

To:

Department of Environmental Protection
Regional Permit Coordination Office
Dominic Rocco, PE, Director
Rachel Carson State Office Building
400 Market Street, 10th Floor
Harrisburg, PA 17101

Re:

Comments on Transco Regional Energy Access Expansion Project's
Revised Applications for Permits for Water Obstructions and
Encroachments and for Erosion and Sediment Control

From:

Carolyn Lange, MT (ASCP)
4296 Upper Smith Gap Road
Saylorsburg, PA 18353

October 12, 2022

Dear Mr. Rocco,

I am writing to you as an environmentally conscious citizen of the Commonwealth of Pennsylvania. I have serious concerns about the applications of the Transcontinental Gas Pipe Line Company, LLC ("Transco") for the Regional Energy Access Expansion Project ("the Project") for permits ESG02000160002, E40-780, E13-185, E48-435, and E09-998 ("Applications") and the impacts that it will have wherever it might happen. I ask you to deny the Chapter 102 and 105 permits requested by Transco for its Regional Energy Access Expansion. This pipeline expansion is unnecessary and the application has many problems. I cite the following concerns:

The waterways and surrounding habitats that this pipeline would cut across are among the highest quality streams and wetlands in the Commonwealth. As such they are entitled under *by law* to the highest protections. Vast areas of our watershed will be negatively impacted by both the construction and maintenance of the pipeline. Trees will have to be cut, heavy equipment and support vehicles will be needed to install and maintain the line. New roads will be needed to facilitate the entire process. All of this will create an enormous earth disturbance, particularly on the steep slopes where runoff will be greatest. Even allegedly temporary impacts to these waters still do significant damage to the water quality and habitat in the area of disturbance.

I am seriously concerned that the applications and plans do not provide for adequate oversight by the DEP, nor for accountability by Transco. The applicant is seeking to cut across multiple High Quality (HQ) and Exceptional Value (EV) streams and wetlands, along with forested areas, yet there is still no requirement or oversight in way of water quality monitoring for these cuts. Without pre and post water quality monitoring data, how is DEP ensuring the public that degradation of these special protections waters is not occurring? Transco asserts: "Disturbed wetland, streams and floodways within the ROW will be returned to pre-construction grade and contour upon completion of construction." What monitoring and documentation is DEP requiring of Transco to ensure that pre and post conditions remain the same? What stream monitoring is being conducted by Transco or the agency to ensure there

are no harms or declines in water quality? Past records and monitoring data submitted by Commenters on other similar pipeline cuts in Pennsylvania demonstrate that declines in water quality occur as a result of pipeline construction, and yet there appears to be no additional measures or new BMP measures being taken by Transco to minimize harm that will come if this pipeline expansion is approved.

Transco also asserts that thermal impacts to riparian buffers will be “negligible and localized.” Yet there is no indication for a plan to monitor thermal impacts. Thermal degradation causes decline of trout populations, including and especially our native Brook Trout, the PA State Fish. I urge the Department to require specific, enforceable monitoring and reporting by Transco during and after construction, and to hold the company to any restoration obligations which it has incurred. Transco hasn't done enough to account for other sensitive wildlife in the area. Many of these areas are home to Federally listed Threatened and Endangered species of both plants and animals. For example, Transco claims protection of bat species through seasonal restrictions on tree felling. But Transco also defines ground disturbance (which is permitted during seasonal restrictions) to include tree felling. As a result, Transco would be allowed to cut down the adjacent forest at **any** time of the year in a mostly forested landscape that has vulnerable bat species present. In addition, Transco did not survey for wood turtles, currently under federal consideration as an endangered species, despite citizen reports of wood turtles in the area.

Transco's plans to compensate for wetlands destruction are insufficient. Transco attempts to define many of the impacts as “temporary,” which is not scientifically supported, and results in calculating the total impact as far less than it would likely be. Transco also proposes to “enhance” existing emergent and scrub-shrub exceptional value wetlands, which is entirely inappropriate. The “enhancement” involves planting trees and shrubs in these wetlands, which would lead to premature succession into forested wetlands. The goals of the wetlands mitigation requirements are to create new wetlands to replace those destroyed as a result of the permitted action, not to transform an existing type of wetland into a different type of wetland.

Transco's geologic hazard report provides no assurances that any hazards will be mitigated, avoided, or frankly even discovered before it is too late. The company identifies multiple miles of hazards, including high susceptibility to landslides, but presumes its routes are fixed rather than considering rerouting options as a method of hazard mitigation. Moreover, rather than do the analysis before starting pipeline construction, Transco does not intend to do further investigation until during pipeline installation, potentially creating the need for changes during construction that would not be subject to meaningful public scrutiny.

Transco fails to acknowledge its outstanding violations with the DEP, doesn't say that it has other pending permit applications, and doesn't acknowledge that REAE will increase emissions and exacerbate the climate crisis. Climate change is consistently in the news-we must all take responsibility! Especially those regulatory bodies such as DEP who are tasked with protecting the environment.

There are many other reasons why I oppose this pipeline expansion. I have not even touched on economic and property value impacts since the focus here is on permits under Chapter 102 and 105. DEP must hold Transco to its legal obligations under Chapter 102 and Chapter 105 of the Clean Water Act, which are designed to protect and conserve our vital water resources. There are many of us in this area who rely on private wells for our drinking water. As a member of a local watershed conservancy whose motto is to “*Protect your Drinking Water-Protect your Watershed*” I strongly urge DEP to deny the Transco REAE permit applications!

Thank You,

Carolyn Lange