



September 15, 2015

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

Re: Docket PF15-1-000  
PennEast Proposed Natural Gas Pipeline

Dear Ms. 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, supporters and advocates, who reside largely in the Northeast, including New Jersey and Pennsylvania.

AMC has previously commented twice in Docket PF15-1-000 for the PennEast Project – first on February 27th in scoping comments, and again on May 19th to comment on PennEast’s scoping comment responses. AMC wishes to highlight the failures of the applicant in accurately portraying the project’s planned Appalachian National Scenic Trail crossing, and to request that FERC require the applicant to address this deficiency before issuing a Notice of Application.

On page 8-121 of the Resource Reports, the applicant states the following:

“Through coordination with the NPS, the Appalachian Trail, the PGC and private stakeholders, PennEast has identified a suitable location for the crossing of the Appalachian Trail that will avoid crossing lands owned by the NPS. PennEast will bore under the Appalachian Trail and no tree clearing will occur over the pipeline within 150-feet of the trail. Therefore, no impacts to the Appalachian Trail are anticipated to occur as a result of the construction of the Project.

PennEast will develop a site-specific crossing plan in coordination with NPS and other stakeholders for the crossing of the

**Main Headquarters:** 5 Joy Street • Boston, MA 02108-1490 • 617-523-0636 • [outdoors.org](http://outdoors.org)

**Regional Headquarters:** Pinkham Notch Visitor Center • 361 Route 16 • Gorham, NH 03581-0298 • 603 466-2721

**Additional Offices:** Bretton Woods, NH • Greenville, ME • Portland, ME • New York, NY • Bethlehem, PA

Appalachian National Scenic Trail, and the crossing plan will be included in PennEast's application anticipated to be filed in September 2015."<sup>1</sup>

Contrary to the applicant's claim, as currently proposed, the construction of the project will undeniably result in negative impacts to the Appalachian National Scenic Trail, both during construction and from the long-term operations of the project. The proposed 150 foot zone of vegetation will be insufficient in avoiding the impacts of boring equipment and other pipeline installation activities from negatively impacting the Appalachian National Scenic Trail.

AMC welcomes the opportunity to review a crossing plan, which we expect to identify a comprehensive list of alternative Appalachian National Scenic Trail crossing locations, as well as construction alternatives that may further minimize impacts to the Appalachian National Scenic Trail, and including mitigation measures that may be implemented to offset realized impacts. With the planned clear cutting of locations near, but not adjacent to the Appalachian Trail, as well as the expected drilling of the project underneath the trail, as currently proposed within a close proximity to the trail corridor, it is undeniable that short-term and long-term impacts to the Appalachian Trail will be realized and which should be accurately portrayed in the draft resource reports and forthcoming Appalachian National Scenic Trail crossing plan.

AMC requests that the applicant submit an updated draft resource report identifying the negative impacts on the Appalachian National Scenic Trail from construction and operation of the project. AMC welcomes the opportunity to review and submit comments after reviewing an updated draft resource report, as well as the forthcoming Appalachian Trail crossing plan, and seeks to provide these comments in advance of FERC issuing a Notice of Application.

Please do not hesitate to contact me to discuss this matter further.

Sincerely,



Catherine Reuscher  
Mid-Atlantic Policy Associate  
Appalachian Mountain Club  
creuscher@outdoors.org  
610-868-6903

---

<sup>1</sup> PennEast Pipeline Company, LLC to Kimberly Bose, July 31st, 2015, Federal Energy Regulatory Commission E-Library, Docket PF15-1-000, pages 8-121 through 8-122. (Accession number: 20150731-5266.)