

From: Cathy Reuscher [<mailto:creuscher@outdoors.org>]
Sent: Tuesday, May 31, 2016 2:20 PM
To: Wejkszner, Mark
Cc: Mark Zakutansky
Subject: AMC comments on Kidder Township Compressor Station

Dear Mr. Wejkszner,
The Appalachian Mountain Club would like to submit the attached comments regarding the proposed compressor station in Kidder Township. Please let me know if you have any questions.
Thank you for your consideration,
Cathy Reuscher

Catherine Reuscher
Mid-Atlantic Policy Associate

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Your Connection to the Outdoors



May 31, 2016

Mark Wejkszner
Air Quality Program Manager
Department of Environmental Protections
2 Public Square
Wilkes-Barre, PA 18701

Re: PennEast Pipeline Project Air Quality Plan Application for Kidder Twp. Compressor Station

Dear Mr. Wejkszner:

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, supporters and advocates who reside largely in the Northeast including in New York, New Jersey, Pennsylvania, and Delaware.

AMC has serious concerns about PennEast’s application to build a compressor station in Kidder Township, many of which we have voiced in previous correspondence with the Federal Energy Regulatory Commission in addition to our concerns with the larger pipeline project. Our concerns are focused on the compressor’s potential to have a negative impact on the health of outdoor recreation users, as well as it’s potential to be a source of greenhouse gas emissions. AMC opposes the use of a natural gas-fired turbine at the compressor station site proposed in Kidder Township in favor of an electric-powered, zero emissions facility, which we believe is both feasible and practicable.

Because hikers, skiers, paddlers, and other people who spend time exercising in the outdoors risk increased exposure to methane emissions, particulates, and other hazardous air-borne substances which threaten their cardiovascular and pulmonary health, AMC urges DEP to examine potential air quality degradation from this project in relation to health impacts to these user groups, especially considering the proximity to the Appalachian National Scenic Trail, the Army Corps of Engineers Francis E. Walter Dam, and Jack Frost Big Boulder Ski Resort. The applicant should be required to provide a detailed plan to ensure that these areas are monitored for negative impacts on air quality, and to mitigate for those impacts when they are detected.

In addition to threats to outdoor recreation users, emissions from the proposed compressor station, in particular methane, are contributing to climate change, which harms Pennsylvania through contributing to an increased occurrence of intense storm events and extreme flooding along the Delaware River. To minimize these emissions, the proposed compressor station turbine should be powered with an electric motor instead of natural gas, something that could be accomplished by tapping into the high-voltage lines currently serving

Jack Frost Ski Resort, and should include zero emission pneumatic control features. DEP should also require that the applicant's plans include voluntary participation in the Environmental Protection Agency's Natural Gas STAR program to reduce methane emissions as well as measures to ensure that the proposed compressor station would meet or exceed the Environmental Protection Agency's new standards for controlling volatile organic compounds, which have been in effect since January of 2015.

In conclusion, the Appalachian Mountain Club urges the Department of Environmental Protection to require significant changes to PennEast's proposal for a compressor station. As it stands, the application should not be approved due to threats it poses to outdoor recreation users and Pennsylvania's climate.

Thank you for the opportunity to express our thoughts on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Reuscher".

Catherine Reuscher
Mid-Atlantic Policy Associate
Appalachian Mountain Club