



August 15, 2016

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

Re: Docket CP15-558-000 – Proposed PennEast Pipeline Project

Dear Ms. Bose:

I am writing this letter on behalf of the Sourland Conservancy, an intervenor in this proceeding. The Sourland Conservancy's mission is to protect, promote and preserve the unique character of the Sourland Mountain region, through which the proposed PennEast Pipeline will cut a devastating path. The Conservancy is located in Hopewell, NJ in Mercer County. The Sourland Mountain region lies, within Somerset, Hunterdon and Mercer Counties.

I urge FERC to reconsider your issuance of this DEIS at this time and **withdraw the DEIS**. FERC has a responsibility to receive all the necessary factual data to evaluate this project before reaching any conclusions about its viability or advisability. We have extensively detailed the massive impacts this project will have in our communities, our water supply, our environment, our economy and our region, through testimony at FERC scoping hearings, FERC Open Houses and thousands of comments to FERC.

Currently, PennEast has failed to provide all the required environmental data for its application. Therefore, the DEIS is premature. In addition to withdrawing the DEIS, I urge you to **extend the public comment period** so the public has ample opportunity to review and comment on the data once it is provided by PennEast.

I am commenting on the PennEast Draft Environmental Impact Statement (DEIS). In this letter, in particular, I will focus on the following sections in the Executive Summary: Introduction and Environmental Impacts and Mitigation-Water Resources and Wetlands. First, I will state the text of concern in the DEIS; this will be followed by my comments and questions *in italics*.

## **Executive Summary: Environmental Impacts and Mitigation-Water Resources and Wetlands**

“Because **surveys along the Project route are not yet complete**, we are recommending that, prior to construction, PennEast Provide a revised list of water wells and springs within 150 feet of any construction workspace (500 feet in areas characterized by Karst terrain) based on completed surveys.”

*Comment/question:*

*What if it is not possible for PennEast to provide the revised list due to inability to survey caused by landowners refusing access to property? Why are you using the words “prior to construction” – this indicates that approval is a given. Why don't you use words like “as a requirement for and prerequisite to approval?”*

“Based on our analysis, we conclude that the Project **is not expected** to significantly impact groundwater, surface water, or wetland quality or quantity during construction or operation with implementation of PennEast's proposed mitigation measures as well as our recommendations.”

*Comment/question:*

*An analysis of a Project of this magnitude with so much potential to harm human health and safety and irreparably damage sensitive environmental areas should not include words like “...is not **expected** to significantly impact.” FERC should require PennEast to demonstrate that the Project will NOT impact groundwater, surface water, etc. Furthermore, how can any conclusion be based on an analysis of incomplete data. The DEIS states that “surveys along the Project route are not yet complete.” This DEIS should be withdrawn as it is not based on actual field survey data in all required areas. Vernal pools are an integral part of the Sourland ecosystem and incomplete data is not acceptable. Regarding Vernal Pools: The Natural Resources Inventory for the Sourlands (included in the Smart Growth Planning and Management Project for the Sourland Mountain-funding provided by NJ Dept of Community Affairs, 2005) states that “The region also supports diverse populations of amphibians and reptiles. Critical to the continued success of amphibian populations in particular are vernal pools... One study of a vernal pool in the Sourland region revealed that no less than 500 spotted salamanders and 700 wood frogs visited one pond to breed (Heilferty)... The Heilferty study found that individuals had come from as far as 600 yards from the pool under observation; as such, the maximum wetland buffer of 150 feet for exceptional resource value wetlands would do little to protect the critical area surrounding a vernal pool.” Most vernal pools in the Sourlands are not documented. Combine that fact with the fact that PennEast's survey data is incomplete and it is a certainty that vernal pools and their dependent amphibians and reptiles (critical components of the Sourland ecosystem) will be devastated by this Project.*

On behalf of the Sourland Conservancy, I respectfully and vehemently ask that FERC withdraw its Draft EIS, demand the actual field survey data in all required areas and

actually listen to the many diverse yet unified voices impacted by this destructive project.

Finally, It is clear from the DEIS that thousands of pages of comments already submitted are being ignored. I am expecting a written response to my comments.

Sincerely,

Caroline Katmann  
Executive Director  
Sourland Conservancy  
[ckatmann@sourland.org](mailto:ckatmann@sourland.org)  
609-309-5155  
www.sourland.org