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FEDERAL ENERGY
REGULATORY COMMISSION



August 11, 2016

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

ORIGINAL

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 am commenting on the PennEast Draft Environmental Impact Statement (DEIS).

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.

In particular, I am concerned about the following:

1. PennEast is bad for the environment: The entire proposed PennEast project intrudes on sensitive land and waterways. Along the proposed route in the Sourlands alone, the pipeline would seriously impact 200 acres of forest, 150 acres of agricultural land and 15 acres of wetlands. The pipeline would require tree cutting and blasting, further fragmenting the Sourland forest and destroying habitat for native plants and animals. Fragile headwaters of Sourland streams that flow to the Delaware River, protected wetlands and other natural habitats would have to be crossed and disrupted; public-owned natural treasures on Baldpate Mountain would be disturbed.
2. PennEast takes public land for corporate gain: PennEast has intentionally selected routes that cross preserved land, seeing such undeveloped property as the path of least resistance. It takes the efforts and good will of many people to preserve a piece of land. Landowners often accept less than market value for their property; donors give generously to preserve a piece of property in its natural state for perpetuity. Use of

preserved land for a commercial venture is a violation of trust that affects the viability of open space preservation efforts going forward.

3. **PennEast lies:** PennEast Pipeline maintains in its filings with FERC (Federal Energy Regulatory Commission) that it will provide gas to 4.7 million homes in NJ and PA and that the pipeline is necessary to maintain energy independence, supply and resiliency in NJ and PA. However, PennEast said the opposite to the SEC (Securities and Exchange Commission). PennEast's investors have all stated in writing that they had no problem with supplying customers in NJ and PA during the frigid winter of 2014. Each partner has information on its website and in SEC filings which clearly state that they do not anticipate demand for energy to supply an extra 4.7 million homes or any other number of homes or businesses in this area.

4. **PennEast is bad for the economy:** According to a PennEast spokesperson, only 21 permanent jobs would be directly dedicated to pipeline maintenance. In March, Drexel University and Econsult issued an Economic Impact Report and Analysis for the PennEast Pipeline Project, which was commissioned by PennEast. The report boasted that 12,160 jobs would be supported by the pipeline. On closer inspection, the vast majority of these jobs would be temporary or ancillary. Already, surveying is being done by workers from outside the Northeast. The Drexel study failed to consider the costs such as impacts on fishing and tourism, reduction in farm production, and lower property values.

5. **PennEast breaks the rules:** PennEast would like to subvert the entire FERC process. The NJ Department of Environmental Protection has told PennEast that they won't consider permits until they have on-the-ground survey data. However, almost 70% of NJ landowners along the proposed route have denied PennEast survey access. PennEast would like to apply without permits, without an Environmental Impact Statement based on real data and with incomplete Resource Reports. They want to get the certificate of need and then go back to the beginning and get the surveys using their Eminent Domain power to gain access to the land. This is NOT how the process is supposed to work. If citizens opposing the pipeline must follow the rules, so should FERC!

6. **PennEast is bad for your health:** Dr. Tullis Onstott, a Professor of Geosciences at Princeton University has spoken about arsenic and arsenite, the most dangerous form of arsenic, aside from arsenic gas, which exists in the bedrock along the proposed PennEast pipeline route in Hunterdon and Mercer Counties and would likely end up in groundwater, streams and rivers and, ultimately, drinking water. Dr. Michael Trachtenberg, an expert in neurobiology and green house chemistry has said, "Contaminants that can be released from compressor stations and are present in the pipeline include radon, lead and polonium, particulates, and volatile organic compounds... Health consequences from emission exposures include affects to the following systems: respiratory, neurologic, dermal, vascular, and gastrointestinal, along with dangers to inhalation of radioactive gas and ultra-fine particles."

7. **PennEast is dangerous:** UGI Energy Services is PennEast's project manager and operator of the pipeline. At a hearing in January 2013, the Public Utility Commission (PUC) unanimously voted to fine UGI the maximum allowed by law. PUC Chairman Robert Powelson and Vice Chairman John Coleman blasted UGI's record of safety compliance. "This is the eighth time in slightly more than four years that this commission has adjudicated a matter containing allegations of gas safety violations by a UGI-owned gas distribution utility," they said. "This goes beyond cause for concern; it is downright alarming."

8. **PennEast is bad for the planet: Methane is the main component of natural gas. Methane has powerful short-term effects on climate change — by some estimates, 80 times the heating effects of carbon dioxide in the first 20 years in the atmosphere and Methane's global warming potential is about 30 times that of carbon dioxide over a 100-year period. Methane can escape into the atmosphere during the drilling and hydraulic fracturing process; it's emitted from processing plants and wells and, large quantities of methane can escape when pipelines and other parts of the infrastructure spring leaks or are ruptured.**

9. **Municipalities don't want PennEast: every municipality, and all affected preservation groups, along the route in New Jersey have submitted resolutions or letters opposing the PennEast pipeline, as have many townships in Pennsylvania. Concerned citizens and advocacy groups have submitted thousands of comments on FERC's docket for the project. Almost 3,000 comments have been submitted on the PennEast docket, most of which have been in opposition of the project, except for a few written mostly by industry employees or companies with direct ties to the line.**

10. **PennEast promotes dirty energy dependence: Electricity generation from renewable sources has overtaken natural gas to become the second largest source of electricity worldwide, the International Energy Agency announced this year. We need to invest much more in the areas of energy efficiency and renewables instead of in an extensive network of new pipelines that will become obsolete in the near future.**

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**

Document Content(s)

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