November 11, 2016

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

RE: PennEast Pipeline Company, LLC; FERC Docket No. CP15558000
Regarding proposed route modifications issued for public comment Nov 4, 2016

Secretary Bose:

Attached please find an expert analysis conducted by Schmid & Company regarding the proposed route modifications for the PennEast Pipeline.

As the attached report documents, FERC has once again provided a document filled with misinformation, missing information and misleading information and simply does not provide the quantity, quality or type of information necessary to assess the environmental and community ramifications of the proposals nor does it provide the quantity, quality of type of information necessary to fulfill the mandates of the National Environmental Policy Act (NEPA).

FERC cannot be said to have fulfilled its legal obligations pursuant to NEPA. A new and complete DEIS with a minimum 90 -120 day comment period and public hearings is clearly required.

Submitted,

Maya K. van Rossum
the Delaware Riverkeeper

Attachments:

Schmid & Company, Comments to DRN on 4 November 2016 FERC letter regarding proposed modifications of the PennEast Pipeline route in Pennsylvania and New Jersey (Docket CP15-558-000), Nov 9, 2016

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9 November 2016

Comments to DRN on 4 November 2016 FERC letter regarding proposed modifications of the PennEast Pipeline route in Pennsylvania and New Jersey (Docket CP15-558-000)

- There are 33 proposed modifications, which range from 0.1 mile to more than 2 miles in length.

- The brief description/rationale for each proposed modification provides limited, vague, and incomplete information (e.g., "*to avoid sensitive resources*").

- In no case are any impacts associated with the proposed route modification identified or compared with the impacts associated with the original route segment.

- Aerial photo-based maps of the proposed route modifications are provided, but no GIS shapefiles have been made available that could be used to precisely identify their locations or their relation to the original routes.

- In many cases, the proposed modified route extends beyond the study corridor for the original route, so no inventory information is available along the modified route to determine potential impacts.

- In most instances (22 of 33 modifications; 6 of 7 in New Jersey and 16 of 26 in Pennsylvania), the original route segment and the modified route segment cross properties where no access was provided for inventory purposes, so it is impossible to evaluate the potential impacts of either route, or to compare the two. In some cases wetlands are mapped (but not field delineated) and the proposed modification appears to avoid or minimize potential impacts, but the accuracy of the mapped wetlands where not field-verified is questionable. In at least one case (NJ Deviation P-1914, near MP 96.75), the modification appears to involve a new EV wetland impact that did not exist with the original route.

- Given this overall lack of relevant and necessary information, it is unclear what the landowners who are the primary recipients of this FERC letter are supposed to comment on. It should not be their burden to identify and evaluate the sensitive resources that may be found on their land within the proposed pipeline construction corridor. The identification of resources at risk and assessment of potential impacts, and comparisons between alternative routes, is the responsibility of the applicant. It then is the responsibility of FERC and other regulatory agencies to review that information and evaluate its accuracy and significance, and to provide that assessment to the landowners and the general public.