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September 12, 2016

Mr. Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

**Re: PennEast Pipeline Project – Draft Environmental Impact Statement
Docket No. CP15-558-000**

Dear Mr. Davis:

The Lehigh Valley Planning Commission (LVPC), at its regular monthly meeting on August 25, 2016, reviewed the above-referenced document. The LVPC has served as the official regional planning organization for Lehigh and Northampton counties since 1961. The LVPC maintains a comprehensive plan for the two counties titled *Comprehensive Plan The Lehigh Valley...2030 (Comprehensive Plan)* that provides a regional framework for protecting natural and agricultural resources, guiding the location and intensity of development, and matching land development with appropriate infrastructure. The General Land Use Plan component of the *Comprehensive Plan* identifies four categories of land use that are all traversed by the proposed pipeline: natural resources, farmland preservation, rural development and urban development.

The proposed PennEast Pipeline enters Northampton County in Lehigh Township near Little Gap along the Kittatinny Ridge, locally known as Blue Mountain. The pipeline route continues through portions of Moore, East Allen, Upper Nazareth, Lower Nazareth, Bethlehem, Lower Saucon and Williams townships. According to the draft Environmental Impact Statement (EIS) prepared by the Federal Energy Regulatory Commission (FERC), the Project will impact approximately 670 acres in Northampton County: 350 acres in Agriculture, 152 acres in Forest/Woodland, 35 acres in Open Land, 23 acres in Residential, 112 acres in Industrial/Commercial and 0.5 acres in Open Water.

PennEast indicates that it will obtain all necessary federal and state permits and will follow all federal and state regulations as required. We note that the impacts of the Project are not fully known at this time because a number of surveys and plans have not been completed or finalized, such as for water supply wells, groundwater seeps and springs, water body crossings with steep slopes, and proposed crossing methods for all impaired waterbodies.

We offer the following comments on the proposed PennEast Pipeline draft EIS based on the *Comprehensive Plan* goals, policies and strategies related to the specific features that the proposed pipeline intersects or is proximate to in Northampton County.

- **Kittatinny Ridge:** One of Pennsylvania's important landscapes, the Kittatinny Ridge (Ridge) is over 330,000 acres, covering a 185-mile stretch from the Delaware River to the Mason-Dixon Line. The Ridge is an important natural area, the scenic backdrop to Northampton County, home to the internationally known Appalachian Trail, and is

recognized as one of the major East Coast fall flyways for migrating raptors. The location of the proposed pipeline does not appear to have been adjusted to reduce the impacts to the interior woodlands found on the Ridge.

- **Wetlands:** The *Comprehensive Plan* states that *wetlands* should be preserved as 100% permanent open space. The proposed pipeline route crosses two wetlands as identified in the National Wetland Inventory. According to the draft EIS, the Project would also impact several vernal pool areas within the proposed pipeline right-of-way in Lehigh Township, Northampton County. Approximately 0.12 acres of vernal pool habitats would be affected by construction of the Project, with 0.10 acres permanently impacted during operation, however; these vernal pools have not been surveyed to date.
- **Woodlands:** The *Comprehensive Plan* states woodlands that have important environmental significance should be protected or preserved. When development is planned for wooded tracts, site design and development should maximize the preservation of trees. The proposed pipeline route crosses several woodland areas, primarily in Lehigh, Moore, Lower Saucon and Williams townships and crosses four interior woodland areas (Lehigh, Moore, Lower Saucon and Williams townships). The draft EIS states that PennEast routed the proposed pipeline to avoid areas containing large, interior forested stands where possible, or when forests could not be avoided, proposed routing was accomplished by locating the pipeline as far from the interior portion of the forest as practicable to maximize preservation of interior forest habitat. The proposed pipeline route still does not avoid these areas as listed above.
- **Natural Heritage Areas:** The *Comprehensive Plan* recommends preservation of open space and important natural areas. The proposed pipeline route was not adjusted to avoid two Core Habitat areas: 1) Neffs Ponds, Lehigh Township, Spotted Pondweed endangered plant, last recorded in 2012, and 2) Slatefield Wetlands, Lehigh and Moore Townships, Herbaceous vernal pond natural community and Goldenclub rare plant, both last documented in 2012.
- **Conservation easements:** The proposed pipeline route was not adjusted to avoid or minimize the impact on two conservation easement properties in Williams Township, the one being completely bisected by the route. These two properties are not listed on Table G-17.
- **Proposed Greenways:** The EIS does not have a section about impacts to greenways. The LVPC designated 21 greenways in Northampton County in its *Lehigh Valley Greenways Plan (2007)*, nine of which are crossed by the proposed pipeline route. Greenways are important components of a landscape and have several benefits, such as protecting the environment; providing safe, alternate routes as part of a multimodal transportation system; providing recreational opportunities; and connecting natural and cultural areas.
- **Sewer and water facilities:** We urge PennEast and FERC to continue to work with the Bethlehem Authority to minimize construction and operation impacts to the Authority watershed and water supply infrastructure, which are critical to providing a potable water supply to over 100,000 people within the region.

- **Historic Resources:** The draft EIS did not address potential adverse effects on historic or archaeological resources that may be present in one of the oldest settled areas in the Commonwealth and of known paleological significance.
- **Large Parcel Crossings:** The proposed pipeline route often disregards parcel boundaries, crossing through the interior of twelve parcels in Northampton County that measure at least 50 acres in area. Of particular concern is the fact that one of these large parcels—along Hope Road in southeastern Bethlehem Township—is designated for urban development in the *Comprehensive Plan*. The LVPC recognizes that large parcels in Urban Development are generally suitable for high intensity uses or land development. Crossing parcel interiors has the potential to limit their use and productive yield, and thus significantly diminish their value. The loss of value of a large parcel could exert a particularly negative impact on the tax base of that respective municipality. Thus, the LVPC recommends that the applicant work with local planners to devise a path that traces the edge of parcel boundaries, minimizing intrusion on potential future development sites.
- **Transportation projects:** PennEast should coordinate pipeline construction activities with PennDOT for the three projects within the pipeline pathway that are on the current Transportation Improvement Program (TIP) as follows:
 - SR 33 Median Barrier – Involves the installation of a median barrier or guiderail along State Route 33 between milepost 1.4 to milepost 16 in Bethlehem Township, Lower Nazareth, Palmer Township, Bushkill Township, Plainfield Township, Wind Gap, and Stockertown.
 - SR 248 Alignment – Realignment of Northampton Street to its intersection with Main Street as Route 248, reducing the number of turning movements in the Borough.
 - SR 248 Monocacy Creek Bridge – Replacement of the bridge carrying State Route 248 over the east branch of Monocacy Creek.
- **Transportation planning:** The pipeline will route under several local roads and larger arterials. PennEast should collaborate with municipalities regarding construction schedules and use best available construction methods to assure minimal disruption to all roadways. PennEast intends to develop a Traffic Management Plan that would be filed with FERC prior to issuance of the final EIS. It is recommended that this Plan be shared with the LVPC, PennDOT District 5 and the impacted municipalities for review and comment prior to filing with FERC.

Additionally, the proposed pipeline route will also intersect the following features. According to the EIS, impacts will be short term. FERC should ensure that all construction activities are completed in a safe and environmentally sound manner.

- Floodplains
- Steep slopes
- Riparian buffers
- Rivers and streams
- Carbonate bedrock areas
- Parks/open space

- Agricultural easements
- Trails

The draft EIS discusses pipeline route adjustments made to avoid/minimize impacts to environmental features. However, the route apparently has not changed in Northampton County based on the list of features intersected by the route of the pipeline as provided in the LVPC March 2016 County Land Use letter. It is not clear that PennEast has fully considered the LVPC comments in this regard. Mitigation is generalized so it is not possible to fully understand the impacts to specific features listed in the LVPC March letter. Further, the EIS does not appear complete since many additional surveys and specific mitigation plans still need to be performed or finalized.

Based on the above, the EIS does not provide sufficient evidence that the features of concern listed in the LVPC March 2016 letter have had appropriate mitigation procedures identified. We therefore find the PennEast Pipeline Project to be inconsistent with the LVPC *Comprehensive Plan* pending further consideration of LVPC concerns as part of the finalization of the EIS.

Sincerely,



Geoffrey A. Reese, P.E.
Director of Environmental Planning