



**APPALACHIAN
MOUNTAIN CLUB**
YOUR CONNECTION TO THE OUTDOORS

July 20, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission (FERC)
888 First Street, NE
Washington, DC 20426

Re: PennEast Pipeline Company, LLC, Docket No. CP15-558-000
Deficiencies and Concerns in Response to the Applicant's June 8, 2016 Filing,
Responses to Environmental Information Request

Dear Secretary Bose,

The Appalachian Mountain Club (AMC) is a non-profit organization whose mission is to “promote the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region.” The protection of our outdoor resources is of great importance to our over 100,000 members and supporters, who reside largely in the Northeast, including New Jersey and Pennsylvania. AMC has previously filed a number of comments related to the portion of the project proposed to cross the Appalachian National Scenic Trail (Appalachian Trail). The AMC - Delaware Valley Chapter is the maintaining club for the portion of the Appalachian Trail for which the project proposes to cross.

On June 8, 2016, the PennEast Pipeline Company submitted to FERC responses to an Environmental Information Request (EIR) dated June 2, 2016, wherein Response #8, alternative Appalachian Trail crossings were identified by the applicant for the project and the applicant provided other information related to the Appalachian Trail.

AMC is concerned the applicant's preferred route of crossing the Appalachian Trail will create a new right of way crossing of the Appalachian Trail corridor, negatively impacting the integrity of the Appalachian Trail and the user's experience. As included in past comments, the Appalachian Mountain Club, National Park Service, and numerous other organizations have strongly suggested that the applicant meaningfully pursue alternatives that would avoid impact to the Appalachian Trail entirely, as well as alternatives that would minimize impacts to the Appalachian Trail through co-location within or adjacent to an existing right of way (ROW).

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AMC is concerned that the EIR Response #8 submitted on June 8, 2016 does not evaluate any no impact alternatives, and provides a very limited review of only a few alternatives that would minimize impacts on the Appalachian Trail crossing through co-location. A number of additional deficiencies remain in the information provided by the applicant, specifically in regard to the scope of its considered alternatives and the level of detail included in the “crossing plan” provided for each alternative.

Applicant States Safety Concerns Related to Co-Locating Adjacent to Product Pipelines without Justification

PennEast’s EIR Response #8, dated June 8th, 2016, states the Buckeye West and Buckeye East alternative locations would “*pose significant operational safety concerns due to proximity to existing products pipelines*”. However in the March 13, 2015 PennEast response to scoping comment under comment FSL 14, the applicant maintains that “*PennEast has co-located the construction ROW adjacent to or in proximity to existing utility ROW wherever possible (e.g. gas pipeline, transmission line, or product pipeline).*” The applicant cites efforts to co-locate wherever possible, even suggesting opportunities to co-locate adjacent to product pipelines, yet in this instance, dismissed an opportunity to co-locate noting unsubstantiated safety concerns not previously suggested by the applicant. The Appalachian Mountain Club suggests that an additional, detailed analysis and justification of why these proposed alternatives pose an increased safety concern should be provided on the docket. Additionally, the relative risk of co-location adjacent to other linear energy products should be included in the analysis for a comparison of associated risk.

Consideration of Additional Appalachian Trail Crossing Alternatives Needed, Including No Impact Alternative

On February 27th, 2015, the National Park Service (NPS) filed comments to FERC under the pre-filing docket (PF15-1) suggesting alternative Appalachian Trail crossings for the proposed pipeline. Eight crossings alternatives were provided by the NPS, while only six alternate locations were evaluated by PennEast in the June 8th EIR Response #8. In order to have a more robust and meaningful alternatives analysis, the applicant should explore all alternatives suggested by the NPS, as well as additional alternatives suggested by AMC and other commenters.

Additionally, stakeholders involved in the proposed project have requested and again request that the applicant meaningfully evaluate a no build as well as other no impact alternatives. A variety of no and low impact alternatives have been suggested by AMC previously and would include alternatives such as routing the project along existing highways and other similar linear infrastructure that currently crosses the Appalachian Trail in an area of disturbance.

Appalachian Trail Alternatives Presented Lack Practicability and Must be Evaluated Further

The alternative Appalachian Trail crossing locations provided by the applicant do not include interconnecting lateral pipelines between the project and Blue Mountain Resort, a purported direct customer of PennEast, questioning the seriousness by which these alternatives are proposed. As such, the applicant has broadly stated that the alternatives do not meet the project purposes, AMC presumes because the applicant has not included the necessary component of each alternative that would connect the project to the Blue Mountain Resort. The applicant should be required to demonstrative how each alternative could be designed, constructed and operated to meet the project purpose.

For example, in regards to co-locating the PennEast project next to Blue Mountain Drive, an existing road crossing of the Appalachian Trail, the applicant states, *“PennEast did not select this crossing and the associated route variations as the preferred crossing because it would not satisfy the Project’s purpose and need of delivering to the proposed UGI interconnection necessary to serve the Blue Mountain ski resort.”* AMC asserts that the applicant unjustly dismisses this alternative due to their own failure to cite a lateral interconnection as part of the alternative.

Additionally, the alternatives presented cannot be meaningfully compared lacking the details of interconnecting laterals route, therefore the possible impact of each alternative to the Appalachian Trail is uncertain. For the existing alternatives to be meaningfully considered, interconnection laterals must to be planned and considered for each alternate location.

Appalachian Trail Alternatives Should Include Additional Crossing Plan Specifics

Lastly, a thorough crossing plan for each alternative should be required in the applicant’s alternatives analysis in addition to stating the crossing technology planned to be utilized. Crossing plans should include detailed construction schedules, access road delineations, traffic and vehicular management plans, hiker and recreational user management plans, a discussion of visual and audible impacts, and other specifics, which are crucial for meaningfully considering proposed pipeline locations that would cross the Appalachian Trail.

Conclusion

In conclusion, the Appalachian Mountain Club requests further information from the applicant regarding the details and alternatives provided regarding the crossing of the Appalachian Trail. Although alternative pipeline locations are identified and discussed in the applicant’s alternatives analysis, each plan has numerous deficiencies and lacks crucial information needed to thoughtfully evaluate a project of this scale.

Further, AMC requests that the applicant provide the information requested and allow AMC the opportunity to respond in advance of the issuance of a Draft Environmental Impact Statement (DEIS), such that the alternatives analysis and crossing plans can be meaningfully incorporated into the DEIS.

Thank you for your attention to these items. Please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Zakutansky', with a long horizontal flourish extending to the right.

Mark Zakutansky
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