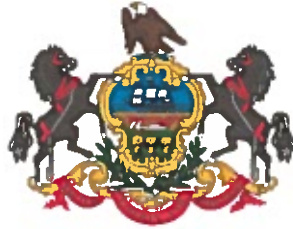


EXHIBIT “A”

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January 31, 2017

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

Re: FERC Docket CP15-138

Dear Secretary Bose:

I am writing to you today in regard to multiple inaccuracies in the Final Environmental Impact Statement (FEIS) for the Atlantic Sunrise Pipeline project (ASR), issued on December 30, 2017, as it pertains to parts of Manor Township, Conestoga Township, and Martic Township. Since the final determination of the project must be based on factual information, I am specifically asking that you carefully consider the enclosed information that I believe demonstrates there were multiple factual errors made in the FEIS.

The source of the information contained in this document comes directly from the alignment sheets as submitted to the FERC by Transco in accession # 20160920-5019. You will see after a careful inspection of these sheets that there are multiple and glaring discrepancies between what Transco submitted and what the FERC reported. These discrepancies relate to four substantive areas, namely, the number of streams, wetlands, and roads crossed, and the number of residences within 100 ft. of the pipeline center.

The first of the discrepancies concerns the number of streams and wetlands crossed. After a meticulous scrutiny of the Transco alignment sheets, it is clear that there are 26 streams and 12 wetlands crossed by the currently proposed route. That is nearly triple the number of streams noted in the FEIS in addition to 12 more than the highly inaccurate figure of 0 wetlands. Because of the tremendous impact of a project of this magnitude, surely you agree that the FEIS must be made upon impeccable analysis as required under NEPA. Please reference this chart which provides stream and wetland counts and locations and compare this to the Transco alignment sheets to verify the observed discrepancies.

See comparison chart on page 2.

STREAMS			WETLANDS		
	Stream Location	Identification		Wetland Location	Identification
1	MP m-0184 0.85	stream WW-T10-004	1	MP 7.1	wetland W-T10-1016
2	MP 5.3	stream WW-RS-001	2	MP 7.1	wetland W-T10-101A
3	MP 7.1	stream WW-T10-100,	3	MP 7.1	wetland W-T10-100
4	MP 7.1	stream WW-RS-100	4	MP 7.4	wetland W-T20-002
5	MP 7.1	stream WW-RS-99024	5	MP 7.5	wetland W-T20-002
6	MP 7.1	stream WW-RS-99025	6	MP m-0417 0.5	wetland W-T70-1001
7	MP 7.4	stream WW-T20-002	7	MP 11.0	wetland W-T35-1001
8	MP 7.9	stream WW-T31-002	8	MP 11.13	wetland W-RS-1001
9	MP 7.9	stream WW-T31-002A	9	MP 11.6	wetland W-RS-1006
10	MP 8.15	stream WW-T65-001	10	MP m-0248 0.15	wetland W-T65-1003
11	MP 8.2	stream WW-T31-003	11	MP 13.7	wetland W-T36-1003A
12	MP 8.2	stream WW-T65-001	12	MP 13.7	wetland W-T36-1003C
13	MP m-0405 0.5	stream WW-RS-120006			
14	MP m-0405 0.5	stream WW-RS-120005			
15	MP m-0405 1.45	stream WW-T25-1001			
16	MP m-0417 0.5	stream WW-T65-1002,			
17	MP 10.1	stream WW-T10-1003			
18	MP 10.9	stream WW-T35-1002			
19	MP 11.0	stream WW-T35-1002			
20	MP 12.4	stream WW-T36-1001A			
21	MP m-0248 0.15	stream WW-T49-1001			
22	MP 13.6	stream WW-T92-1002			
23	MP 13.6	stream WW-T93-1001			
24	MP 13.7	stream WW-T36-1004			
25	MP 13.8	stream WW-T92-1003			
26	MP 13.9	stream WW-T36-1006			
	Stream Total =			Wetland Total =	
	26			12	
	FERC's Total =			FERC's Total =	
	9			0	

You can clearly note the dramatic differences between the findings of the FERC and the survey information provided by TRANSCO. Put together, the impacted waterbodies on the currently proposed route is Streams (26) + Wetlands (12) = 38. This number is vastly different than the FERC's reported number of Streams (9) + Wetlands (0) = 9. It is plain that the environmental impact of the Proposed Route on the waterbodies of these townships is far greater than the FERC contemplated. Therefore, when there is a comparison between the Proposed Route and the CAR related to the number of waterbodies crossed (38 vs. 9) it is obvious that the Proposed Route has a far greater environmental impact than the Conestoga Alternate Route (CAR).

The second observed discrepancy concerns the number of roads crossed. While this discrepancy is far smaller than the egregious differences in waterbodies crossed, a project of this magnitude and impact on the local population commands exactitude. As such, it is important to note that the FEIS claims that the Conestoga Alternate Route crosses 18 roads and the Proposed Route crosses 17. Upon careful inspection of the mechanical drawings of the alignment sheets, the actual roads crossed by the Conestoga Alternate Route is 17 and the Proposed Route crosses 18. Again, this is a factual error upon which a decision will be made which will have a dramatic and lasting impact on the local community. It is therefore essential that the facts are 100% accurate.

The last observed discrepancy concerns the number of residences within 100 ft. of the pipeline centerline. According to the FEIS there are only 4 on the proposed route, however this is inaccurate. The actual number of residences is 13. See chart below.

Current Route Residences within 100 ft. of Centerline	
Residences	Location
1	m-0248 MP 0.10
3	MP11.3-MP 11.5
1	MP 7.4
2	MP 5.6
1	m-0184 MP 0.8
1	MP 2.8
1	MP 2.85
1	MP 2.7
1	MP 2.0
1	MP 1.95
Total Residences within 100 ft. = 13	

It is clear from the above chart that when comparing the FERC's reported number of residences within 100 ft. of the centerline (4) and the documentation above (13), the number of impacted residences is more than triple the number of houses used to contemplate the final FEIS determination. Again, when comparing the impacted residences on the current route (13) to the number of impacted residences on the CAR (4), it again becomes clear that utilizing the CAR will have a substantially lower impact on the residents.

It is important to note that throughout the pre-filing and formal application phase of this project the FERC requested information concerning the number of residences within 150 ft. of the construction zone, not 100 ft. of the centerline. Were we to apply that distance as the yardstick for serious impact, the number of residences would rise exponentially to 27 as opposed to 4 on the CAR. See chart below.

Current Route Residences within 150 ft. of Centerline	
Residences	Location
1	MP 12.7
1	MP 11.45
1	MP 11.38
1	MP 11.31
2	MP 10.35
1	MP 8.1
1	MP 7.5
1	MP 7.4
1	MP 7.2
1	MP 7.0
1	MP 6.9
1	MP 6.85
3	MP 6.75
2	MP 5.6
1	MP 5.1
2	m-0184 MP 0.91
1	m-0184 MP 0.55
1	m-0184 MP 0.15
1	MP 2.85
1	MP 2.5
1	MP 2.2
1	MP 2.02
Total Residences within 150 ft. = 27	

Impacting 27 residences as opposed to 4 is a stark contrast that the FERC must take into consideration when determining the least negative impact on the residents.

It is paramount that the FERC has accurate information on which to base its decisions. This letter demonstrates multiple errors in the FEIS report. The following chart summarizes these errors and notes the corrected data.

Table 3.3.2-13 Comparison for the Conestoga Alternate Route to the Corresponding Segment of the Proposed Route for the Atlantic Sunrise Project				Corrected Totals	
Environmental/Engineering Factor	Unit	Conestoga Alternate Route	Proposed Route	Conestoga Alternate Route	Proposed Route
Waterbodies crossed/fishery classification	no.	10	9		26
Wetlands crossed	no. (ft.)	0 (0)	0 (0)		12
Road crossings	no.	18	17	17	18
Residences within 100 ft. of the pipeline center	no.	4	4		13

In light of the corrected data, I request that the FERC reevaluate its decision concerning the preferability of the Conestoga Alternate Route.

Sincerely,

Brett R. Miller
 Member, 41st Legislative District
 Pennsylvania House of Representatives

Original FERC Table 3.32-13 cited as reference for comparison

Environmental/Engineering Factor	Unit	Conestoga Alternative Route	Proposed Route
Length	miles	11.1	12.1
Length adjacent to existing right-of-way	miles (percent)	6.0 (54)	0.5 (4)
Construction right-of-way ^a	acres	134.5	146.6
Forestland crossed	miles	7.0	2.6
Agricultural land crossed	miles	3.7	8.6
Residences within 100 feet of the pipeline centerline	no.	4	4
Recreation areas/preserves crossed	miles	4.3	2.1
Tucquan Glen Nature Preserve	miles	0.5	0.0
Pequea Creek Recreational Center	miles	0.5	0.0
Pequea Creek Woods Natural Heritage Area	miles	0.4	0.0
Shenk's Ferry Wildflower Preserve Natural Heritage Area	miles	0.4	0.0
PPL Environmental Preserve	miles	0.4	0.0
Safe Harbor Recreation Area	miles	0.8	0.0
Safe Harbor East Woods Natural Heritage Area	miles	0.0	<0.1
Safe Harbor Woods Natural Heritage Area	miles	1.3	0.4
Trout Run Ravine, Red Hill Hollow, Camp Snyder Woods Natural Heritage Area	miles	0.0	1.6
Waterbodies crossed/fishery classification	no.	10	9
Trout Stocking	no.	2	0
High Quality Cold Water Fishes	no.	2	2
Cold Water Fishes	no.	0	2
High Quality Warm Water Fishes	no.	1	0
Warmwater Fishes	no.	5	5
State wild and scenic rivers crossed	no.	2	1
Wetlands crossed	no. (feet)	0 (0)	0 (0)
Road crossings	no.	18	17

^a Based on a 100-foot-wide construction right-of-way.

Document Content(s)

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