall provide documentation of correspondence with these landowners. PennEast shall either incorporate these deviations or a route that avoids the resources of concern, or otherwise explain how potential impacts on resources have been effectively avoided, minimized, or mitigated. (*Section 4.7.3.2*)

Response to Recommended Mitigation Item 42

Proposed Development "Fields at Trio Farms Subdivision"

PennEast provided a history of its correspondence with the land developer of the Fields at Trio Farms Subdivision in its May Data Response to Data Request 8-5. As stated in that response, PennEast obtained a copy of the development plans for the planned subdivision to aid in determining route modifications to minimize impacts to the proposed development plans. Based on review of the proposed development plans, PennEast is evaluating and finalizing a minor route modification to relocate the proposed pipeline by approximately 85 feet to the east. PennEast will file the figures, alignment sheets, and tables related to this and other route modifications in a September 2016 filing. This route modification will reduce the amount of proposed permanent easement on the developable lots of the Fields at Trio Farms Subdivision. Based on the concerns raised by the developer that PennEast has been made aware of, as described in the May Data Response, it is PennEast's understanding that the route modification addresses those concerns.

Huntington Knolls, LLC Housing Development

As described in PennEast's May Data Response to Data Request 8-6, PennEast has communicated with the Huntington Knolls, LLC Housing Development landowner primarily through in-person meetings and phone conversations, beginning with initial contact in August 2014. After several conversations and in-

person meetings to discuss various routing options and the landowner's development plans, PennEast evaluated and adopted several route modifications to avoid conflicts with the proposed development in this area at the landowner's request (filed as Deviation Nos. 51-54 of Appendix P in PennEast's September 2015 Application). These adopted route modifications avoid impacts to the landowner's development plans and address the landowner's concerns about which PennEast is aware.

Hopewell Township Emergency Services Facility (Emergency Services Facility)

As described in PennEast's May Data Response to Data Request 8-7, PennEast had an in-person meeting with the Hopewell Township Administrator and solicitor to discuss the planned development of the Emergency Services Facility. Since that meeting, Hopewell Township has not contacted PennEast with any additional concerns regarding future development of the Emergency Services Facility.

Based on the proposed conceptualized sketch of the Emergency Services Facility located on Hopewell Township Tax Block 91, Lot 3.02 filed in this proceeding (FERC accession number 20151215-5202), PennEast is proposing to change the construction method on Lot 3.02 to allow flexibility in the pipeline installation methodology, as depicted in Attachment 5. PennEast has changed the proposed HDD that crossed the CSXT railroad tracts at mile post (MP) 112.3 to be a conventional bored crossing. By implementing this change, workspace flexibility is optimized on Block 91, Lot 3.02. Additionally, PennEast has located the proposed pipeline centerline approximately 10 feet inside an existing powerline easement, thus requiring only 15 feet for a proposed permanent easement outside of the existing powerline easement. PennEast currently has a typical construction workspace configuration across Block 91, Lot 3.02 for pipeline installation. However, if the Emergency Services Facility is constructed before the PennEast Pipeline is constructed, PennEast will coordinate with Hopewell Township to develop a reduction in workspace to minimize disruption to the Emergency Services Facility. This would include, but not be limited to, reducing the temporary workspace and additional temporary workspace to avoid the Emergency Services Facility access driveway and communication tower. Based on the concerns raised by Hopewell Township that PennEast has been made aware of, it is PennEast's understanding that the modifications described above address those concerns.

Recommended Mitigation Item 43

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary an update of the status of the development of the site-specific crossing plans for each of the recreation and special interest areas listed as crossed by the Project or otherwise affected in appendix G-14. The site-specific crossing plans shall include, as applicable:

- a) site-specific timing restrictions;
- b) proposed closure details and notifications (e.g., reroutes, signage, public notices);
- c) specific safety measures; and/or
- d) other mitigation to be implemented to minimize effects on the recreation areas and their users during construction and operation of the Project. (*Section 4.7.5*)

Response to Recommended Mitigation Item 43

PennEast has developed site-specific crossing plans for the public recreation and special interest areas listed in Appendix G-14 and for three (3) additional privately-owned recreation/special interest areas that were not included in Appendix G-14: Blue Mountain Ski Area, Calvary Baptist Church, and Jacob's Creek Trail.

There are several county- and municipal-owned lands listed in Appendix G-14 that are not recreation areas but have been acquired by counties and municipalities to improve existing land uses, increase quantities of preserved lands, and provide protection to public water supply reservoirs. As these lands have not been designated as recreation areas, PennEast does not anticipate having to employ timing restrictions, closures, or property-specific safety measures beyond what will be employed for the overall Project and has not created site-specific crossing plans for such preservation areas.

Site-specific crossing plans for all designated recreation areas are provided herein as Attachment 6. PennEast continues to work with public and private landowners to determine mitigation measures that will minimize impacts during Project construction and operation. Mutually-agreeable mitigation measures will be finalized during the licensing process.

Recommended Mitigation Item 45

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary documentation of USDA approval for construction and operation of the Project within any and all parcels affected that have active USDA conservation easements. Alternatively, PennEast shall identify any Project changes made to avoid parcels with USDA conservation easements, and include documentation of consultation with the USDA that confirms avoidance of USDA conservation easements. (*Section 4.7.5.4*)

Response to Recommended Mitigation Item 45

Pennsylvania

PennEast reached out to Ms. Hathaway Jones with the Pennsylvania Natural Resources Conservation Service (NRCS) on June 16, 2016 to discuss the parcel identified in DEIS Section 4.7.5.4 that is encumbered by a United States Department of Agriculture (USDA) Farm and Ranch Land Protection Program easement. Ms. Jones stated that, as long as PennEast will have a standard construction corridor without staging yards or access roads, the NRCS finds the route to be acceptable and will allow PennEast to cross the parcel. Accordingly, PennEast is maintaining the proposed alignment for that parcel.

PennEast notes that the DEIS identifies a second property in Pennsylvania with a USDA easement; however, the second parcel is the same as the one discussed with Ms. Hathaway, as described above, and there are no other parcels in Pennsylvania with USDA easements that will be impacted by the PennEast Project.

New Jersey

PennEast has been in communication with the New Jersey division of the USDA throughout Project development. PennEast is evaluating and finalizing a route modification to avoid the USDA-encumbered parcels in New Jersey. PennEast will file the figures, alignment sheets, and tables related to this and other route modifications in a September 2016 filing. That filing will also include documentation of PennEast's consultation with the USDA that confirms that PennEast's route modifications will avoid the New Jersey parcels encumbered with USDA easements.

Recommended Mitigation Item 53

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary proposed mitigation measures to minimize noise levels associated with emergency or maintenance MLV blowdown events. Mitigation measures may include but not be limited to use of a silencer, restricting maintenance blowdowns to daytime hours only, and/or notifying landowners in the immediate area of the planned blowdown event. (*Section 4.10.2.3*)

Response to Recommended Mitigation Item 53

PennEast addressed noise mitigation associated with maintenance MLV blowdown events in its Supplemental Responses to FERC's February 10, 2016 Data Request and the April Data Request, filed on August 5, 2016 (August Supplemental Data Response). With respect to emergency blowdown events, PennEast will need to take immediate action to resolve the emergency event, and to the extent practicable, PennEast will implement the mitigation measures associated with maintenance blowdown events described in PennEast's August Supplemental Data Response.

Recommended Mitigation Item 54

Prior to the end of the draft EIS comment period, PennEast shall file with the Secretary a complete noise analysis of the Project metering (interconnect) stations using the best available typical design or vendor specification with regards to impacts on the closest identified residences/NSA as shown in table 4.10.2-10. (*Section 4.10.2.3*)

Response to Recommended Mitigation Item 54

PennEast filed a complete noise analysis of the Project's metering (interconnect) stations using the best available typical design with regards to impacts on the closest identified residences/NSA, as shown in table 4.10.2-10 of PennEast's August Supplemental Data Response.