



August 24, 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 particular, I am submitting an analysis made by a Sourland Conservancy Board Member, Jim Amon. Mr. Amon was the first executive director of the D & R Canal Commission and also served as Land Steward for the D & R Greenway. The Sourland Conservancy endorses Mr. Amon's analysis, which is as follows:

“Your staff has compiled an impressive amount of data in the Draft Environmental Impact Statement for the above-referenced document. There are, of course, a number of errors of fact, two examples of which are:

- The pipeline will traverse the Piedmont geological province in New Jersey as well as the Inner Coastal Plain.
- The inventory of wildlife in New Jersey to be impacted is stunningly incomplete. Fewer than 50 species of birds?!!; no salamanders?!!; no box turtles?!!; is it unnecessary to list insects despite my knowledge of the presence of dragonflies and butterflies of special concern?!!; etc. This report needs much work to fully list the wildlife species that will be impacted.

“The real problem with the report is that it is based upon assumptions that reveal an appalling lack of field experience with construction projects and/or a bias in favor of approving the project. Reading the Draft EIS is like reading a document prepared for academic purposes only. All the boxes are checked but that does not mean the report actually reflects what will happen in the field. I spent 30 years overseeing construction projects in a New Jersey State park that includes a 60 mile-long historic canal that is now a water supply system. I can assure you that however voluminous the EIS, there will be many things that will go wrong during construction. PennEast should be required to place a substantial escrow to cover unexpected damages. An example is their plan to use HDD to put the pipe under bodies of water. Have they done soil borings to be sure that there are no large boulders that cannot be drilled or that bedrock will not interfere with the drilling route? (I could not find any account of these borings if they were made.) On at least two occasions attempts to drill under the canal in “my” park were unsuccessful because borings did not precede drilling. The consequences were extensive environmental damage.

“Another assumption that is totally wrong is reflected in the assertion that the construction would impact 1,613.5 acres of land. I could not find in the DEIS how this figure was determined but my calculations led me to conclude that it reflects a 60 foot-wide corridor for the length of the pipeline. Elsewhere in the DEIS, reference is made to “edge effect” when a corridor through forests is cut, yet if my calculations are correct no edge effect is taken into account when calculating the amount of forest that will be impacted. There is not a scientific consensus on the precise distance into the forest that is impacted from a cut but many scientists have agreed that a minimum distance is 250 feet. That would mean that to determine the amount of land that would be impacted by this project a corridor in forested areas of 560 feet should be used instead of a 60-foot corridor.

“There is an assumption that in New Jersey forests that have been preserved by the Green Acres program are the only forests of significance. My reading of the DEIS is that for Green Acres forests there would be planting of native trees (How about the rest of the forest? Forests are not just trees; forests also include understory trees, shrubs, herbaceous plants and soil fungi. Are any of these things that would be lost in a cut to be re-planted? Why not?) Other forests, according to the DEIS would be restored by volunteers. A distinction between Green Acres land and other forested land is totally unjustified.

“There is an assumption that if PennEast files an Invasive Species Management Plan it will be complied with. They should also deposit an escrow to assure compliance with the plan. Further, it seems clear that this plan would only cover invasive species control during construction. New Jersey is such a highly disturbed landscape that this cut will open ground for invasive species to colonize long after construction is completed. Control should be extended for 10 years after construction. (Another reason to have an escrow to cover this cost.)

“On page 4-77 there it is stated that impacts on forested areas would be long-term, which is defined as more than 30 years. Thirty years is just the beginning of the impacts of this cut. A hundred years would be closer to adequate but even that would not always be enough. Reference is made to soil compaction by construction vehicles so the preparers of this report know about that. How many centuries do you think it will take to overcome that impact?

“By far the most appalling assumption leads to your conclusion that the project should be approved because PennEast’s objectives could not be met if the no-build alternative is adopted. (page ES-15) Their objective is simple and understandable as the objective of any for-profit corporation. It is to make money. But why do you not consider the objectives of the people who live in central New Jersey. Our objective is to preserve ecological values that make our lives more meaningful and more enjoyable. Despite your conclusions in the DEIS, that objective cannot be met if PennEast’s desire to make money through this project is realized. Our landscape will be further despoiled by this project. I assume that those of you who prepared this plan and who must decide if the project will be constructed are public servants. You are employed by the citizens of this country to represent their interests as well as those of big corporations. If you think it is impossible to determine the interests of the citizens then drive around and see all the signs in yards that urge the denial of this project. (I have yet to see a single yard sign urging construction.) If that seems too imprecise then consider that fact that all of our elected officials at the local level have passed resolutions against the project. At least one of the affected municipalities or counties in New Jersey would not have passed these opposing resolutions if the elected officials thought that their constituents were in support of the proposed pipeline. None have hesitated. In hopes that you will do what is right for the people of this area, I am, yours sincerely, James C. Amon.”

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 ([www.sourland.org](http://www.sourland.org))  
[ckatmann@sourland.org](mailto:ckatmann@sourland.org)  
609-309-5155