

August 15, 2016

Comments of Marilyn J. Jordan PhD  
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Re: Docket #CP15-558-000  
PennEast/UGI Pipeline-DEIS

I have a PhD in Plant Ecology from Rutgers-The State University, NJ. I Retired from The Nature Conservancy (TNC) on Long Island, NY as a Senior Conservation Scientist in 2014. The mission of TNC "...is to is to conserve the lands and waters on which all life depends" which includes nature and people. I moved to Bethlehem Township in 2015.

I am also on the Board of Directors of the Wildlife Information Center, a conservation organization with a mission of restoring and protecting ecosystems in Carbon, Lehigh and Northampton Counties, the Kittatinny Ridge in eastern PA, and beyond. My comments today reflect the position of the Wildlife Information Center unless stated otherwise.

There are a great many reasons for rejecting construction of the PennEast natural gas pipeline as now proposed including:

1. The PennEast Draft Environmental Impact Statement (DEIS) is missing so much information that it should be considered incomplete.
2. The pipeline project does not meet a public need. Customers in Pennsylvania and New Jersey are already getting ample natural gas through other pipelines, so the PennEast pipeline is not needed.
3. Natural gas customers' bills will increase in order to pay for pipeline construction and maintenance costs.
4. Meanwhile the pipeline company will make greater profits. The pipeline appears designed to enable exporting natural gas overseas via a proposed Liquid Natural Gas port in Philadelphia. The origin of the gas could be already available gas displaced by gas transported using the proposed PennEast Pipeline. Thus the claim that the pipeline will meet the needs of natural gas consumers in Pennsylvania and New Jersey is disingenuous.
5. Eminent domain is not a justifiable reason for seizing private property for a pipeline that does not meet requirements for serving the public good.
6. A transparent and open evidentiary hearing is needed to determine whether or not the pipeline really serves a public good that justifies losses to property owners.

7. The proposed pipeline route is completely inappropriate and would cause serious environmental damage along its entire 120 mile length. The pipeline would cross more than 40 wetlands, more than 30 parks, two major rivers and more than 80 streams in Pennsylvania and New Jersey. Many of these streams are designated high quality by PA or NJ. It also would cross the Kittatinny Ridge (an important wildlife corridor with extensive forests), numerous protected areas, preserved farmland and intact forests. The permanent pipeline right-of-way would be generally be 50 feet wide, with claimed reductions of the maintained right-of-way when crossing forests and streams (<http://penneastpipeline.com/proposed-route/>). Damage from construction would likely extend more than 50 feet. The right-of-way would be a gash across previously intact forests, cutting them into smaller fragments. These reduced areas would have an increased length of disturbed edges that would subject the forest fragments to altered microclimate and invasion by damaging non-native species.
8. There is already a transcontinental pipeline that starts and finishes at nearly the same locations as would the proposed PennEast pipeline. Thus the PennEast pipeline could be co-located along the same route as the existing pipeline and/or along the many other existing rights-of-way including roads and transmission lines. There would then be no need to cut a new route for the Penn pipeline. Damage to the environment, public parklands, wetlands, streams, farmlands and natural areas, and private property owners from constructing a new right-of-way would be avoided.
9. If FERC permits the construction of the Penn East pipeline (with new and/or expanded rights-of-way) FERC should require an adequate management plan – and funding – in perpetuity. The DEIS only calls for a one-time planting of grass along the rights-of-way with no provision for monitoring or future management. This is unacceptable. I have had many decades of conservation and land management experience, and years spent dealing with invasive species. I also had experience with revegetation of the barren, zinc contaminated areas at Lehigh Gap through my past PhD research (Buchauer 1971, Buchauer 1973, Jordan 1975), subsequent consulting work, and recent efforts of The Wildlife Information Center. I know from this experience that damaging non-native species will invade the disturbed soil in the rights-of-way and invade adjacent natural areas, degrading ecological integrity and habitat value for wildlife.

I conclude by expressing my own personal concerns about the dangers to our global climate of continued and expanded extraction of fracked natural gas, and continued use of all fossil fuels. We are fast approaching, or may already be at, a tipping point where any additional burning of fossil fuels will result in catastrophic climate changes. My concerns are shared by the overwhelming majority of scientists worldwide.

Natural gas is touted as “clean energy” for the near future but this claim is misleading. The primary component of natural gas is methane, which is 34 times stronger than CO<sub>2</sub> at trapping heat over a 100-year period and 86 times stronger over 20 years. Methane leakage during drilling, extracting and transport of natural gas ranges from 1 to 9 percent of total life cycle emissions. When these “fugitive” methane emissions are taken into account the global

warming potential of natural gas over its total life cycle is often comparable to – or greater than – that of coal or oil.

Given all the very serious impacts of extracting, transporting and burning natural gas it is clear that we don't need any more shale gas, and we certainly don't need another pipeline.

Citations:

Buchauer, M.J. 1971. Effects of zinc and cadmium pollution on vegetation and soils. Ph.D. Thesis, Rutgers - The State University, New Brunswick, New Jersey. [Buchauer was a former last name of Marilyn Jordan]

Buchauer, M.J. 1973. Contamination of soil and vegetation near a zinc smelter by zinc, cadmium, copper and lead. *Environ. Sci. Technol.* 7:131-135. [Buchauer was a former last name of Marilyn Jordan]

Jordan, M.J. 1975. Effects of zinc smelter emissions and fire on a chestnut oak woodland. *Ecology* 56(1):78-91.