

IND440 – Jenny Graybill

20160628-5031 FERC PDF (Unofficial) 6/27/2016 10:38:32 PM

Jenny Graybill, MANHEIM, PA.
IND440-1 Please consider this request to extend the public comment period for the DEIS of the Atlantic Sunrise Pipeline. (FERC Docket: CP 15-138). These documents took the full attention of dozens of FERC and Williams employees and contractors literally thousands of hours and months to prepare. We, the public, are expected to comment on such a complicated set of documents in a short period of time in comparison.

IND440-2 The Atlantic Sunrise Proposal is a project that would greatly contribute to runaway climate change, and will have negative impacts for folks living in the shale fields, along the route of the pipeline, and near the destinations of its fracked gas, including Cove Point and other export facilities. It is a small request to have an extended period of time to address the multiple impacts we will have to live with the rest of our lives and for generations to come.
Thank you for your consideration.

IND440-1 See the response to comment PM1-130.

IND440-2 See the response to comment PM2-94.

IND441 – Jenny Graybill

20160628-5030 FERC PDF (Unofficial) 6/27/2016 10:28:07 PM

Jenny Graybill, MANHEIM, PA.

The Atlantic Sunrise Pipeline which Transco intends to build would have significant negative impacts, both short and long term, on the many diverse ecosystems in its pathway. The proposed pipeline should also be viewed within the larger context of the natural gas market, and its impacts on the environment. It is supported by the federal National Environmental Policy Act (NEPA). NEPA "is the basic national charter for protection of the environment." 40 C.F.R. § 1500.1(a). NEPA calls for federal agencies to take environmental concerns into consideration during their decision making process "to the fullest extent possible." 42 U.S.C. § 4332. The law also guarantees public participation during the decision making process, calling this public input "essential to implementing NEPA." 40 C.F.R. § 1500.1(b). According to federal law, the EIS is intended to study and make available to public scrutiny all of the potential environmental effects of the proposed project, including "ecological, aesthetic, historic, [and] cultural" impacts, "whether direct, indirect, or cumulative." 40 C.F.R. §§ 1502.16(a), (b); 1508.8. In addition to studying the impacts of the proposed project, the EIS must evaluate "the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented." 40 C.F.R. §§ 1502.16. The EIS must also "rigorously explore and objectively evaluate all reasonable alternatives", even to the extent of including "alternatives not within the jurisdiction of the lead agency" and the "alternative of no action." Upon reviewing the plans of Transco, and the DEIS released by FERC, we conclude that the direct, indirect and cumulative negative impacts on our water resources, wetlands, and vegetation is not justified for the purpose of increasing the natural gas transportation capacity of companies operating in the Marcellus Shale. I do not advocate for a route which destroys fewer trees, crosses fewer than 331 streams, impacts less public water sources, etc. I recommend that the commission deny Transco the permit entirely. This view is based upon the significant negative environmental impacts, both short and long term; both project specific and cumulative impacts. Temporarily during the construction phase the project will affect 1,414 acres of agricultural land, 949 acres of upland forest, 275 acres of open lands, and 50 acres of wetlands. During the construction of the pipeline these areas will be destroyed or significantly damaged, and will therefore be prevented from performing the ecological functions which allow for a natural system to thrive. In the short term I expect there to be significant destruction of riparian zones during the 331 water body crossings. This will lead to downstream effects such as flooding, increased turbidity, and decreased habitat opportunities for aquatic species. In the longer term the right of way will diminish the function of riparian zones leading to increased erosion, and a greater potential for bank failures. The felling of trees and tall shrubbery during construction, and height limit on vegetation within the permanent right of way during operation will also reduce shade along streams, increasing the thermal loading of the streams and decreasing habitat for coldwater aquatic species such as trout. The proposed project will permanently alter 119 acres of interior forest habitat. This will fragment the forest ecosystem, compact the soils, and

IND441-1

IND441-1 Comment noted.

IND441-2

IND441-2 Comment noted. Mitigation measures to minimize impacts on environmental resources are described throughout section 4 of the EIS.

IND441-3

IND441-3 See the responses to comments PM1-71 and PM2-123.

IND441-4

IND441-4 Section 4.5.3 of the EIS has been revised to include additional information regarding measures to mitigate the impacts on interior forests. Also see the response to comment FA1-97.

IND441 – Jenny Graybill (cont'd)

20160628-5030 FERC PDF (Unofficial) 6/27/2016 10:28:07 PM

IND441-4
(cont'd) create conditions for a drier climate due to reduced canopy cover. The
IND441-5 aforementioned negative consequences have been local and project specific
(construction and operation), but there are also cumulative, systemic and
IND441-6 non-local effects to be considered. By approving this project which
proposes to transport 17,000,000 therms of natural gas the commission is
approving the release of 90,134 metric tons of co2 equivalent daily. In a
year this pipeline, if filled to capacity, will lead to as much co2e
release as 8.6 coal-fired power plants, or 76,509,093 barrels of oil in
one year. This proposal to increase our co2 emissions comes at a time
when virtually all climate scientists worldwide are describing the urgent
need to reduce our emissions. Last year the United States signed an
agreement with 185 other countries to reduce our emissions by 26-28
percent below 2005 levels by 2025. This project will not aid in that
effort. For all of these reasons, I recommend that the commission deny
Transco the authority to build the Atlantic Sunrise Pipeline. The
IND441-7 proposed project does not serve the public good, nor should the company's
desire to profit from the transport of Marcellus Shale gas trump my
ecologically dependent right to life, liberty, and the pursuit of
happiness.
This pipeline is to send my Pennsylvania natural gas to overseas markets
which will drive our U.S. prices sky high.

IND441-5 See the response to comment IND425-19.

IND441-6 Comment noted. See the response to comment PM1-32.

IND442 – Eva Telesco

20160628-5029 FERC PDF (Unofficial) 6/27/2016 10:15:51 PM

Eva Telesco, Conestoga, PA.
In regard to the DEIS for the proposed Atlantic Sunrise Project (CP15-138):

IND442-1 Please give us more time! Extend the comment period so that we may carefully respond to all pieces of the statement. Williams/Transco submitted supplemental information as late as last week . . . if you are allowing the pipeline company to file information after the DEIS was officially issued, you owe the public additional time to read and respond to this "late" information.

We need more time.

Thanks,

Eva Telesco
3788 Main St.
Conestoga PA 17516

IND442-1 See the response to comment PM1-130.

IND443 – Rebecca Gardner

20160628-5027 FERC PDF (Unofficial) 6/27/2016 10:12:08 PM

Rebecca Gardner, Piquette, PA.
IND443-1 As indicated in the DEIS 4-22 "We received a comment from the Lebanon County Commissioners requesting that Transco complete a detailed study of karst features along the pipeline route, particularly in the area near US 422 and Clear Springs Road. Transco developed a Karst Investigation and Mitigation Plan that identifies karst-related features (e.g., sinkholes) and specific mitigation measures to be implemented in these areas (see appendix J). The presence and incidence of existing karst features, manifested as ground surface subsidence, were investigated and identified using geologic site reconnaissance and aerial photograph and LiDAR data evaluation."

Sinkholes are a well-documented problem in regions along the proposed pipeline <http://www.dcnr.state.pa.us/topogeo/hazards/sinkholes/index.htm>. Specifically, "The water-driven nature of karst systems lends them to be more sensitive to changes in land use. Rapid and widespread groundwater contamination or the sudden "unclogging" of a karst drain is a public safety as well as an economic concern. When we consider how to manage stormwater runoff, infrastructure layout and design, and utilize groundwater as a resource, it becomes important to understand the relationships between activities at the surface and their potential impact beneath."

FERC is in support of this greenfield line with unknown risks through documented karst/limestone formations in lieu of utilizing existing routes where the risks are known. As indicated in the comment above as well information from the Pennsylvania Department of Conservation and Natural Resources there are legitimate economic and public safety concerns regarding the placement of a 42" pipeline through these known limestone/karst formations.

With the high potential risk associated with this project, accurate tools and data collected at local scales (1:200) should be used to assess the environmental impact of this project. One of the USGS map references (1999; and 2014 Weary and Doctor) use data at scales not suitable for local analysis. Additionally, there is no mention of the PA Water Science Center (PAWSC) or the USGS Geologic Mapping as partners to evaluate water-related and geologic hazards along the route of the pipeline. It should be noted the USGS is an internationally recognized agency that provides unbiased scientific information. Finally, there is no reference to sinkhole mapping by the Pennsylvania Department of Conservation and Natural Resources "DENSITY OF MAPPED KARST FEATURES IN SOUTH-CENTRAL AND SOUTHEASTERN PENNSYLVANIA WILLIAM E. KOCHANOV AND STUART O. REESE, 2003" Map 68, <http://www.dcnr.state.pa.us/topogeo/hazards/sinkholes/index.htm>.

In the DEIS, there were other notations for depth mapping however it is unclear how many local well logs and drill points were used to determine a general depth and other characteristics of the bedrock in areas with karst features.

IND443-1 See the revised text in sections 4.1.5.6 and 4.1.7 of the EIS. The *Karst Investigation and Mitigation Plan* is included as appendix J of the EIS. As described in the report, the information used to identify karst features includes review of published literature, geologic maps, aerial photography, LiDAR imagery, ground reconnaissance surveys, as well as karst features obtained from the PADCNr digital dataset of mapped karst features in southcentral and southeastern Pennsylvania. In addition, geophysical surveys using the multichannel analysis of surface waves method and geotechnical borings were completed to characterize the bedrock and identify the locations of potential geophysical anomalies (e.g., voids, solution enlarged joints) within the karst areas crossed by the Project.

IND443 – Rebecca Gardner

20160628-5027 FERC PDF (Unofficial) 6/27/2016 10:12:08 PM

IND443-
(cont'd) Through preliminary approval of this project, FERC is requiring affected landowners and communities in these regions is to assume the unknown risks of this greenfield pipeline.

Why is FERC not requiring that Williams utilize accurate tools and local-scale data including detailed subsurface mapping through the use of ground-penetrating radar to collect information in the risk areas (low, moderate and high) to prevent any permanent damage from the installation of this unnecessary pipeline?

Why is FERC not using all available information on limestone/karst formations at the state and federal level?

Without additional data-both existing and utilization of accurate measuring techniques FERC cannot honestly say the proposed pipeline will have no significant impact.

IND444 – Eva Telesco

20160628-5026 FERC PDF (Unofficial) 6/27/2016 10:09:54 PM

Eva Telesco, Conestoga, PA.

- IND444-1 I am writing to request that FERC require Williams to address the following deficiencies in the DEIS. Once completed, FERC should reissue a new, complete DEIS, with a new 90-day comment period for the public to address the very significant impact of this pipeline.
- Deficiencies to be addressed in a new, improved DEIS include:
- IND444-2 • Justification for additional temporary workspaces at several locations near wetlands.
 - IND444-3 • Inclusion of four of the minor alternative routes into the proposed route and additional information on four route deviations currently under review.
 - IND444-4 • Fall hibernacula survey results and avoidance/mitigation measures for the Indiana and northern long-eared bats.
 - IND444-5 • Results of Transco's consultation with PA DEP and any updates to its Abandoned Mine Investigation and Mitigation Plan.
 - IND444-6 • For HDD, all outstanding geotechnical feasibility studies for the crossing locations and mitigation measures to be implemented to minimize drilling risks. And site-specific contingency crossing plans for an open-cut crossing where HDD fails.
 - IND444-7 • Where the project will cross source water protection areas, a plan for notification in consultation with surface water intake operators.
 - IND444-8 • Documentation of Transco's correspondence with the PA Game Commission and PA DNR and avoidance/mitigation measures developed with these agencies regarding State Game Land and Sproul State Forest crossings regarding potential impacts on and restoration of wildlife habitat in affected areas.
 - IND444-9 • Updated consultations with the FWS regarding migratory birds, and additional avoidance or mitigation measures developed in a revised Migratory Bird Plan, if applicable.
 - IND444-10 • Results of mussel surveys conducted within the Susquehanna River and any additional avoidance or mitigation measures in Transco's site specific HDD contingency crossing plans.
 - IND444-11 • For residences within 10 feet of construction work area, revised site-specific residential plans.
 - IND444-12 • Update on status of site-specific crossing plans for each of the recreation and special interest areas listed as being crossed or otherwise affected by the Project, including site-specific timing restrictions, proposed closure details and notifications, specific safety measures, and other mitigation to be implemented.
 - IND444-13 • Documentation of Transco working with Natural Resources Conservation Service, Farm Service Agency and landowners to identify conservation easements and develop restoration measures to ensure enrolled properties remain eligible to participate in the programs. Evidence of negotiated compensation of fees or penalties, taxes, if tract determined to be ineligible for a program.
 - IND444-14 • Requirements for Transco to file updated information regarding an identified landfill, including mitigation measures to avoid the site or recover in the event that contamination is encountered.
 - IND444-15 • Detailed description of the proposed communication towers associated with Compressor Station 605, the River Road Regulator Station and

- IND444-1 See the responses to comments PM1-70 and PM1-30.
- IND444-2 See the response to comment IND399-1.
- IND444-3 See the response to comment IND399-2.
- IND444-4 See the response to comment IND399-3.
- IND444-5 See the response to comment IND399-4.
- IND444-6 See the response to comment IND399-5.
- IND444-7 See the response to comment IND399-6.
- IND444-8 See the response to comment IND399-7.
- IND444-9 See the response to comment IND399-8.
- IND444-10 See the response to comment IND399-9.
- IND444-11 See the response to comment IND399-10.
- IND444-12 See the response to comment IND399-11.
- IND444-13 See the response to comment IND399-12.
- IND444-14 See the response to comment IND399-13.
- IND444-15 See the response to comment IND399-14.

IND444 – Eva Telesco (cont'd)

20160628-5026 FERC PDF (Unofficial) 6/27/2016 10:09:54 PM

- IND444-15 (cont'd) Compressor Station 610 along with mitigation measures to minimize portions visible by nearby residences, along with assessment of visual effects resulting from construction of the two new communication towers. Response to landowner comments regarding design and visual screening at Compressor Station 610.
- IND444-16 • Consultation with ELRC Development to minimize impact and report to the secretary.
- IND444-17 • Incorporation of CPL South Alternative 10A into proposed route (Goodleigh Manor Subdivision)
- IND444-18 • Surveys and/or consultation with PA Game Commission, PA Fish and Boat Commission, or VA Dept of Game and Inland Fisheries and file survey results and avoidance or mitigation measures for 5 state-listed animal species (Allegheny woodrat, eastern small-footed bat, brook floater, bald eagle, and timber rattlesnake) and 5 state-listed plant species (jeweled shooting-star, American holly, crane-fly orchid, puttyroot, and stiff cowbane).

Please address these shortcomings and reissue a complete DEIS.

Eva Telesco

IND444-16 See the response to comment IND399-15.

IND444-17 See the response to comment IND399-16.

IND444-18 See the response to comment IND399-17.

IND445 – David M. Jones

20160628-5025 FERC PDF (Unofficial) 6/27/2016 10:09:42 PM

David M Jones, New Providence, PA.
Attn: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, Dc 20426

RE: Atlantic Sunrise, Docket CP15-138-000

Secretary Bose and Commission Representatives,

IND445-1 We have received and reviewed the Williams Partners most recent DEIS survey report regarding the forecasted historical and cultural impacts that if permitted would directly affect Pennsylvania's historical indigenous central core in Lancaster County Pennsylvania. The current updated study report adds even more proposed significant cultural impacts, while neglecting the mention of the already existing preserved cultural sites this proposal would impact. It's become very clear the Williams Partners has a very limited knowledge of Lancaster County's preserved historical culture, nor any foreseen respect for it or the county itself. This becoming very obvious with projects recent move "off" historic Conestoga Indiantown while the right of way still directly crosses the boundaries of the William Penn land grant to the Susquehannock and numerous burial sites in the immediate area as well. Please refer to: Supplemental Information / Submission by Native Preserve and Lands Council under CP15-138-000. Deceleration of Cultural and Historical Impacts Proposed by Atlantic Sunrise Proposal Submission Date/Time: 6/27/2016 9:51:51 PM

The HDD proposed for the Conestoga river crossing would also go directly under one of the oldest only partially studied indigenous historical sites for the county 36LA1. The Roberts Farm Site 36LA1 is a vast extremely important late archaic to contact site containing an overwhelming amount of unstudied cultural history and burials. In no way possible should this site or any grave sites ever be placed under industry control or entrusted to its regulation. The Roberts site is preserved on the Nation Registry of Historic Places and simply putting a historic cultural site of this magnitude even close to a potential impact zone would be in very disastrous poor judgment. These areas are not even close to the survey study term of isolated find areas and we demand they be avoided.

IND445-2 The environmental impacts from this proposal by no means justify the need for this greenfield proposal. The permanent loss of forestry must be defended against and nothing could ever compensate the clean watersheds or preserved farmlands losses.

IND445-3 We strongly urge your commission to force Williams Partners to utilize and or expand already existing rights of way under their immediate control.

Sincerely,
David M. Jones V.P.

IND445-1 Transco would avoid sites 36LA0001, 36LA1532, 36LA1540, and 36LA1541 by crossing the Conestoga River via the HDD method. Site 36LA0001 is NRHP-listed, site 36LA1532 is not eligible, site 36LA1540 has not been evaluated for eligibility by the Pennsylvania SHPO, and site 36LA1541 is potentially eligible for the NRHP. Transco would not own or control these sites.

IND445-2 Comment noted.

IND445-3 See the response to comment PM1-162.

IND445 – David M. Jones (cont'd)

20160628-5025 FERC PDF (Unofficial) 6/27/2016 10:09:42 PM

Native Preserve and Lands Council

IND446 – Bonnie Martin

20160628-5024 FERC PDF (Unofficial) 6/27/2016 9:56:54 PM

Bonnie Martin, Conestoga, PA.
IND446-1 I ask that you reject this unnecessary shortcut through Lancaster County. There are too many reasons FERC should reject the Atlantic Sunrise Project.
Threatening, endangered and other special status species are of great concern and need to be protected.
Water resources are of great concern. Private wells within 150 feet of construction in the area of Lancaster County 4-39. What will we do when we can not drink our water?
Native American History is of great concern. This pipeline needs to be rejected due to the sacred land of the Native Americans.

Again, I ask that you reject this unnecessary shortcut through Lancaster County. No good will come of this.

Sincerely,
Bonnie Martin

IND446-1 Comment noted.

IND447 – Cecelia Daubert

20160628-5023 FERC PDF (Unofficial) 6/27/2016 9:37:04 PM

Cecelia Daubert, Pine Grove, PA.
IND447-1 As a landowner who will be impacted by the proposed Atlantic Sunrise Pipeline, I feel the current FERC Draft Environmental Impact Statement is inadequate and incomplete. In addition, there was not enough time given to adequately review the study. There is definitely a need for an extension of the comment period and additional hearings. Please consider doing so. Thank you.

IND447-1 See the responses to comments PM1-70 and PM1-130.

IND448 – Anne Sensenig

20160628-5022 FERC PDF (Unofficial) 6/27/2016 9:08:26 PM

Anne Sensenig, Lancaster, PA.
Some comments on Socio-Economics:
• Some comments on the socio-economic section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000
• I would ask FERC to refrain from making a decision on the DEIS until the following comments and questions are addressed:

- IND448-1 1. In point 4-167, Williams/Transco lists that between 48 and 985 jobs that will be available. There is no specific mention of how many of these jobs would actually go to Pennsylvanians. 4-168 states that 75% will be a non-local; and even though claims are made that between 534 and 623 construction workers might be hired locally, they would need to have the requisite experience for the installation of natural gas facilities. It is likely that few Pennsylvanian construction workers would have such experience. Earlier, Williams stated that only 15 permanent jobs would result. This is not enough of an economic benefit for PA versus the permanent damage to our resources.
- IND448-2 2. 4-169 states that housing-availability in the area could temporarily decrease because of pipeline construction, and puts a positive spin on this as a boon for the rental industry. However, based on the experience of the Rock Springs line, workers filled local campgrounds, which would actually be detrimental for Lancaster County, since tourism is one of our biggest industries.
- IND448-3 3. 4-171 mentions short-term impacts on public services, possibly including the need for localized police assistance or certified flaggers to control traffic flow during construction activities. Will there be any monetary reimbursement to local municipalities for the extra burden they will bear? Once again, the cost would be exacted from Lancaster County, and the benefit nil, or next to it.
- IND448-4 4. Re damage to local roads resulting from pipeline construction, Transco promises to repair them (4-172). Who will keep Transco accountable? Will before and after photos be taken to document the damage? What outside monitoring body will do this? Who determines which damage needs to be repaired?
- IND448-5 5. FERC finds Williams/Transco plan and mitigation measures to be sufficient to keep traffic-flow impacts minor and temporary. How was that determination made? - based on what criteria?
- IND448-6 6. Why would property owners be responsible for property taxes associated with the area encompassed by the permanent easement (4-173)?! This whole process seems to be taking power and value away from land owners, yet they would be required to pay for something not of their choice?
- IND448-7 7. Per 4-173, Williams/Transco would compensate landowners for easements, use of workspace, and any construction-related damages. Who determines what damage is done during construction? What does a landowner have to do in order to prove damage done during construction? Is FERC able to provide documentation for past Transco projects where landowners have had complaints of damage during construction? How did Transco respond? Did the landowners have to sue in order to get any compensation? Who holds Transco accountable for this work?

IND448-1 See the response to comment PM1-23.

IND448-2 As described in section 4.9.2 of the EIS, while some of the construction activity would be conducted during the peak tourism season, sufficient temporary housing is likely to be available as indicated in table 4.9.2-1, but may be more difficult to find and/or more expensive to secure. However, housing options for construction workers and tourists in addition to those listed in table 4.9.2-1 would include campgrounds, bed and breakfast lodges, and inns. Therefore, impacts on tourism due to the construction of the Project are expected to be minimal. The estimated 15 new permanent employees required for operation of the Project would have no measureable impact on local housing stocks.

IND448-3 Section 4.12 of the EIS discusses emergency training and response. Company personnel are responsible for the pipeline in the event of an emergency. Local public safety officials (fire, police) would be responsible for protecting the public during an emergency situation and making the determination of the necessary emergency steps to take, including notifying or evacuating residents if necessary. As described in section 4.12.1 of the EIS, Transco has met with local emergency services departments and would continue to meet annually with these departments. While Transco would not necessarily compensate municipalities for any public service assistance that might be required to train for or respond to an emergency incident, Transco has partnered with the Pennsylvania State Fire Academy to provide training. Additionally, as described in section 4.9.3 of the EIS, Transco has established a community grant program that may be used for improvements to local public services.

IND448-4 See the response to comment IND398-2.

IND448-5 All impacts on roads would be temporary, as described in section 4.9.4.1 of the EIS and in Transco's *Traffic and Transportation Management Plan*. If a road would be closed due to pipeline construction, section 4.9.4.1 of the EIS states Transco would excavate the trench across the road one lane at a time. One lane would be left open for the majority of the process, except for the short period of time when the pipeline is lowered into the trench. During any period when a road is completely cut or temporarily closed, steel plates would be available on site to immediately cover the open area to permit travel of emergency vehicles.

IND448-6 See the responses to comments PM1-116 and IND425-13.

IND448-7 See the responses to comments PM1-1, PM1-177, IND373-1, and IND425-16.

IND448 – Anne Sensenig (cont'd)

20160628-5022 FERC PDF (Unofficial) 6/27/2016 9:08:26 PM

IND448-8 8. Per 4-173, Transco would offer farmland owners a compensation plan for crop damages that includes provisions for the owner to identify crop yield deficiencies. Who oversees the easements Transco signs with farmers to ensure they are fair - especially since FERC knows that many of the easements are signed through intimidation and bullying tactics-as has been documented by landowner comments to FERC.? Will Transco reimburse beyond what is in their contract, if the farmer's land does not recover as quickly as Transco expects? What does a landowner have to do to get further compensation for lost crops?

IND448-9 9. I find it ludicrous that, per 4-173, "subjective aspects" such as the potential effect of a pipeline would not be taken into account for the valuation/appraisal of land (only "objective" characteristics such as size, location and any improvements. It is obvious that the awareness of potential explosions, possible contamination of local water sources, permanently damaged and compacted soils, etc. would have a major impact on potential buyers.

IND448-10 10. 4-174 claims that "based on information obtained by Transco to date, insurance underwriters have not considered the presence of a transmission pipeline when determining the cost and coverage of property insurance. Transco is fully insured and maintains insurance coverage that extends to landowners from the start of the survey process through the lifetime of the pipeline. Transco would pay for damage caused by construction and operation of its facilities." Numerous comments have been submitted from insurance companies stating that they would not be able to continue with home owners insurance because the space is now being used commercially; that the landowner would have to find new insurers, and face increased prices. Transco does not come out and assess the land/home and cover insurance for each landowner. Instead, if there is an accident, the landowner has the damage to deal with AND would have to sue Transco to have Transco's insurance cover the damage. FERC makes it sound as if Transco would go out of their way for the landowner. On the contrary, history has shown with the industry, this is NOT the case. In Dimnick PA, landowners lost their water supplies, and spent years in legal battles, spending thousands of dollars on legal fees in order to try to get compensated for the damage to their properties and their lives - and were never adequately compensated.

IND448-11 11. The claim in 4-175 that construction of the pipeline would beneficially impact local sales tax revenue because of material used is not true. Pipes and other material have been bought from Turkey and India. The only local purchase might be straw for controlling erosion.

IND448-12 Finally, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline.

IND448-8 See the response to comment PM1-83.

IND448-9 See the response to comment PM1-116.

IND448-10 See the response to comment PM1-177.

IND448-11 Economic benefits are described in section 4.9.7 of the EIS. Also see the response to comment PM1-50.

IND448-12 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5021 FERC PDF (Unofficial) 6/27/2016 9:06:45 PM

Anne Sensenig, Lancaster, PA.

Some comments on Threatened, Endangered & Other Special Status Species:

- Some comments on the threatened, endangered and other-special-status species section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000
- I would ask FERC to refrain from making a decision on the DEIS until the following comments and questions are addressed:

- IND448-11 1. Of species protected in Pennsylvania under Title 58 Part II of the PA Code (58 PA Code sections 75.1-75.4), administered by the PA Game Commission, PA Fish and Boat Commission, and Pennsylvania Department of Conservation and Natural Resources), 4 of the 8 species listed by Williams/Transco (4-104) as potentially living in the space proposed for the pipeline might be affected: the northern long-eared bat, Indiana bat, bog turtle and northeastern bulrush. The table on 4-105 inexplicably says the pipeline "may affect, but not likely adversely." I find it hard to imagine that having an intrusive pipeline coming through a habitat would positively impact them. What does this statement mean?
2. Sections 4-107 through 109 speak generally about Williams/Transco's studies on the bats and the potential impacts. We need more detail about who did the studies and whether they were neutral parties, and their methodology.
- IND448-14 3. In 4-110, Williams/Transco offers steps to limit impact on the bats. Using existing right-of-ways seems to me to be the only acceptable and legal option for Williams/Transco, given the laws protecting these species, and I urge FERC to deny permits for any greenfield lines.
- IND448-15 4. Sections 4-111 and 4-112 indicate that Williams/Transco's survey and study of bog turtles - a federally-listed threatened species - is incomplete: "Transco is currently developing Phase 2/3 survey report to be submitted to FERC and FWS." How can FERC move forward with any decision when studies on threatened species, protected by both state and federal laws, are not complete - and when the incomplete studies already show some presence of these turtles?
- IND448-16 5. In 4-113, Williams/Transco admits that while it would attempt to lessen the pipeline's impact on the Northern Bulrush, it cannot entirely avoid the wetland. Even if the pipeline is 110 feet from the bulrushes, wetlands are an interconnected biome. How then would the bulrushes be isolated or protected from negative impact?
- IND448-17 6. Points 4-114, -118, -119, -121 and -122 enumerate 5 other state-listed animals (including the national bird): Bald eagles, Allegheny Woodrat, Eastern Small-Footed Bat, Timber Rattlesnake and Mussels, and 5 state-listed plants that may be present in the way of the proposed pipeline: 10 more good reasons to deny a pipeline permit.
- IND448-18 Finally, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline. This is not our job, the way it is for Williams/Transco and FERC, but something we must squeeze into our "spare time." I urge FERC to issue an extension to the comment period. However I've heard from a friend that, far from granting an extension, FERC has allowed Williams/Transco to submit hundreds of pages of supplemental information a mere 2 days before the comment period

- IND448-13 See the response to comment IND425-12. Bat surveys were conducted in accordance with FWS survey protocols; the effects determination will require FWS concurrence. We would complete the process of complying with Section 7 of the Endangered Species Act prior to construction.
- IND448-14 See the response to comment IND397-6.
- IND448-15 See the response to comment FA1-20.
- IND448-16 Section 4.7.2.4 of the EIS has been revised to include the updated information on northeastern bulrush and surveys results.
- IND448-17 See the response to comment IND321-4. Since the issuance of the draft EIS, Transco has provided additional information on the Pennsylvania state-list species mentioned in this comment. The appropriate sections of the EIS have been updated to reflect this new information.
- IND448-18 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5021 FERC PDF (Unofficial) 6/27/2016 9:06:45 PM

IND448-18 | ends. How can we to consider this process anything but a farce when the
(cont'd) | public is not even given sufficient time to comment, and then has no
| opportunity to review supplemental information?

Anne Sensenig

IND448 – Anne Sensenig (cont'd)

20160628-5020 FERC PDF (Unofficial) 6/27/2016 9:04:54 PM

Anne Sensenig, Lancaster, PA.

Some comments on the wildlife and aquatic resources section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project,

• I would ask FERC to refrain from making a decision on the DEIS until the following comments and questions are addressed:

1. The proposed pipeline would cross agricultural land, upland forest, open land, developed land, and wetlands, impacting wildlife diversity and density in habitats located in contiguous forest tracts, successional habitats and grasslands. Some of these habitats support populations of big and/or small game (black bear, white-tailed deer, wild turkey, gray squirrel, cottontail rabbit, waterfowl, mallard, wood duck, American coot, grouse). (4-86) Per 4-89 & -90, the pipeline would cross one "Important Mammal Area" along the Central Penn Line South (IMA # 26: Stony Mt. Woodrat Complex) of which construction would affect 219 acres in St. Anthony's Wilderness. While IMAs are not legally protected, they are intended to promote mammal conservation by identifying sites with habitats critical to their survival.

2. Per 4-92, the proposed pipelines in PA would have the greatest potential to affect migratory birds - of which 157 species are regular breeders in project counties. The pipeline would cross four "IBAs" - Important Bird Areas - designated and recognized as the most critical regions in the state for conserving bird diversity and abundance in PA - in Ricketts Glen, Lower Susquehanna River Gorge, Conowingo/Muddy Run, St. Anthony's Wilderness, Kittatinny Ridge, and would affect 133.4 acres (4-90). Executive Order 13186 requires that all federal agencies - presumably FERC included - avoid making decisions that may negatively affect migratory birds. FERC entered into an MOU with the FWS in March

IND448-19 2011. (4-91). What was this MOU? Is FERC exempt from this federal requirement? Williams/Transco says it has developed a Draft Migratory Bird Plan, but has FERC seen specifics of that plan? (The public certainly has not had the opportunity to review it.) Who will decide whether the measures are enough to avoid negative impact? Who will monitor Williams/Transco to ensure they are following the plan?

3. Point 4-94 seems to me an open admission that this pipeline proposal should be rejected: "the impact of grading, clearing, and excavation of open lands, non-forested wetlands, open water, agricultural lands, and developed lands would be short in duration- 1-5 years." [I do not consider that short duration!] - "The effect of clearing, grading, and right-of-way maintenance in upland and wetland forested lands would be more prominent and long term. These areas *may not be restored to

IND448-20 their preconstruction condition potentially for decades, if at all.* How can FERC be debating destroying land to a point it may not be restored?!

IND448-21 4. The conclusion at 4-96, that overall, wildlife resources are not expected to be significantly affected due to construction and operation based on the presence of suitable adjacent habitat available for use, the proposed clearing window for avoidance of the migratory bird nesting season, and Williams/Transco recommendations, does not appear to be true for various points along the pipeline, but is especially not true of the greenfield Central PA Line South. I urge FERC to deny permit *at the very least,* of this part of the pipeline.

IND448-19 See the responses to comments IND425-10 and CO14-14.

IND448-20 Comment noted. Mitigation measures to minimize the impacts on forested areas, including wetland forests, are addressed in sections 4.4.4 and 4.5.5 of the EIS.

IND448-21 Comment noted.

IND448 – Anne Sensenig (cont'd)

20160628-5020 FERC PDF (Unofficial) 6/27/2016 9:04:54 PM

IND448-25 Williams/Transco holds in 4-99 that "temporary stream bank disturbance, short-term increase in sedimentation and water turbidity, a temp reduction in shading, and temporary modification of flow" are "not significant" impacts. What would be considered significant? The DEIS is incomplete without definitions for "short-term" and "temporary." In 4-99

IND448-26 Williams/Transco also offers assurances of mitigation such as: "completing waterbody crossings during appropriate in-stream construction windows and completing open cut crossings within 24 hours and 48 hours for minor and intermediate crossings, installing temp erosion controls and maintaining flow rates, dispersing any downstream discharges to minimize scour and downstream siltation, crossing waterbodies perpendicular to the channel or as close as practicable, promptly restoring stream channels to their original contours and flow rates and stabilizing banks." Doing so is not in Williams/Transco's interest or time. Who will be monitoring to make sure they are compliant? Who will sanction them when they are not?

IND448-24 6. In 4-99, Williams/Transco states that they would "allow a 25-foot riparian strip along each waterbody bank to revegetate with native flora in order to stabilize banks, reduce erosion impacts, and provide shading and cover for fisheries resources." Are they promising to replant native flora? FERC should require this; otherwise invasive, possibly non-native plants will take over.

IND448-27 7. In 4-101 Williams/Transco states that blasting may be required in 55 waterbodies. If so, Transco "would develop a detailed, site-specific blasting plan for that location." This study is incomplete, and should not be approved before a plan is delineated for FERC to review and for public comment.

IND448-24 8. In 4-101, Williams/Transco promises to mitigate the impacts of the hydrostatic testing of the pipeline (water withdrawals and discharges on aquatic resources) prior to its placement, but does not specify how. FERC should not approve a permit when the report is obviously complete.

IND448-27 9. In the same point, Williams/Transco claims that no chemicals or additives would be added to the water *except where necessary to eradicate non-native aquatic species* - but again, does not specify what chemicals, who would determine whether their use is really necessary - or who would regulate the use of chemicals. Why would Williams/Transco even care about non-native aquatic species? To me, this sounds suspiciously like a loophole for the use of toxic chemicals necessary for some process they want to use.

IND448-28 Finally, I register my protest that there hasn't been enough time to comment.

IND448-22 See the response to comment PM1-9. As described in section 4.3.2.6 of the EIS, temporary impacts would occur during in-stream construction activities. Following in-stream construction activities, streambanks would be stabilized and revegetated.

IND448-23 Section 2.5 describes the environmental inspection and monitoring program that would be implemented if the Project is approved.

IND448-24 Transco has committed to revegetating disturbed riparian areas with native species of conservation grasses, legumes, or woody species. See Transco's Procedures included as attachment 18 of its ECP. As described in section 4.5.4 of the EIS, Transco developed a Management Plan to minimize the spread of noxious and invasive species.

IND448-25 We disagree. Transco developed a Blasting Plan, which is included as attachment 10 of its ECP. If in-water blasting is required, Transco would be required to obtain a permit from the PFBC and comply with the conditions included as part of the authorization.

IND448-26 We disagree. Transco would obtain the necessary authorizations to appropriate and discharge water associated with hydrostatic testing and comply with the conditions included as part of the authorizations.

IND448-27 Hydrostatic test water discharges are regulated by the PADEP. As described in section 4.3.2.6 of the EIS, Transco does not plan to add any chemicals or biocides to the test water.

IND448-28 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5019 FERC PDF (Unofficial) 6/27/2016 9:02:21 PM

Anne Sensenig, Lancaster, PA.

Some comments on Vegetation:

- Some comments on the vegetation section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000
- I would ask FERC to refrain from makes a decision on the DEIS until the following comments and questions are addressed:

1. 4-76 states that the majority of vegetation the pipeline would affect during construction is agricultural land (1,413.9 acres); that additional vegetation types affected would include 949.2 acres of upland forest, 275.1 acres of open lands, and 50.4 acres of wetlands. (4-76).

IND448-29 Lancaster's 2 top economic areas are agriculture and tourism. The DEIS cannot conclude this pipeline would not have a significant impact.

2. In 4-77, Williams/Transco asserts it would make improvements to access roads for its construction equipment by removing trees, brush, or structures. Personally, I do not consider tree removal - or possibly structure removal as an improvement. I would be just fine if these roads were left in their current conditions.

IND448-30 3. 4-78 indicates that several jeweled shooting stars - a threatened plant species in Pennsylvania - were identified along the Central Penn Line South route - a reason alone for FERC to deny Williams/Transco's application. None of the other 5 PA DCNR identified vegetation community types were documented - hence the DEIS is incomplete.

IND448-31 4. Per 4-80, clearing or fragmentation of interior forests creates more "edge habitat" and smaller contiguous forested tracts, which can affect availability and quality of feeding and nesting habitat for certain species as well as isolate species populations. Fragmenting any biome/habitat is NOT BENEFICIAL to the species therein, yet in 4-81, the DEIS almost makes edge habitats sound like a good thing: "Newly created edge habitats would be established by maintenance of the permanent right-of-way. Indirect impacts extend for 300 ft on each side (600 ft) or 1,993.8 acres of interior forest" - followed by a "non-statement" about habitat fragmentation possibly benefiting or have no effect on some species, but being detrimental to others. I know of no species that would benefit from fragmentation of their habitat, unless it would be opportunistic species taking over a niche.

IND448-32 5. Per 4-82) removing existing vegetation and disturbing soils during construction could create conditions conducive to the establishment or spread of noxious weeds - particularly where new corridors are established in previously forested areas -22 Noxious weed and Invasive Plant Species along the Central Penn Line North route; 51 along Central Penn Line South-NW and IPS - which would change or degrade natural vegetation communities and reduce the quality of habitat for wildlife and native plant species. Another concern is that they would take over the right-of-way; resulting in toxic chemical spraying by the government to keep them under control (4-82).

IND448-33 6. 4-84 indicates that the primary effect of pipeline construction would be cutting clearing and or removing 2,688.8 acres of existing vegetation, of which 949.7 acres would be upland forest. The conclusion reached in 4-85 is that "due to the prevalence of forested habitats within the project area and eventual re-growth of prior forested areas

IND448-29 See the response to comment PM1-9.

IND448-30 As described in section 4.7.3.4 of the EIS, the jeweled shooting-star was determined to be located outside of the proposed workspace and would not be affected by the Project.

IND448-31 Comment noted. Many species of wildlife use edge habitat for nesting, feeding, and traveling. For example, the indigo bunting is typically present along forest edges because that is its primary habitat. Other species like the wild turkey, eastern cottontail, or white-tailed deer may feed along a forest edge.

IND448-32 See the responses to comments PM1-85 and IND448-24.

IND448-33 See the responses to comments PM1-9 and FA1-97.

IND448 – Anne Sensenig (cont'd)

20160628-5019 FERC PDF (Unofficial) 6/27/2016 9:02:21 PM

IND448-33 (cont'd) outside of the permanent right-of-way, we conclude that the permanent conversion of forested land would not result in a significant impact on the vegetation resources within the project area." I cannot imagine how this statement could be accepted as true, as Pennsylvania is already fast-losing its forested land - down to only 15-16%. There are so many reasons why tree removal is detrimental and destructive, but not least is the mitigating effect of trees on the increasing threat of climate change.

IND48-35 Finally, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline. This is not our job, the way it is for Williams/Transco and FERC, but something we must squeeze into our "spare time." I urge FERC to issue an extension to the comment period. However I've heard from a friend that, far from granting an extension, FERC has allowed Williams/Transco to submit hundreds of pages of supplemental information a mere 2 days before the comment period ends. How can we to consider this process anything but a farce when the public is not even given sufficient time to comment, and then has no opportunity to review supplemental information?

Anne Sensenig

IND448-34 See the response to comment PM2-94.

IND448-35 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5018 FERC PDF (Unofficial) 6/27/2016 9:00:58 PM

Anne Sensenig, Lancaster, PA.

Some comments on Wetlands:

- Some comments on the wetlands section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000
- I would ask FERC to refrain from making a decision on the DEIS until the following comments and questions are addressed:

1. 4-71 states that Pennsylvania pipeline facilities (CPL North, CPL South, Chapman Loop, and Unity Loop) would cross 251 wetlands. In Pennsylvania, "exceptional value wetlands" are given special protection by the PADEP under PAcCode Title 25 (Pennsylvania Code, 1991). Fifty-one of the wetlands, or 20%, crossed by the proposed pipelines in Pennsylvania are classified as exceptional value, with 15 of these containing a forest component. The 8 forested wetlands, of the Hemlock/Mixed Hardwood Palustrine Forest community type, identified by PADCNr as a special concern community type due to a restricted range, relatively few populations, recent and widespread declines, or other factors making them at risk of extirpation in Pennsylvania. Given this special-protection PA law, how can "special protection" allow for a pipeline, which would obviously be detrimental to wetlands? Furthermore, since the pipeline right-of-way must remain permanently deforested, how can a pipeline be justified through these areas?
2. 4-74 states that following construction, Williams/Transco would ensure all disturbed wetland areas are successfully re-vegetated. Again, how can this be, when the right-of-way must remain deforested? What organization would monitor and enforce the re-vegetation, or impose sanctions if it doesn't happen?
3. Also in 4-71, the DEIS states that "Construction would be conducted in accordance with Williams/Transco's ECP" (4-71). Why would FERC allow - the company inflicting damage on the land - determine the guidelines by which construction can happen? FERC should demand or appoint an independent third party to determine guidelines.
- Finally, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline. This is not our job, the way it is for Williams/Transco and FERC, but something we must squeeze into our "spare time." I urge FERC to issue an extension to the comment period. However I've heard from a friend that, far from granting an extension, FERC has allowed Williams/Transco to submit hundreds of pages of supplemental information a mere 2 days before the comment period ends. How can we consider this process anything but a farce when the public is not even given sufficient time to comment, and then has no opportunity to review supplemental information?

Anne Sensenig

- IND448-36 Transco would be required to obtain authorization from the PADEP and the USACE for wetland crossings. As part of this permitting process, Transco would be required to mitigate for wetland impacts. The PADEP may include specific restoration conditions and monitoring requirements. Also see the responses to comments FA1-6, FA1-15, and IND114-20.
- IND448-37 See the responses to comments PM1-84, IND114-43, and IND448-36. Section 2.5 of the EIS describes the environmental inspection and monitoring program that would be implemented if the Project is approved.
- IND448-38 Transco's ECP contains project-specific plans that we have reviewed and find acceptable. In fact, Transco's Plan and Procedures are based on our guidelines.
- IND448-39 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5017 FERC PDF (Unofficial) 6/27/2016 8:59:09 PM

Anne Sensenig, Lancaster, PA.

Some comments on Water Resources:

- Some comments on the water resources section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000
- I would ask FERC to refrain from making a decision on the DEIS until the following comments and questions are addressed:

IND448-40 1. 16 private wells are located within 150 feet of construction sites in Lancaster County (4-39). How can FERC approve this proposal when it is incomplete? Point 4-41 indicates that surveys along the project route have not yet been completed, and that there is a potential other private water supply wells and springs might be identified.

2. This section discusses contamination of ground water - first indicating that contamination is unlikely (at least from construction) - point 4-44 - but that aquifers and shallow groundwater areas could be vulnerable to contamination by spills of hazardous materials (4-45). We're apparently not to worry because Williams/Transco has a "Spill Plan." This is not reassuring to me. Exxon probably had a spill plan too, before the Valdez had its spill. It's all very easy to say there's a plan in place after toxic waste is unleashed. Shouldn't FERC's job be to protect residents of an area, particularly affected landowners, from possible danger - this being only one of many?

3. As so often in this DEIS, regarding construction impacts on groundwater, Williams/Transco's promise is only to restore the ground surface "AS CLOSE AS IS PRACTICABLE" to original conditions (4-44) - which is likely not very close, as the damage in so many cases will not make it "practical" to restore.

IND448-41 4. In 4-46, Williams/Transco commits to test water prior to and after construction, "subject to landowner permission." Or Will Williams/Transco approach each landowner? Will the landowner have to somehow know of the offer and approach Williams/Transco? If a landowner asks for water testing and it wasn't in their contract, will the offer be honored? In the Geology section (4-9) Williams/Transco offers the testing and mitigation for wells within 150 feet of construction. First of all, how will landowners be informed of this offer? And what about wells outside that 150-foot area - which will surely also be impacted by construction. Based on landowner experience with other pipelines, pipelines are generally approved before the water quality is tested, resulting in empty promises. Furthermore, the water should be tested by a neutral, third party, chosen by the landowner - not by Williams/Transco (who has a vested interest) - which is what has been offered in the past.

IND448-42 5. I urge FERC to deny the Williams/Transco proposal based on the number of critical waterbodies the pipeline would impact or cross: nine watersheds or drainage basins (4-47); 331 waterbody crossings (311 associated with pipeline, 20 involving access roads), 207 perennial waterbodies, 79 intermittent waterbodies, 39 ephemeral waterbodies, 6 ponds, 23 perennial waterbodies, 18 intermittent waterbodies, 6 ephemeral waterbodies by access roads. (4-48); 4 potable surface water intakes within 3 miles downstream of waterbody crossings were identified. (4-49). Further 8 bodies of water are classified as High Quality level crossed

IND448-40 See the responses to comments PM1-70, PM1-174, and IND397-4.

IND448-41 As described in section 4.3.1.7 of the EIS, Transco would perform pre- and post-construction monitoring for well yield and water quality for private wells and springs within 150 feet of the construction workspace, subject to landowner permission. Landowners could elect to not have Transco complete the testing. As described in section 5.2 of the EIS, we are including a recommendation that Transco develop and implement an environmental complaint resolution procedure that provides landowners with clear and simple instructions for identifying and resolving their environmental mitigation problems/concerns during construction of the Project and restoration of the right-of-way. Also see the response to comment PM1-174.

IND448-42 Comment noted. Mitigation measures to minimize the impacts on waterbodies crossed are included in section 4.3.2.6.

IND448 – Anne Sensenig (cont'd)

20160628-5017 FERC PDF (Unofficial) 6/27/2016 8:59:09 PM

for Central Penn Line South, and are to be given special protection- (4-52). Tucquan Creek would be a Dam and Pump crossing- (4-55)

IND448-43 6. Williams/Transco would use Horizontal Directional Drilling on the Susquehanna and Conestoga Rivers. Water from the waterbody being crossed would be used to create the drilling mud. An estimated 286,065 gallons of water would be required at the Susquehanna crossing; 275,565 at the Conestoga crossing. (4-59) First of all, this is a wasteful diversion of our community's water. Second, what would be done with the mud/slurry waste from the drilling? How can it be disposed of without negatively impacting the waterbody?

IND448-44 7. In 4-63, Tansco promises to implement mitigation measures within floodplains to minimize floods ("installing and maintaining erosion and sediment control structures, restoring floodplain contours and waterbody banks to their preconstruction condition, and conducting post construction monitoring to ensure successful re-vegetation") Who will monitor and enforce this? These things did not happen when Williams/Transco installed the Rock Springs pipeline during the first 3 days of construction; and then only because neighbors took photos and reported to authorities.

IND448-45 Finally, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline. This is not our job, the way it is for Williams/Transco and FERC, but something we must squeeze into our "spare time." I urge FERC to issue an extension to the comment period. However I've heard from a friend that, far from granting an extension, FERC has allowed Williams/Transco to submit hundreds of pages of supplemental information a mere 2 days before the comment period ends. How can we to consider this process anything but a farce when the public is not even given sufficient time to comment, and then has no opportunity to review supplemental information?

Anne Sensenig

IND448-43 The Susquehanna River Basin Commission regulates the appropriation of surface waters. Drilling mud would be disposed of at an approved facility/location in accordance with applicable regulations.

IND448-44 Section 2.5 of the EIS describes the environmental inspection and monitoring program that would be implemented if the Project is approved. As described in section 5.2 of the EIS, we are including a recommendation that Transco develop and implement an environmental complaint resolution procedure that provides landowners with clear and simple instructions for identifying and resolving their environmental mitigation problems/concerns during construction of the Project and restoration of the right-of-way.

IND448-45 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5016 FERC PDF (Unofficial) 6/27/2016 8:57:22 PM

Anne Sensenig, Lancaster, PA.

Some comments on Soil:

- Some comments on the soil section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000
- I would ask FERC to refrain from making a decision on the DEIS until the following comments and questions are addressed:

- IND448-46 1. Point 4-26 describes how human disturbance and sparse vegetation lead to erosion - yet that is exactly what will happen with a pipeline.
2. Per 4-27, 106 miles of the soils along the proposed line segments are considered prime farmland- 89.9 miles of these prime farmland soils are active agricultural land. Agriculture is one of the region's most important economic arena; inarguably much more profitable to Pennsylvania than the supposed benefits Williams/Transco claims would result from the pipeline.
- IND448-47 3. In 4-28, despite description of construction equipment on wet soil as having compaction potential, and 52% of the soil along the proposed pipeline course giving cause for re-vegetation concern, the conclusion is that no significant impacts on soils expected in the staging areas. I don't understand this conclusion.
- IND448-48 4. The conclusion goes on to say (in point 4-30) that after construction, rough grading and vegetation clearing would be restored in accordance with landowner lease agreements. However there is no clarification about whether verbal agreements would be honored, and what would happen to landowners who were not aware that this restoration option was available. Further, who will hold Williams/Transco accountable to carry out this restoration?
- IND448-49 5. In 4-33, Transco says it would re-vegetate using a specific seed mix (grasses, herbaceous plants, and legumes) or as specified by landowner. Does this need to be specified by the landowner in the written contract?
- IND448-50 6. Again in 4-33, will Transco's promise to compensate farmland owners and/or tenants for crop loss and conduct crop yield monitoring at the request of the landowner (until crops are growing again) be fulfilled even if not specified in the landowner contract?.
- IND448-51 7. I am concerned that Williams/Transco's promise to monitor disturbed areas for a minimum of 2 growing seasons, and correct any area that has not successfully re-vegetated does not promise to return the land to the condition it was in prior to pipeline installation: only "to conditions similar to surrounding undisturbed areas."
- IND448-52 8. I urge FERC to err on the side of caution in terms of this pipeline proposal, given that few studies have addressed the effects of heat from pipelines on crop growth (4-33).
- IND448-53 Finally, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline. This is not our job, the way it is for Williams/Transco and FERC, but something we must squeeze into our "spare time." I urge FERC to issue an extension to the comment period. However I've heard from a friend that, far from granting an extension, FERC has allowed Williams/Transco to submit hundreds of pages of supplemental information a mere 2 days before the comment period

IND448-46 Comment noted. See the responses to comments PM1-60, PM1-83, and CO9-21.

IND448-47 About 6.5 miles (or about 3 percent) of the proposed pipeline route crosses soils with a revegetation concern (see revised table 4.2.1-1). As described in section 4.2.2 if the EIS, Transco would implement the measures its project-specific Plan, Procedures, and Agricultural Plan (see appendix E and attachments 6, 17, and 18 of Transco's ECP), which identify baseline mitigations measures Transco and its contractors would implement to minimize soil disturbance (including compaction) and transportation of sediments off the right-of-way or into sensitive resources (e.g., wetlands, streams, residential areas). The procedures presented in these plans represent BMPs and are designed to accommodate varying field conditions while maintaining strict minimum standards for the protection of soil resources and environmentally sensitive areas. Therefore, we conclude that the Project would have no significant impacts on soils. Also see the responses to comments PM1-60, PM1-83, and CO9-21.

IND448-48 Comment noted. See section 2.5 of the EIS for a description of the environmental inspection and monitoring measures that would be employed during construction of the Project to ensure compliance with the recommended mitigation measures.

IND448-49 Yes, any special arrangements for restoration/revegetation of the property would need to be included in the terms of the right-of-way agreement between the landowner and pipeline company. See also response to comment IND420-2.

IND448-50 Transco would implement the measures in its Agricultural Plan (attachment 6 of its ECP), the purpose of which is to aid in planning, construction, and post-construction operations in a way that considers and accounts for soil, water, and agricultural issues. The plan states: "...valuation of the crop loss will be conducted separately from the easement appraisal. Normal crop valuations consists of 100 percent reimbursement for crop losses in the first growing seasons, 50 percent in the second growing season and 25 percent in the third growing season. This compensation will be made in a one time, upfront payment."

IND448-51 See the responses to comments IND420-2 and IND448-44.

IND448-52 Potential thermal effects of pipeline operation on soil moisture and agricultural productivity are described in section 4.2.2.2 of the EIS.

IND448-53 See the response to comment PM1-130.

IND448 – Anne Sensenig (cont'd)

20160628-5016 FERC PDF (Unofficial) 6/27/2016 8:57:22 PM

IND448-53 | ends. How can we to consider this process anything but a farce when the
(cont'd) | public is not even given sufficient time to comment, and then has no
| opportunity to review supplemental information?

Anne Sensenig

IND448 – Anne Sensenig (cont'd)

20160628-5015 FERC PDF (Unofficial) 6/27/2016 8:56:08 PM

Anne Sensenig, Lancaster, PA.

Some comments on Geology:

- Some comments on the geology section of the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000

IND448-53 (cont'd) • First, I register my protest that there has not been nearly enough time for community review and comment on this 472-page DEIS - even though we are the ones who would be impacted by a pipeline. This is not our job, the way it is for Williams/Transco and FERC, but something we must squeeze into our "spare time." I urge FERC to issue an extension to the comment period. However I've heard from a friend that, far from granting an extension, FERC has allowed Williams/Transco to submit hundreds of pages of supplemental information a mere 2 days before the comment period ends. How can we to consider this process anything but a farce when the public is not even given sufficient time to comment, and then has no opportunity to review supplemental information?

- I would ask FERC to refrain from makes a decision on the DEIS until the following comments and questions are addressed:

1. Re rock removal requiring blasting (4-9) - with potential impact on water wells, springs, wetlands, nearby above-ground facilities and adjacent pipelines and utility lines - Williams/Transco says it would "use minimum charges, use blasting mats where necessary, use seismograph equipment to monitor, inspect aboveground and underground facilities within 150 ft, and provide occupants of nearby buildings 72 hours notice.

IND448-54 Williams/Transco needs to specify who they will inform about blasting: What is a "nearby" occupant? Presumably facilities beyond 150 ft. from the blast will not be inspected. This does not seem far enough away for safety.

IND448-55 2. In 4-23, Williams/Transco (or FERC?) claims that existing pipelines in the project area have not been adversely affected so far as a result of seismic activity, active faults or soil liquefaction, however, there has never been a pipeline of this size and pressure in this area, which does have active seismic activity. So this is a potentially dangerous conjecture.

IND448-56 3. Williams/Transco makes many high-minded assurances and promises in sections 4-24 and 4-25 maintaining slope stability on steep-side slopes, minimizing the potential for surface water ponding and sinkhole mitigation - but there is no specificity about how they will be kept accountable, and by whom.

IND448-57 4. (from the Water Resources section): Williams/Transco mentions that to cross waterways, blasting may be required to allow trench excavation. If so Williams/Transco says they would "develop a site specific blasting plan for each crossing." FERC should not approve this application without specific plans for where, and how much damage would be involved.

Anne Sensenig

IND448-54 See the response to comment IND425-1.

IND448-55 See the response to comment IND198-1

IND448-56 See the response to comment IND448-44.

IND448-57 See the response to comment IND448-25.

IND449 – Malinda Clatterbuck

20160629-5129 FERC PDF (Unofficial) 6/29/2016 1:46:19 PM

Malinda Clatterbuck, Holtwood, PA.
Dear FERC Commissioners,

I am very frustrated with the process we, the public, have had forced upon us from FERC for this Atlantic Sunrise Project.

IND449-1 From the public's point of view, the industry has all of the power. They know how the system works. They know how to manipulate landowners, and how to bully and intimidate, and convince people to sign contracts before those individuals realize what is going on, and certainly before they know their rights.

I am very frustrated that FERC is complicit in allowing the industry to function in this way.

First of all, every new community has to learn for the first time, every step of the way what their rights are, and how the system works- and the only contact they have is with the industry. If FERC were really "regulating" they would be the ones to go and meet with landowners, and community members- and give them both sides of the story. FERC would want landowners and community members to know they have the right to say no- and that eminent domain is not what the field agents have expressed it to be (at least to hundreds of landowners we have reached out to along the Atlantic Sunrise Project).

Secondly, we, the public, have to be given a clearer sense of how our comments are being considered. As an E- Subscriber, I have seen hundreds of comments from individuals working in the gas industry all over the country who would bear no burden of the pipeline coming through their backyard. They sign their name to form letters- and send them in. Often the names signed at the bottom are completely illegible. Many of those who are bold enough to sign their names are business owners, who probably have contracts with Williams/Transco- and they make their money by exploiting communities like ours (businesses like trucking companies, large equipment sellers, and VPs of gas supply and engineering firms, just to name a few of the hundred I researched). I want to know if those letters hold more weight than the letters our community members are sending to FERC trying to defend their rights and their land? FERC should be more transparent in revealing to the public what comments matter, and what comments don't, and why and how those comments influence FERC's decision.

IND449-2 In addition, I find it deplorable that it is so difficult for the general public to even submit a comment. I have had to assist dozens of people to navigate the FERC website. It is not easy for many people who are not comfortable with computers, which includes an entire subset of our community in Lancaster County, the Amish. That the public comment period (45 days) pales in comparison to the years the industry is given to create their plan is unfair and, again, gives more power to the industry.

IND449-3 Finally, I want to emphasize my frustration that a gas industry can just put a line on a map and have more power to make that line become an

IND449-1 As described in section 1.3 of the EIS, FERC has conducted extensive outreach for the Project and has provided numerous sources and opportunities for stakeholders to learn and comment on the Project, including its eLibrary website. FERC has received a large volume of comments on the Project, most recently concerning the draft EIS. Some commentors have been in favor of the Project but the majority of commentors are opposed or have concerns. FERC has considered all of these comments equally whether they are pro or con and does not give any more weight to one comment than another. FERC's response to each comment depends on its relevance and content.

IND449-2 See the response to comment PM3-55.

IND449-3 FERC's role and responsibilities are described in section 1.2.1 of the EIS. Also see the responses to comments PM1-46, PM1-186, and IND449-1.

IND449 – Malinda Clatterbuck (cont'd)

20160629-5129 FERC PDF (Unofficial) 6/29/2016 1:46:19 PM

IND449-3
(cont'd) installed pipeline than the power anyone who lives along that line has to stop it. I think it is ridiculous, especially in the case of the Atlantic Sunrise Project, that Williams/Transco can decide they want something, and they submit to FERC and they get it. I know FERC would argue that the public had the first amendment rights in this process- a lawyer I spoke to for 2 hours last week from FERC kept telling me to exercise my first amendment rights- but that means squat if our voices have no power at the table to influence this decision. The way FERC is set up, the industry has all the power- they pay the bills for FERC, they pay all the surveyors, the specialists who submit all of the information submitted to FERC from which FERC makes a decision. THE PEOPLE most directly, adversely impacted have so little power, I am just appalled over and over again at the injustice.

If FERC were a fair regulatory agency, they would create a more equitable situation for the landowners and communities. We have dozens of stories of people who have lost tens of thousands of dollars, lost time spent trying to learn and then navigate the process, live with increased stress because the short time limit of reading and responding to the dEIS, from trying to juggle life and work and children and the demands of their land (esp. in rural setting such as most of the Central Penn Line is)- and falling and failing health and quality of life- just to try to have a semblance of justice in this system.

FERC could do better-
And what is it for? We still have no idea what matters to FERC, and what doesn't. We have no idea what "significant" means. We get no answers to our questions and concerns. It is a broken system. And one which celebrates, respects and honors the power of the industry, and yet breaks the power of the community. This is an upside down system, which needs to change.

I would love to have some actual responses to the questions I pose in this letter.

Where is the transparency?

What matters to FERC and what doesn't?

What does it matter to have first amendment rights, if the power still lies with FERC and our voices don't translate into influence?

How can industry voices from other states have more power of this decision than those who are most adversely affected?

If the opposition that the ASP has faced along the Central Penn Line, especially in Lancaster and Lebanon Counties- opposition that FERC employees themselves have identified as unprecedented- if this great opposition is not enough to persuade FERC to deny this application, what possibly could persuade them to do so?

Please let me know.

Sincerely,

Malinda Harnish Clatterbuck

IND450 – William and Dolores Smith

20160630-5027 FERC PDF (Unofficial) 6/29/2016 8:15:37 PM

Secretary Bose
Federal Energy Regulatory Commission
888 First Street NE
Room 1A
Washington, DC 20426

RE: FERC Docket CP 15-138

Data on homes near the proposed pipeline, Alternative 22 vs June 2015 route.

Dear Secretary Bose,

IND450-1 "FERC's Draft Environmental Impact Survey on the Atlantic Sunrise Pipeline recommends Williams consider Alt-22 with the statement "Of the routes evaluated, we conclude that Alternative 22 would provide the greatest separation distance from existing residential structures while not significantly increasing effects on other environmental features." The DEIS also states this conclusion was reached using testimony from a few Conestoga residents. *This logical conclusion was unfortunately based on incorrect and misleading testimony.*"

This is how a comment/letter began when recently submitted by Mr. Blair Mohn (accession # 20160627-5192). I will show how the reasoning behind submitting Alternative 22 in place of the June 2015 proposed route was arrived at using Mr. Mohn's own distance comparison list. There was **no** incorrect or misleading information and Alternate 22 should **still** be the **logical conclusion**.

Mr. Mohn and Mr. Erb (who sent in a copy of the same list previously) somehow neglected to show at least one property and 5 green dots showing where homes were located on the route comparison map that they submitted. This is not a big deal, but does skew the view in their favor for someone that doesn't look closely at the map.

In the list of residential structures within 1100 feet of the pipeline that they submitted:
1: Of the 29 homes on Alternative 22, only **one** is 150 ft or less from the pipeline. On the June 2015 proposed route, **four** homes are less than 150 ft away.
2: When comparing homes closer than 400 ft, **four** are involved on Alternative 22, while the June 2015 route has **ten** homes nearer than that to the pipeline.
3: Eight houses are 900 or more feet **away** on Alternate 22, with only four on the June 2015 route that are that far removed.

When Alternative Route 22 was proposed, basically, only homes somewhat close to the pipeline were considered. While there is only a very small chance of a major calamity that would involve an area anywhere near 1100 feet away, we were trying to consider **personal living space, wells and septic systems** as the main purpose of pipeline relocation.

IND450-1 Comment noted. See the responses to comments PM1-106 and PM1-147.

IND450 – William and Dolores Smith (cont'd)

IND450-1
(cont'd)

Below is the address list submitted by Mr. Mohn, comparing the two Routes.

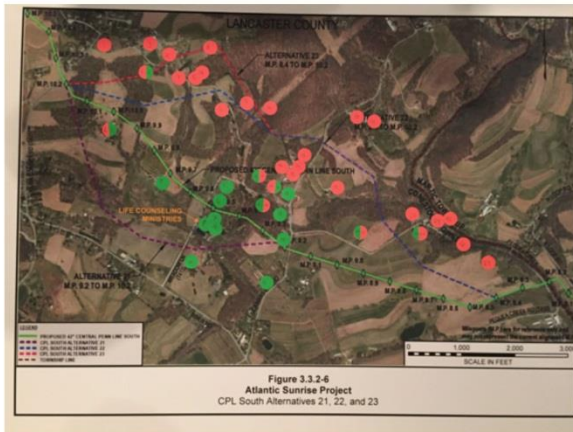
Residential Structures within 1100ft of Route Alternative 22 vs. June 2015 Proposed Route

Alternative 22 Route Orange		June 2015 Proposed Route Green			
Number	Address	Distance (in ft. from pipeline)	Number	Address	Distance (in ft.)
1	289 River Corner Rd	1000	1	Wiker Farm	400
2	River Corner Rd (Wiker)	700	2	138 Hilltop Dr	1100
3	35 Hilltop Dr	900	3	318 Hilltop Dr	300
4	73 Hilltop Dr	1100	4	Leakway, Sr	150
5	93 Hilltop Dr A	1100	5	146 Meadow Lane	400
6	138 Hilltop Dr	600	6	184 Meadow Lane	100
7	169 Hilltop Dr	900	7	198 Meadow Lane	150
8	179 Hilltop Dr	800	8	L.M. Residence	225
9	189 Hilltop Dr	700	9	L.M. Hall	500
10	350 Hilltop Dr	150	10	264 Meadow Lane	1100
11	374 Hilltop Dr	250	11	66 Meadow Lane	400
12	415 Hilltop Dr	500	12	55 Meadow Lane	700
13	540 Sickmans Mill Rd	300	13	415 Hilltop Dr	1000
14	550 Sickmans Mill Rd	540	14	700 Sickmans Mill Rd	150
15	564 Sickmans Mill Rd	670	15	810 Sickmans Mill Rd	800
16	584 Sickmans Mill Rd	700	16	650 Sickmans Mill Rd	500
17	55 Meadow Lane	1000	17	600 Sickmans Mill Rd	800
18	66 Meadow Lane	1100	18	601 Sickmans Mill Rd	850
19	541 Sickmans Mill Rd	525	19	Martin Ranch	200
20	409 Sickmans Mill Rd A	700	20	Martin Farmhouse	700
21	1020 Pequea Cr Rd	525	21	1020 Pequea Cr Rd	650
22	1000 Pequea Cr Rd	425	22	1005 Pequea Cr Rd	1000
23	1005 Pequea Cr Rd	400			
24	996 Pequea Cr Rd	500			
25	994 Pequea Cr Rd	525			
26	950 Pequea Cr Rd	700			
27	805 Pequea Cr Rd	700			
28	93 Hilltop Dr B	1025			
29	409 Sickmans Mill Rd B	500			

IND450 – William and Dolores Smith (cont'd)

20160630-5027 FERC PDF (Unofficial) 6/29/2016 8:15:37 PM

IND450-4
(cont'd)



While the comparison between the Alternative 22 and the June 2015 route should show a significant reason for using Alternative 22, there is a still better Alternative that has been submitted last December, 2015. It is the Conestoga Alternative and would bypass the town of Conestoga, all of the road crossings and most of the taking of private property, at least in the Township of Conestoga. Please direct the Williams Company to reconsider using that area. It was their first choice back in 2014, or at least a very similar route using co-location with electrical power lines in the area was, and would give much relief to the residents of Conestoga.

Thank you for your consideration.

William M Smith

Dolores E Smith

184 Meadow Lane

Conestoga PA 17516

IND451 – Donna Hoar

20160701-0015 FERC PDF (Unofficial) 07/01/2016

CP15-138

Donna R. Hoar
69 Colemanville Church Rd
Conestoga, PA 17516

ORIGINAL

houndz@comcast.net

June 26, 2016

FILED
SECRETARY OF THE
COMMISSION
2016 JUL -1 P 4:13
FEDERAL ENERGY
REGULATORY COMMISSION

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Dear Ms. Bose,

How would you like it if a giant corporation told you that they were going to rip up your back yard by placing a highly explosive gas line through it and your entire neighborhood? How would you like to have to live with the noise of giant earth-moving equipment day and night? How would you like to have to listen to trees falling that have shaded you and provided shelter for the birds? How would you like it to have to listen to those noisy compressors for the rest of your life? How would you like to live with the helpless feeling that if that pipeline explodes, (and they DO explode, as you can read about should you care to trouble yourself to do so), you and your pets will be blown to smithereens? How would you like it if there were no longer the joyous sound of birdsong coming to your ears because their nests and habitat have been irreplaceably obliterated? How would you like it if the chorus of spring peepers that you have looked forward to hearing every spring after a long winter were to suddenly be silenced? How would you like it if you had to witness turtles and salamanders and toads and newts being crushed because they could not get out of the way of the destructive bulldozers? I ask you these pointed questions because this is precisely what will happen should this proposed Atlantic
IND451-1 Sunrise Pipeline be approved. Thus, I emphatically implore you to not all this pipeline to go through Lancaster County. There are existing lines in use. Utilize and upgrade those lines instead of ripping up our valuable farmland and woodlands to make new lines just so Williams Co. can get the gas more quickly to ports, where they are only going to export it to other countries just to get the cost of said gas up since gas is at a record low right now. Please consider all these arguments, and those of my fellow supporters in this matter, and reject this pipeline. Thank you.

Sincerely,

Donna R. Hoar

IND451-1

Systems alternatives that would make use of existing infrastructure in lieu of all or part of the proposed facilities are evaluated in section 3.2 of the EIS. Also see the responses to comments PM1-32 and PM1-162.

IND452 – Ronald Simpson

20160720-5087 FERC PDF (Unofficial) 7/20/2016 2:10:30 PM

Ronald D Simpson, Oak Ridge, NC.

IND452-1 FERC Docket# CP15-138: We are writing to express grave concerns over the manner in which Williams Gas/Transco is trampling on local zoning ordinances in the Town of Oak Ridge (Guilford County). With other more suitable property available, Williams has leased land on Fogleman Road that is zoned light commercial-professional office. Williams is running a heavy industrial staging and pipe prep activity: 18 wheeler trucks, heavy construction equipment, hazardous liquids and gasses, pressure vessel testing are operating in what is mostly a residential neighborhood. These activities pose safety and environmental hazards with little buffer for residential landowners. Trucks are clogging the narrow one way in/out road. This poses an unreasonable hazard to the community.

We wish to refer this matter to the Federal Energy Regulatory Commission which has jurisdiction over the project. The property owner is claiming that local zoning is trumped by Federal Law. Please bear in mind there is nothing that makes this property uniquely suited to the need and it does not abut the pipeline right of way. Oak Ridge is a small municipal jurisdiction and is hard pressed to mount a legal challenge.

We support the intent of the Atlantic Sunrise Project, but there is no need to willfully violate local zoning. Even if adjoining property owners were contacted, this is not sufficient because of the limited traffic capacity of Fogleman Road. Residential property is located within 100 yards of the Williams industrial operation.

The Draft Environmental Impact Statement (DEIS) claims "minor modifications at existing aboveground facilities at various locations in Pennsylvania, Virginia, North Carolina..." If the modifications are indeed minor, why is there a major industrial operation sited on land zoned for doctor's offices? We believe Williams has not honored its promises to implement "mitigating measures".

IND452-2 Further, the site is close to documented Native American burial grounds referred to as the "buffalo pits." Again, it is clear too little thought was given to the selection of this site in a residential neighborhood.

In closing, we urge you to move immediately to bring this travesty to an end and/or hold hearings.

We appreciate your immediate attention to this matter. Every day that passes poses a risk to the young children living close to this site.

Ron and Pam Simpson
8022 Fogleman Road
Oak Ridge, NC
336-423-6125

IND452-1

The use of this staging area is not associated with the Atlantic Sunrise Project. Williams is a major company involved with infrastructure projects and has ongoing operations all over the United States. These operations necessitate equipment yards and staging areas in various locations. It is up to the Williams company to ensure its commercial operations are consistent with local zoning ordinances. Questions regarding proper use of a site should be brought up with the local zoning board or other applicable local authority. While a FERC-approved project (including equipment yards, staging areas, etc.) does carry with it the concept of federal preemption, the Commission expects that the company will comply with all applicable state and local laws and ordinances. While applicants may be required to comply with appropriate state and local regulations where no conflict exists, state and local regulation is preempted by the NGA to the extent they conflict with federal regulation, or would delay the construction and operation of facilities approved by this Commission.

To receive assistance with disputes involving the construction and operation of FERC jurisdictional projects, landowners should contact the Commission's Landowner Helpline Toll Free at 1-877-337-2237 or by Email at LandownerHelp@ferc.gov.

IND452-2

The proposed activities in North Carolina are located within existing facilities and no new ground disturbance is planned. Section 4.10 of the EIS states that, in a letter dated October 23, 2014, the North Carolina SHPO concluded that no archaeological surveys would be recommended, and the Project would have no effect on historic properties in North Carolina.

IND453 – Rebecca Harnish Lattanzio

20160629 0913 FERC.PDF CP15-138-000 6/29/2016

Regarding CP15-138-000 Comments due 6/27/16 :

My comments were written electronically and I attempted to submit them yesterday, June 27, 2016. When I pushed "submit" a message from your site appeared telling me a minor technical problem prevented submission of my comments and to try to resubmit in a few minutes. I called the number for HELP you provided and explained my comments also disappeared and left my name and phone number. I hope you will accept this as my "resubmission" electronically refiling is not possible.

ORIGINAL

Thank you,
Rebecca Harnish Lattanzio
717 464 8739

FILED
SECRETARY OF THE
FEDERAL ENERGY
REGULATORY COMMISSION
JUN 29 11:17 AM '16

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.	
For Official Filing (send 2 copies):	Another Copy (send 1 copy):
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND453-1 If Williams/Transco's project through Lane Co is approved, what assurances are there that they will complete this project in the right, correct way, safeguarding the areas they will affect as much as possible, and fulfilling the promises they made, mentioned in the DEIS. Who will see that Williams/Transco does not rush, cut corners, or fail to keep promised items in DEIS or fail to adhere to regulations. What will happen if they fail to follow through? Who will force them to follow through? What is riding on Williams performance and on FERC's performance is HUGE to Lane Co, its people, and future generations.

Commentor's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street PA 17584

PLEASE SEND NIM,

Comment Meeting Location: Manheim Twp. H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs/filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. **The comment period ends June 27, 2016.**

IND453-1

See section 2.5 of the EIS for a description of the environmental inspection and mitigation monitoring measures that would be employed during construction and operation of the Project.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET No. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426
---	---

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND453-2

Preparation for and construction of Williams/Transco pipeline project will forever alter Lancaster Co. land and all it contains: homes, preserved farms + natural areas that are breathtakingly beautiful, wetlands, water and forested areas, areas being managed to benefit Lanc. Co. and beyond, historically, culturally + recreationally important areas and much more. Many reasons to reject this pipeline project were eloquently and uniquely explained at the meeting you facilitated at Manheim Township H.S. If this project goes forward, the negative impacts cannot be undone. Say no to approval, please.

Commentor's Name and Mailing Address (Please print legibly)
Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584

Comment Meeting Location: Manheim Twp. H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/about-filing/comment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. **The comment period ends June 27, 2016.**

IND453-2 Comment noted.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies):	Another Copy (send 1 copy):
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND453-3 *Please say NO to Williams/Transco's pipeline project. Williams has not shown that significant numbers of permanent jobs will be created by this project. The majority of jobs will be temporary.*

IND453-4 *Fracked gas for export using pipe from Turkey does not benefit Lancaster County. The benefit will be financial for Williams/Transco and its stakeholders. For them it's business. For Lancaster Co. it's much more... loss... of land, water that is protected, and so much more. But those two are loss enough. Say No.*

Commenter's Name and Mailing Address (Please print legibly)
Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584

Comment Meeting Location: *Manheim Twp. H.S.*

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends June 27, 2016.

IND453-3 Comment noted.

IND453-4 See the response to comment PM1-196 regarding the potential economic benefits of the Project. The potential impacts of the Project on environmental resources are assessed throughout section 4 of the EIS.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies):

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Another Copy (send 1 copy):

Gas Branch 1, PJ-11.2
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND453-5

Approval of Williams/Transco's pipeline project places sensitive wetlands, water supply, fertile land, historically/culturally significant areas, not to mention homes and the families living in them at great risk. Blasting, contamination from shoddy work or work completed in great haste or using inferior materials, accidents, or pipeline failures are, unfortunately, not rare occurrences in areas where pipelines carry gas to its destination. The construction and presence of pipelines are not without risk. They impact the environment through which they pass.

Commentor's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584

Please say NO Pipeline.

Comment Meeting Location: Manheim Twp, H. S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/dscs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends June 27, 2016.

IND453-5

Comment noted. Mitigation measures to minimize impacts on the environment, cultural resources, and public safety are included throughout section 4 of the EIS.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies):

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Another Copy (send 1 copy):

Gas Branch 1, PJ-11.2
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND453-6

Do NOT approve Williams/Traeco's pipeline project, please. So much time, work, cooperation, taxpayer and privately donated money over the years has gone into preserving land, farms and natural areas in the pipeline's path and near it. Preserved lands protect water supply, fish and wildlife, and are important to efforts to clean up the Chesapeake Bay, itself an important body of water. How is it possible that years of planning and money spent to preserve these areas can be dismissed for a corporation's project to make a great deal of money exporting fracked gas? Please, say No.

Commentor's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584

Comment Meeting Location: Manheim Twp. H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends June 27, 2016.

IND453-6

Sections 4.8.6.1 and 4.8.6.2 of the EIS describe potential impacts on and mitigation measures to protect recreational areas and preserved agricultural lands. Also see the response to comment PM1-179.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies):

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Another Copy (send 1 copy):

Gas Branch 1, PJ-11.2
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

I live in Willow Street, PA near the farm on which I grew up, where my father was born, and where my grandparents began their married life in 1908. This farm, surrounded by the farms of relatives and friends, is very near Conestoga, PA where Williams Transco wants to put its pipeline. There should be NO pipeline project in Lancaster Co. at all. The land is too fertile and of high quality. There's too much important history in the path of the pipeline project that must be protected. People's homes, farms, land and recreational areas in the pipeline path must be protected. Please do not approve this pipeline.

Commenter's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
7 Batt Avenue
Willow Street, PA 17584

Comment Meeting Location: Marheim Twp, H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs/efiling/comment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends June 27, 2016.

IND453-7 Comment noted. Mitigation measures to protect land, farms, and recreation areas are discussed in section 4.8 of the EIS.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.	
For Official Filing (send 2 copies):	Another Copy (send 1 copy):
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) (attach an additional sheet if necessary)

Preserved farms, nature preserves, sensitive wetlands and wildlife and fish habitats, managed areas for clean up and preservation of areas beyond Southern Lane Co. that are affected by what happens in Lane Co., archaeological sites and Native American historically significant sites and burial grounds, recreational areas of many kinds. Fertile top quality farm land, farms, & farmers working toward organic status: lands + water highly valued, respected + cared for by the current stewards... we are so lucky in Lane Co. to have all this. Not everyone everywhere does. We want to preserve it and pass it on to future generations. We say No to the pipeline. Please, FERC, say No

Commenter's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
9 Batt Avenue Willow Street,
PA 17584

Comment Meeting Location: Marbleton Twp. H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends June 27, 2016.

IND453-8

IND453-8

Comment noted.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426
---	---

COMMENTS: (PLEASE PRINT LEGIBLY) *[attach an additional sheet if necessary]*

IND453-9

FERC, I question your reliance on Transco's collected information and input (re: Lancaster Co.) in your decision-making. Yes, Transco provides company information, its procedures, its data, etc. Why would it collect data and information that Lancaster Co. affected residents or land managers should provide and expect that you'll rely on it. Is this part of your methodology for decision-making? Are you relying on Transco's input? If you are, that is deeply disturbing. I don't understand why you would operate in this manner to

Commentor's Name and Mailing Address *(Please print legibly)*

*Rebecca H. Lattanzio
9 Batt Avenue
Willow Street, PA 17584*

decide such an important life-changing, land-affecting matter. Say No to their input.

Comment Meeting Location: *Manheim Twp. H. S.*

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. eFiling is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs/efilingcomment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. **The comment period ends June 27, 2016.**

IND453-9

Our description of the affected environment is not based solely on information provided by Transco. In addition to information and data provided by Transco, our analysis is based on a combination of other data sources, including desktop resources (such as scientific literature and regulatory agency reports); information provided by various agencies, organizations, individuals, and other stakeholders; and other publically available information and data.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET No. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426
---	---

COMMENTS: (PLEASE PRINT LEGIBLY) (attach an additional sheet if necessary)

IND453-10

Something many Americans don't have to worry about or even think about is EMINENT DOMAIN. It is unAmerican to take the property/preserved lands of people because it will benefit the bottom line of one's business. Eminent domain should be reserved for the rarest of circumstances that will benefit the common good of all in a way that can be shown concretely. Compare: benefits to Williams/Trans employees and shareholders to negative impacts to Lane Co. land, preserved farms + natural areas, wetlands, waterways, forested land, fish/wildlife, its people + so much common good.

Commenter's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584

Say No

Comment Meeting Location: Marbleton Twp, H. S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/doing-business/doing-business.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. The comment period ends June 27, 2016.

IND453-10

The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET No. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies):

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Another Copy (send 1 copy):

Gas Branch 1, PJ-11.2
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) [attach an additional sheet if necessary]

IND453-11

Williams Transco is a business... a large corporation wanting to make a lot of money exporting fracked gas in the cheapest possible way. That's great for its shareholders BUT, they'll do it on the backs of Lanc. Co. land and water and present and future generations; equally important Lanc. Co. people. We are stewards of this land and we are trying to protect it for future generations. Corporations must accept certain risks of doing business + one of them must be that the price of what they want is too high. Their risk is that they'll be told no. Catty to them? yes, but that's business. Say NO to Williams Transco.

Commentor's Name and Mailing Address (Please print legibly)

Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street PA 17584

Comment Meeting Location: Manheim Twp. H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/proc-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. **The comment period ends June 27, 2016.**

IND453-11 Comment noted.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)**

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.

For Official Filing (send 2 copies): Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Another Copy (send 1 copy): Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426
---	---

COMMENTS: (PLEASE PRINT LEGIBLY) (attach an additional sheet if necessary)

IND453-12

I live a few miles from the proposed Williams/Tranaco pipeline. People living in the proposed path are directly affected to be sure. But all of us in Lancaster county are affected. We all should be aware of what will be LOST to us all if this pipeline is approved. Our elected officials should be leading the way to present our feelings to you, FERC. Too bad most of them are politicians at heart and living up behind the power & money of Williams/Tranaco. But in PA we are used to being let down by our elected "leaders." FERC, please don't let us down. Some of you have science backgrounds & college degrees. Use it all to acknowledge what will be lost if you approve the pipeline. Say NO, please.

Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584

Comment Meeting Location: Marheim Twp H.S.

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.201(a)(1)(ii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/dep-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account; however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. **The comment period ends June 27, 2016.**

IND453-12 Comment noted.

IND453 – Rebecca Harnish Lattanzio (cont'd)

20160629-0012 FERC PDF (Unofficial) 06/29/2016

FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC SUNRISE PROJECT (DOCKET NO. CP15-138-000)

Comments can be: (1) left with a FERC representative, (2) mailed to the address below, or (3) electronically filed.¹

Please send copies referenced to Docket No. CP15-138-000 to the addresses below.	
For Official Filing (send 2 copies):	Another Copy (send 1 copy):
Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, DC 20426	Gas Branch 1, PJ-11.2 Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

COMMENTS: (PLEASE PRINT LEGIBLY) (attach an additional sheet if necessary)

IND453-13

Does Williams/Transco have an alternative route, an existing right of way already in place that they could use to export their fracked gas? My understanding is that they do possess such a right of way, one needing upgrades and not the shortcut that Atlantic Sunrise project is. If so, this pipeline is about making more money using their proposed project. Tell them no. Tell them the many negative impacts to Lanc Co. and people there are too high a price (and irreversible) for Lanc Co. to pay to increase the bottom line of Williams/Transco. That's business. Please, say no.

Commenter's Name and Mailing Address (Please print legibly)

*Rebecca Harnish Lattanzio
9 Batt Avenue
Willow Street, PA 17584*

Comment Meeting Location: *Manheim Twp. H.S.*

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Register." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." In addition, there is an "eComment" option available online at: <http://www.ferc.gov/docs-filing/eComment.asp>, which is an easy method for interested persons to submit text only comments on a project. eComment does not require a FERC eRegistration account, however, you will be asked to provide a valid email address. All comments submitted under either eFiling or the eComment option are placed in the public record for the specified docket or project number(s). Please note that to be added to the mailing list you will need to provide a mailing address. **The comment period ends June 27, 2016.**

IND453-13 See the response to comment PM1-162.

IND454 – Lynda Like

20160629-5003 FERC PDF (Unofficial) 6/28/2016 7:25:21 PM

lynda like, Conestoga, PA.

In pursuant of the comments from all the environmental agencies along with the Clean Air And Water Council and the Lancaster Farmland Trust I

IND454-1 too agree this project has too many missing data to be able to intelligently and adequately come to a fact based decision on Ferc's part. This project is too important to Pa. and the landowners involved. It will also impact forests and streams not provided in the DEI study. Whether this info was intentionally or accidentally left out, the fact remains you cannot make an important decision on this project without having all the facts. I urge FERC to include the new safety precautions for gathering lines and the impact of the infrastructure from this project.

IND454-2 I would also like to see more info and impacts from the Methane Gas as this project comes dangerously close to a school. I believe all of us can confidently say that our children's health is of critical importance. With this said I again state that, if approved, this project must go around our township and follow the rights of way already in place.

Lynda Like

IND454-1 See the response to comment PM1-70.

IND454-2 Section 4.12 of the EIS provides information regarding the health effects of methane.

IND455 – Individual

20160630-5031 FERC PDF (Unofficial) 6/29/2016 10:02:10 PM

FERC Obstruction to Public Comment 6/29/16

IND455-1 We have wasted over an hour composing our response to the DEIS only to receive “an error message, to try back in 10 minutes” and have all of our information evaporate. How many others has this happened to? Everyone we have spoken to in our community has had similar experiences --- error messages, unable to see posted comments, try back in 10-20-30 minutes, trying to muddle through a confusing FERC website. How many people have given up because they have families to attend to, job responsibilities, and health issues? How many comments are NOT being recorded due to this intentionally broken process?

FERC has known about the Atlantic Sunrise Pipeline (and so many others) for a number of years yet is only upgrading their online system over the next 2 years? How convenient for their employer, the NG industry, to not have a fully functional online system for the public to place comment. What a dysfunctional system for impacted landowners --- many in rural communities who are not tech savvy, or the elderly --- who cannot make public comment because they do not own a computer or know how to use one and, therefore, are unable to stay current on the continuous comments to FERC. And for those of us who do use a computer, more often than not our comments are thwarted, presumably to become more frustrated and give up.

IND455-2 FERC repeatedly gives special treatment to Transco while making the process as difficult as possible for landowners to defend their homes and properties. To issue a DEIS with incomplete data (allowing Transco to furnish it at a later time), NOT VERIFY or require data from an independent source, and NOT GRANT an official time extension for public comment is not being impartial but intentionally slanting the process in favor of Transco. We believe this duplicitous policy is a directive of the Chairman and the perfect basis for a class action and individual lawsuits that will be certain to follow.

IND455-1 See the response to comment PM3-55.

IND455-2 See the response to comment PM1-70.

IND456 – Kandi Bowers

20160628-5014 FERC PDF (Unofficial) 6/27/2016 8:25:00 PM

Kandi Bowers, Columbia, PA.
IND456-1 I would like to express the fact the Atlantic Sunrise Project is not a necessary project. There is another route already in existence that could be reused rather than disturb new grounds, affecting wildlife and landowners for the profit of Williams Co. FERC is not thinking of the best of the people if approved.

IND456-1 See the response to comment PM1-162.

IND457 – Kirsten Sensbach

20160628-5013 FERC PDF (Unofficial) 6/27/2016 7:55:17 PM

kirsten sensbach, dallas, PA.

My name is Kirsten Sensbach, and I am a resident of Briar crest Rd in Dallas, PA, which is a proposed site for an extension of the Atlantic Sunrise Pipeline. (docket no. CP15-138) I am writing in protest of this pipeline due to the following concerns.

IND457-1 I understand that FERC is assessing the environmental impact on this site, which to my knowledge has an extensive area of old growth forest as well as many acres of wetlands and a diverse population of birds, mammals and insects.

IND457-1 Comment noted.

To my knowledge, builders are required to create an alternate wetland space in another area when they remove an established habitat to build homes. Although they may report this, it would be impossible to re-create an established wetland with the unique biodiversity that has developed over such an extended period of time. It would also be impossible to replace an old growth forest, and I know that the extensive region over the pipeline will remain cleared. To my knowledge the area on 42nd street that belongs to the Byron family is also a designated green space.

IND457-2

IND457-2 Comment noted.

Our own governor just restricted fracking in state parks, due to the extensive damage that is caused, but there is consideration to allow a private company that plans to export gas out of this county, state and country to add a pipeline to a private citizens land that is also a designated green space. It seems absurd that people must require permits to add an addition to their homes to insure appropriate distance and safety, but a private company can run a pipeline within 100ft or less from a private home. This pipeline will be next to one of my neighbor's fence while their small daughter plays in the yard. I also do not see how this would fall under eminent domain as this private company alone will benefit as they do not fall under the federal government, and all of the gas will be exported.

IND457-3

IND457-3 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND457-4 As this is an environmental assessment, I will not further discuss the risk of placing a pipeline literally next to schools and homes. You can view the newspapers and television to see that there is risk, and people have been greatly injured or even killed.

IND457-4 Comment noted.

IND457-5 There will be toxic herbicides used, which also has an impact on local homes and this green space. Many people have wells, and even though they may be a distance from the pipe, we are not yet aware of the potential hazards that could occur. These herbicides will almost surely enter the wetlands on this private property, which is a green space. The Byron family is also generous enough to share this space with the local schools, colleges and community for cross country, soccer and other activities; therefore, children may also be exposed to chemicals and the ongoing amounts of gas leakage from the pipe.

IND457-5 As described in section 4.5.4 of the EIS, herbicides would be applied in accordance with agency regulations and manufacturer's recommendations and, to protect water resources, no herbicides would be applied within 100 feet of a wetland or waterbody except as allowed by the appropriate state or federal agency.

IND457-6 I ask you to consider this request and the potential hazards and loss to this green space as well as to the many families that will live have to live in close proximity to the pipeline. As this is a green space, could there be an alternate plan that would be less obtrusive. Although I support the need to find sources of energy, we must consider the impact

IND457-6 An evaluation of alternatives is included in section 3.0 of the EIS.

IND457 – Kirsten Sensbach (cont'd)

20160628-5013 FERC PDF (Unofficial) 6/27/2016 7:55:17 PM

that our choices make on all people as well as the environment, and avoid making choices that just increase the wealth of the few.

I thank you for your consideration and hope that you will make the right choice.
Sincerely, Kirsten Sensbach

IND458 – Peggy Dawson

20160628-5012 FERC PDF (Unofficial) 6/27/2016 7:49:49 PM

Peggy Dawson, Drumore, PA.

IND458-1 There are existing pipelines and pipeline corridors that could be used instead of running through new areas. Eminent Domain to take additional properties should not be used. There is no public gain for this gas. Our county will not be using it. Do not interfere with more properties to run new pipelines. This pipeline will be going through historical and natural lands where it is not welcome. This pipeline is for private gain. This should not be a satisfactory criteria to seriously negatively affect the properties of those who oppose it. There is no public convenience or necessity, and that is the bottom line.

IND458-1

See the response to comment PM1-113. The use of eminent domain is discussed in section 4.8.2 of this EIS. Analyses of possible collocation alternatives are included in sections 3.2 and 3.3 of the EIS.

IND459 – Kristina Swisher

20160628-5009 FERC PDF (Unofficial) 6/27/2016 6:38:55 PM

Kristina L. Swisher, Elizabethtown, PA.
Pass...on The Pipe Line

Unexpected beauty...a Sandhill Crane made Duffy Lake, Mount Greta area home for over four seasons. It's tenacious search for mollusks+ stitching together laborers, athletes, birders, families and solitary adventurers all appreciating this uncommon event.

In our race to be first, we've forgotten that first can also mean last. Last to realize, that the pure water used for extraction purposes has been replaced by chemically inoculated liquid...or, the primary energy we depend upon has been depleted...or, has become to costly (in many ways) to obtain.

Do we concern ourselves with the damage to environment...these spiritual retreats, recreational venues, homesteads and livelihoods? Or, do we reside far enough away that the consequences are safely tucked from view/mind?

Passing on our polluted actions to another's backyard for profits. We value freedom, to create the life we envision...yet, who lives down stream from our choices?

Do we move...

...willfully, seek a balance...or, utilizing our wisdom forgo something...even though we can?

Responsibility is part of freedom and acting without this in mind can lead to painful circumstances, whether experienced directly or indirectly, there are ripple effects.

Are our gas extraction methods contributing to the instability of earth's mantle+?

If so, do we pause, collaborate on developing better alternatives or rush blindly along...white knuckled...hoping for the best?

Why are we in such a hurry? Yes, there are times quickness is currency, must we remain in our full on mode regardless of the outcome? Or, can we lean in with flexibility and recognize when to pull on patience? Find a better way.

As stewards, our world is vast in so many ways...and, small in so many others.

Time...heals, how much time depends on the circumstances...on the damaged, diseased state of our great planet. What do we do while we wait for nature to heal itself...and us?

We feel the duality of arrogance and awe, when life's forces humble our efforts/projects. We gluttonously grab to be first...to claim our share...and maybe others shares too. We tell ourselves, "someone's going to do it, it may as well be me...us".

If in our carelessness we can then only breathe bottled air, drink bottled water or go outside in sealed suits how free are we?

IND459 – Kristina Swisher (cont'd)

20160628-5009 FERC PDF (Unofficial) 6/27/2016 6:38:55 PM

Utilizing such contained resources is appropriate for our universal and extreme environment explorations.
Where does the fresh water come from for drinking and living...and who pays for it? Is the source for the replacement fresh water now at risk of being depleted?
It is vital that we protect the unique place we call home...
...perhaps, we've grown to familiar with earth?
We are forgetting the wisdom available to us...
...if we pause...step back, we can remember.

IND459-1 Appeals could be made against the proposed Atlantic Sunrise gas pipeline:
* Documented dangers of some gas extraction activities and the burden on residences with its chemical wake.
IND459-2 * Illegal use of eminent domain (or any other legal action) for private profit at the expense of individual/public use property rights.
IND459-3 * Most importantly, the unnecessary environmental destruction/depletion and ripple effects this will cause.

We're connected; helping our families, neighbors and fellow citizens+...is helping...ourselves.
And, if approving this pipeline is for the greater good of our nation...our world, then let it be.

IND459-4 * If, it is just another private corporation out to strip, pollute and profit another of our diminishing, wonderful places...I vote to protect the land and it's resources.

I humbly ask FERC, et al. to be open and trust the creative minds of our Great Nation+...who are willing to step up and tackle our energy challenges.
Please steer our course towards a more sustaining, healthier balance...for the greater good.

Thank you for your time and consideration ©
Sincerely,
Kris

IND459-1 See the response to comment PM1-40.

IND459-2 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND459-3 The environmental impacts of the project are discussed throughout section 4 of the EIS.

IND459-4 Comment noted.

IND460 – Lynda Like

20160628-5008 FERC PDF (Unofficial) 6/27/2016 6:37:20 PM

lynda like, Conestoga, PA.

This is from S&P Global Williams Sr. Vice Pres. Rory Miller responded to the Diamond East project 'Unlike competing projects designed to serve the New Jersey Pool, Diamond East is a cost-effective expansion "along an existing Transco corridor." I am siting this comment as they are doing what Ferc guidelines requires them to do. FOLLOW EXISTING CORRIDORS. Diamond East in respect to the PennEast pipeline Bentek's Yahya," worries that the region is in danger of having too much pipeline in the next five years as project after project is announced, all designed to move cheap gas from the Marcellus to premium markets in the northeast.

Pa State Impact article Aug. 2015. We recently reported on how poorly mapped some of these pipelines are. DEP Secretary John Quigley told StateImpact that he expects the industry to add 20 to 28000 miles of gathering lines. Now this is what should be interesting and concerning to us here in the southern end of the county. Most of these lines will be in rural areas, the so called class one lines which no state, federal or local authorities oversee.

Linda Daugherty said the slow pace of federal regulatory change had the agency begging states to take action. But so far. PA. hasn't been one of those states.

IND460-1 The line that exploded in 2012 in Sissonville were interstate lines in a rural area that hadn't been inspected for "24 YEARS". AND IT WASN'T THE ONLY LINE IN THAT AREA.

This is and what we can expect from Williams Atlantic Sunrise. The people Need the guarantee of safety when these pipelines want to go through rural areas.

IND460-2 With reports from leading authorities stating the gas market will be saturated in five years leads me to believe that this pipeline really isn't a necessity so much as the greed behind it and it strikes right at the hearts of rural communities who obviously mean so little to these NG corp.

IND460-3 It seems that Transco/Williams only follows existing right of ways whenever it feels like it and FERC sees nothing wrong with this Dictation as they are well aware of the existing right of ways as opposed to the Eminent Domain process they are only too willing to force property owners to endure. How arrogant and yet so true of an agency who doesn't force their own policies on NG corp.

Lynda Like

IND460-1 Comment noted. See the response to comment PM3-1.

IND460-2 See the response to comment PM1-51.

IND460-3 Sections 3.2 and 3.3 of the EIS describe alternatives for use of existing infrastructure/rights-of-way. The use of eminent domain is discussed in section 4.8.2. Also see the responses to comments PM1-1 and PM1-106.

IND461 – Shannon Watson

20160628-5007 FERC PDF (Unofficial) 6/27/2016 6:30:07 PM

Shannon Watson, Hershey, PA.
IND461-1 I am a PA resident who is GREATLY concerned by the overabundant build out of natural gas & natural gas liquids pipelines that are crossing our state to move these products from other states as well as from within PA to end up being EXPORTED overseas for huge profits that the residents of PA & impacted landowners will NOT benefit from. Transco is NOT investing in American made pipes for their lines, they are importing them from Turkey. This does NOT benefit PA or the US. Trucking these pipes in 2 at a time has NOT been accounted for in DEIS when looking at air quality, fossil fuel consumption or road impacts. Natural Gas extraction has a huge impact on Climate change, the water quality of our streams & wells, as well as our Constitutional Right to a beautiful natural landscape.
IND461-2 Williams/Transco will irrevocably damage the natural settings where these pipelines cut through. The rights of the landowners are completely ignored. Some of the pipelines will run right next to homes/residences.
IND461-3 The hazard zone (PIR) is 1,150 ft in the event of an explosion & the explosion that occured in Westmoreland this past spring affected homes 2 miles away! These impacted homes will be obliterated if the pipeline fails! How can statistics like this NOT affect property values?
IND461-4 Williams/Transco will ask for eminent domain to acquire any home in the way of their plans BUT this is a VIOLATION of property rights since their product is contracted to be shipped overseas & NOT for domestic use or the public good! Stand up for PA residents/taxpayers & DENY Williams/Transco's plans!

IND461-1 See the response to comment PM1-32.

IND461-2 See the response to comment IND384-6.

IND461-3 Comment noted. See the responses to comments PM1-6 and PM1-75.

IND461-4 See the response to comment PM1-13.

IND461-5 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the responses to comments PM1-1, PM1-32, and PM1-143.

IND462 – Cricket Hunter

20160628-5006 FERC PDF (Unofficial) 6/27/2016 6:25:50 PM

Cricket Hunter, State College, PA.
On behalf of Pennsylvania Interfaith Power & Light, I submit the Board's Resolution on Fossil Fuel infrastructure and ask FERC to consider the full effects of this proposed pipeline, and decline to allow it to move forward.

The fully-formatted document can be accessed here:
<https://drive.google.com/a/paipl.org/file/d/0Bw8gQ9Gqroj-MThSN01ONWN6WkU/view>

IND462-1 PA IPL Policy on Fossil Fuel Infrastructure
Pennsylvania Interfaith Power & Light (PA IPL) is a community of congregations, faith based organizations, and individuals of faith responding to climate change as a moral issue. We envision a clean-energy future in which the poor and vulnerable no longer bear the heaviest burdens of our energy use, in which global warming has been halted, and we have begun to reverse the damage already done to our common home.

We do not intend for this policy to condone or excuse existing fossil fuel infrastructure or use. (Indeed, the board of PA IPL has gone on record committing to a fossil fuel free future, calling for a moratorium on fracking and an end to all fossil fuel use in PA by 2050). We recognize, however, that decision points about new infrastructure may set us on the path to a cleaner future, or chain us to harmful fuels of the past. New infrastructure investments act as an economic covenant with a particular future, and we must begin to covenant with the future in which we wish to live: one that protects the vulnerable, is sustainable and is just. To make moral decisions about our energy future, we need to be free to choose: we will not be able to afford to build a just clean energy future if we continue to invest in our current, destructive system.

It is obvious that communities, the Commonwealth of Pennsylvania, and federal entities are under pressure to permit a vast network of proposed gas pipelines and increased volume of railroad traffic constituted of tank cars filled with oil destined for processing plants. Whether by pipeline or rail, increasing the volume headed to processing facilities, export terminals, and power generation plants can only increase the pressure to extract more fossil fuels. Here in Pennsylvania, that pressure is particularly great for methane (natural gas) extracted via a set of processes best known in the public discourse as "fracking," but new infrastructure continues to be built for other fossil fuels as well - and all these investments in a polluting past must stop.

We now know what some already suspected in 2011 when we released our document Principles for Considering Drilling in the Marcellus Shale: an Ethical Analysis: we cannot consider methane to be a responsible "bridge fuel." Far more methane is released during fracking than estimates anticipated, and any methane emissions, due to methane's extraordinary insulating potential - more than 80 times greater than carbon dioxide's for the first 20 years, can further destabilize our climate. Growing the network of pipelines, compressor stations, processing facilities, power

IND462-1 See the responses to comments PM1-36 and CO13-9.

IND462 – Cricket Hunter (cont'd)

20160628-5006 FERC PDF (Unofficial) 6/27/2016 6:25:50 PM

IND462-1 | generation plants and export points will only increase the pressure to
(cont'd) | depend more heavily on this fuel here, and even abroad.

Fossil fuel infrastructure will prolong or accelerate the depletion of natural resources from communities in order to get at mineral resources. Fossil fuel infrastructure feeds a system that is already destroying the blessings we have held in common for generations: clean air, a stable and predictable climate which allows us to grow the food that feeds all people, and the clean, available, unsalted water that allows us to drink.

Thus, as people of faith and residents of the Commonwealth of Pennsylvania, we call on the Commonwealth to:

- Neither build nor permit new networks for fossil fuel transport, including pipelines, port facilities, and additional road and rail routes designed primarily for fossil fuel transport.
- Halt growth in fossil fuel transport through our state that puts additional pressure on existing infrastructure and creates demand for new infrastructure.
- Neither build nor permit new fossil fuel processing facilities.
- Neither build nor permit new power generation plants utilizing fossil fuels.
- Neither build nor permit new pumping stations, pads, or other infrastructure designed for additional drilling sites

Resolution passed by the Board of PA Interfaith Power & Light

February 2016 at Harrisburg, PA

IND463 – Faith D'Urbano

20160628-5005 FERC PDF (Unofficial) 6/27/2016 6:17:28 PM

Faith D'Urbano, Lancaster, PA.
IND463-1 As a clergy person, I firmly believe that a balanced, just economy does not weigh industry profits and industry viability by a factor that undercuts the measure and deserved weight of the total human-environmental wellbeing of the community, state and world. Please deny Atlantic Sunrise Pipeline Project access to Pennsylvania ecology and protection of its citizens.

IND463-1 Comment noted.

IND464 – Thomas Byron

20160628-5004 FERC PDF (Unofficial) 6/27/2016 6:10:57 PM

Thomas Byron, Dallas, PA.
IND464-1 Dear FERC, Comments from Joan and Thomas Byron Mile 23.2 to 24. We are very disappointed that our e-comments have landed on deaf ears at FERC! We understand that a document that Transco filed on Friday June 24, 2016, was impossible to open. We learned that no one knows when our park is in use. Our "Central Park" Dallas Pa. is open 24-7 7 days a week. There are big events and daily use! Hiking, camping, horseback riding, yoga airplane club , etc. We have informed you of this many times. We were also disappointed to learn that no environmental statement can be made without an on-site inspection. Consequently, you have to extend the comment period since no such inspection has taken place. You donot have any wetland info. We request a public hearing. FERC seems unaware of the Dallas township properties. The pipeline will be passing through close quarters in neighborhoods and a few feet from nursing homes. It will end the development of very expensive commercial and private land. It will pass next to or threw some of the most expensive and beautiful properties. The state gamelands above Ricketts Glen is the perfect route away from all homes. Please take the time to read our e-comments. We took time to send them.

IND464-1 See the responses to comments PM1-70, PM1-130, and IND431-1. Section 3.3.2 of the EIS includes our recommendation that Transco develop a schedule for construction and restoration activities on the Byron property that minimizes conflict with the planned public use of the property.

IND465 – Reaves Goehring

20160628-5002 FERC PDF (Unofficial) 6/27/2016 6:08:22 PM

Reaves F Goehring, III, Columbia, PA.
June 27th 2016
Atlantic Sunrise Project Opposition.
Wrong for World Economy, Wrong for Pennsylvania, Wrong for Lancaster County!

IND465-1 First, thank you to FERC for posting my complete comment regarding natural impact which would affect my property should Transco's Atlantic Sunrise be approved. I was alarmed that after two days, and the deadline having arrived, the full comment would not be posted... again, thank you. For posting and the follow up email.
To the hundreds of individuals who do actually read all of the posted comments... my apologies for a duplicate comment... please read the complete comment as posted today.
Thank you FERC for allowing the public in general to comment on the proposed project.
Thank you to all of the individuals who, through courage and your sense of duty to protect our homes, environment, and future spoke up in opposition to the proposed project. Regardless of outcome and opinions regarding the validity of the entire process... I am proud to say that I stood with you!
Thank you to all of the individuals who posted comments in favor of the proposed project as well... your willingness to provide your names and offer your properties for use as routs for Atlantic Sunrise, rather than those who oppose it, means a great deal to us who are not in favor of losing our homes for big business' economic gains. You have done more to strengthen the argument against eminent domain use for the Atlantic Sunrise Project than you can imagine!
All of those who oppose Atlantic Sunrise, take notice of who the government officials are that supported their constituents in opposition and support them in coming elections. Those that apparently look more favorably at the compensation given by big business rather than the people they are supposed to represent, well, shame on you... and we will not forget where you've demonstrated your loyalty lies in coming elections!
Secretary Bose, I do not envy your position. I appreciate you, and your entire team's, efforts. I realize you are charged with a difficult task and that you must be in that position because you are able to handle the responsibility it holds. Through this process, literally, thousands of peoples' lives have been affected. I urge you to consider the consequences of your team's decision regarding Atlantic Sunrise. I urge you to look at the data and details objectively and consider the source... the source of data and details from both sides. I am one of the individuals who have read all of the comments, at least over the past few months, and it is not difficult to tell which side would be most impacted by the proposed project. I am hopeful that you will make the correct decision and support the gas industry in bringing honorable and respectful activities and habits to the process, rather than the example Transco has set forth in their attempt and behavior in the case of the Atlantic Sunrise Project. Unfortunately for the respectable individuals in the gas industry, Transco has forever tarnished your reputation in the eyes of the public. Please Secretary Bose and your honorable team...you

IND465-1 Comment noted.

IND465 – Reaves Goehring (cont'd)

20160628-5002 FERC PDF (Unofficial) 6/27/2016 6:08:22 PM

IND465-1 represent FERC to us all... please make the right decision... Stop the
(cont'd) Atlantic Sunrise Project.
Sincerely,
Reaves F. Goehring III

IND466 – Alena Clatterbuck

20160628-5001 FERC PDF (Unofficial) 6/27/2016 5:33:50 PM

Alena, holtwood, PA.
My name is Alena Clatterbuck and I'm a sophomore at Lancaster Mennonite High School. Two years ago, Williams invaded Lancaster County with their detrimental plans. They trespassed on our properties, bullied and harassed my family and my neighbors, and continue to drive this project forward, despite the 'significant environmental impact' it would have on our land and our lives. My generation depends completely on you making responsible choices. You hold my future in your hands and if you approve this project, you are throwing away my right to clean air, clean water, and safety. You seem to have teamed up with Williams to make our lives miserable.

IND466-1 My generation is the one that will have to deal with the mess that you are leaving us, yet we are the generation who is most suppressed. We cannot vote, we are not heard, we are taught in school to sit back and let the government take care of us, our parents ask us to turn to adults to solve the world's problems. In general, we are made to feel powerless.

IND466-2 But your history of approving pipelines, fracking, and other harmful practices show how you are exchanging my future for short term corporate profits. That's not your decision to make!

IND466-3 You are the agency that chooses which lives are more important by allowing Williams to use lower grade pipes just because we live in a less populated area. You are the agency that is responsible for letting hundreds of thousands of people be victim to the extremely dangerous process of fracking, many even having to buy bottled water because their wells are filled with methane. You, FERC, are the reason 90% of the Holleran family's maple tree farm is now gone without cause because you gave Williams permission to start construction before sufficient permission had been given by New York state.

IND466-4 FERC, it's time you learn from your mistakes and wake up to the realization that fossil fuels are not sustainable and are not worth the danger they bring. My generation is asking you to look farther down the road than your own wallet and see the cliff you're driving us toward. I'm asking that you think not only about endangered salamanders -but also pay attention to the damage you are doing to the people. We the people are asking you to do your job and say no to the Atlantic Sunrise Project.

Lancaster decides; not FERC...And Lancaster says NO!

IND466-1 Comment noted. See the responses to comments PM1-22 and PM1-143.

IND466-2 See the response to comment PM1-46.

IND466-3 See the responses to comments PM1-40, PM1-46, and PM2-126.

IND466-4 See the response to comment PM1-8.

IND466-5 Comment noted. See the response to comment PM1-99.

IND467 – Terry Sloan

20160628-5000 FERC PDF (Unofficial) 6/27/2016 5:14:33 PM

Terry A Sloan, Albuquerque, NM.
To the Federal Energy Regulatory Commission:

IND467-1 Within the last year Williams Partners had begun to solicit the practice of "sensitivity" to Native American culture and historical sites yet still intends to use a route that will directly impact some of Pennsylvania's most cultural significant Native American historical lands. To make such a mission statement after planning a route through Manor, Conestoga, and Martic Townships is extremely hypocritical. The level of cultural disregard has become very obvious considering the numerous statements from Anthropologists, Historians, Archaeologists and Indigenous peoples thoroughly versed in local culture. This has made no apparent impact with any immediate decisions for this proposal which will require laying approximately 194 miles of new greenfield pipe through Pennsylvania and impacting hundreds of acres of sensitive areas within the Chesapeake Bay watershed.

The Williams Partners modified the route of the pipeline in their official application to FERC on March 31, 2015. The new route avoids Chief's Hill, but still crosses the southwest portion of the 414 ¼ acres deeded as Indiantown. Only the mere surface of prehistoric to historic knowledge of these townships has been discovered and the random 0.5 meter-by 0.5 meter state required shovel test surveys in "select areas deemed significant" shows the amount of total disregard for the vast amount of known and unknown Native American cultures contained within these soils. In an August 2014 Millersville Pa open house the commission was directly advised the proposed pipeline route runs adjacent to seven major archaeological sites already on the National Register, there were literally hundreds of smaller villages and settlements spread throughout these townships and simply moving the proposed route a few hundred feet to avoid a site, as might be done in other places would only impact others. Also that literally nowhere else in the entire state contains a greater concentration of archaeological sites, features, artifacts, and human burials. Simply slating a few corporate driven third phase archaeological surveys will not justify the destruction of priceless historical resources throughout this entire route. Many indigenous burials have already been unearthed, desecrated, and removed from these sacred sites. All of which to this day continue to reside disrespectfully stored in basements of local colleges and state warehousing facilities. Undoubtedly, many more remain on these lands and we demand they respectfully be left to rest undisturbed!

I strongly oppose the development of the Atlantic Sunrise Expansion Project due to its direct threat to Native American culturally sacred sites, its threat to the environment, the lack of Native American Free, Prior and Informed Consent and approval, and encroachment on Native American lands. We also ask that the United States Office of Surface Mining be involved and require a full Environmental Impact Statement and that the American Indian Religious Freedom Act of 1978, the Native American Graves Protection and Repatriation Act, Executive Order 13007 on Indian Sacred Sites, the National Historic Preservation Act, and the National Environmental Protection Act be enforced on Williams Partnership

IND467-1

Section 4.10 of the EIS addresses survey results and consultations with consulting and interested parties. Transco would prepare any necessary avoidance or treatment plans that outline measures to avoid, reduce, and/or mitigate effects on historic properties.

IND467 – Terry Sloan (cont'd)

20160628-5000 FERC PDF (Unofficial) 6/27/2016 5:14:33 PM

IND467-
(cont'd) L.P. and the Atlantic Sunrise Expansion Project. We urgently request you regulate the Williams Partners to thoroughly utilize their existing infrastructure and already substantiated right of way systems.

Historical culture is forever. This destructive unsustainable gas pipeline is Not.

Thank you,

Terry

Terry A. Sloan
Director
Southwest Native Cultures
Albuquerque, New Mexico
(505) 858-0050
tas@sloancompany.net

IND468 – Kochan

20160701-5012 FERC PDF (Unofficial) 6/30/2016 11:27:15 PM

Kochan BEST Alternate Route to be Considered by FERC

IND468-1 Considering Tranco/Williams was not at all cooperative in providing us with the exact route or details concerning our property, and we continue to receive new information via the DEIS and elsewhere, we have determined there is a better route that has not yet been considered if a route absolutely must be built through our Dallas Twp. community.

Landview/Goodleigh Manor and Ray Jackloski have agreed to have the pipeline through their land. We have not. Therefore, the easiest and best solution for a pipeline between what is now being called MP.02 and .35 (Kochan property) is to completely avoid the Kochan property and simply connect the ASP between the two land owners who have already agreed to having the pipeline on their land (Goodleigh Manor which appears to be MP.35 and Jackloski which appears to be MP.2). An attached map of this alternate is attached and named as Best Route for Kochan property.

Benefits to Kochan Property:

This route would:

- * Eliminate the potential water damages to the Kochan property from dynamiting through our steep side slope that contains streams, numerous springs and wetlands.
- * Eliminate the potential problems of our two ponds silting from uprooting mature trees on our steep slope and replacing with ROW meadow that cannot hold back increased water flow.
- * Offset the flooding water from our ponds onto state roadways that currently exists in heavy rains.
- * Eliminate the tearing down of our historical stone walls.
- * Eliminate the costly and additional expense of installing new drainage systems around our buildings.
- * Provide more safety to our human and animal lives by placing the blast/KILL zone further from us and our home of 28 years.
- * Let us proceed with our lifelong plans to build a secondary home (cited for their ROW) for caretaking in our elderly years. (We are currently classified as senior citizens in Pennsylvania.)
- * Eliminate Transco's requirement that "we" monitor a ROW for which we do NOT WANT on our property and are not being paid to do.
- * Hopefully allow us to continue working from home because construction noise would be farther away.
- * Maintain the value, and allow us to safely enjoy the home and property we have cared for, for the last 28 years and intended for many more.

Benefits to the Community

- * This route would move the blast/KILL zone further away from the Kunkle Fire/Ambulance/Emergency Dept. which is the ONLY Fire Department in our entire Dallas Twp.
- * **Every person in every residence** on Lake Catalpa Road might not be killed or seriously injured if a NG explosion occurs because the pipeline would be further away from actual residences.

IND468-1 See the response to comment PM3-58.

IND468 – Kochan (cont'd)

20160701-5012 FERC PDF (Unofficial) 6/30/2016 11:27:15 PM

IND468-1
(cont'd)

- * This route would not impact any new landowners.
- * Not allowing the ASP in our community at all **would protect everyone**. As it stands, if there is a pipeline leak or explosion, thousands in our area would be affected --- including the trucks en route to the fracking wells north of us --- because **the pipeline corridor would have to be crossed to get into or out of the area**. This includes the alternate back roads from Routes 309 and 415. This includes access by our one and only volunteer fire department that serves the entire Dallas Twp. community. The Atlantic Sunrise Pipeline route is essentially boxing the residents of Dallas Twp. in a deathtrap and leaving us no EXIT.

Benefits to Jackloski Property:

- * This route still avoids the septic drainage field problem on the Jackloski property as did Alternate Routes 10A and 10.
- * This route would not destroy the natural springs Mr. Jackloski uses for his cattle.

Benefits to Goodleigh Manor:

- * Owner of Landview/Goodleigh Manor Development DOES NOT RESIDE in our community. His only interest in this pipeline route is profit.
- * Goodleigh Manor will be happy to be compensated for his UNDEVELOPED lot.
- * Any lots Goodleigh Manor may have bordering our property line are UNINHABITED and there are no current structures on the land. No living being will be in harms way.

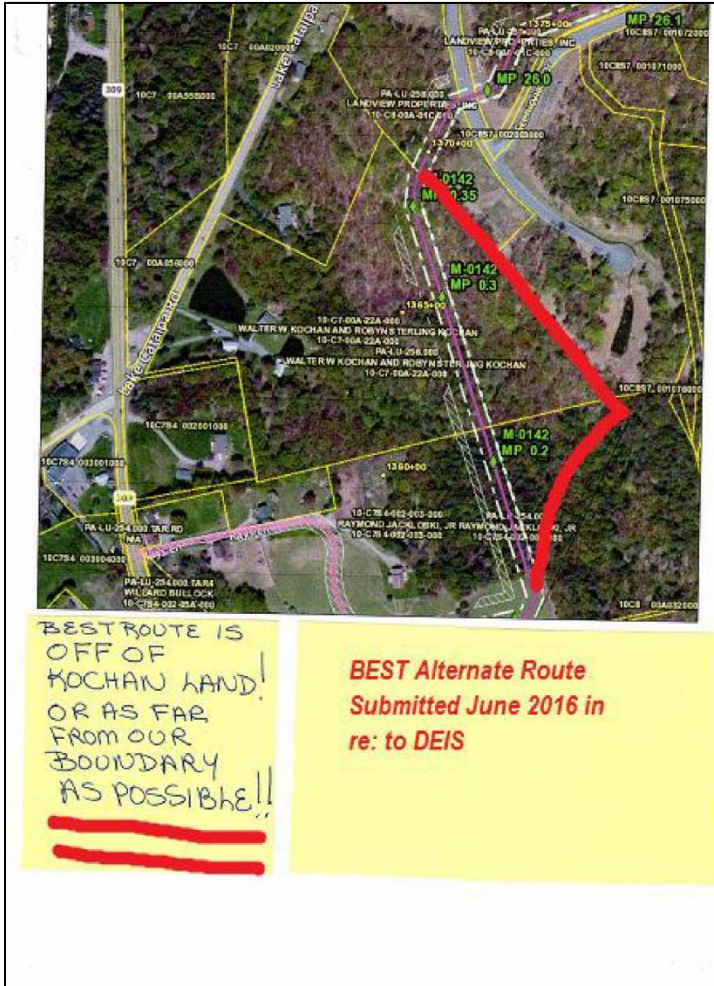
Benefits to Transco/Williams:

- * Since this route would be on our property boundary line, they would not be disturbing our streams and natural springs and, therefore, could reduce their construction costs.
- * Reduces Transco's liability for ruining our property by dynamiting through our steep slide slope and disrupting our natural streams and springs.
- * They already have 2 willing landowners by signing agreements with Goodleigh and Jackloski and would not have to further coercing the Kochans.
- * By eliminating the Kochans in the mix, they are dealing with 1 less property owner.

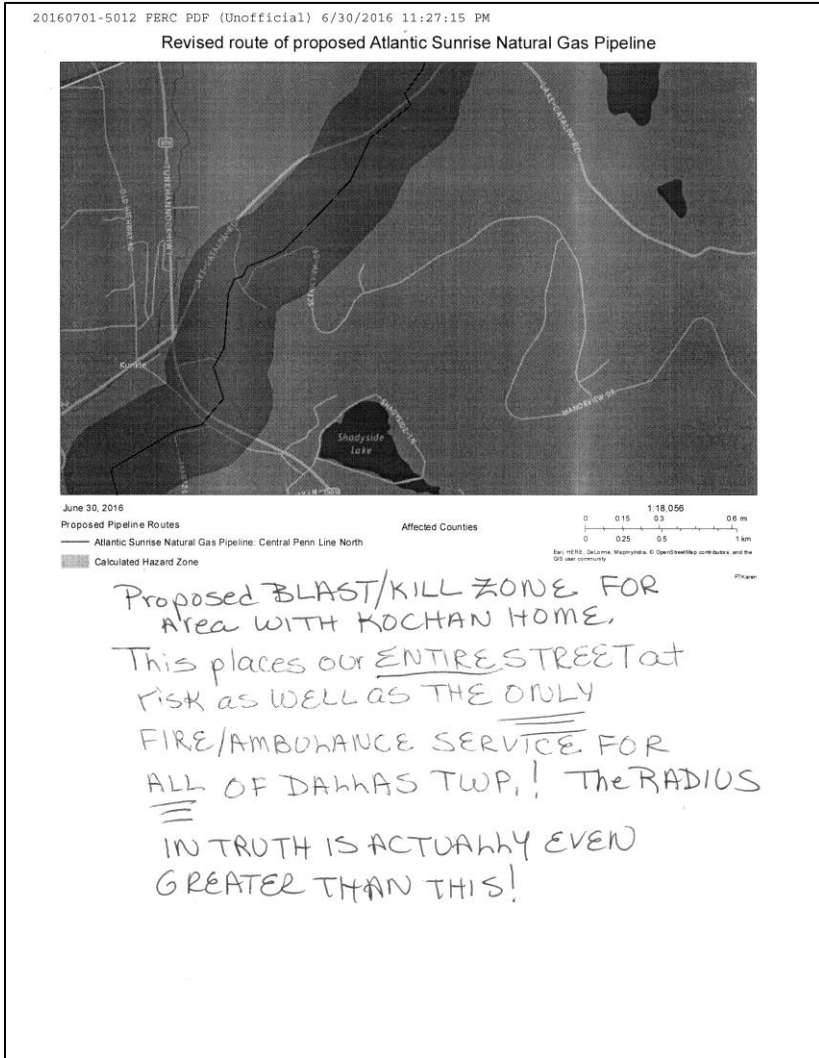
Major Considerations in FERC's Decision:

- * FERC needs to place more **value** on our lives and safety as well as protecting our property and state roads from potentially devastating impacts, particularly when Transco could easily adopt this BEST Alternative Route.
- * To state it may (or actually may not when it's all said and done) cost Transco more money to adopt this BEST route, is not a reasonable or valuable argument, particularly when it is **our lives** at stake versus their profits, particularly when this gas is not slated to serve us or our community, and when we will be receiving NO COMPENSATION for "their gas" running through "OUR PROPERTY." This pipeline is strictly for Transco's profit.
- * We stand NOTHING TO GAIN except the stress of having our lifetime property ruined either in construction or with an explosion. If you do not recommend placing the ASP off our property, and FORCE US AGAINST OUR WILL to exist with a potential NG explosion that would kill us, you FERC, will be committing murder.

IND468 – Kochan (cont'd)



IND468 – Kochan (cont'd)



IND469 –Kim Kann

20160627-5180 FERC PDF (Unofficial) 6/27/2016 2:18:53 PM

Kim Kann, CONESTOGA, PA.
June 27, 2016

Kimberly D. Bose, Secretary Federal Energy Regulatory Commission

888 First Street, NE
Washington, DC 20426

Re: Comments of Kimberly Kann, Docket No. CP15-138

Dear Secretary Bose:

As a potentially affected landowner and resident of Lancaster County I respectfully demand that you deny Williams Partners permission to build the proposed greenfield Atlantic Sunrise shortcut. Extensive research results in the following conclusions:

Williams Partners is a private corporation. Extreme, permanent hardships will be experienced by individuals and communities, while the benefit of ongoing profit will go only to Williams employees and shareholders.

IND469-1 This project is a shortcut. Easements already exist to move natural gas from extraction to the proposed destination. Cost and logistics should not be a permissive factor in locating unwanted, new infrastructure when an alternative exists.

IND469-1 See the response to comment PM1-162.

IND469-2 There is no natural gas shortage or need currently, or projected, in markets in the proposed delivery area.

IND469-2 See the responses to comments PM1-32 and PM1-99.

The vast majority of this gas is contracted for foreign export.

Current domestic prices, kept low by supply which exceeds demand, will increase as natural gas reserves are exported and gas suppliers are better able to manipulate supply.

IND469-3 Natural gas is catastrophically damaging to the environment from extraction, through transport, to the point of use. With a scientifically proven effect of being at least 86% worse as a climate warming gas than the byproducts of burning oil or coal, it is misguided to promote it as a bridge fuel to a more sustainable energy future.

IND469-3 See the response to comment PM1-36.

IND469-4 This DEIS at no point evaluates the cumulative effect of the entirety of this project including the projected surge in well drilling, climate warming effect of burning more natural gas, and risks of export facilities.

IND469-4 See the response to comment PM1-6.

IND469-5 Private land ownership is a sacred right of United States citizenship. The power to use eminent domain should only be granted for projects that can objectively prove benefits to those affected which greatly exceed negative side effects, and then landowners should be fairly compensated for any and all possible financial losses.

IND469-5 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND469 –Kim Kann (cont'd)

20160627-5180 FERC PDF (Unofficial) 6/27/2016 2:18:53 PM

More specifically, the DEIS is deeply flawed in the following regards.

4.11 Air Quality and Noise - NOISE

IND469-6 The EPA has issued guidelines for noise standards set at 55 dBA by day, and 45 dBA by night (= max level of 48.6 dBA on a 24-hr basis) (see top 4-220). However, an acoustical analysis conducted at Transco's Compressor Station 520 demonstrated that noise levels far exceed these EPA standards at 5 NSAs, with noise levels ranging "from 59.7 to 65.0 dBA. (4-221) It is clearly admitted that EPA noise level guidelines are knowingly violated, and the rural climate of the community is given as reason to excuse such violations. Rural residents are equally protected under the law, and by constitutionally protected right, can be regarded no differently than their urban counterparts.

"The results of the noise assessments indicate that the estimated noise attributable to HDD (Horizontal Directional Drilling) equipment operations would increase above FERC's noise level criterion of 55 dBA L dn at three NSAs if no additional litigation is employed. Moreover, the noise of the HDDs would exceed 55 dBA L dn (FERC threshold) at NSAs at the following HDD entry and/or exit locations..." (4-233) Furthermore Transco "indicated" that property owners would be notified of planned nighttime construction activities." The DEIS claims: "Since mitigated noise levels attributable to HDDs are anticipated to be below the FERC sound criterion at any NSAs, overnight construction, if necessary, is not expected to create significant impacts on surrounding NSAs.

However, if the noise levels cannot be reduced to target levels, Transco has committed to providing temporary housing or equivalent monetary compensation to the occupants of affected NSAs in the project area until the construction activities are completed" (4-234)

It is important to note, "HDD activities at the three sites are estimated to be completed over a 3- to 6-month period." (4-229)

This indicates Transco has no requirement of maintaining acceptable noise levels, and can disrupt and or relocate local residents as they see fit. Many rural families own animals that need tending. Work crews need to be required to mitigate noise to a level considered acceptable by public health standard measures. Additionally, what parameters are in place to determine what is necessary, when families need to be notified and within what time period? Who will transport disabled residents and animals dependent on care? Who is providing alternate housing, where and to what standard? Neither dangerous noise levels, nor relocation is an acceptable option.

IND469-7 I respectfully request that permission to proceed with this proposed project be denied, or at the very least withheld until the above issues can be resolved using data independently collected and verified by scientists unconnected to the natural gas industry. Additionally, binding policy regarding the litigation of violations, and the pathway for local residents to resolve disputes during the infraction must be developed by an independent entity.

IND469-6

As described in section 4.11.2.1 of the EIS, the EPA guidelines provide information for state and local governments to use in developing their own ambient noise standards. With the exception of Columbia County, there are no state- or local-level noise regulations that are applicable to the Project in Pennsylvania. As described in section 4.11.2.3, we are recommending that Transco conduct noise surveys to verify that noise from Compressor Station 520 when operating at full capacity does not exceed the existing noise levels and, if existing noise levels are exceeded, to implement additional noise control measures to reduce the operating noise level at the NSAs to at or below the previously existing noise level. The predicted increase in noise at NSAs associated with the proposed modifications at Compressor Station 520 would be 0.3 dB or lower, and would not be perceptible to the human ear. See the revised text in section 4.11.2.3 of the EIS regarding noise related to HDD operations.

IND469-7

FERC's responsibilities are described in section 1.2.1 of the EIS and are also referenced in the responses to comments PM1-46 and PM1-77. Any stakeholder that believes they may be materially affected by FERC's decision on a specific case, project, or policy can become an intervenor to the proceeding. An intervenor is an official party to a proceeding and has certain legal standing, as opposed to those who only file comments. Intervenors have the right to participate in hearings before FERC's administrative law judges; file briefs; and file for rehearing of a Commission decision. More information about how to become an intervenor can be found on FERC's website.

IND470 – Kochan

20160627-5292 FERC PDF (Unofficial) 6/27/2016 4:00:51 PM

Kochan DEIS Comment on Wetlands 6/27/16

IND470-1

- “Transco identified and delineated wetlands along the proposed pipeline route during field surveys in 2014.” However, “For areas where Transco was unable to complete surveys in the 2014 and 2015 field seasons, remote-sensing resources were used to approximate the locations and boundaries of wetlands within the project area.”

We have wetlands on our property which have not been identified. How is FERC going to get that data? Approximations are not accurate. We’ve already seen how destructive “approximate” distances are for the blast/KILL zones that are erroneously reported to FERC and that FERC willingly accepts even while reality has proven otherwise.

- Transco’s surveys identified a “total of 50.4 acres” that “would either be crossed by the project, affected by temporary extra workspace, or located within the construction right-of-way.” (4-69)
- Of those 50.4 (approximate) acres, 48.2 acres are in PA. Again, “Transco did not have access to survey all parcels; therefore, the total acreages were determined through a combination of field survey data and remote sensing.” (4-70)
- “The proposed temporary access roads would cross 12 wetlands. However, Transco argues that the impacts would be minimal due to their proposed use of “free-span bridges at temporary access road crossings to avoid wetland impacts.” (4-70).
- The Pennsylvania pipeline facilities (CPL North, CPL South, Chapman Loop, and Unity Loop) would cross 251 wetlands.” Of these, 153 are classified as palustrine emergent; 13 palustrine scrub-shrub; 41 palustrine forested; 44 have more than one wetland classification)
- “Exceptional value wetlands are given special protection in the state of Pennsylvania by the PADEP under Pennsylvania Code Title 25 (Pennsylvania Code, 1991)” (4-71)
- Note: “Fifty-one of the wetlands crossed by the proposed pipelines in Pennsylvania are classified as exceptional value, with 15 of these containing a forest component.” (4-71).

If 20% of all “noted” wetlands being crossed by the ASP in PA are designated as “exceptional value wetlands,” where is the “special protection”? Or, does it just cost more to buy the government to look away from these facts? If FERC allows the ASP to destroy these “exceptional value wetlands” then, perhaps FERC should be penalized. Heavily.

- “The project would cross eight forested wetlands...that are characteristic of the Hemlock/Mixed Hardwood Palustrine Forest community type, which the PADCNr identified as a natural or special concern community type due to a restricted range, relatively few populations, recent and widespread declines, or other factors making them at risk of extirpation in Pennsylvania” (4-71).

It is obvious that this process is being RUSHED through, without properly protecting our communities and environment. The people in this decision making process, whether its pipeline or government employees, first need to get third party OBJECTIVE data, then take adequate time to study the actuality of the situation, and become more creative to find a

IND470-1

See the responses to comments PM1-84, PM2-102, CO21-2, FA1-6, FA1-15, and IND425-8.

IND470 – Kochan (cont'd)

20160627-5292 FERC PDF (Unofficial) 6/27/2016 4:00:51 PM

IND470-1 (cont'd) positive solution, rather than rush through and bully landowners into devastation. These people need to honor the environment and landowners. Apparently, they are above the law.

- In wetland areas, "Construction would be conducted in accordance with Transco's ECP" (4-71).

For FERC to allow Williams, the company responsible for inflicting harm on these wetlands, to determine the guidelines by which construction in wetlands will take place says that FERC's decision is already made. This entire process is a sham. If FERC were genuinely interested in the environment, an independent independent party would be providing the data.

According to Transco's assessment, 15 of the "exceptional value wetlands" affected by the ASP in PA are forested. Since the pipeline ROW will leave our steep side slope with a meadow, and essentially "deforested," FERC needs to look at the true impact in these areas, and most particularly how a meadow is going to hold back the water that our mature trees do now.

- "Following construction, Transco would ensure that all disturbed wetland areas are successfully revegetated" (4-74).

IND470-2 As numerous other landowners have commented, how is going to guarantee that our lands are restored, that Transco keeps its promise? From inception, they have treated landowners deceptively. Why should we believe all of a sudden, and once they have destroyed our land, that all of a sudden they are going to become the good guys? They've had every opportunity to do so from day 1 but have actively chosen not to. Bullying has been more effective for them. So, FERC, are you going to point the finger at PHMSA or DEP and say it's not your problem and we have to try and get resolution from them? Of course, it will be more finger pointing at another agency, or denial because it is a state or a federal issue and no one wants to take responsibility for the destruction. We would really love to know how this going to be remedied.

IND470-2

Areas disturbed by construction that are not part of the permanent rights-of-way would be restored to preconstruction contours, stabilized, and vegetated following the completion of construction activities per landowner and applicable agency requests. See section 2.5 of the EIS for a description of the environmental inspection and monitoring measures that would be employed during construction of the Project to ensure compliance with the recommended mitigation measures.

IND471 – Sally Lyall

20160627-5276 FERC PDF (Unofficial) 6/27/2016 4:56:37 PM

Sally Lyall, Lancaster, PA.

Dear FERC Chairman and Commissioners,

IND471-1 We are writing to ask you to deny a permit for the Atlantic Sunrise Project (Docket No. CP15-138-000).

There are three primary reasons for our request:

1. A 36" pipeline already exists in Lancaster County, PA which Williams can remove and replace with 42" pipeline for its new purpose. This would be a simple solution that would save additional damage to the historic, fertile, and scenic beauty of Lancaster County.

2. If removing and replacing is not a preferred option, 42" pipeline could be laid next to the existing 36" pipeline, thereby using an existing path of land already claimed for the pipeline route. Again, this would preserve the historic, fertile, and scenic beauty of Lancaster County.

IND471-2 3. Eminent domain should be used only for the public good, not private profit. A new pipeline would not be used for our public good. Instead, it would slice through pristine farms which Lancastrians have already

IND471-3 worked and donated millions of dollars to preserve. It would decimate sixteen (16) Native American gravesites dating back to the time of William Penn. It would rip through pristine hiking trails and private

IND471-4 property, putting children, teachers, doctors, farmers, and many others at risk of being evaporated with one explosion.

IND471-5 We realize that your job is difficult and that much pressure comes to bear to support a gas company. We are asking you to stand with Lancastrians in saying, "No," to the seizure of more land and to demand that the Williams Co. use the existing pipelines or pipeline routes already in Lancaster County's soil.

Please stand with Lancaster County in saying, "No." Thank you.

Sincerely,

Sally & Joe Lyall

IND471-1 See the responses to comments PM1-162 and FA1-29.

IND471-2 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND471-3 See the response to comment IND315-3.

IND471-4 See the response to comment PM1-13.

IND471-5 See the response to comment PM1-162.

IND472 – James Eaves

20160627-5274 FERC PDF (Unofficial) 6/27/2016 4:04:10 PM

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

RE: Atlantic Sunrise, Docket No. 15-138-000

Dear Secretary Bose,

IND472-1 I support Atlantic Sunrise and am writing to ask the Commission to approve this much-needed pipeline as soon as possible.

Atlantic Sunrise will help millions more Americans gain greater access to affordable, reliable, environmentally responsible and domestically produced energy. It will also:

- Drive \$1.6 billion in regional economic activity.
- Directly employ approximately 2,300 people during the pipeline's construction phase.
- Help the country further reduce carbon emissions, which it is currently doing thanks to the proliferation of natural gas.
- Increase the potential for greater supply of renewable energy by giving utilities better access to lower-cost and more-reliable natural gas, offsetting higher costs and reliability issues that are sometimes associated with renewables.

As noted in the Commission's DEIS, any environmental impacts would be reduced to less-than-significant levels with the implementation of recommended mitigation measures.

It's also worth noting that Williams has taken a collaborative approach and kept an open mind when working with local stakeholders. As a result, Williams has adjusted more than half of the originally planned route.

In a further demonstration of being a good neighbor and environmental steward, Williams, through its Atlantic Sunrise Community Grant Program and Atlantic Sunrise Environmental Stewardship Program, has contributed more than \$3.5 million to 148 fire departments, schools, townships, hospitals and – in coordination with The Conservation Fund – 17 conservation projects.

Atlantic Sunrise is vital in helping meet U.S. energy needs in an affordable, reliable and environmentally responsible manner. It will also provide many short- and long-term economic benefits. With this in mind, please move this project forward without delay.

Sincerely,

James Eaves
5347 Channel Dr
Gillsville, GA 30543

IND472-1 Comment noted.

IND473 – Sarah Dawson

20160627-5273 FERC PDF (Unofficial) 6/27/2016 4:51:11 PM

Sarah Dawson, Lancaster, PA.
IND473-1 I am strongly against this pipeline. You are abusing eminent domain to commandeer the lands of people who don't want the pipeline. This nation's path forward is not through coddling special interest and pushing forward technologies that are not in the best interest of people or the planet. Please consider stopping this pipeline.

IND473-1 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND474 – Liam Maloney

20160627-5270 FERC PDF (Unofficial) 6/27/2016 4:46:40 PM

Liam Maloney, Lancaster, PA.
To the FERC COMMISSIONERS:
As a concerned resident of Lancaster county PA, I am contacting you to protect the Atlantic Sunrise Pipeline project. Having been a geology major, I am very aware of the harm done to the environment by both fracking and pipeline construction.
IND474-1 The geology of central Pa is filled with karst topography and has several active fault lines. The limestone formations are susceptible to sink holes. Williams has not addressed well how to avoid this, which is probable.
In addition to the harm to the environment, this project is detrimental to the community. Not only is this damaging favorite recreational spots but also ancient Native American sites.
IND474-2
IND474-3 This project unfairly infringes the livelihood of the farming community. Williams has seemed to target state preserved farmland and organic no till farms.
IND474-4 I am outraged by the ploy of eminent domain, which properly understood is used to benefit the public, not private corporations.
I am urging you to reject this project for the above reasons.
Thank You
William J Maloney 111

IND474-1 See the response to comment PM1-82.
IND474-2 See the response to comment IND467-1.
IND474-3 Sections 4.8.4 and 4.8.6.2 of the EIS and Transco's Agricultural Plan describe mitigation measures Transco would implement to minimize impacts on agricultural lands, including organic and no-till farms. Also see the responses to comments PM1-18 and PM1-179.
IND474-4 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

IND475 – Kochan

20160630-5386 FERC PDF (Unofficial) 6/30/2016 4:47:50 PM

Kochan Comment on DEIS 5.1.12 Safety and Reliability and Request for FERC to Adopt our BEST Alternate Route

IND475-1 The fact that landowners have to take their time to obtain accurate data and incur unnecessary expenses to defend their properties in America is repugnant. Being decent Americans, we do not understand how FERC can ignore true data on the blast/KILL zone of a natural gas pipeline when reality shows the distances to be much closer than Transco/Williams (or the NG industry for that matter) reports. For FERC to omit this data from the DEIS, and for Transco/Williams to NOT formally notify households potentially affected by the intended pipeline in their communities is intentional deception not to mention irresponsible and careless.

The DEIS erroneously states Transco routed the pipeline to "minimize risks" to local residents and vulnerable locations/populations (e.g., hospitals, prisons, schools, daycare facilities, retirement or assisted-living facilities). Placing us and our home of 28 years in the Blast/KILL/Incineration Zone is NOT minimizing our risk, nor is locating their pipeline near an assisted living/gated retirement facility --- the Village at Greenbriar in Dallas Twp. on Route 415.

The proposed 30 inch diameter ASP for our property supposedly has a maximum pressure of 1,480 psi (at least until FERC erroneously approves increasing the pressure as it did in relation to the April 2016 Salem Twp. explosion).

Since FERC and Transco did not seem it important to disclose the Blast/KILL zone distances, we've included information from The Pipeline Safety Trust report for the Gas Research Institute (the gas industry) which states it "developed a simple and defensible approach to sizing the ground area potentially affected by a worst-case ignited rupture of a high-pressure natural gas pipeline. Based on this model, a simple equation was developed that relates the diameter and operating pressure of a pipeline to the size of the area likely to experience high consequences in the event of an ignited rupture failure. Pipeline incident reports, located in the public domain, were reviewed and provided the basis for evaluating the validity of the proposed affected area equation. The correlation suggests that the simple equation provides a credible estimate of affected area."

"In general, THE MOST APPROPRIATE VALUE FOR THE RELEASE RATE DECAY FACTOR WILL DEPEND ON THE SIZE OF PIPELINE BEING CONSIDERED, THE PRESSURE IN THE LINE AT THE TIME OF FAILURE, THE ASSUMED TIME TO IGNITION, AND THE TIME PERIOD REQUIRED TO DO DAMAGE TO PROPERTY OR CAUSE HARM TO PEOPLE. Given that even immediate ignition will require several seconds for the establishment of the assumed radiation conditions and given further THAT A **FATAL DOSE OF THERMAL RADIATION CAN BE RECEIVED FROM A PIPELINE FIRE IN WELL UNDER 1 MINUTE...**"

"Given that anecdotal information on natural gas pipeline failures suggests that **THE TIME TO IGNITION MAY TYPICALLY BE IN THE RANGE OF 1 TO 2 MINUTES** (as in the Edison, New Jersey incident of 1994)..."

"...If it is assumed that within a 30 second time period an exposed person would remain in their original position for between 1 and 5 seconds (to evaluate the situation) and then run at 5 mph in the direction of shelter, it is estimated that within this period of time they would travel a distance of about 200 ft. On the further assumption that, under typical conditions, a person can reasonably be expected to find a sheltered location within 200 ft of their initial position, a 30 second exposure time is considered credible and is, therefore, adopted as the reference exposure time for people outdoors at the time of failure..."

A sample of 2 actual occurrences with a 30" pipeline and at *less pressure* than what Transco proposes for their natural gas pipeline on our property are cited here and included in our attachment detailing other sample cases of destruction and fatalities:

1. Rupture at 9:10PM with **ignition soon after failure BURNED** an area 500' wide by 700' long, 2 houses, 3 house trailers and numerous other structures and equipment was destroyed; **5 FATALITIES DUE TO SMOKE INHALATION in house 318' FROM**

IND475-1 Comment noted. See the response to comment PM1-11.

IND475 – Kochan (cont'd)

20160630-5386 FERC PDF (Unofficial) 6/30/2016 4:47:50 PM

IND475-1
(cont'd)

RUPTURE (150' offset), 3 PEOPLE BURNED RUNNING FROM HOUSE 320' FROM RUPTURE (200' offset), ONE PERSON HOSPITALIZED WITH 2ND DEGREE BURNS.

2. Rupture at 2:05AM (most likely *these residents were innocently sleeping*) with ignition soon after failure **BURNED an area 900' by 1000'**, 2 houses, 1 house trailer and numerous other structures and equipment destroyed; **3 PEOPLE BURNED RUNNING FROM HOUSE 280' FROM RUPTURE REQUIRED HOSPITALIZATION), 5 OTHERS RECEIVED MINOR BURN INJURIES RUNNING FROM DWELLINGS BETWEEN 200' AND 525' FROM RUPTURE (250' OFFSET).**

Most, if not all, residents are unaware that their homes, workplaces, and schools are located within the "hazard" or more accurately, the "Blast/KILL/Incineration zone of the proposed Atlantic Sunrise Pipeline. Williams **DOES NOT INFORM THE PUBLIC ABOUT THIS DANGER!** For both FERC and Transco/Williams to omit this critical information is criminal. Of course we know why this information has not been communicated to the public, because NO ONE would want this pipeline once they saw the visuals of the blast/KILL zone for their community.

FERC MUST REALIZE that the ONE AND ONLY FIRE AND AMBULANCE EMERGENCY service for ALL of Dallas Twp. IS IN the Blast/Kill zone. Who is going to rescue us then if a pipeline accident occurs? Allowing the ASP to have this route endangers EVERYONE in our community and particularly in the vicinity of our Kunkle Fire and Ambulance Service which is across Route 309 from our home.

The hazard/blast/kill zone of the 30" pipeline they want to install in our yard, in our area, is 796'. As witnessed in the video of the April 2016 natural gas line explosion in Salem Twp. PA, THE SIDING MELTED ON RESIDENTS' HOMES 2,640 FEET AWAY. It doesn't take much to realize what would happen at 796'...or 500' for that matter. A man was burning alive as he tried to run to safety from the natural gas explosion 1500' away. The public is raising money for his medical bills because the pipeline company takes no responsibility. DEP was nowhere to be found after the explosion.

Residents --- human beings --- deserve accurate answers and deserve to live safely in their homes and communities. For FERC to allow Transco/Williams to knowingly and intentionally place human and animal lives in a deathtrap is acting without conscience and completely reckless.

IND475-2 Although FERC has recommended the pipeline on our property be moved slightly farther up our hill (Route 10A), it will still be 435' from our home. We have verified that our homeowners insurance WILL NOT COVER us from natural gas pipeline damages. We DO NOT WANT to be placed in harms way. With 3 natural gas explosions in PA within the last year alone, and averaging 2 fatalities per year, we DO NOT BELIEVE we would be safe with a NG pipeline this close to our home.

IND475-3

DEIS states, "The DOT rules require regular inspection and maintenance, including repairs as necessary, to ensure the pipeline has adequate strength to transport the natural gas safely." It does not state who is doing the regular inspections. For Transco to place the burden of regular inspections upon the landowner is even more incredulous.

Transco's own letter states "a PIPELINE LEAK OR FAILURE IS a serious situation that can be DANGEROUS. It is important that YOU know how to quickly respond to a potential pipeline emergency. Use your sense of smell, sight or sound to help identify a potential natural gas pipeline hazard." Transco tells US to identify "dead or dying vegetation near the pipeline, or dirt blowing into the air..."

IND475-2 See the response to comment PM1-177.

IND475-3 Transco representatives will perform inspections of the pipeline as required by the DOT regulations in 49 CFR 192.

IND475 – Kochan (cont'd)

20160630-5386 FERC PDF (Unofficial) 6/30/2016 4:47:50 PM

IND475-3
(cont'd) So first Transco coerces us to steal our land, then we are told that we must regularly monitor the construction to be sure it is being done properly. After that, we are expected to monitor their pipeline for leaks because they have forced us to live 24/7 under the threat of death by incineration. This irresponsibility is preposterous and sounds more and more like Nazi Germany. How does Transco expect elderly residents or those with health issues to be able to check their pipelines? Maybe their lives have even less value than the rest of us.

Transco tells us that if we "suspect a pipeline leak or failure we should evacuate the area, abandon equipment being used in or near the area, avoid introducing any sources of ignition to the area." So, essentially Transco is telling me that when I am cooking out in my backyard and their pipeline leaks... (that I don't stand a chance to stay alive). Or, am I not allowed to cookout anymore? What happens when my neighbor uses their outdoor fireplace?

IND475-4 First Transco is going to cut down a lot of our trees for their ROW and never allow trees to grow in that large area again. Then, they are going to spray toxic herbicides on that land to ensure nothing ever grows on it, and the runoff will flow into our ponds where we catch fresh fish to eat. Then, if there is a pipeline explosion, acres more trees will be destroyed as well as our earth scorched. Don't tell us it doesn't happen, FERC. We are attaching photos. We don't want our home or land to look like this. We are proposing the BEST Alternate Route for our land that COMPLETELY ELIMINATES our property from the equation and runs DIRECTLY between the 2 landowners who have agreed to the pipeline on their property ---- Goodleigh Manor and Ray Jackloski. This route still solves the problem of not ruining Mr. Jackloski's drainage field. If FERC has any integrity, it should not take even a second to decide which is more important --- cutting more trees, or placing us further from harms' way --- running the pipeline through more UNDEVELOPED lots at Goodleigh versus ruining our home of 28 years and intentionally sending us to the gas chamber by willingly placing us in the blast/KILL/Incineration zone.

IND475-4 See the response to comment IND468-1.

IND475-5 To erroneously state this is a safe situation is intentionally deceiving landowners. It is stealing our quality lives, liberty and happiness...and worse yet, all for corporate profits. So easily Transco and FERC push landowners' safety concerns aside, telling us that PHMSA and DEP will protect us, yet in reality the truth is quite the opposite:

IND475-5 See the responses to comments PM1-13 and PM1-40.

FERC grants certificates to be built based on data provided by the pipeline company, in this case Transco. Then, FERC hands over responsibility for safety of the pipeline to PHMSA yet this agency does NOT have adequate resources or staffing to monitor the millions of miles of pipelines ALREADY IN EXISTENCE. The agency has only 139 federal inspection and enforcement staff and 300 state inspectors to regulate nearly 3,000 companies for 2.6 million miles of pipelines, 118 liquefied natural gas plants, and 6,970 hazardous liquid breakout tanks. That sounds grossly understaffed to us. That sounds like the inspections will not be very complete. (Presumably, that is why Transco is pushing landowners to self-inspect besides the fact they want to shirk even more responsibility for problems.) How could anyone effectively manage that load?

FERC's own website states that the entire pipeline safety program is funded by a user fee yet Congress has even acknowledged that there has been a long-term problem with understaffing the PHMSA pipeline safety program. FERC must take this into account when deciding whether or not to grant a pipeline certificate. If the pipelines already in existence cannot be adequately monitored for safety, than logic would state NO MORE PIPELINES can be built until they can be monitored safely. With the NG industry funding the pipeline safety program AND the FERC office, and lobbyists, and paying off legislators, landowners don't stand much chance of being treated fairly.

We have heard over and over again how Pennsylvania does not have enough inspectors to check most of the activities at the fracking well sites. Pennsylvania has been a lush state with an abundance of good, clean water. However, with fracking activities, Pennsylvania has confirmed

IND475 – Kochan (cont'd)

20160630-5386 FERC PDF (Unofficial) 6/30/2016 4:47:50 PM

IND475-5
(cont'd) over 209 cases of water pollution from O&G drilling. Our corrupt state has intentionally ignored certain drinking water test results related to suspected contamination from fracking as well as numerous health complaints from residents near well pads and compressor stations. Pennsylvania regulators do not protect landowners or communities from the damages of fracking that is already taking place. Certainly, they will not protect us from natural gas pipeline problems either.

Like PHMSA, the PA-DEP is understaffed and unable to properly regulate the thousands of fracking wells in our area. Our own Auditor General's report revealed that: PA-DEP did not routinely and consistently issue orders mandating drillers to clean up water supplies they had ruined as required by law; PA-DEP could not prove that all active gas wells were inspected on a timely basis; PA-DEP poorly communicated with residents affected by oil and gas activities, and failed to make information public on its website; PA-DEP had a disorganized and ineffective system for tracking complaints; and PA-DEP inspection information was often inaccurate or incomplete.

With both the PHMSA and PA-DEP agencies chronically short of inspectors, the industry is allowed to **INSPECT ITS OWN PIPELINES**, yet it has already been proven that many employees don't even understand the regulations! Worse yet is that the government inspectors are basically paper pushers while the on-site pipeline inspections are done by **inspectors who are paid by the pipeline company**. And to make matters worse, dozens of **safety standards** adopted by the PHMSA are **written by the oil and natural gas industry**. This is the same industry who claims no responsibility in their contract for harming people or damaging properties when their pipelines explode. This is the same industry who has had the laws written behind closed doors so we are taxed more heavily on any money received through eminent domain rather than bow down to their one-sided contract to force as many pipelines as they want on our land. This is the coercive, greedy industry that steals landowners land and forces people into harms way, all so they can increase their corporate profits. Now, this doesn't seem much different than FERC being paid by the industry either. This entire process, on the federal or state level is a sham. There is **NO PUBLIC SAFETY!!!**

With the legislative corruption and haphazardness of the PHMSA and PA-DEP governmental agencies, do you really think we feel safe being forced to exist in a blast/KILL zone where we could be INCINERATED in 1 second and at any time?

As one astute writer has claimed, "This isn't like the fox guarding the hen house. It's like the fox designing the hen house."

IND475-6 For FERC decision makers to do anything other than move us and our Fire/Emergency Department out of the Blast/KILL zone is knowingly, willingly and intentionally placing us in harms way. We challenge these decision makers to have some integrity and decency to place more value on human life than dollars --- **adopt our BEST alternate route** (or better yet don't grant the ASP certificate at least until real and true safeguards are in place and Transco coexists its pipeline).

Attachments:

1. Chart of more accurate Blast/KILL zone data than what Transco pretends
2. Sample of Actual Destruction and Fatalities with distance, pipe size and pressure similar to what Transco proposes for our Kochan property
3. Proposed Blast/Kill zone for area with Kochan home --- **places our entire street at risk as well as the ONLY Fire/Ambulance Service for ALL of Dallas Twp.**
4. **BEST Alternate Route for Kochans**
5. Transco/Williams correspondence to residents telling them to check for NG leaks
6. Photo of Home Destroyed in April 2016 NG Explosion in PA

IND475-6 See the response to comment IND468-1.

IND475 – Kochan (cont'd)

20160630-5386 FERC PDF (Unofficial) 6/30/2016 4:47:50 PM

7. Photo of Scorched Earth from April 2016 NG Explosion in PA
8. Photo of NG Explosion
9. Photo of NG Explosion Fireball

<https://www.fractracker.org/2015/10/updated-central-penn-pipeline/> - Information on the Blast Zone

<http://www.wtae.com/news/sky-4-over-gas-pipeline-explosion-site-looks-like-a-battlefield/39284494#comments> - Video of Salem Twp. Explosion Aftermath

IND475 – Kochan (cont'd)



IND-970

Individuals

IND475 – Kochan (cont'd)



IND-971

Individuals


IND475 – Kochan (cont'd)

20160630-5386 FERC PDF (Unofficial) 6/30/2016 10:35 AM

**WILLIAMS IS PLACING
ITS RESPONSIBILITY
FOR SAFETY ON TO
THE COMMUNITY +
HANDOWNERS!?!**

Williams

Transco Pipeline
2800 Post Oak Blvd
Houston, TX 77056
(866) 857-7094



Dear neighbor,

As you may be aware, Williams operates a high-pressure natural gas transmission pipeline in Pennsylvania known as the Transco pipeline. You may be more familiar with your local public utility company, which receives its natural gas supply from pipeline operators like Williams.

While you may not give our pipeline much thought, it is important to Williams that you are aware of its presence and that you are able to recognize and respond to any unauthorized activity or abnormal conditions. The safety information contained in this letter and in the attached fact sheet will help prepare you for the unlikely event of a pipeline emergency.

Caution: Working Near Pipelines
If you plan to dig or perform any type of excavation near the pipeline right of way, be sure to dial 811 at least three business days before you begin. Dialing 811 will connect you with your state's One Call service, which will help protect you from unintentionally hitting underground utility lines. After you call, a company representative will identify and clearly mark the location of our pipeline if it is in the vicinity of your planned excavation work.

Locating Pipelines
You may have noticed the yellow Williams pipeline markers located near roads, fence crossings and curbs (see image on the attached fact sheet). Although these markers are used to alert the public of the presence of one or more pipelines, they do not represent the exact location of the pipeline. If you wish to learn more about the location of our pipeline and other pipelines in your community, visit the National Pipeline Mapping System on the Internet at www.npms.phmsa.dot.gov.

Leak Recognition & Response
Although rare, a pipeline leak or failure is a serious situation that can be dangerous. It is important that you know how to quickly respond to a potential pipeline emergency. Use your sense of smell, sight or sound to help identify a potential natural gas pipeline hazard.

- **Smell** - Strong petroleum scent or other pungent odor, a smell similar to rotten eggs
- **Sight** - Dead or dying vegetation near the pipeline, dirt blowing into the air, fire coming from the ground
- **Sound** - Hissing, blowing or loud roaring sound

If you suspect a pipeline leak or failure, your personal safety should be your first concern. Follow these steps:

- **Evacuate** the area and try to prevent anyone from entering
- **Abandon** any equipment being used in or near the area
- **Avoid** introducing any sources of ignition to the area
- **Call** 911 or contact local fire or law enforcement
- **Notify** the pipeline company (Transco emergency gas control: 800-440-8475)
- **Do not** attempt to extinguish a natural gas fire, and do not attempt to operate pipeline valves

Your personal safety is important to us, so please take the time to share the enclosed information with others in your household. We appreciate your interest in our operations. If you ever have any non-emergency related questions, call us anytime at 866-857-7094. You can also learn more about our operations on our web site at www.williams.com/safety.

IND475 – Kochan (cont'd)

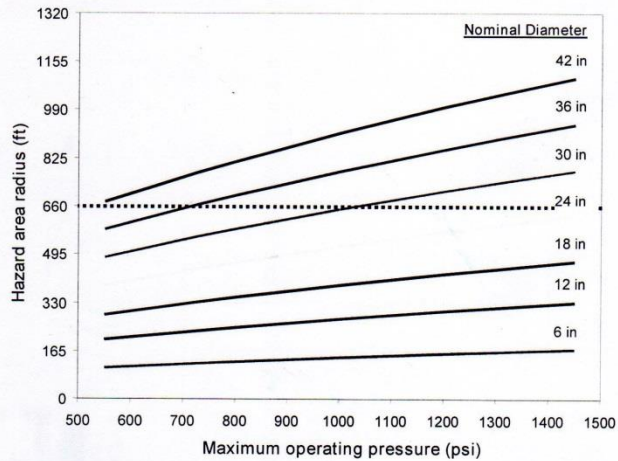


Figure 2.4 Proposed hazard area radius as a function of line diameter and pressure.

MORE ACCURATE BLAST/KILL ZONE
DATA THAN WHAT TRANSCO
PRETENDS OR SUGARCOATS
AS "HAZARD AREA RADIUS"

IND475 – Kochan (cont'd)

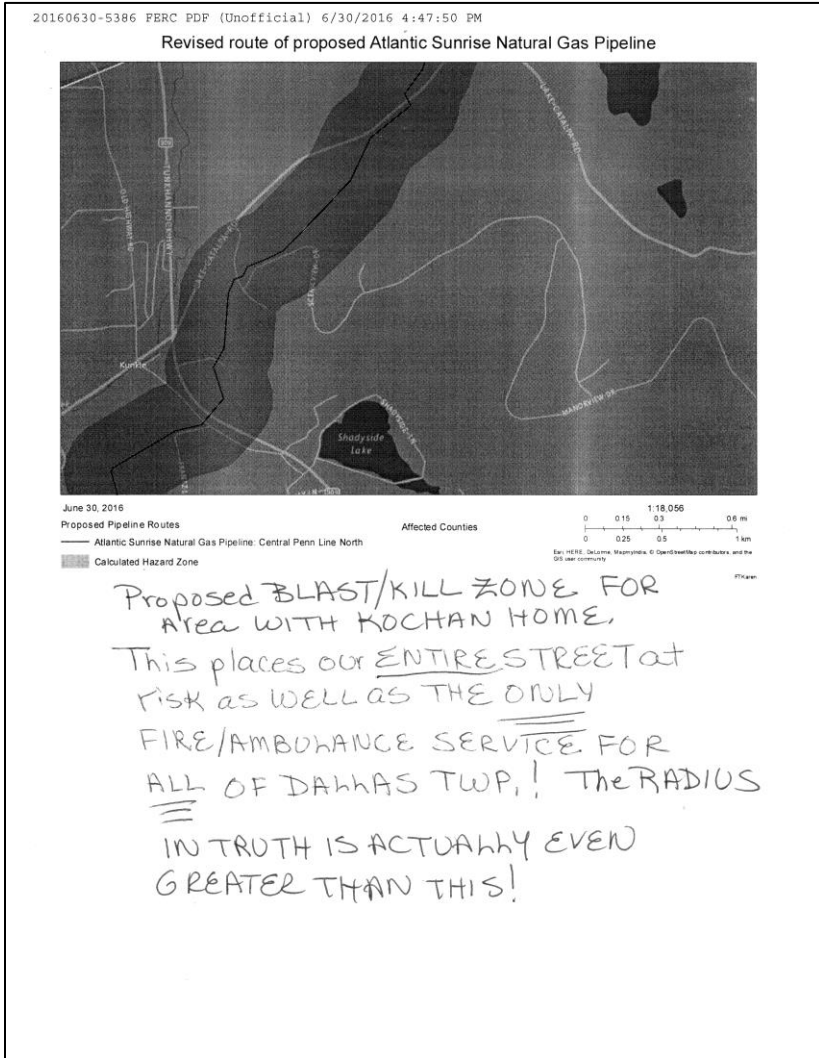
20160630-5386 FERC PDF (Unofficial) 6/30/2016 4:47:50 PM

Date	Report	Location	Incident	Damage	Maximum Burn Distance	Diameter (in)	Pressure (psi)
1969	NTSB-PAR-71-1	near Houston, Texas	Rupture at 3:40 p.m. on September 9th, explosive ignition 8 to 10 minutes after failure.	Burned area 370 ft long by 300 ft wide (all to one side). Houses destroyed by blast to 250 ft, heat damage to 300 ft, 106 homes damaged, 9 injuries, and 0 fatalities.	300 ft	14	785
1974	NTSB-PAR-75-2	near Bealeton, Virginia		Burned area 700 ft by 400 ft.		30	716
1974	NTSB-PAR-75-3	near Farmington, New Mexico	Rupture at 3:45 a.m. on March 15th, ignition soon after failure.	Earth charred within a 300 ft diameter circle, 3 fatal injuries (within 60 ft offset).		12.75	497
1976	NTSB-PAR-77-1	Cartwright, Louisiana	Rupture at 1:05 p.m. on August 9th, ignited within seconds	Burn area 3 acres (implies a 200 ft radius circle), 6 fatalities (within about 100 ft offset) and 1 injury.		20	770
1982	NTSB-PAR-83-2	Hudson, Iowa		5 fatalities (within 150 ft, less than 50 ft offset).		20	820
1984	NTSB-PAR-86-1	near Jackson, Louisiana	Rupture at 1:00 p.m. on November 25th, ignition soon after failure.	Burned area 1450 ft long by 360 ft wide (furthest fire extent 950 ft), 5 fatalities (within 65 ft, 0 ft offset), and 23 injuries (within 800 ft, 160 ft offset).	Offset 180 ft, Distance 950 ft.	30	1016
1985	NTSB-PAR-87-1	near Beaumont, Kentucky	Rupture at 9:10 p.m. on April 27th, ignition soon after failure.	Burned area 500 ft wide by 700 ft long, 2 houses, 3 house trailers and numerous other structures and equipment destroyed, 5 fatalities due to smoke inhalation in house 318 ft from rupture (150 ft offset), 3 people burned running from house 320 ft from rupture (200 ft offset) one hospitalized with 2nd degree burns.	Offset 350 ft, Distance 500 ft.	30	990
1986	NTSB-PAR-87-1	near Lancaster Kentucky	Rupture at 2:05 a.m. on February 21st, ignition soon after failure.	Burned area 900 ft by 1000 ft, 2 houses, 1 house trailer and numerous other structures and equipment destroyed, 3 people burned running from house 280 ft from rupture (requiring hospitalization), 5 others received minor burn injuries running from dwellings between 200 and 525 ft from rupture (250 ft offset).	Offset 700 ft, Distance 800 ft.	30	987
1994	NTSB-PAR-95-1	Edison, New Jersey	Rupture at night on March 23rd, ignition within 1 to 2 minutes after failure.	Burned area 1400 ft long by 900 ft wide. Fire damage to dwelling units up to 900 ft from rupture, dwelling units at 600 ft and beyond caught fire between 7 to 10 minutes after failure, no fatalities but 58 injuries.	Offset 720 ft, Distance 960 ft.	36	970
1994	TSB Report No. P84-H0003	Maple Creek, Saskatchewan	Rupture at 7:40 p.m. on February 14th, ignition soon after failure.	Fire burn area 21.0 acres (8.5 hectares).		42	1207
1994	TSB Report No. P84-H0036	Latchford, Ontario	Rupture at 7:13 a.m. on July 23rd, ignition soon after failure.	Fire burn area 11.8 acres (4.77 hectares), heat-affected area 18.6 acres (7.52 hectares).		36	1000
1995	TSB Report No. P89-H0036	Rapid City, Manitoba	Rupture of 42 inch line at 5:42 a.m. on July 29th, ignition soon after failure leading to rupture and fire on adjacent 36 inch line at 6:34 a.m.	Fire burn area 48.5 acres (19.6 hectares), heat-affected area 198 acres (80 hectares).		42	880

Table 3.1 Summary of relevant North American pipeline failure incident reports.

SAMPLE OF DESTRUCTION +
 FATALITIES WITH DISTANCE, PIPE SIZE
 + PRESSURE SIMILAR TO WHAT
 TRANSCO PROPOSES FOR
 OUR PROPERTY (KOCHAN).

IND475 – Kochan (cont'd)



IND475 – Kochan (cont'd)



IND476 – Kim Kann

20160627-5252 FERC PDF (Unofficial) 6/27/2016 3:52:35 PM

Kim Kann, CONESTOGA, PA.
June 27, 2016

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

Re: Comments of Kimberly Kann, Docket No. CP15-138

Dear Secretary Bose:

As a potentially affected landowner and resident of Lancaster County I respectfully demand that you deny Williams Partners permission to build the proposed greenfield Atlantic Sunrise shortcut.

More specifically, the DEIS is deeply flawed in the following regards.

4.9 Socio-economics

IND476-1 "Once construction is complete, the workforce numbers would decrease substantially. (4-167) Williams estimates the project would employ about coordinators 15 permanent full time personnel- 2 managers, 2 maintenance, 1 measurement specialist and 10 technicians- they would either be hired locally, or would be permanently relocated to the region. (4-168)." The claim that 75% of total workforce would be non-local (4-168) contradicts the testimony of Cindy Ivey of Williams, who stated that workers would come from outside the community.

Williams claims "construction would result in a temporary but positive impact on the employment for counties within the project area. Transco anticipates hiring between 534 and 623 local PA construction workers with the requisite experience for the installation of the natural gas facilities. (4-168)" This is not supported by the historic Williams presence working on the Rock Springs line. Can Williams demonstrate this has been their practice in the past? Can they demonstrate the availability to find enough highly skilled workers in a region with our low unemployment rate and a shortage of skilled labor? How will this claim be verified? What consequences are in place to compensate the local communities if this promise goes unfulfilled? Also, short term employment results in a future rise in unemployment rates and associated societal side effects. What provisions must Williams provide to buffer communities from those issues?

Williams cites two seemingly contradictory claims. "Construction of the project could temporarily decrease the availability of housing in the area." AND..."The project could have short-term positive impacts on the area rental industry through increased demand and higher rates of occupancy- however no significant impacts on the local housing markets are expected. (4-169). While some of the construction activity would be conducted during the peak tourism season, sufficient temporary housing is still likely to be available. (4-169)" Are there any independently gathered and analyzed statistics with which to verify these claims?

IND476-1 See the responses to comments PM1-23, PM1-31, IND398-2, IND425-16, and IND448-3.

IND476 – Kim Kann (cont'd)

20160627-5252 FERC PDF (Unofficial) 6/27/2016 3:52:35 PM

IND476-11
(cont'd) Without independently verifiable data, this point is irrelevant and should not be admitted.

"Based on the number of police and fire stations, school and hospitals there appears to be adequate public service infrastructure in the project area to accommodate the temp needs of the 1,873 non-local construction workers and their families. (4-170)" This is ridiculous statement and a random non-specific claim. Where is the analysis of the response times or personnel to resident ratio for each municipality? Conestoga Township is currently struggling to restructure/retain it's current police force given the existing population. This is clearly a point without any substantiated merit.

"Once Construction is complete, Transco would be responsible for repairing any damage to roads resulting from construction activities. (4-172)" What protocol has been established, with agreement of local communities, that assesses the before and after? What funds are set aside to broker disputes, and who is responsible for such decision making.

"We find Transco's plan would adequately reduce impacts on traffic flow: and based on the mitigation measures listed above, we expect the impacts from construction across and within roadways to be minor and temp. (4-172)." To our knowledge, no one associated with this project has every surveyed a cross-section of communities to fully understand what would be considered extreme or minimal impact. What measures are in place if Williams is wrong in their declaration?

Nothing in this section is substantiated nor is there any plan for requiring mitigation of misstated intentions. Any reasonably educated adult could have written this section with absolutely no knowledge of the project or communities. There is no documentation, data, analysis or demand for responsibility associated with it. Our communities deserve better.

I respectfully request that permission to proceed with this proposed project be denied, or at the very least withheld until the above issues can be resolved using data independently collected and verified by scientists unconnected to the natural gas industry. Additionally, binding policy regarding the litigation of violations, and the pathway for local residents to resolve disputes during the infraction must be developed by an independent entity.

Sincerely,

Kimberly S. Kann

IND477 – Elissa Pete

20160705-5033 FERC PDF (Unofficial) 7/4/2016 7:24:29 PM

Elissa Pete, Annville, PA.

IND477-1

I am writing against any natural gas pipeline through our beautiful state of PA. The gas companies are all out for making money and NOTHING else. They don't care about our environment. I went to a meeting held at Lebanon Valley College a year and a half ago where the arrogant man that was hired by Marcellus Shale Co. debated against farmer Stephen Cleghorn of Paradise Gardens in Reynoldsville PA. Mr Cleghorn was very detailed with the environmental issues that are happening when they are drilling. They are leaking the methane chemicals on the ground and a worker was seen just watching it leak into the environment, trying to wipe it up. We are aware of them not having the correct regulations for supervision. Really sounds environmentally safe to me, really!!!! The guy from Marcellus just kept repeating the same thing that there is no proof of anything going wrong. He seriously had no other comment but that to every point brought up, I am serious. These companies hire people from who knows where and dont care about the environment. Mr Cleghorn said he spoke to an elderly lady that the pipeline company talked into putting their pipeline through her land by telling her it was to support our military she told him, so she did. Really?! That is such a low lie. They say their stupid pipes are fullproof and lined up perfectly, the risks are too monumental. We need to stand behind our "Rights of Nature". We need to stand up for nature not destroy it. Scientists already have backed up that these pipes have leaked into our river streams. Not to mention have caused extreme damage to areas by loud trucks coming and going all day and night. Ruining the landscape. I live in Annville PA and know they want to put a pipeline right through this beautiful area by our woods and river. I want PA to stay beautiful for my grandchildren and their grandchildren. Please don't let them ruin our state any more then they have up north already. I pray you do the right thing and oppose this Giant evil. God Bless you all to do the right thing for us, all our children, our wildlife and enviroment. Keep our land and sky beautiful. Thank you. Sincerely, Elissa M. Pete

IND477-1

Comment noted.

IND478 – Kochan

20160627-5202 FERC PDF (Unofficial) 6/27/2016 1:11:44 PM

Kochan DEIS Comment on Air Quality and Noise Pollution 6/27/16

IND478-1 The DEIS states, “Air quality would be affected by construction and operation of the project.” It also states:

- The project would generate emission during construction due to gasoline and diesel-fired combustion equipment, as well as earth-moving activities (4-192)
- The project would also generate ongoing emissions during operation, including emissions from: 2 new compressor stations in PA; “additional ancillary facilities” in PA; 2 new meter stations and 3 new regulator stations in PA (4-192)
- “States have the authority to adopt ambient air quality standards if they are more stringent than the NAAQS [National Ambient Air Quality Standards].”

Pennsylvania has adopted pollution standards that go beyond those required by federal regulations, specifically: beryllium, fluorides, hydrogen sulfide, and settled particulate. (4-194)

- “GHGs (green house gases) occur in the atmosphere both naturally and as a result of human activities, such as the burning of fossil fuels... **The EPA found that the current and proposed concentrations of the six GHGs in the atmosphere threaten the public health and welfare** of current and future generations through climate change.” (4-196).

The DEIS is suppose to be an assessment of environmental impacts related to a massive fossil-fuel burning project—namely, the ASP. If the words above mean anything at all, it is erroneous for FERC to state that the ASP would have “no significant” environmental impact. The DEIS is full of contrary and mis-information and has conspicuously omitted critical information as well.

- “Under PSD (Prevention of Significant Deterioration), any new major source modification of an existing source of air pollution is required to obtain an air quality permit **before beginning construction**...PSD also applies to an existing major source when physical modifications are made that result in increased emissions above the “major modification.” (4-197)
- “Emissions of GHGs associated with the construction and operation of the [ASP], including all direct and indirect emission sources were calculated.” (4-201)

It appears that the DEIS considers only compressor stations, pipeline construction, and pipeline operations in its assessment of air quality impacts. Where does FERC assess the impacts associated with the increased natural gas extraction (fracking, injection wells, gathering line construction, etc.) from the construction of the ASP? And exactly who is assessing this?

It is unacceptable to allow information into the DEIS that is not validated, or self-reported. Of course, any intelligent person realizes that when Transco/Williams has everything to gain, and the landowners and communities the most to lost, that Transco will submit calculations that are not accurate. Only a truly independent source can provide true information. Based

IND478-1 See the responses to comments PM1-74, CO21-5, CO25-9, and IND425-19.

IND478 – Kochan (cont'd)

20160627-5202 FERC PDF (Unofficial) 6/27/2016 1:11:44 PM

IND478-
(cont'd) on the way Transco has behaved in this process, there is no WAY TO BELIEVE THAT the information that have submitted to FERC and landowners is objective and true.

As a supposed governmental regulatory agency, why isn't FERC MANDATING rather than weakly requesting Transco to comply? How can this be viewed by the public than anything other than an agency that is bought and paid for by the NG industry?

For Transco to tell FERC it is providing "it's own monitoring data" is useless. Why even bother requesting the information? We all know Transco will supply calculations to suit their profits and not the quality and safety standards for which the EPA would regulate. Let's face it, all of the information supplied by Transco to FERC will be slanted to line Transco's pockets; none of it takes the truth into account and how adversely it will impact landowners and communities.

Allowing Transco to choose when they would gather air quality monitoring data at a compressor station, in an attempt to selectively produce results better suited for their agenda is unconscionable. This process is more and more disgusting by the minute.

Incomplete data renders FERC's assessment of ASP's environmental impact premature. Since FERC is "requesting" that Transco submits the requisite data "prior to the issuance of the final EIS," we can only ask: why didn't FERC wait for this critical information before issuing the draft EIS? Furthermore, have provisions been made to ensure that Transco, at some point, submits air quality data based on full station loads? If, under those conditions, FERC determines that proposed modifications would push air pollution levels beyond acceptable levels, will FERC retroactively disapprove the project and/or halt construction? Honestly.

IND478-2 • "We received comments about the potential exposure to released radon gas. The downstream use of natural gas in the market areas, including the effects of burning gas and exposure to radon in homes, is beyond the scope of this EIS." (4-218)

If FERC does not assess and regulate the downstream impacts of the very project for which they are giving approval, whose responsibility is that? Is it going to be more of this pretend game that Transco/Williams activities are effectively monitored when in truth that is not the case?

IND478-3 • The EPA has issued guidelines for noise standards set at 55 dBA by day, and 45 dBA by night (= max level of 48.6 dBA on a 24-hr basis)(see top 4-220). However, an acoustical analysis conducted at Transco's Compressor Station 520 demonstrated that noise levels far exceed these EPA standards at 5 NSAs, with noise levels ranging "from 59.7 to 65.0 dBA. (4-221)

For FERC to ignore these violations and still be willing to issue preliminary approval for the ASP per this DEIS is beyond belief. Both FERC and Transco have no regard for rural communities. We hope every FERC employee has to live in these conditions.

IND478-2

Section 4.11.1.4 of the EIS provides background information regarding radon and the potential for radon exposure associated with natural gas combustion. The Commission has addressed the radon concentration of natural gas in multiple certificate proceedings, including recently in CP14-96-000. Based on the July 2012 study of natural gas samples from the Marcellus shale gas field cited in that proceeding, the radon concentrations in natural gas pipelines are significantly less than the average indoor and outdoor radon levels. We concluded that the risk of exposure to radon is not significant.

IND478-3

As described in sections 4.11.2.2 and 4.11.2.3 of the EIS, the existing ambient noise level at Compressor Station 520 ranges from 59.7 to 65.0 dBA, which already exceeds the FERC's 55-dBA L_{dn} threshold. We are recommending that Transco conduct noise surveys to verify that noise from Compressor Station 520 when operating at full capacity does not exceed the existing noise levels and, if existing noise levels are exceeded, to implement additional noise control measures to reduce the operating noise level at the NSAs to at or below the previously existing noise level. The predicted increase in noise at NSAs associated with the proposed modifications at Compressor Station 520 would be 0.3 decibels or lower, and would not be perceptible to the human ear.

Also see the responses to comments IND415-1, IND425-19, and IND469-6.

IND478 – Kochan (cont'd)

20160627-5202 FERC PDF (Unofficial) 6/27/2016 1:11:44 PM

IND478-31
(cont'd)

- “The results of the noise assessments indicate that the estimated noise attributable to **HDD (Horizontal Directional Drilling) equipment operations would increase above FERC’s noise level criterion of 55 dBA L dn at three NSAs** if no additional litigation is employed...**Moreover, the noise of the HDDs would exceed 55 dBA L dn (FERC threshold) at NSAs at the following HDD entry and/or exit locations...**” (4-233) Furthermore Transco “indicated” that property owners would be notified of **planned nighttime construction activities.**” The DEIS claims: “Since mitigated noise levels attributable to HDDs are anticipated to be below the FERC sound criterion at any NSAs, overnight construction, if necessary, is not expected to create significant impacts on surrounding NSAs. However, **if the noise levels cannot be reduced to target levels, Transco has committed to providing temporary housing or equivalent monetary compensation to the occupants of affected NSAs in the project area until the construction activities are completed**” (4-234)—NOTE: “HDD activities at the three sites are estimated to be completed **over a 3- to 6-month period.**” (4-229)
- Regarding construction activities including “grading, clearing, grubbing, and trenching operations”—“if the noise levels cannot be reduced to target levels, Transco has committed to providing temporary housing or equivalent monetary compensation to the occupants of affected NSA (Noise Sensitive Areas) in the project area until the construction activities are complete.” (4-235)
- “Blasting would be required during construction in some areas with shallow depth to bedrock (i.e. less than 8 feet).” (4-235)

We work from home. We have animals to care for. As it stands, we keep our windows closed at night to reduce the noise from traffic on state Route 309. ANY and ALL construction noise IS NOT ACCEPTABLE and most particularly at night. We have health issues and MUST BE ABLE TO REST AT NIGHT. It is IMPOSSIBLE for us to move our home business to a hotel, or take our animals with us. We cannot move our business. We MUST BE ABLE TO RETAIN OUR ABILITY TO EARN OUR INCOME. This cannot be accomplished if noise levels are too great to have a phone conversation. Likewise, NIGHT TIME CONSTRUCTION ABSOLUTELY CANNOT BE PERMITTED. The dynamiting is enough of an insult. FERC MUST COMMIT to some sensibility. Rural landowners cannot be uprooted to live elsewhere to accommodate Transco’s money making venture. Transco’s greediness only has them focused on money. They don’t realize that decent people have different values and priorities. Money does not provide a good night’s sleep. Is Transco going to pay our salaries when we cannot complete our business activities as usual from our home? Is Transco going to pay for additional medical bills due to health problems incurred from this? We can send in the bills already incurred from the insurmountable stress Transco has caused over this project, and particularly when it was all unnecessary. Where shall we send the bills for the additional stress if we are forced to exist 24/7 in the Blast/KILL zone?

IND479 – Malinda Clatterbuck

20160627-5199 FERC PDF (Unofficial) 6/27/2016 2:52:52 PM

Malinda Clatterbuck, Holtwood, PA.

Dear FERC Commissioners,

IND479-1

I just read a comment submitted by Luke Bunting-(copied below)

I would like to add a question to his final questions-

IN addition, how can FERC deny that properties are affected in this way, when there have been landowner submissions (and I have seen some, and spoken to my own insurance company, who assured me they would drop our homeowners insurance if the pipeline came through our property) to indicate otherwise. FERC has not fully studied these impacts on homeowner's insurance, or they have lost the documents submitted, or they have refused to fully address these valid concerns of landowners.

No permission for this line should be given until this detail is more fully addressed, and the truth of the transmission line's impact on homeowner's insurance is revealed. And it is a significant impact for landowners who are now without insurance on their home.

Luke Bunting's comments•

Based on info obtained by Transco to date, insurance underwriters have not considered the presence of a transmission pipeline when determining the cost and coverage of property insurance. Transco is fully insured and maintains insurance coverage that extends to landowners from the start of the survey process through the lifetime of the pipeline. Transco would pay for damage caused by construction and operation of its facilities. (4-174)

Problem:

Residents have submitted signed letters from their insurance agents stating that the pipeline would prevent the homeowner from renewing their homeowners coverage since the property is being used for a commercial endeavor. Residents were not informed of the potential loss of their homeowners insurance in the contracts sent by Transco. In the passage above from the DEIS it is implied that the homeowners would be covered by the Transco insurance. However this does not address the loss of homeowners insurance coverage due to the commercial use of the property. Loss of homeowners insurance prevents coverage of the home. Inability to get homeowners insurance also prevents buyer's from securing a mortgage and may make the property unsellable at great financial cost to the owner. Transco says they are not aware of landowners having problems, yet the paragraph starts with the admission that several comments had been filed on the issue. I have personally seen letters sent stating that homeowners insurance would be dropped in the event of a pipeline of the magnitude proposed by Transco.

Question:

Part A: How will Transco compensate financial damages caused by the increased costs, or loss, of homeowners insurance to properties on or near the route due to the commercial aspect of the pipeline on their property?

Part B: How will Transco provide homeowner insurance coverage for residents who are unable to get insurance due to this commercial use of their property?

IND479-1 See the response to comment PM1-177.

IND480 – Multiple Individuals

20160627-5198 FERC PDF (Unofficial) 6/27/2016 1:06:06 PM

June 27, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

RE: Atlantic Sunrise, Docket No. 15-138-000

IND480-1 Dear Secretary Bose,

On behalf of the Laborers' District Council of Eastern PA, our affiliated Local Unions, and our hard working and dedicated membership, please accept the following petition of support for the Atlantic Sunrise Project, Docket No. 15-138-000.

I support the Atlantic Sunrise pipeline project. I know it will create 2,300 good jobs and bring affordable and clean natural gas to Pennsylvania. I also know that pipelines can be built safely and in an environmentally friendly way and urge approval of this pipeline as soon as possible.

Individuals in support of the foregoing petition are listed below:

WILLIAM	A	HOOPER	28 BROOK STREET	SWOYERSVILLE	PA	18704
SCOTT	M	VERMAC	5085 RT 115	BLAKESLEE	PA	18610
STANLEY	P	VITZAKOVITCH	307 6TH STREET	VANDLING	PA	18421
JAMES	A	BATTON	4323 HIGH RD	CRESKO	PA	18326
EDWARD		WASHNEY	31 EAST CHARLES ST	PLAINS	PA	18705
IAN		BUSER	51 MILLER LANE	TEMPLE	PA	19560
			437 SILVER SPRINGS			
FRANK		BEDNAREK	BLVD	KUNKLETOWN	PA	18058
WILLIAM		ZALENSKI	922 DEMUNDS ROAD	DALLAS	PA	18612
			10 PHILADELPHIA			
CHRISTOPHER		SHAY	AVE	WEST PITTSBURGH	PA	18643
JOHN		RUPINSKI	534 COLUMBIA AVE	ARISTES	PA	17920
CARL	J	ROTHER	78 JAKE MOORE RD	DALLAS	PA	18612
			6170 PERKIOMEN			
JERRY	A	CLARK	AVE	BIRDSBORO	PA	19508
DONALD	B	RUDY	4 BLUE JAY DRIVE	STEVENS	PA	17578
BARRY	L	HALLER	122 PARK AVENUE	SHILLINGTON	PA	19607
TIMOTHY	E	LAMBERT	SR	SUSQUEHANNA	PA	18847
			250 SOUTH 13TH			
JONATHAN		POOLE	STREET	ALLENTOWN	PA	18102
GERALD	M	KRZAN	185 E CHERRY ST	DUSHORE	PA	18614
KRISTOPHER	L	PIGARUT	21 HIGH ST	STEWARTSTOWN	PA	17363
TYLER	M	PEREGRIN	57 SHAMROCK AVE	CARBONDALE	PA	18407
REX		RATHBUN	338 MANN HILL RD	TIOGA	PA	16946

IND480-1 Comment noted.

IND480 – Multiple Individuals (cont'd)

20160627-5198 FERC PDF (Unofficial) 6/27/2016 1:06:06 PM

BENJAMIN	LENCESKI		2476 BALD MTN ROAD	CLARKS SUMMIT PA	18411
PETER	NEGRON		531 BERWICK TURNPIKE	ULSTER PA	18850
CHRISTOPHER	CURTIS	P	50 CAVAGE ROAD	WAYMART PA	18472
DAVE	RUSSELL	JR	312 CHARLES ST	OLD FORGE PA	18518
ROBERT	MAY	M	208 N QUEEN ST	ABBOTTSTOWN PA	17301
OSCAR	CRUZ		130 COPPER MT DR	TAFTON PA	18464
ELIJAH	WASHINGTON		1954 BERRYHILL ST	HARRISBURG PA	17104
BRETT	SERINO		6 1/2 LINDA LN	CARBONDALE PA	18407
ADAM	SLACKTISH		1709 LAKELAND DR	SCOTT TWP PA	18433
ALEXANDER	DEPPEN		53 S DIAMOND ST	SHAMOKIN PA	17872
MICHAEL	LONGFOOT		223 COOPER STREET	COURTDALE PA	18704
SEAN	MCDONALD	M	60 CHURCH ST	PITTSTON PA	18640
DONALD	SOLOMON	O	128 W MERION AVENUE	PLEASANTVILLE NJ	8232
DAVID	NEVEL		3978 HWY 220	HUGHESVILLE PA	17737
LARAMY	BRITTON		110 W GIRARD STREET	MOUNT CARMEL PA	17851
CARL	CAUM	W	1868 MERRILL AVE.	WILLIAMSPORT PA	17701
RAYMOND	TENASCO		11377 RT 187	WYALUSING PA	18853
ARIEL	ROSENTHAL	R	50 N 4TH ST	READING PA	19601
MATTHEW	DEANTONIO	J	25 FARVIEW ST	CARBONDALE PA	18407
JOSHUA	NEECE	R	4204 RT. 87	MONTOURSVILLE PA	17754
JOSEPH	BURDGE	L	16492 SHADE VALLEY RD	BLAIRS MILLS PA	17213
MATTHEW	SMITH	R	6115 SR 848	NEW MILFORD PA	18834
JOHN	SMITH	E JR	P O BOX 191	HENRYVILLE PA	18332
MICHAEL	MCKENNA	A	28 S. HICKORY ST	MT. CARMEL PA	17851
BRIAN	ELLIOTT		40 BRIARCLIFF RD	GLENOLDEN PA	19036
SCOTT	THORSON		7256 BORMAN RD	NEW TRIPOLI PA	18066
IRA	NIENHUESER	JR F	5191 THOMPSON HILL RD	GILLETT PA	16925
RONALD	BOYER		53 HILLSIDE AVE	SOUDERTON PA	18964
ANTHONY	MORGANELLI		418 E. 4TH ST.	NORTHAMPTON PA	18067
MICHAEL	SHOCKENCY		8784 BREINIG RUN CIRCLE	BREINIGSVILLE PA	18031
ANTHONY	DOLINISH		139 S DEWEY AVE	SCRANTON PA	18504
RITA	SEALES		220 WILLIAMS STREET	HEMPHILL TX	75948
BENJAMIN	RICHARDS	D	549 MAYFLOWER CROSSING	WILKES-BARRE PA	18702
MARK	FAKE	A	568 MAGARO RD.	ENOLA PA	17025
JOHN	HARLEY		2129 LONG RUN ROAD	LEHIGHTON PA	18235
KYLE	KLINE	P	3709 BROAD TOP MT	DUDLEY PA	16634

IND480 – Multiple Individuals (cont'd)

20160627-5198 FERC PDF (Unofficial) 6/27/2016 1:06:06 PM

			RD POB 2028			
DAVID		WALLO	835 BROOK STREET	DICKSON CITY	PA	18519
LOUTRAIL	W	CAMPBELL	SR 8849 RT 35 S	HONEY GROVE	PA	17035
EUGENE		JONES	33 S 14TH STREET	ALLENTOWN	PA	18102
ALEX	J	FARLEY	404 CHESTNUT ST.	COLUMBIA	PA	17512
			234 CONNIE			
COLTON		BRYANT	WALTERS RD	CALHOUN	LA	71225
STEPHEN		HEFFELFINGER	405 E MAIN ST	SCHUYLKILL HVE	PA	17972
JOSEPH		JACKSON	1932 PARK STREET	HARRISBURG	PA	17103
			2736 EVERGREEN			
ROBERT		KROPTAVICH	DRIVE	CLARKS SUMMIT	PA	18411
			49 APT B			
			LACKAWANNA			
COREY	A	BARUM	AVENUE	DALLAS	PA	18612
			3285 NORTH OLD			
WILLIAM	A	CRAGLE	TRAIL	SHAMOKIN DAM	PA	17876
KURTIS		DOWNNEY	SR 622 6TH ST	PORT CARBON	PA	17965
MATTHEW		ANDREWS	25 S CHURCH ST	CARBONDALE	PA	18407
			350 WEST 4TH			
JOHN		TLOCZYNSKI	STREET	MT. CARMEL	PA	17851
ROBERT	H	TWISS	350 VIRGINIA AVE	PECKVILLE	PA	18452
MATT		DOUGHERTY	24 WELSH ST	PITTSTON	PA	18640
COREY		FISCHER				
MICHAEL	A	CRUM	410 WILDCAT ROAD	SHINGLEHOUSE	PA	16748
FRANK		NYE	237 LEHMEN STREET	LEBANON	PA	17046
			51 OLD LAIRDSVILLE			
SCOTT	R	HENRY	RD	MUNCY	PA	17756
RYAN		STARKS	210 SPEECE AVE	SUNBURY	PA	17801
THOMAS		WONDOLOSKI	1638 W HOLLY ST	COAL TOWNSHIP	PA	17866
RYAN		FREY	19 OAKDALE ESTS	ORWIGSBURG	PA	17961
TIMOTHY		LAWRENCE	620 NINTH AVENUE	WILLIAMSPORT	PA	17701
			702 MEIXSELL			
DWAYNE		RIEBEL	JR VALLEY RD	SAYLORSBURG	PA	18353
LESTER	E	ENGLISH	8778 RT 6	WELLSBORO	PA	16901
CHARLES		HAMMOND	81 PATERNO PL	SUSQUEHANNA	PA	18847
			119 S MERRYFIELD			
JUSTIN		OSET	AVE	SCRANTON	PA	18504
			546 CHESTNUT			
BERNARD	J	NOVAKOSKI	STREET	KULPMONT	PA	17834
			1207 LAKE HENRY			
PAUL	H	BERGER	JR RD.	LAKE ARIEL	PA	18436
KENNETH	L	WISNOSKIE	165 MAIN STREET	LOCUST GAP	PA	17840
			152 BOAK AVENUE			
MICHAEL	D	KOCH	JR #22	HUGHESVILLE	PA	17737
JOSHUA	L	KING	260 E MAIN STREET	TROY	PA	16947
			69 E HANOVER			
SHAUN	M	MCKINLEY	STREET	WELLSVILLE	NY	14895

IND480 – Multiple Individuals (cont'd)

20160627-5198 FERC PDF (Unofficial) 6/27/2016 1:06:06 PM

BENJAMIN			2476 BALD MTN ROAD	CLARKS SUMMIT PA	18411
CANICE	L	LENCESKI	822 EAST ST	WATERFORD PA	16441
BRYAN		LATSCH	149 DOUGLAS ROAD	KUTZTOWN PA	19530
MICHAEL		DREDDEN	304 KRISTY LANE	HARRISBURG PA	17111
SPENCER	R	EMORY	30 CAMP NIX RD	LOBELVILLE TN	37097
ZANE		GILMORE	19743 TUSCARORA CRK RD	BLAIRS MILLS PA	17213
BRIAN	M	YANCHESKI	380 SPRUCE STREET	KULPMONT PA	17834
FRANK		KRUCZEK	41 LAKESIDE AVE	DELANO PA	18220
THOMAS		CIOCCA JR	423 JADWIN STREET	SCRANTON PA	18509
COLIN		MCNEIL	241 BACK STREET LOT 9	MONTOURSVILLE PA	17754
RICK	A	CRIPPEN	1111 JEMISON ROAD	WESTFIELD PA	16950
MICHAEL		DREYER	453 N 11TH ST	READING PA	19604
JOYCE		LANE	522 NORRIS RD	AIRVILLE PA	17302
MICHAEL	H	BUTLER II	214 E MARKET ST	GRATZ PA	17030
DUANE		OLEXA	3811 CANNON AVENUE	BETHLEHEM PA	18015
SHARIA		BEVANS	1208 THOMAS ST	CHESTER PA	19013
HEIDI	L	GREIDER	37 MAIN ST	KLINGERSTOWN PA	17941
JAMES		JUDGE	447 COLFAX AVE	SCRANTON PA	18510
MICHAEL	L	LILLEY	7434 MOUNTAIN RD	PORT ROYAL PA	17082
TAMEKA		GRAYSON	12 ARTMAN RD.	NATCHEZ MS	39120
BRUCE		UHLER JR	1009 GILBERT RD	EFFORT PA	18330
MICHAEL		KUZMIAK	7 BRUNO DRIVE	THROOP PA	18512
BARRY	L	SHULTZ	2000 CRYSTAL SPRINGS RD #2235	SAN BRUNO CA	94066
PATRICK	A	CASELLA	1670 SWEENEY AVENUE	SCRANTON PA	18508
STEPHEN	J	REDDING	272 MAPLE GROVE RD	HANOVER PA	17331
GENO		CATANZARITI	142 S BROAD ST	NAZARETH PA	18064
JAMES	D	DEPPE	1107 EASTON RD	RIEGELSVILLE PA	18077
CARL	L	JACKSON	2640 N 3RD ST #2D	HARRISBURG PA	17110
SHAWN		EDIE	1710 COUNTRY CLUB APTS	DALLAS PA	18612
JERRY		DIGAN	1140 OLD PIKE RD	S WILLIAMSPOR PA	17702
WILLIAM		FOSTER	521 N 12TH STREET	READING PA	19604
THOMAS	J	CARRICATO JR	101 RUBENDALL DRIVE	LIVERPOOL PA	17045
LUCAS		SHULTZ	1345 HERRS RIDGE RD	GETTSBURG PA	17325
BRIAN	M	YANCHESKI	380 SPRUCE STREET	KULPMONT PA	17834
JEFFREY	C	DAVISON	665 SIEGFRIED ST.	HARRISBURG PA	17113
MIGUEL		SABATER	1404 EASTON	BETHLEHEM PA	18017

IND480 – Multiple Individuals (cont'd)

20160627-5198 FERC PDF (Unofficial) 6/27/2016 1:06:06 PM

		AVENUE APT. 1			
DENNIS	POWANDA	1 EMERICK ST	POTTSVILLE	PA	17901
BENJAMIN	ADAMS				
POTTS	CHRISTOPHER				
HOPSTOCK	PETER				
WEAVER	KEVIN				
WILLI	SETH				
ZAAKRICK	MARTIN				
GRIGOLI	SAL				
GREEN	CLARENCE				
GREEN	JERRY				
MARTA	MARIO				
KHODAI	ASHLEY				
GREEN	ANDRE				
HAMEEN	MUHAMMAD				
CARUSL	MICHELLE				
MINORD	JOEL				
PAYNE	KEVIN				
THOMAS	TYRONE				
GUZMAN	JORGE				
GALLAGHER	KELLI				
RABENSTEIN	BRANDON				
CORBIN	KIM				
HOPPLE	TIMOTHY				
WALKER	JASPER				
HEAPS	THEODORE				
LUDWIG	JOSHUA				
WITTEMORE	CHRISTINE				
BRANSFIELD S.	WILLIAM				
MECKWOOD	ZEE				

IND481 – Individual

20160627-5192 FERC PDF (Unofficial) 6/27/2016 11:49:50 AM

Secretary Bose
Federal Energy Regulatory Commission
888 First Street NE
Room 1A
Washington, DC 20426
RE: FERC Docket CP 15-138

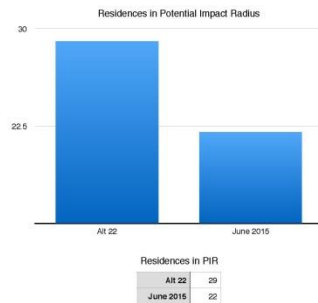
Maps and Data on homes within the Potential Impact Radius, Alt-22 vs June 2015 Proposal

Dear Secretary Bose,

IND481-1 FERC's Draft Environmental Impact Survey on the Atlantic Sunrise Pipeline recommends Williams consider Alt-22 with the statement "Of the routes evaluated, we conclude that Alternative 22 would provide the greatest separation distance from existing residential structures while not significantly increasing effects on other environmental features." The DEIS also states this conclusion was reached using testimony from a few Conestoga residents. *This logical conclusion was unfortunately based on incorrect and misleading testimony.*

There are 32% *more* residential structures within the Potential Impact Radius on Alt-22 than the June 2015 proposed route.

Charts 1 and 2 below graphically summarize and list the specific addresses with distances.



IND481-1 See the responses to comments PM1-10 and PM1-106.

IND481 – Individual (cont'd)

20160627-5192 FERC PDF (Unofficial) 6/27/2016 11:49:50 AM

IND481-I
(cont'd)

Residential Structures within 1100ft of Route Alternative 22 vs. June 2015 Proposed Route

Alternative 22 Route Orange		June 2015 Proposed Route Green	
Number	Address	Number	Address
	Distance (in ft. from pipeline)		Distance (in ft. from pipeline)
1	289 River Corner Rd	1	Wilker Farm
2	River Corner Rd (Wilker)	2	138 Hilltop Dr
3	35 Hilltop Dr	3	318 Hilltop Dr
4	73 Hilltop Dr	4	Leakway, Sr
5	93 Hilltop Dr A	5	146 Meadow Lane
6	138 Hilltop Dr	6	184 Meadow Lane
7	169 Hilltop Dr	7	198 Meadow Lane
8	179 Hilltop Dr	8	L.M. Residence
9	189 Hilltop Dr	9	L.M. Hall
10	350 Hilltop Dr	10	284 Meadow Lane
11	374 Hilltop Dr	11	66 Meadow Lane
12	415 Hilltop Dr	12	95 Meadow Lane
13	540 Sickmans Mill Rd	13	415 Hilltop Dr
14	550 Sickmans Mill Rd	14	700 Sickmans Mill Rd
15	564 Sickmans Mill Rd	15	810 Sickmans Mill Rd
16	584 Sickmans Mill Rd	16	850 Sickmans Mill Rd
17	55 Meadow Lane	17	600 Sickmans Mill Rd
18	66 Meadow Lane	18	501 Sickmans Mill Rd
19	541 Sickmans Mill Rd	19	Martin Ranch
20	409 Sickmans Mill Rd A	20	Martin Farmhouse
21	1020 Pequea Cr Rd	21	1020 Pequea Cr Rd
22	1000 Pequea Cr Rd	22	1005 Pequea Cr Rd
23	1005 Pequea Cr Rd		
24	996 Pequea Cr Rd		
25	994 Pequea Cr Rd		
26	950 Pequea Cr Dr		
27	805 Pequea Cr Rd		
28	93 Hilltop Dr B		
29	409 Sickmans Mill Rd B		

There are 32% more homes within 1100 feet of Alternative 22 than June 2015 Route segment.
The claim that Alternative 22 provides the greatest separation distance from existing residential structures is not true.

Methodology for Data collection

Universal Field Services (Williams' subcontractor doing the surveying) was contacted and asked how to calculate the impact zone.

- They said $PIR = 0.69 \times d \times \sqrt{P}$, where:
 - Where PIR = Potential Impact Radius (feet)
 - Where d = diameter of the pipe (inches)
 - Where \sqrt{P} = square root
 - Where P = pressure (psi)

This calculation uses the diameter and pressure of the pipeline to determine the impact zone. For this very large, very high pressure pipeline, the impact zone is 1,112 feet on either side of the pipe.

- Radius = $0.69 \times 42'' \text{ pipeline} \times \sqrt{1475 \text{ psi}} = 1,112 \text{ feet}$

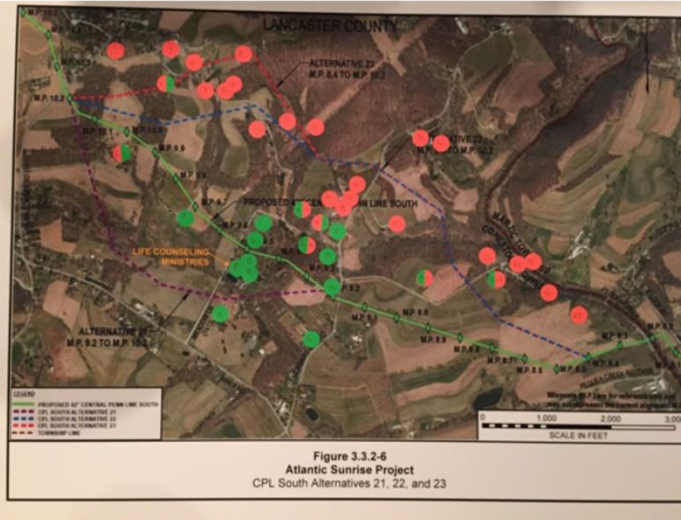
Note this formula and result match those used by other organizations but obtained from alternate sources.

IND481 – Individual (cont'd)

20160627-5192 FERC PDF (Unofficial) 6/27/2016 11:49:50 AM

IND481-1
(cont'd)

Using Figure 3.3.2-6 from the DEIS below, you will see the homes impacted by the Alt-22 and June 2015 proposed routes. Note the Alt-22 homes are depicted in red, June 2015 in green and homes in both PIR's are bicolor.



In addition to the above map we utilized GIS and Google Maps along with distance measurement tools to estimate the distances from the proposed pipeline routes to the residential structures. We then verified the desktop estimates with field tests on multiple residences along Alt-22 utilizing a laser-range finder. The range finder distances were within 50 feet of the computer based and FERC map based estimates. Note using only the birds eye view maps, it is very difficult to identify all of the residential structures due to the extensive foliage in this rural area. Local knowledge is essential.

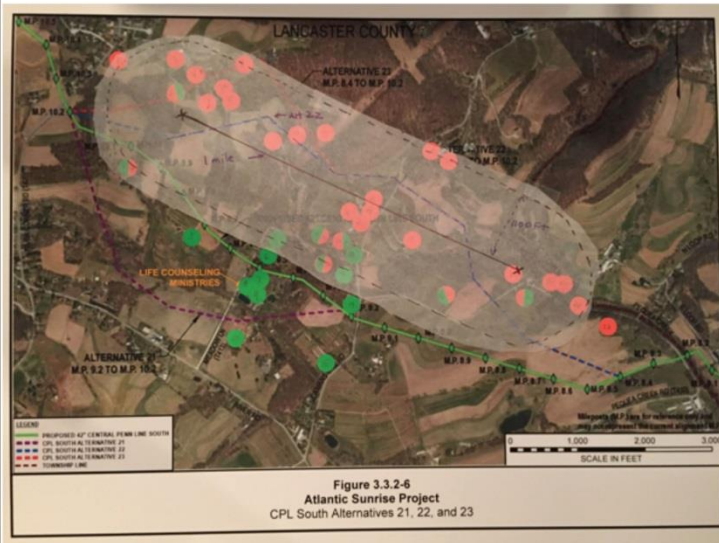
Not only are more homes impacted on Alt-22, there is sufficient density relative to that route to constitute a PHMSA High Consequence Area. A one mile segment of the a high pressure pipeline with 20 or more buildings intended for human occupancy with in the potential impact radius requires for extra stringent construction and maintenance standards.

IND481 – Individual (cont'd)

20160627-5192 FERC PDF (Unofficial) 6/27/2016 11:49:50 AM

IND481-1
(cont'd)

On FERC's figure 3.3.2-6 below you will see a tissue overlay depicting the impact zone.



Conclusion

If this pipeline must be sited through Conestoga, PA, the Proposed June 2015 is the better path to provide the greatest separation distance from existing residential structures. Further the original path that more closely followed the Susquehanna River is better yet for achieving that objective. This original path and perhaps the Conestoga Alternate Route proposed December, 2015, avoid crossing Main Street into the more populated areas plus utilize existing Rights of Way.

Sincerely,

Blair B. Mohn

IND482 – Brinton Culp

20160627-5188 FERC PDF (Unofficial) 6/27/2016 2:45:18 PM

Brinton Culp, Lititz, PA.

IND482-1 I am contacting you today to request that you extend the public comment period for the Draft Environmental Impact Statement for the Atlantic Sunrise Pipeline Project, Docket No. CP15-138-000. Though I have attempted to read through the 472-page document and also taken time to inform myself of its significance, as a busy middle school teacher and mother in Lancaster County, PA, I have not had sufficient time or means to adequately understand the implications of the DEIS. I ask for the extension for the public comment period so that I, and others whom this might affect, would have the chance to thoroughly read through, research, and understand the DEIS so that we can make informed comments. As a resident of Lancaster County, I am greatly concerned for the long-term impact the proposed Atlantic Sunrise Pipeline Project would have both in Lancaster, PA and beyond.

IND482-1 See the response to comment PM1-130.

IND482-2 In addition to my request for an extension for the public comment period, I am also concerned about the destination of the natural gas. In the DEIS it states:

IND482-2 See the response to comment PM1-32.

"The Project would provide an incremental 1.7 million dekatherms per day of year-round firm transportation capacity from the Marcellus Shale production area in northern Pennsylvania to Transco's existing market areas, extending to the Station 85 Pooling Point in Choctaw County, Alabama. Transco indicates that the Project would provide Transco's customers and the markets they serve with greatly enhanced access to Marcellus Shale natural gas supplies, support the overall reliability and diversification of energy infrastructure along the Atlantic seaboard and points south, and meet the anticipated increase in market demands for natural gas consumption."

IND482-3 I have heard that it is likely that the natural gas would be exported to countries outside of the United States of America. Perhaps this is not true, but if it is, I believe that this is not in the best interest of our country, would only accelerate the negative consequences of climate change, and thus, would nullify reasons to construct the proposed Atlantic Sunrise Pipeline. I am also greatly concerned about the impact on the local environment including vegetation, water and air quality, and wildlife. It seems the impact on local residents and farms would also be grave. Though I do not have sufficient arguments or data to debate my concerns at present, I would like to make more informed comments once given the opportunity to become more informed. So once again, I ask for an extension for the public comment period in order that I, and others in the community, can become more informed and then submit comments.

IND482-3 See the response to comment PM1-130.

Thank you for your consideration.

IND483 – Tim Spiese

20160627-5186 FERC PDF (Unofficial) 6/27/2016 2:43:01 PM

IND483-1 Tim Spiese, Pequea, PA.

I am writing in opposition to the proposed Atlantic Sunrise Pipeline for the following reason. The DEIS mentions that natural gas is good for the environment because it is a cleaner burning fuel and replaces coal which produces carbon dioxide. Please be aware that studies now show that with the amount of leakage all along the extraction, transmission and distribution process, that natural gas is as harmful as coal for producing heat trapping greenhouse gases. Even if this were not true the notion that this "cleaner burning" fuel will be needed in ever increasing amounts does not take into consideration the expanding impact of wind and solar in the energy market. Fix the leaks first and let's see if new pipelines are even needed. That is the sensible approach.

Tim Spiese, Martic Township
Lancaster County PA

IND483-1 See the responses to comments PM1-36 and PM1-99.

IND484 – Tim Spieseck

20160627-5185 FERC PDF (Unofficial) 6/27/2016 2:38:55 PM

IND484-1 Tim Spiese, Pequea, PA.
I am writing to bring to light something I recently learned regarding the Chapman loop of the proposed Atlantic Sunrise Pipeline. I have a property along the South side of the Transco line in Clinton County. The 4 mile loop is a fourth line that will be installed on the North side. Is it true that the existing Line on the south side is no longer in use because of leaks? Why would anyone install a new pipeline when there are pipelines already occupying rights of way that could be repaired or removed and replaced? This would negate the need to obtain new rights of way and would reduce the need for tree removal. Please consider requiring Williams to place the new Chapman loop pipeline where the unused leaking one is now. Your representative at a recent FERC/Williams open house said that the commissioners would be interested in hearing about that. Whoever is actually reading this please pass this concern up the chain. Thanks.

Tim Spiese, Martic Township
Lancaster County, PA

IND484-1 See the response to comment PM1-95.

IND485 – Tim Spiese

20160627-5184 FERC PDF (Unofficial) 6/27/2016 2:36:07 PM

Tim Spiese, Pequea, PA.

IND485-1 A certificate for necessity and public convenience for the Atlantic Sunrise Pipeline should not be given to Williams for the following reason. The additional run off from construction and from the permanent, treeless compacted right of way will contribute to surface run off above the levels experienced now in Lancaster County. This increased run off must be considered to be significant as any additional runoff into the Susquehanna and its tributaries will have an adverse effect on the health of the already threatened Susquehanna river and in turn the Chesapeake bay. We witnessed firsthand the wanton disregard for erosion control measures with William's recent Rock Springs pipeline in Southern Lancaster County. On one day they received ten violation notices for a ten mile long project. When fines are levied the damage is already done. Even if constructed properly the permanent line will allow run off in close proximity to valuable streams that flow into the Susquehanna River nearby. Any run off is "significant".

Tim Spiese, Martic Township
Lancaster County, PA

IND485-1 See the responses to comments PM1-9, PM1-60, and PM1-71.

IND486 – Mark Clatterbuck

20160627-5182 FERC PDF (Unofficial) 6/27/2016 2:21:57 PM

IND486-1 Mark Clatterbuck, Holtwood, PA.
I write this letter out of concern for the ways in which Williams/Transco has disproportionately targeted Lancaster County's Amish with the proposed ASP route, seeking to exploit the religious convictions & way of life of this historically persecuted religious minority for their own economic advantage. I submit this letter not only as a deeply concerned neighbor amid a thriving Amish community in southern Lancaster County, but also as an Associate Professor of Religion at Montclair State University.

Over the past two years, each new route change for the ASP brought more Amish farmland into the pipeline's path. There are numerous reasons why I believe these efforts represent an exploitation of the unique values and religiously-stipulated lifestyle choices of the Amish, as follows:

On religious grounds, members of the Amish church are, except in the rarest of cases, expressly forbidden to sue another person or party. By manipulating the proposed pipeline path to target more and more Amish land, Williams has contrived to insulate themselves from legal opposition across an ever-expanding portion of the route.

The Amish prohibition against taking another to court-based on the church's interpretation of the teachings of Jesus-also eliminates the option of Amish landowners forcing Williams into eminent domain proceedings. For this reason, many of my Amish neighbors in Lancaster County have reluctantly signed leases with Williams, rather than holding their ground as they felt convicted to do. "I didn't want to go to court," they explain, "and eminent domain means going before a judge. So I figured I should sign."

Williams avoids eminent domain cases like the plague, which is why they go to such extraordinary lengths to secure leases from even the most resistant landowners. Such manipulation of Amish religious beliefs is morally abhorrent, coercive, perhaps even criminal, and FERC should aggressively investigate this pattern of religious abuse.

The religiously-mandated lifestyle of the Amish also precludes full access to Williams, FERC, and significant portions of the ASP review process. The Amish have little access to phones, the internet, social media, television, or radio. These are, of course, the primary means by which opponents and supporters alike have been sharing information, debating harms and merits, and offering essential resources to interested parties. Locally, media coverage has functioned as a primary means of learning about, and developing informed opinions on, this massive project. The Amish, on religious grounds, have had very limited access to these vital venues for public debate.

Limited access to media may also help to explain why so many of our Amish neighbors have believed the false claims of Williams land agents who have repeatedly told them that they would receive no compensation if eminent domain was used to secure a right-of-way through their land. FERC should be aware that this has been a widely disseminated falsehood by land

IND486-1 See the response to comment IND396-4.

IND486 – Mark Clatterbuck (cont'd)

20160627-5182 FERC PDF (Unofficial) 6/27/2016 2:21:57 PM

IND486-
(cont'd) agents negotiating with the Amish. With limited access to local news stories that reported on documented cases of land agent violations and strong-arm tactics here in Lancaster County, Amish residents are left at an obvious disadvantage when it comes to challenging such blatant misinformation.

Not only are Amish largely cut off from electronic media; they are also generally prohibited from inserting their own voices in the broader public discourse. Once again, on religious grounds, members of the Amish church are prevented from appearing on television, conducting news interviews, and taking part in public protests. Given the steep opposition the ASP has faced here in Lancaster County, evidenced by the fact that public opposition to the project ranked among the top-5 news stories in Lancaster in 2015, it's no wonder Williams has taken such pains to target as many non-wired, media-averse landowners as possible.

Sadly, gas industry voices have attempted to portray the absence of Amish voices in the media as "Amish support" for the ASP. Nothing could be farther from the truth. Amish voices aren't absent due to project support; they're absent due to religious principle. One of my Amish neighbors owns a farm along the proposed ASP route in southern Lancaster County. He's strongly opposed to the project, but feels constrained by his religion to avoid public protest, for fear it could appear vainglorious. "Thanks for fighting this pipeline so hard for us," he said, "since we can't really raise our voices."

Finally, we might consider the large-scale public events that both Williams and FERC have hosted in Lancaster County over the past two years, as required by law, to inform residents of project impacts. From Williams open houses to FERC hearings, these events have taken place at prohibitive distances for a great many Amish residents who have a clear stake in the process. Traveling 20 miles, through town, by horse and buggy to attend a meeting, only to turn around and travel 20 miles back home at 11 PM is hardly a reasonable expectation. I was among the local residents who requested that FERC hold special public meetings for affected Amish landowners at more accessible venues. To my knowledge, despite these requests, neither FERC nor Williams made any such accommodations.

In conclusion: Williams has disproportionately targeted Amish landowners, exploiting the community's centuries-deep religious principles, in order to avoid litigation, eminent domain proceedings, public protest, and to ensure the Amish community's limited participation at every stage of the review process. This exploitation must be investigated and addressed by FERC before any further action is taken on the ASP. Once investigated and confirmed, Williams' actions – which would likely amount to prosecutable actions if the Amish church were not prohibited from pursuing litigation – should lead to a denial of Transco's application for the ASP.

Mark Clatterbuck, Ph.D.

IND487 – Luke Bunting

20160627-5181 FERC PDF (Unofficial) 6/27/2016 2:19:26 PM

Luke Bunting, Conestoga, PA.

IND487-1 DEIS Excerpt Being Addressed:

• Based on info obtained by Transco to date, insurance underwriters have not considered the presence of a transmission pipeline when determining the cost and coverage of property insurance. Transco is fully insured and maintains insurance coverage that extends to landowners from the start of the survey process through the lifetime of the pipeline. Transco would pay for damage caused by construction and operation of its facilities. (4-174)

Problem:

Residents have submitted signed letters from their insurance agents stating that the pipeline would prevent the homeowner from renewing their homeowners coverage since the property is being used for a commercial endeavor. Residents were not informed of the potential loss of their homeowners insurance in the contracts sent by Transco. In the passage above from the DEIS it is implied that the homeowners would be covered by the Transco insurance. However this does not address the loss of homeowners insurance coverage due to the commercial use of the property. Loss of homeowners insurance prevents coverage of the home. Inability to get homeowners insurance also prevents buyer's from securing a mortgage and may make the property unsellable at great financial cost to the owner. Transco says they are not aware of landowners having problems, yet the paragraph starts with the admission that several comments had been filed on the issue. I have personally seen letters sent stating that homeowners insurance would be dropped in the event of a pipeline of the magnitude proposed by Transco.

Question:

Part A: How will Transco compensate financial damages caused by the increased costs, or loss, of homeowners insurance to properties on or near the route due to the commercial aspect of the pipeline on their property?

Part B: How will Transco provide homeowner insurance coverage for residents who are unable to get insurance due to this commercial use of their property?

IND487-1 See the response to comment PM1-177.

IND488 – Kim Kann

20160627-5178 FERC PDF (Unofficial) 6/27/2016 2:10:06 PM

Kim Kann, CONESTOGA, PA.
June 27, 2016

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

Re: Comments of Kimberly Kann, Docket No. CP15-138

Dear Secretary Bose:

As a potentially affected landowner and resident of Lancaster County I respectfully demand that you deny Williams Partners permission to build the proposed greenfield Atlantic Sunrise shortcut. Extensive research results in the following conclusions:

Williams Partners is a private corporation. Extreme, permanent hardships will be experienced by individuals and communities, while the benefit of ongoing profit will go only to Williams employees and shareholders.

IND488-1 This project is a shortcut. Easements already exist to move natural gas from extraction to the proposed destination. Cost and logistics should not be a permissive factor in locating unwanted, new infrastructure when an alternative exists.

IND488-1 See the response to comment PM1-162.

IND488-2 There is no natural gas shortage or need currently, or projected, in markets in the proposed delivery area.

IND488-2 See the responses to comments PM1-32 and PM1-51.

The vast majority of this gas is contracted for foreign export.

Current domestic prices, kept low by supply which exceeds demand, will increase as natural gas reserves are exported and gas suppliers are better able to manipulate supply.

IND488-3 Natural gas is catastrophically damaging to the environment from extraction, through transport, to the point of use. With a scientifically proven effect of being at least 86% worse as a climate warming gas than the byproducts of burning oil or coal, it is misguided to promote it as a bridge fuel to a more sustainable energy future.

IND488-3 See the response to comment PM1-36.

IND488-4 This DEIS at no point evaluates the cumulative effect of the entirety of this project including the projected surge in well drilling, climate warming effect of burning more natural gas, and risks of export facilities.

IND488-4 See the response to comment PM1-6.

IND488-5 Private land ownership is a sacred right of United States citizenship. The power to use eminent domain should only be granted for projects that can objectively prove benefits to those affected which greatly exceed negative side effects, and then landowners should be fairly compensated for any and all possible financial losses.

IND488-5 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the response to comment PM1-1.

More specifically, the DEIS is deeply flawed in the following regards.

IND488 – Kim Kann (cont'd)

20160627-5178 FERC PDF (Unofficial) 6/27/2016 2:10:06 PM

4.11 Air Quality and Noise - AIR QUALITY

IND488-4 Pennsylvania has adopted air pollution standards more stringent than federal regulations require. Lancaster County, home to a large portion of the proposed ASP pipeline, already exceeds federal standards for air pollution. This portion of the DEIS admits "The EPA found that the current and proposed concentrations of the six GHGs in the atmosphere threaten the public health and welfare of current and future generations through climate change." (4-196) We know natural gas contributes to climate warming 86% more than other fossil fuels. It is unconscionable in light of this documentation that FERC could conclude that ASP would have "no significant" environmental impact".

There also are repeated examples in this section of FERC relying on data collected by Williams. "...we reviewed the air quality monitoring data collected by Transco." (4-213). Some of that data is collected in ways that seems to be avoiding the reporting of data damaging to Williams claims. FERC "requested that Transco complete an air quality impact" analysis (4-120) Transco then "indicated its preference" to produce monitoring data of its own, rather than relying on the EPA's AERSCREEN or AERMOD results, for fear that these tools "may overestimate impacts associated with certain pollutants." FERC permitted Transco to make such adjustments. (4-210) Why would data collected by an independent entity be discarded in favor of data collected by the company requesting the permit? Who independently verified Williams data? Why would Williams be allowed to circumvent the industry standard EPA monitoring criteria and tools?

Additionally, FERC's requirements, as outlined above, carried with them a requirement that Transco provide air quality monitoring data for 1 year. "To date," however, "Transco provided...about 6 months of air quality monitoring..." This is unacceptable.

The FERC claim that "all direct and indirect emission sources were calculated." implies that all reasonably projected, additional emissions to be generated by the ASP are included in this calculation—including increased fracking emissions; increased release of methane and other pollutants due to increased extraction, shipping, and storage of this natural gas; projected emissions generated by shipping this product overseas to the markets for which its contracted; etc. Is there independently verifiable data, from sources unconnected to the gas industry, which can be cited to prove this? If not, the claim holds no more value than the paper on which it is printed.

IND488-7 "We received comments about the potential exposure to released radon gas. The downstream use of natural gas in the market areas, including the effects of burning gas and exposure to radon in homes, is beyond the scope of this EIS." (4-218) As an agency responsible for assessing the impacts of this project, including upstream and downstream impacts, how can the FERC choose to ignore potentially significant, life threatening environmental impacts of the very project for which they are being asked for approval?

IND488-6

Section 4.11.1.1 of the EIS describes the existing air quality in the vicinity of the Project. See the response to comment IND425-19 regarding project GHG emissions. As noted in section 4.11.1.3 of the EIS, there are multiple tools that allow for an assessment of existing and potential future air quality effects associated with the Project. We requested that Transco provide information to allow us to complete an analysis of potential impacts, and we require that the information be collected following accepted data collection practices. Transco provided an air quality monitoring plan, which outlined the methods that it proposed to use to collect the air quality data. We reviewed the monitoring plan and believe that it will result in data representative of the existing air quality in the vicinity of the compressor stations. See the response to comment CO25-9 regarding indirect impacts from air emissions associated with natural gas production. See the response to CO13-12 regarding indirect impacts from air emissions associated with downstream natural gas uses.

IND488-7

See the response to comment IND478-2.

IND488 – Kim Kann (cont'd)

20160627-5178 FERC PDF (Unofficial) 6/27/2016 2:10:06 PM

IND488-8 I respectfully request that permission to proceed with this proposed project be denied, or at the very least withheld until the above issues can be resolved using data independently collected and verified by scientists unconnected to the natural gas industry. Additionally, binding policy regarding the litigation of violations, and the pathway for local residents to resolve disputes during the infraction must be developed by an independent entity.

Sincerely,

Kimberly S. Kann

IND488-8 See the responses to comments PM1-22, PM1-70, IND414-2, and IND469-7.

IND489 – Blair Mohn

20160627-5177 FERC PDF (Unofficial) 6/27/2016 2:09:59 PM

Blair B Mohn, Conestoga, PA.
Support for Alt-22?

IND489-1 The original proposer for Alternative 22 has submitted subsequent and preferred routes. The Conestoga Township Supervisors have rescinded their support. Williams has noted more land lowers are affected and the pipeline lengthen by Alt-22 vs the June 2015 proposed route. There are more homes in the potential impact radius on Alt-22 than the June 2015 route. And the density of home along a one mile section of Alt-22 requires High Consequence construction and operation methods.

Please remove Alt-22 from consideration.

IND489-1 See the responses to comments PM1-10 and PM1-147.

IND490 – Patricia Walmer

20160627-5176 FERC PDF (Unofficial) 6/27/2016 2:06:42 PM

Patricia Walmer, Newmantown, PA.
IND490-1 As a for-profit company it is inconceivable that Transco-Williams would be able to use eminent domain as they are not a public utility nor have they proven the project is for the greater good. Additionally, the 'greater good' point will remain unproven as the product is mainly intended for export.
IND490-2 A gas company with a very questionable safety record wanting to run pipeline in a family's backyard should be laughable. Yet it is being considered in spite of some residences in Lebanon County being within 10 feet of the proposed right-of-way.
IND490-3 Streamside businesses and property owners throughout the Chesapeake Watershed are being asked and are complying with requests to reduce pollution runoff. However, Transco-Williams is proposing stream crossings without providing how they will meet commitments to NOT impact the water quality and habit.
IND490-4 Allowing this project to proceed is in direct violation to the PA constitution which provides for clean air and pure water. In not one instance has Transco-Williams, PA DEP, FERC or our politically appointed representatives given us the confidence to believe that our best interests are being considered.

IND490-1 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the responses to comments PM1-1, PM1-32, and PM1-143.

IND490-2 See the response to comment PM1-89.

IND490-3 See the responses to comments PM1-60 and PM1-71.

IND490-4 Comment noted.

IND491 – Malinda Clatterbuck

20160627-5174 FERC PDF (Unofficial) 6/27/2016 1:36:58 PM

Malinda Clatterbuck, Holtwood, PA.

Dear FERC Commissioners,

It is with grave concern I write to you.

I am an E-subscriber, and have seen perhaps hundreds of form letters issued by industry insiders who are touting information that is not accurate.

On one hand, there are letters from industry insiders who are voicing their support for the Atlantic Sunrise Project with the reason being that it will provide "cheap necessary natural gas to Americans"-

IND491-1 I am asking you to dismiss any of these pro comments from the docket, as they are comments that are either written from a false understanding of the ASP. The ASP would mostly carry fracked gas to export facilities, not needy Americans- or they are purposely trying to mislead FERC into making a decision for what they are naming as "needy americans"- but what is really for the industry to make a greater profit from overseas sales. Please consider scratching their comments based on false data- and only consider comments based on facts.

IND491-2 I am also very concerned about the form letters that have continually quoted a study done by a number of Penn State University professors, including Seth Blumsack. The study claims (on William's website as well as in many form letters submitted to FERC) that, "According to the researchers, the design and construction of the Williams Atlantic Sunrise Pipeline project could support approximately 8,000 jobs and an associated \$870 million in economic value added during the construction period. Additionally, the ongoing operation of the pipeline would generate approximately \$1.9 million in annual economic impact, supporting 29 jobs."

In an email exchange I had with Dr. Seth Blumsack in March of 2015 concerning the claims of this study, he wrote me, "As with all of these types of 'economic impact' analyses (not just this one), the numbers that come out of the model are going to be pretty sensitive to the assumptions used. In the paper I found that if Williams used less local labor than anticipated, or more money was spent outside of the construction counties than is commonly assumed, the associated economic benefits will decline, sometimes by a lot."

Since Williams has confessed that the overwhelming majority of workers will not be coming from within the community, and in fact, most will not be coming from Pennsylvania, this economic impact is highly inflated, and I ask FERC to also disregard any comments that are based on this false information spread by Williams from a study that is based on assumptions we know will not be followed in the case of this pipeline.

More importantly, the study itself carries a disclaimer that it was paid for by Williams- the very company seeking to inflate the project's benefits and downplay the projects harms. This fact alone should disqualify the study from being legitimate- and therefore rendering all of the comments citing it illegitimate as well.

IND491-1 See the responses to comments PM1-1 and PM1-32. NEPA encourages all interested parties to submit comments. Every substantive comment and suggestion has value, whether expressed by one respondent or many.

IND491-2 See the response to comment PM1-45.

IND492 – Cathryn Maloney

20160627-5171 FERC PDF (Unofficial) 6/27/2016 1:19:33 PM

Cathryn Maloney, Lancaster, PA.

Dear FERC Commissioners:

IND492-1 As a PA Environmental Scientist after studying the Environmental Impact Statement, I have concluded that the construction of this pipeline would cause irreparable harm to the delicate environment of central PA, particularly Lancaster county PA. This is a fairly populated area with limited greenspace left. There are very little wooded areas and wetland areas due to farming. Williams would be cutting right through these areas which provide habitat for endangered species.

Studies have shown that wetlands and waterways never totally recover from this type of construction. There are already issues with water qualities in PA and this pipeline is too close to major water sources for many communities. If there were an pipeline breach, it would be devastating to the people and environment.

IND492-2 In addition I have real concerns regarding the geology of this area. It is a highly karst topography and sinkholes are very common. It is a real possibility that the massive amounts of water used for testing could create new sinkholes. The Martic line fault is seismically active and the pipeline goes across it several times. Williams tends to downplay this, but the USGS has reported a high likelihood to stronger earthquakes in the NE including PA.

The damage to the streams, rivers and wetlands will effect the water quality, the native plant and animal quality and the air quality.

IND492-3 Williams can put a band-aid on it, but the scar will last forever. This land must be preserved for future generations to enjoy.

It seems that Williams has targeted State Preserved farms and no-till organic farms in their route. Central PA has some of the most fertile soil in the USA. It is being eaten up by developers and many understand that if these farms are not preserved, food in this country will become a problem.

IND492-4 Centrally PA is a historic and beautiful location. The wildlife and wildflower preserves are enjoyed by many. The construction of this pipeline would destroy many of this areas, including the remains of Native Americans who lived on the shores of the Susquehanna. I believe this is the reason why so many people are protesting this pipeline. This area is the only pristine areas left along the Susquehanna River.

IND492-5 I have studied the shippers who would benefit from this project. Most of the gas would go to Alabama to be shipped oversees. This project is just a short-cut to get more product to shipping ports. This does not benefit anyone but the corporations.

IND492-6 PLEASE do not approve this application . Williams and it's investors in this deal, do not have a great safety record. Williams has had pipelines explode and leak. Williams can expand the pipelines already

IND492-7 existing and don't need to ruin this fragile environment. I know most of the Commissioners are lawyers and maybe don't understand that the environment of this planet is at risk. Just think of your favorite camping area, lush with trees and streams and animals being bulldozed over with a 100' scar. It ruins the area forever. Please think of our future and deny this project.

Thank You

IND492-1 We disagree. We believe the minimization measures included throughout the EIS would effectively mitigate the impacts of the Project on wetlands, waterbodies, forested areas, and wildlife/endangered species.

IND492-2 See the response to comment PM1-82.

IND492-3 Sections 4.8.4 and 4.8.6.2 of the EIS and Transco's Agricultural Plan describe mitigation measures Transco would implement to minimize impacts on agricultural lands, including organic and no-till farms. Also see the responses to comments PM1-18 and PM1-179.

IND492-4 See the responses to comments IND315-3 and IND467-1.

IND492-5 See the responses to comments PM1-32 and PM1-51.

IND492-6 See the response to comment PM1-89.

IND492-7 See the response to comment PM1-46.

IND493 – Sally Wilson

20160627-5170 FERC PDF (Unofficial) 6/27/2016 1:03:55 PM

Sally Wilson, Pequea, PA.

Dear Commissioners,

I am writing in opposition to the Atlantic Sunrise Project Docket CP15-138-000, part of which is proposed to go through my neighborhood of 150+ homes bordering parts of the Lancaster County Conservancy preserved lands. The proposed pipeline will lay less than a mile from my home and cut off the only two access roads to my neighborhood.

IND493-1

IND493-2

One of the issues our neighborhood faces as a whole is water. We are ALL on well and septic systems. The house I am still paying for has in fact TWO wells as many in this neighborhood do. We conserve. I am absolutely distraught and outraged that this PRIVATE ENTITY will be allowed to draw 8.5 million gallons of water from the Pequea Creek and additionally several million gallons from the Conestoga River and Chicques Creek. Beyond the impact on the wildlife which is absolutely certain and tragic, there will be an impact on people who live in this area who require clean water to live as well possibly causing our wells to dry up. There is certain to be an impact when the questionable water is reintroduced into the Chicques Creek near Marietta.

It is FACT that chemicals in drinking water and soil cause birth defects and cause cancer in infants, children and adults. The chemicals used in these operations are NOT SAFE for humans or animal life. Look up these chemicals and tell me that my granddaughter's birth defect is the cost of doing business. HOW DARE YOU.

IND493-3

Further, this private entity has NO RIGHT to affect my property value by coming through our neighborhood and cutting off ingress and egress during the construction phase. Red Hill Road in Pequea is a HIGH TRAFFIC MAJOR THOROUGHFARE. In the event of a construction accident we can hardly drive our vehicles through the woods or across the rocky ground. How do we get out? Are we to be sacrificed as the cost of doing dirty business?

IND493-4

Do you realize we have no natural gas access to our own neighborhood?

This gas is not intended for local use or even American use. HOW DARE YOU TAKE MY RIGHTS TO ENJOYMENT OF MY OWN PROPERTY WITHOUT MY CONSENT AND HOW DARE YOU PUT ME IN DANGER.

This is the Federal Government at it's absolute worst form of tyranny. My Name Is To Be Added to those OPPOSING your Rubber Stamp Approval.

Sally Wilson
52 Raven Crest
Pequea, PA 17565

IND493-1 See the response to comment IND448-5.

IND493-2 See the responses to comments PM1-27, PM1-71, PM1-86, and PM1-174.

IND493-3 See the response to comment IND448-5.

IND493-4 See the responses to comments PM1-32, PM1-51, and PM1-143.

IND494 – Tammy Bonnice

20160627-5165 FERC PDF (Unofficial) 6/27/2016 12:26:26 PM

Tammy L Bonnice, Montrose, PA.
IND494-1 I support the Atlantic Sunrise project. This project will connect abundant, low cost gas from the Marcellus supply to the markets in the Southeastern States. This is a resource under our feet to be used to support our economic growth.

IND494-1 Comment noted.

IND495 – Brenda Kauffman

20160627-5164 FERC PDF (Unofficial) 6/27/2016 12:24:51 PM

Brenda Kauffman, Lancaster, PA.
June 27, 2016

To Whom This May Concern:

- IND495-1 I disagree with the EIS for the Atlantic Sunrise Project that states that this project will not have significant environmental impact on the counties it traverses. Specifically, I disagree with this conclusion in regards to Lancaster County..a 'place' that is known across the United States for its unique heritage, farmland, Amish culture, historical significance, Native American grounds, architecture and character and the place where I have lived most of my life.
In a recent publication, the Hourglass Foundation of Lancaster, a non-profit organization dedicated to managing growth and heritage of Lancaster County's unique culture, had an article entitled "Identity Theft" in which the writer outlined concerns about how development and 'growth' results in the destruction of farmland, historic buildings, unique spaces, our history, our culture and our heritage. The Atlantic Sunrise Pipeline Project does just that. It will have significant adverse effects on this County and its natural, historic and economic resources.
- IND495-2 Lancaster County has preserved more farmland than any other County in the United States. Individual as well as government funding has underwritten the protections for future generations to preserve farmland. The resulting conservation easements restrict real estate development as well as commercial and/or industrial uses. For decades, my family has personally made annual contributions to this preservation effort because we value this unique place for its farming heritage and its unique soils. The EIS does not address why this pipeline project can override this conservation easement for corporate profit and convenience. This is not right and should not be permitted.
- IND495-3 Lancaster County's historical heritage is still being discovered. Archeologists and Native American experts are reporting that the Susquehanna River Hills through which the proposed pipeline will be routed hold evidence of human life that predates the Conestoga Indians by at least hundreds if not thousands of years. These Native American sites should be protected for future research and archeological excavation..not for a pipeline. The Susquehanna River Hills in Lancaster County is the home to many Underground Railroad sites and historic buildings. The Atlantic Sunrise Project threatens Lancaster County's historical heritage for corporate profit and this should not be permitted.
- IND495-4 Along the route and throughout Lancaster County, a budding agricultural industry is organic farming. The introduction of the Atlantic Sunrise Pipeline Project to this county project will make organic farming along the route impossible and will deter future growth in organic farming. The pipeline threatens this new small agribusiness for corporate profit and this should not be permitted.
- IND495-5 Tourism is one of Lancaster County's leading industries and it is one that would be significantly impacted by this pipeline. People from across the country travel to Lancaster County to view and experience, the farms, farmland, historic sites and in recent years to ride or walk on the bike paths along the Susquehanna River and through farmland. This pipeline would significantly alter landscape and will impact this vital industry. Lancaster County would bear the burden and this is wrong.

IND495-1 Comment noted. See the response to comment PM1-9.

IND495-2 See the responses to comments PM1-179 and CO29-1.

IND495-3 See the response to comment IND467-1.

IND495-4 See the response to comment PM1-18.

IND495-5 See the response to comment IND427-3.

IND495 – Brenda Kauffman (cont'd)

20160627-5164 FERC PDF (Unofficial) 6/27/2016 12:24:51 PM

IND495-6 The property values of every property that this pipeline crosses lose value. Who wants to buy a property that has a 42-inch pipeline running across it? The homeowner, the farmer or the small business owner has to shoulder this loss.

IND495-7 This pipeline does not create jobs for people from this region. We have seen in other projects that the auto and truck license plates of the pipeline workers are from other states. Williams has stated that the workers require specific skill sets that make it impossible for them to hire regional workers. After the construction phase, there will be few jobs connected to the pipeline. Additionally, for this project, Williams has prematurely stockpiled pipeline made in Turkey and stored in Lebanon County; Williams elected to import and stockpile pipeline from Turkey instead of using region steel companies like the one in Steelton half a year before the project is scheduled to be approved. This project does not provide economic benefit to this County. The stockpiling of pipes demonstrates corporate hubris and a clear sense by Williams that FERC will approve despite the cries of concern by communities that this project will have a significant impact. The pipeline project creates a significant negative economic impact.

IND495-8 From a health, welfare and safety perspective, the 42 inch high pressure pipeline is absurd. We all witnessed the news accounts of the devastating pipeline explosion that took place in Washington County months ago and that pipeline was half the size of this one. Given the terrain and the geology of Lancaster County, which is prone to sink holes and more seismic activity than any other region in Pennsylvania, the decision to install a pipeline of this size is ludicrous.

IND495-10 This pipeline is for the convenience of the for-profit business. The route did not utilize any of the existing pipeline infrastructures. Williams has been permitted to design a project through nearly 200 miles of greenfield for a short cut that provides no economic benefit to the communities it traverses and leaves behind a hazardous 42 inch pipeline that creates a significant impact on every mile it crosses.

IND495-11 In closing, I oppose this pipeline. Lancaster County opposes this pipeline. I ask FERC to break tradition, to truly examine the local impacts and to deny this project. The teenager who spoke at the FERC Hearing at Manheim Township High School labeled this project as a short-term fix that will benefit the corporations not the people and will create incredible problems that her generation and future generations will need to fix. Once that pipeline is installed, there is no taking it back.

IND495-6 See the response to comment PM1-116.

IND495-7 See the response to comment PM1-23.

IND495-8 See the response to comment PM4-64.

IND495-9 See the responses to comments PM1-13 and PM1-82.

IND495-10 See the response to comment PM1-162.

IND495-11 Comment noted.

IND496 – Valerie Scarantino-Monick

20160627-5162 FERC PDF (Unofficial) 6/27/2016 12:18:42 PM

Valerie A Scarantino-Monick, Dallas, PA.
IND496-I am totally opposed to the proposed project as discussed at the FERC meeting held at Lehman High School, Lehman, PA on June 16, 2016. I worry about the effects it will have on our lovely area, the possible contamination of our water source, the traffic, noise and total disruption to our area. The thought of digging through pristine wetlands and acreage is devastating. Please STOP this immediately. Any jobs created would be temporary. The benefit in energy will only go oversees to ensure profits for the gas company - not anyone in our local community. The testimony the evening of June 16th made me very upset. We need to preserve our area and community. If we don't, who else will? I am totally familiar with the Byron property (he spoke against) and to tear that lovely parcel of land would be horrific. Plus, it is also very close to my home that I cherish and enjoy. STOP THIS PLEASE!!!!

IND496-1 Comment noted. Also see the response to comment PM1-32.

IND497 – Brian and Dawn Erb

20160627-0052 FERC PDF (Unofficial) 06/27/2016

Kimberly D. Bose
Federal Energy Regulatory Commission
888 First St., NE, Room 1A
Washington, DC 20416

FILED
SECRETARY OF THE
COMMISSION
2016 JUN 27 P 2:43
FEDERAL ENERGY
REGULATORY COMMISSION

Docket number CP15-138-000

 ORIGINAL

Dear Ms. Bose,

IND497-1 I am writing you in regards to Alternative Route 22 under consideration for the Transcontinental Gas Pipeline Company LLC's (Transco) proposed Central Penn Line (CPL South), which is part of the Atlantic Sunrise project.

My home is located at 1005 Pequea Creek Road Pequea, PA. 17565. Alternative Route 22 would place my home 400 feet from the pipeline, which is well within the impact zone of 1100 feet. Before Alternative Route 22 was proposed my house was 1000 feet from the June 15 Preferred Route, also within the impact zone. I am opposed to the pipeline following Alternative Route 22 and placing the pipe line very close to my home. I am also opposed to the preferred Route of June 15 which also places my home within the impact zone.

I am not in favor of the pipeline being constructed at all! If the pipe line must be constructed it should be placed on existing rights of way to reduce the impact on people's homes.

Sincerely,

Brian and Dawn Erb

Brian and Dawn Erb
1005 Pequea Creek Road
Pequea, PA. 17565

THERE IS A SEISMIC FAULT LOCATED LESS THAN 1/2 MILE TO THE EAST OF OUR PROPERTY THAT HAS STARTED MINOR EARTHQUAKES. THIS PIPELINE WILL BE OF NO BENEFIT TO COMMUNITY OR PA, AS THE GAS WILL BE SENT OVERSEAS TO BENEFIT ONLY THE PIPELINE OWNERS.

IND497-1 Comment noted. See the response to comment PM1-106.

IND498 – Daniel Rosencrance

20160628-5050 FERC PDF (Unofficial) 6/28/2016 7:52:15 AM

Daniel Rosencrance, Cogan Station, PA.
IND498-1 Energy availability is a foundational element of modern economic life. Simply finding energy resources is not sufficient, the energy resource must be delivered to the consumer. I support the Atlantic Sunrise Expansion Project. It is the critical link between energy resource and the consumer.

IND498-1 Comment noted.

IND499 – William & Dolores Smith

20160628-5074 FERC PDF (Unofficial) 6/28/2016 1:48:11 AM

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

Re: CP15-138-000

Dear Secretary Bose:

IND499-1 My wife and I are not lawyers, nor can we easily afford to engage them. Yet we need to take issue with some comments and "facts" stated by some neighbors and their law firm representatives.

In Conestoga there were a number of possible routes that the proposed pipeline could take. The original plan by the Williams Company was to co-locate the ASP with electrical right of ways along the Susquehanna River hills and farmland to the main Transco line in Drumore. A number of people balked at the idea of the pipeline going through a wildflower area that is owned by the Lancaster County Conservancy. This is a relatively small area of concern when considering the entire distance the pipeline will go through Lancaster County. This IS where the line SHOULD be sited. Few homes would be affected and the pipeline would be out of sight to the general public.

However, after hearing the complaints, the Williams Company rerouted the line right through the town of Conestoga and it now passes through many properties, crosses at least six roads (including Main St), and is causing major problems among some people who live in and around Conestoga. On a 1.8 mile stretch between milepost 8.4 and 10.2, there are 7 or 8 homes that are quite close to the proposed line. Most are within 200 or less feet of the work area and their wells and septic systems are in the same vicinity. The "blast" or "impact" zone of 1100 feet is bad enough, but this close is too close. Some of us got together and proposed an Alternate route which would be a little longer for the Williams Company to deal with, but would basically put the pipeline farther away from residences and their wells. Most everyone would be 500 or more feet from the line, and/or the Williams Company could tweak the line to be less problematic. We were not as concerned about the possible dangers of the "blast zone" fringe areas as we were of "up close and personal" concerns such as wells. That is why we proposed Alternate 22.

Obviously, the people living on Alternate 22 did not see things the same way, and voiced their opinions loudly and clearly. We did not blame them for being upset, but still knew that it was the best route of the two choices – proposed route of June, 2015 or Alternate 22. To try to make things better for almost everyone in Conestoga, the "Conestoga Alternative" (12-22-2015) route was developed. Basically, it proposed siting the pipeline back where the Williams Company originally planned it, co-located with the electrical right of ways which totally unaffected the town of Conestoga. Most of the Conestoga residents, including the Township Supervisors, would prefer the pipeline to follow existing right of ways.

And so, the basics are:

Best choice for siting the ASP (IF it HAS to go through Conestoga Township at all), is to put it where the Williams Company planned for it in 2014 – along the electrical corridor, outside of the town of Conestoga.

Second best choice would be the Alternate 22 route that FERC directed Williams to use and which Williams Company has now put into their proposal. The "organic farm" certificate that the Mohns' possess will NOT be lost as long as the Williams Company follows FERC guidance while working on those properties. Contrary to remarks made by some people on Alternate 22, there are hills just as steep, potential erosion problems just as worrisome, small streams just as lovely, and the same kinds of wildlife on the June, 2015 route as on Alternate 22. The main difference between the routes is the closeness of the homes and wells to the pipeline and the construction area on route June,2015.

IND499-1 See the response to comment PM1-106.

IND499 – William & Dolores Smith (cont'd)

20160628-5074 FERC PDF (Unofficial) 6/28/2016 1:48:11 AM

IND499-
(cont'd) The other choice is the June,2015 proposed route which affects more nearby homes and wells. There are MANY old growth trees on the properties along this route that provide privacy, wind protection and shade just like on the other routes. Also affected would be the Life Counseling Ministries Group. While Ms. Folin Smith stated that she didn't think that the facility was very active based on her personal observation, we live beside the property and notice quite a bit of activity. No, it's not a shopping mall, it is a counseling service that often has people staying overnight. The type of clientele is not prone to noise or wildly running around and therefore it may seem a bit tame, but it IS an active, church-based service with a dozen counselors.

IND499- No one seems to want the Atlantic Sunrise Pipeline it seems, except the company officials, stockholders, and some construction workers looking for a relatively short term job. Since there is enough natural gas available in the United States at this time, based on the low cost, it really does NOT seem like this ASP project is needed right now.

If, in fact, the gas is intended for shipping overseas for higher profits, then eliminate the possible use of eminent domain and let the Williams Company pay for a legitimate right of way by offering a fair price for the use of an easement on someone's property or pay a royalty based on the amount of gas passing through the pipeline while destined for other countries. Fair is fair.

Thank you,
William M Smith
Dolores E Smith
184 Meadow Lane
Conestoga PA 17516

IND499-2 The use of eminent domain is discussed in section 4.8.2 of the EIS. Also see the responses to comments PM1-1 and PM1-32.

IND500 – Elise Kucirka Salahub

20160708-5007 FERC PDF (Unofficial) 7/7/2016 5:00:57 PM

2375 Oak St
Lebanon PA 17042

07 July 2016

Kimberly D Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, 1A
Washington DC 20426

RE: FERC Docket No: CP15-138-000

Dear Ms Bose

IND500-1 Joanne Wachholder, Environmental Project Manager, announced at the FERC meeting in Annville, Pennsylvania on 14 June 2016 that FERC would continue to accept public comments after the official 27 June 2016 deadline, which has not been extended despite many requests by citizen stakeholders, public advocacy groups, private businesses, and interested parties.¹³

FERC vs the Public

IND500-2 We, the citizens of the Commonwealth of Pennsylvania, demand our constitutional right of equal protection under the law. We, the adversely affected citizens of Pennsylvania, have been denied equal access to FERC, and thereby, active participation in the entire consideration of TRANSCO's Atlantic Sunrise Pipeline Project which directly and personally affects us. We have everything to lose solely for the financial gain of a company.

IND500-3 We demand that FERC extend the comment period for 90 days subsequent to each supplement submitted by TRANSCO. FERC cannot responsibly continue to accept TRANSCO's project changes and data submissions after the official close of public comment. FERC is violating 2 of its "Guiding Principles"¹:

Due Process and Transparency: Paramount in all of its proceedings is the Commission's determination to be open and fair to all participants.

Stakeholder Involvement: The Commission conducts regular outreach to ensure that interested parties have an appropriate opportunity to contribute to the performance of the commissions responsibilities.

This DEIS document is over 1300 pages long with accompanying references and reports and yet, the most affected stakeholders, the people and municipalities in the path of this pipeline and its harms, are given 60 days to comment. TRANSCO's most recent updates were submitted on 24 June 2106, just 3 days prior to the end of the public comment period, and most recently on 06 July 2016. This is an untenable situation. FERC is effectively shielding TRANSCO from public scrutiny as TRANSCO makes route, design, and engineering changes, and submits data beyond the official public comment period. We, the disenfranchised citizens and property owners, are the primary stakeholders and 'interested

IND500-1 See the response to comment PM1-130.

IND500-2 See the response to comment PM1-130.

IND500-3 See the responses to comments PM1-70 and PM1-130.

IND500 – Elise Kucirka Salahub (cont'd)

20160708-5007 FERC PDF (Unofficial) 7/7/2016 5:00:57 PM

parties' in this process because this pipeline will destroy our security, health and environment in the places that we have made our homes, communities, and personal and financial investments.

IND500-4 FERC is fraught with conflicts of interest that sacrifice the health, safety and welfare of the public and our environment. FERC, an agency that is funded by the industry that it regulates, cannot afford to deny projects that finance its burgeoning budget that is expected to increase to \$346,800,000 for the 2017 fiscal year.¹ Nor can it guarantee the public an objective and independent assessment of the permanent harmful impacts of this pipeline project. FERC cannot be trusted since it has approved every pipeline application it received during the past 30 years² even in the face of the industry's long and storied record of failures, leaks, and explosions.^{3,4} Where is the independent review performed by experts and professionals whom do not have a fiduciary interest in decision outcomes? Who has oversight over FERC's decisions? The answer is no one, not Congress and not the President of the United States who appoint the Commissioners. Note the FERC Commissioners' connections to the energy sector.¹ Commissioner Cheryl A LaFleur has more than 20 years' experience in the electric and gas industry. Commissioner Tony Clark spent 12 years at the North Dakota Public Service Commission where he oversaw regulatory proceedings that permitted more than \$5.5 billion in development of coal, oil, and gas (fossil fuels) and wind infrastructure. Commissioner Colette D Honorable served on the Arkansas Public Service Commission for 9 years and as past president of the National Association of Regulatory Utility Commissioners.

Federal Court is the public's only recourse to challenge an adverse FERC decision. This is prohibitively expensive and limits justice for the general public, since pipeline companies generally target underpopulated and financially stressed communities⁵ which are the paths of least resistance and the cheapest routes to develop. Unfortunately, these same 'greenfield' areas hold our richest natural resources of forests, wetlands, water ways, habitat areas, fertile soils, indigenous flora and fauna, open spaces... that have no voice in this process, but are critical to our survival.

IND500-4 See the response to comment PM1-46.

IND500-5 TRANSCO's DEIS is a morass of misrepresentations, omissions, and vague and inconclusive statements about the impacts of harms that will permanently affect us and future generations. This project is incontrovertibly and inherently deleterious to the health, safety and welfare of us, our communities, and our environment. No amount of mitigation is sufficient or tolerable when so many resources will be lost to the effects of climate change, forest fragmentation, contaminated and compromised prime agricultural soils, loss of organic farms, impaired preserved farms, disturbed wetlands, water body impairment, riparian buffer destruction, cleared right of ways that welcome opportunistic invasive species and diminish indigenous flora and fauna, loss of habitat areas, and ultimately, loss of lives in PIR (potential impact radius) zones. The impacts of this proposed pipeline and all pipelines violate Article 1 Section 27 of the Pennsylvania Constitution which states,

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

We demand that our natural resources be fully protected as clearly stated in our constitution. FERC must honor our state constitutional right and not grant the permit for this or any other interstate

IND500-6 pipeline project in Pennsylvania. Methane gas is not a sustainable energy source. It is a potent

IND500-5 We disagree. See the responses to comments PM1-9 and PM1-70.

IND500-6 See the response to comment PM2-94.

IND500 – Elise Kucirka Salahub (cont’d)

20160708-5007 FERC PDF (Unofficial) 7/7/2016 5:00:57 PM

IND500-6 (cont'd) greenhouse gas that is released during extraction and transport⁵ and is a leading cause of global warming. According to the most recent Pennsylvania Climate Impacts Assessment Report (2015), Pennsylvania is destined to be 3°C/ 5.4°F warmer by 2050. This warming will dramatically and permanently alter and affect the health of our environment.

IND500-7 We know that Williams Partners LP has executed agreements to serve 2 Gulf Coast LNG export facilities⁶ in addition to the Dominion Cove Point, Maryland LNG export terminal⁷. The Atlantic Sunrise Pipeline is designed to transport high volumes of product via a ‘greenfield’ route that is a shortcut to export terminals to fulfill foreign contracts. This pipeline is not designed for the public’s safety or public necessity and convenience. This is a 42” diameter pipeline under 1480 psi with a calculated PIR (potential impact radius) of 1100 ft. Unfortunately for us, calculated PIRs for pipelines have been exceeded in past and recent explosions.^{3,4,14} Approval of this project would violate the mission and goals set forth by FERC in its Congressional Performance Budget Requests and Fiscal Year Annual Performance Reports.¹

Mission: Assist consumers in obtaining reliable, efficient, and sustainable energy services at a reasonable cost through appropriate regulatory and market means.”

Goal 2 Promote Safe, Reliable, Secure, and Efficient Infrastructure: Promote the development of safe, reliable, secure, and efficient infrastructure that serves the public interest;

Goal 3 Mission Support through Organizational Excellence: Achieve organizational excellence by using resources effectively, adequately equipping FERC employees for success, and executing responsive and transparent processes that strengthen public trust

IND500-9 Public necessity and convenience are not attributable to this fossil fuel pipeline project. The harms and adverse risks far exceed any contrived benefits to Pennsylvanians and property owners who are at risk of losing their lives, liberties and properties to a mercenary company. Approval of this project and eminent domain proceedings against landowners would be a violation of U.S. constitutional rights. Although FERC does not have eminent domain authority, pipeline companies acquire the right of eminent domain when FERC approves projects.² Therefore, FERC is a culpable partner in property takings.

IND500-10 FERC’s refusal to allow public participation during their meetings^{8,9} and refusal to officially extend the public comment period commensurate with TRANSCO’s ongoing submissions further violate the goals set forth by FERC. This pipeline does not serve the public interest and FERC cannot strengthen public trust because there is no vestige of public trust in FERC. We are not willing to sacrifice our properties, personal safety, and environment for a profiteering company that is beholden to its investors and foreign market contracts, and is regulated by an agency that is funded by permitting industry projects.

IND500-11 FERC and the fossil fuel industries that it regulates are complicit in the acceleration of climate change and global warming. Exxon scientists conducting climate research in the 1970’s and 1980’s concluded that, “the world’s use of fossil fuels would warm the planet and could eventually endanger humanity.”⁹ The Global Climate Coalition, a coalition of 50 US corporations and trade groups including British Petroleum (now BP), Chevron, Exxon, Mobil and Shell, commissioned scientists to study climate change and their conclusions warn that heat trapping gases are indeed causing global warming.¹⁰ Exxon is now under investigation for lying to the public about the risks of climate change and to investors about how

IND500-7 See the response to comment PM1-32.

IND500-8 FERC’s responsibilities are described in section 1.2.1 of the EIS and are also referenced in the responses to comments PM1-46 and PM1-77.

IND500-9 The use of eminent domain is discussed in section 4.8.2. Also see the responses to comments PM1-1 and PM1-113.

IND500-10 FERC does not refuse to allow the public to participate in its public meetings. However, FERC does not approve of or condone disruptive or disrespectful behavior or activities at its public meetings. Also see the response to comment PM1-130.

IND500-11 See the response to comment PM2-94.

IND500 – Elise Kucirka Salahub (cont'd)

20160708-5007 FERC PDF (Unofficial) 7/7/2016 5:00:57 PM

IND500-11
(cont'd) | these risks could damage the oil industry.¹¹ FERC has a long, indictable history of ignoring the direct correlation between fossil fuel development and global warming. FERC must deny the TRANSCO Atlantic Sunrise Pipeline Project and all interstate fossil fuel pipelines and facilities.

Sincerely

Elise Kucirka Salahub

¹www.ferc.gov

²www.pennlive.com/news/2016/03/pipeline_fights_raise_big_ques.html

³[www.nts.gov/investigations/Accident Reports/Pages/pipeline.aspx](http://www.nts.gov/investigations/Accident%20Reports/Pages/pipeline.aspx)

⁴www.phmsa.dot.gov

⁵<http://cleanair.org/dirty-energy/pipelines/> Webinar: Natural Gas Pipeline Methane Leaks: Air sampling and technology review findings

⁶[http://www.businesswire.com/news/-/Williams Partners Executes Agreements to Serve two Gulf Coast LNG Export Facilities](http://www.businesswire.com/news/-/Williams%20Partners%20Executes%20Agreements%20to%20Serve%20two%20Gulf%20Coast%20LNG%20Export%20Facilities)

⁷[https://www.prnewswire.com/news-releases/-Cabot Oil & Gas Corporation](https://www.prnewswire.com/news-releases/-Cabot%20Oil%20&%20Gas%20Corporation)

⁸<https://cetology.org/2015/03/22/protestors-refuse-to-be-silenced>

⁹www.ferc.gov/CalendarFiles/20150309130617-RM15-15-000.pdf

¹⁰Banerjee, Neela, Song, Lisa and Hasemyer, David. (16 September 2015). Exxon: The Road Not Taken. Retrieved from insideclimatenews.org

¹¹Negin, Elliott. "Documenting Fossil Fuel Companies' Climate Deception." *Catalyst* 14 (2015 Summer): 9-11. Print

¹²<http://www.nytimes.com/2015/11/06/science/exxon-mobil-under-investigation>

¹³Transcript of FERC Public Comment Meeting held on 14 June 2016 in Annville, PA upon availability

¹⁴<http://nogaspipeline.org/2010-08-19/the-blast-radius>. The Blast Radius: What does it Mean For Your Neighborhood?

The due process clause of the Fourteenth Amendment has been held to require that when a state or local governmental body, or a private body exercising delegated power, takes private property it must provide just compensation and take only for a public purpose. Applicable principles are discussed under the Fifth Amendment.

IND501 – Jack

20160714-5028 FERC PDF (Unofficial) 7/14/2016 10:37:00 AM

IND501-1 Jack, Nanticoke, PA.
Robert Bell will eat your children if you don't sign is what I was told.
I am very concerned about this.

IND501-1 Comment noted.

IND502 – Clyde McMillan-Gamber

20160701-0016 FERC PDF (Unofficial) 07/01/2016

FILED
SECRETARY OF THE
COMMISSION
2016 JUL -1 P 4 14
FEDERAL ENERGY
REGULATORY COMMISSION

re: pipeline

CP15-138-000

ORIGINAL

SUSQUEHANNOCK FIELDS

by Clyde McMillan-Gamber

The Susquehannock Indians dominated what was to be Lancaster County from the early 1500's to 1675 when they were defeated by the Iroquois along the Susquehanna River at Long Level in York County. While the Susquehannocks lived along the Susquehanna at what is now Washington Boro and later Long Level, they hunted, fished, gathered and farmed.

The Susquehannocks created small, but fascinating, fields in the local deciduous forests. Their fields are interesting in that they show us how a people can make the best use of the tools and materials they have on hand. And their fields illustrate how they used their environment to their benefit without major impact.

Using stone axes to strip large slabs of bark from the trees all the way around the trees, they stopped the flow of water to the leaves and killed the trees. That process is called girdling. Without leaves in the dead forest canopy, the sunlight reached the ground. The soil between the dead, but still-standing, trees was cleared of logs, branches and leaves so that seeds could be sown.

Three crops were sown by Susquehannock women-maize (corn), beans like lima beans and squash. These crops we call the "three sisters".

These women were ingenious in planting their crops "when the dogwoods bloom" early in May. Using sharp sticks to punch holes in the soil of the cleared forest floor, they planted hills of maize with about five kernels per hill to make up for losses to deer, bears, insects and other animals. They planted beans in those hills so that the bean vines

IND502 – Clyde McMillan-Gamber (cont'd)

20160701-0016 FERC PDF (Unofficial) 07/01/2016

could climb the maize stalks toward the all-important sunlight. The roots of the bean plants added nitrogen to the soil which was healthy for the maize. Legend says they placed a small fish in each hill for fertilizer. Squashes were either planted in the same hills or between the hills. The squash vines and their large leaves shaded the ground, thus reducing the threat of "weeds" and retaining moisture in the soil.

The Susquehannocks made the best use of the small fields they cultivated. While the maize grew upright and the beans climbed the corn stalks, the squashes sprawled across the ground. The fact that some plants grew up and others grew across reduced competition for the space that was available among the plants and put the small, hard-earned space the Indians had to the best possible use.

The bark the Susquehannocks cut from the trees to make their gardens was used to build their homes we call long houses. Sapling trees were cut away from the fields were dug into the ground in opposing rows and tied together at the top with vines to make a supporting frame. Other saplings were tied between the upright poles to add to the frame. Then the slabs of bark were tied to the frame to make the house. There was a small door at one end and a few little holes in the pointed ceiling to let smoke out. A deer hide may have placed in the doorway to help block the cold winter wind.

A few related families would live in each longhouse. There wasn't much privacy, but this was the best the Susquehannocks could do with the tools and materials they had at hand during their time.

The fields of the Susquehannocks reflected the genius of the people who created them. They also demonstrate how small populations of people in balance with nature can work in harmony with nature.

IND502-1

please be respectful of original Native property in Lanc City in regards to the proposed pipeline. Thank-you.

IND502-1 Comment noted.

IND503 – Sharon & Russell Olt

20160711-5053 FERC PDF (Unofficial) 7/9/2016 1:11:10 PM

July 8, 2016

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Dear Secretary Bose & FERC,

We're writing to you today to provide an update and an alternate re-route request for your consideration of our June 21, 2016 clarified pipeline re-route request on the Williams Atlantic Sunrise Gas Pipeline, Docket No. CP15-138.

IND503-1 Williams Co contacted us on 6/22/16 & we set up a meeting on June 27th to discuss a pipeline re-route. I was informed that Williams does not want to re-route the pipeline & it was suggested that Williams may agree to move the current pipeline to the other side of the current dirt road (away from our residence), which is approx. 20'-30' from the current location. I felt like they were trying to force me into agreeing to this, since Williams' rep told me numerous times if the pipeline is not re-routed to the other side of the current dirt road then we don't want to move the pipeline at all. I informed him that is incorrect & we do want to move the pipeline as far away from our residence as possible but 20'-30' from its current location is not a safe distance away when the blast hazard area of the 42" high pressure gas pipeline is 1,112'. I also told him that in the vicinity of our residence we would prefer the pipeline re-route to run parallel as close to our property boundary lines as possible, where there are no neighbor's residences. We were again trying to work with Williams since they would not have to attain additional environmental surveys, etc. if the pipeline was moved no more than 300' from its current location. We should have learned our lesson from our previous interactions with Williams, which were always for the benefit of Williams without consideration to the landowner's safety or concerns. I requested a letter stating the reasons why Williams will not move the pipeline, if that's what their decision is. I was told I would never receive this letter I requested.

We courteously request and are begging you FERC to please review our clarified pipeline request with 2 re-route alternatives, since I was informed on 7/7/16 that Williams stated they are not moving it 300' away from our residence and may not move it at all.

IND503-1 See the response to comment PM2-84.

IND503 – Sharon & Russell Olt (cont'd)

20160711-5053 FERC PDF (Unofficial) 7/9/2016 1:11:10 PM

Clarified Pipeline Re-Route Request

Our **1st choice**, in the vicinity of our residence, would be to run parallel as close to our property boundary lines as possible, where there are no neighbor's residences. The pipeline would be farther away from our home & would give us more of a chance to protect our family & residence including possible survival in the event of an explosion.

Our **2nd choice**, in the vicinity of our residence, would be to move the pipeline 300' south of the current pipeline location (away from our residence) running parallel with our property boundary lines & current pipeline route. This distance would be approximately 1/2 of the 1,112' blast hazard area. Not good odds to protect our family & residence or even surviving but these odds are better than the current pipeline location.

FERC, WE'RE BEGGING YOU TO PLEASE APPROVE A PIPELINE RE-ROUTE ON OUR PROPERTY AND TO CONTACT WILLIAMS CO SINCE THEY REFUSE TO MOVE THE PIPELINE, UNLESS FERC REQUESTS THE RE-ROUTE. OUR LIVES ARE IN YOUR HANDS SINCE NO ONE ELSE WILL HELP US. PLEASE HELP US!

See Exhibit A for Sharon & Russell Olt's Clarified 1st & 2nd Alternative Pipeline Re-Route Requests.

Our pipeline re-route request was to follow the property boundary lines at a safe distance from our neighbor's residences.

We do not agree with FERC's determination, which was documented in FERC's review of our request, that a safe distance is 100' from our neighbor's residences.

Our Aungst Lane neighbor's residence may be 100' from our property boundary lines, however, that was not our re-route request or our intention to have it that close to their residence or any of our neighbor's residences. As we stated previously we want to also protect our neighbors & friends by keeping the pipeline a safe distance from their residences.

See Exhibit B for FERC's incorrect interpretation of our pipeline re-route request.

IND503 – Sharon & Russell Olt (cont'd)

20160711-5053 FERC PDF (Unofficial) 7/9/2016 1:11:10 PM

Aungst Lane Residence

On the map that was previously submitted, the arrow to show where we requested the pipeline re-route was not extended to our property boundary lines. It would run parallel with our property boundary lines & current pipeline route at a safe distance from the Aungst Lane residence.

With our clarified pipeline re- route request the Aungst Lane residence would be farther away from the pipeline than our residence would be from the pipeline.

Pine Heights Drive Residences will not be affected by our re-route request.

We did not request a re-route near the Pine Heights residents. The current pipeline route is not close to their residences or our residence in this location.

Adjoining Property

Our clarified pipeline re-route request on the adjoining property would be on the north side of where the small stream (waterbody) begins. There is minimal impact of vegetation and brush.

See Exhibit C

The pipeline re-route on the adjoining property could also run parallel with Klick Dr & go around the minimal impact of vegetation and brush.

See Exhibit D

Our Property

Our clarified pipeline re-route request on our property is 300' south (away from our residence) of the current pipeline route, in the vicinity of our residence.

At this location there are not steep slopes on the east side of Klick Dr and the amount of vegetation & forestland impacted is minimal at this location.

See Exhibit E

IND503 – Sharon & Russell Olt (cont'd)

20160711-5053 FERC PDF (Unofficial) 7/9/2016 1:11:10 PM

Dark Woods Road Steep Slopes - Compared To Our Property

There are very steep slopes, dense vegetation, brush & forestland where the pipeline would come across the Dark Woods Rd.

See Exhibit F

Our property's slopes are not steep & it has minimal vegetation, brush & forestland impact.

Refer back to Exhibit E

Pipeline Going Through Streams, Creeks, Pond - Other Landowners Properties

Two other affected landowners have streams, creeks & ponds the pipeline is going through.

One landowner's that lives within 2 miles from us informed use that Williams is going to put the pipeline through their stream & creek at 2 places.

The neighbor of this property owner informed me that Williams is going through their pond.

If Williams can attain the proper permits for going through a creek & steam at 2 places & going through a pond, they should be able to attain the permits to go through our neighbors adjoining property that has a small stream that is dry most of the year.

Why would Williams & FERC choose to put a pipeline near our residence, putting our lives & home in potential danger, rather than getting the proper permits to go through a small stream?

What are more important human lives & our residence or a small stream that is dry most of the year & most importantly has no residence near it?

See Exhibit's G, H, I, J

I researched this further with DEP's Bureau of Oil & Gas.

I was informed that the gas pipeline can go through wetlands, creeks & streams.

Williams is able to get regulatory permission with the proper permits.

I also discovered that Williams will spend less money getting permits with quicker turnaround time if they go around the wetlands, creeks & stream.

We have over 100 acres & enrolled in the Clean & Green Program to ensure the farmland is protected & preserved for future generations.

IND503 – Sharon & Russell Olt (cont'd)

20160711-5053 FERC PDF (Unofficial) 7/9/2016 1:11:10 PM

Williams again re-routed the pipeline to benefit them without any considerations to our requests & concerns. This clearly shows again that Williams does not adhere to their statement that they solicit input from citizens to identify & address landowners concerns. It also clearly shows that their saving money & a faster permit turnaround time are more important than human life & working with the landowners & keeping the landowners safe by being out of the blast/hazard area...

We have voiced our concerns numerous times to Williams & they told us repeatedly that the pipeline won't be re-routed along our property boundary lines unless FERC requests the re-route.

We are very concerned & quite frankly I'm scared to death since the pipeline is so close to our home & in the blast/hazard area.

We are also concerned about our neighbors & do not feel that we should be put in a position where we have to choose between our safety & our neighbor's safety. We decided that the fair humane thing to do would be to request that Williams re-route the pipeline on our property to parallel our property boundary lines but at a safe distance from our neighbor's homes.

We are the type of people who would give the shirt off our back to help someone.

We thought Williams would work with us.

Unfortunately we discovered that they don't stand by their statements to work with the landowners.

We are very disappointed with Williams.

Williams is also aware of my current medical condition of anxiety & depression due to our home being in the blast/hazard area. I informed them that I was petrified & pleaded with them numerous times to reconsider our re-route request, to no avail.

Williams Co wants to put the pipeline close to our home within the blast/hazard area, putting our home & family in danger.

The blast/hazard area of this 42" high pressure gas pipeline is 1112'.

In the event of an explosion, as you must be aware, anything within the blast/hazard area will be destroyed including our home. My family would also not survive.

IND503 – Sharon & Russell Olt (cont'd)

20160711-5053 FERC PDF (Unofficial) 7/9/2016 1:11:10 PM

We have more than enough acreage for the pipeline to be re-routed.

Unless the pipeline is re-routed to a safe distance so our home is out of the blast/hazard area they will not only take part of our property, they will also take away our rights to feel safe in our own home. **Your home is supposed to be your safe haven**, somewhere where we should be able to go to feel safe & secure. In addition they'd also be taking away our being able to have friends & family come to our home because they will not be safe and our grandchildren can no longer safely go for a walk or ride their 4 wheelers on our property.

We're begging you, FERC, please consider a pipeline re-route on our property so we can have peace of mind in knowing that our home is out of the blast/hazard area & so I can try to recover from my anxiety & depression medical condition.

No one will help us. PLEASE HELP US.

Please help the landowners, who worked hard to achieve the "American Dream".

We courteously request your assistance in having the pipeline re-routed on our property.

Thank you for your assistance. We sincerely appreciate it.

Sharon & Russell Olt, 105 Klick Dr, Pine Grove, Pa 17963 Schuylkill County

Phone: 570-617-8497 E-Mail: chuttolt@yahoo.com

IND503 – Sharon & Russell Olt (cont'd)

The attachments to this letter are too voluminous to include in this environmental impact statement. They are available for viewing on the Federal Energy Regulatory Commission's (FERC) website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP15-138, PF14-8), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20160711-5053.

IND504 – Connie Giger

20160718-0023 FERC PDF (Unofficial) 07/18/2016

ORIGINAL

July 13, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE Room 1A
Washington, DC 20426

FILED
SECRETARY OF THE
COMMISSION
2016 JUL 18 P 2:30
FEDERAL ENERGY
REGULATORY COMMISSION

Regarding, FERC No. CP15-138-000
Connie S. Giger, Mountain Township
Columbia County, Pennsylvania

* Please take the time to read this letter from me as it will be very important to a lot of people. Thank you.

I have told Williams Atlantic Service project since 2014 at their first public meeting held at the Bloomsburg Fire Hall about this high erosion area.

This will be my third letter since June 21, 2016. Please read the letter dated June 21 and mailed June 23 followed by the June 24, 2016 letter asking for additional time since I had not been contacted and told about another new pipeline route per my daughter, Jodi M. Boushreckt, I said, "I would write another letter this week."

Today July 13, 2016 I still have not been contacted by a Williams pipeline representative about this new proposed route now going partly

IND504-1

IND504-1

Section 3.3.2 of the EIS has been revised to include a recommendation that, prior to construction, Transco file with the Secretary a revised alignment sheet that incorporates the Option A, B, or C valve site location for Alternative 24D.

IND504 – Connie Giger (cont'd)

20160718-0023 FERC PDF (Unofficial) 07/18/2016

- 2 -

July, 13, 2016

IND504-1
(cont'd)

on my daughter and son-in-law property, the other side of the P.P.L electric lines. According to her the valve site, which will be on my property across State Route SR 4004 Ridge Road, Montone Township, Columbia County, hasn't even been discussed with me. Kevin Lafleur from Williams Pipeline is taking advantage of my daughter, Godi, whom he is discussing the proposed valve site with her, since it will be straight across from their driveway when Godi and Clyde, her husband, and their children live. She is too young to remember the washed out field below the proposed valve site pipeline and doesn't know all the following information, I guess. Kevin doesn't even want to discuss anything with me — the property owner who pays the taxes.

Now Williams Atlanta Sumner Project wants to take away my partial livelihood. There will be no way to even farm this area. Not to mention if this 100' x 175' concrete valve site pipeline, according to my daughter, is put there on my property, which I have not heard anything about this from Williams Pipeline representative, Kevin Lafleur.

This is one large zoned agriculture field.

IND504 – Connie Giger (cont'd)

20160718-0023 FERC PDF (Unofficial) 07/18/2016

-3-

July 13, 2016

IND504-1
(cont'd)

This proposed valve site in this field will make this field unfarmable. The only place that we farm this field is where they are putting this proposed valve site and maybe a little strip of field before the hollow. On the other side of the hollow there are two ponds, a stream, plus a home and business. This field is across the road from the mountain side zoned conservation of Ridge Road. There is a tremendous amount of water coming off this mountain, not to mention the underground and above ground springs, depending on the precipitation. There are three homes in this field area: (1) The part of the field directly across from my house (Connie L. Giger) is to wit to farm. The property bordering this field belongs to my son and daughter-in-law, Jeff and Billie Jo Giger and they reside there with their two children plus animals with a pond below their house. (2) The next section going to the left contains one of the PPL Electric power lines on my property, the other being the PPL Electric metal tower lines. This happens to be the wooden PPL power lines, which I now rent out to a farmer to help pay my taxes. That is where Williams wants to put the proposed valve site. Right below this proposed valve site my farmer cannot even farm the

IND504 – Connie Giger (cont'd)

20160718-0023 FERC PDF (Unofficial) 07/18/2016

-4-

July 13, 2016

IND504-1
(cont'd)

down side of this hill because of the run off. So much land has washed away. The neighbor's pond at the bottom of R edge Road began filling up with dirt because of a large rain storm. We had to telephone the Agricultural Extension Office for Columbia County and had to install a netting in this bottom and side part of the field. I can't remember how much money it cost, thousands of dollars and it can't be farmed. The only part farmed is near the wooden PPL electric power lines and now this proposed valve site (100 feet by 175 feet cement slab with exposed 42" pipes) will create more run off and no more farming. I won't ever have money to help pay my taxes because there will be no more money coming in from that rental section. Maybe the people would like to pay taxes on property with two PPL lines running through it and now maybe a pipeline with a valve site. I'll be tired of paying taxes on property that no one else wants and no one wants to build on if the gas pipeline goes through with this valve site. Devalued Property. My house (Connie's) built near 49 years ago, my daughter and son-in-law and their

IND504 – Connie Giger (cont'd)

July 13, 2016

IND504-1
(cont'd)

children's home built new - I guess the pipeline is 200 feet from their home and my son and daughter-in-law and children's home built new will be living in this non-survival zone if an explosion occurs. My whole immediate family. If the pipeline goes through with this unhealthy valve site, which regulates the pressure for the pipeline, it will effect a lot of innocent people. The release of these fumes from this

IND504-2

42" valve site pipeline will be over nearby neighbors, a neighborhood and an elementary school, W.W. Cross Memorial, down in the lower end of this neighborhood. I believe these following people will be in the non-survival zone or injured should an explosion occur:

1. Clyde and Gadi Hausbrecht and Family (2 children)
2. Conni L. Egin
3. Jeff and Billie Jo Egin and Family (2 children) plus animals
4. Clitia (Chip) and Kym Lauke
5. Charles and Susan Margos (6 children)
6. Robert and Pam Sommers
7. James and Bonnie Fiedler
8. Bill and Sandy Heier

IND504-2 See the responses to comments PM1-36, PM3-15, and CO9-13.

IND504 – Connie Giger (cont'd)

July 13, 2016

IND504-3

I was told 92 percent of the gas is already sold to China. Don't get me wrong GOD knows we all need power but I'm hoping there are still some common sense conscious people to help guide these big businesses. Don't forget we need to feed the American people here in the United States of America.

IND504-3 See the response to comment PM1-32.

IND504-4

Montauk Townships Supervision, with the help of many people, drew up a pipeline ordinance and forwarded it to Columbia County for change and approval. Did their hard work even get read or discussed?

IND504-4 Comment noted.

IND504-5

Can a route without hurting peoples' safety, health and property values be found?

IND504-5 Comment noted.

If you need any additional information or have any questions, please contact me by my landphone 570-784-2761.

Sincerely,

Connie L. Giger
321 Ridge Road
Bloomsburg, Pa 17815

Copies to: Please see page 7

IND504 – Connie Giger (cont'd)

20160718-0023 FERC PDF (Unofficial) 07/18/2016

- 7 -

July 13, 2016

Copies to:

David R. Millard, State Representative
Chris Young, Columbia County Commissioner
David Kovach, Columbia County Commissioner
Rich Ridgeway, Columbia County Commissioner
Lois Elright, Montona Township Supervisor
Joe Muller, Montona Township Supervisor
Forrest Bennett, Montona Township Supervisor
Mara Cole, Department of Environmental Protection
Attorney John Shoemaker
PPL Electric Utilities
Clyde and Jodi Horachnecht, Neighbor
Jeff and Belki Jo Giger, Neighbor
Celia (Chips) and Kym Lawler, Neighbor
Charles and Susan Mangis, Neighbor
Robert and Pam Sommers, Neighbor
James and Bonnie Fredler, Neighbor
Bill and Sandy Heier, Neighbor

IND505 –Walter and Robyn Kochan

20161017-5029 FERC PDF (Unofficial) 10/15/2016 8:40:48 PM

CPL NORTH ALTERNATIVE 12 WEST - VARIATIONS

IND505-1 There is absolutely no reason why Transco cannot purchase the defunct Penn State Seed property along Route 309 North in Dallas Twp., PA that has long been for sale and would accommodate their Atlantic Sunrise Pipeline rather than rob and destroy existing landowners' properties -- except that Transco has not even attempted to use this as an alternative route because they are greedy and do not want to redo their work or pay for a tract of land when they can rob us and destroy our home and property instead.

Transco has already adopted CPL North Alternative 12A for the Nesbitt property to be rerouted to tie in with existing right-of-way. The attached map shows 2 variations of CPL North Alternative 12A that avoid the ASP crossing Lake Catalapa Road and ill-affecting Goodleigh Manor, Kochan and Jackloski properties, by purchasing the Penn State Seed property. These variations would also tie in to an existing ROW and eliminate switching back on Route 309 by instead running parallel with it as well as eliminate the problems with the Nesbitt, Kochan and Jackloski properties.

If FERC is going to follow its own regulation (18 CFR Section 380.15(d) to require applicants to consider the use, widening or extension of existing rights-of-way, and if FERC is concerned about protecting trees, then they must require Transco to investigate these variations in good faith because it is the only path in our area to mitigate environmental impact. To do otherwise, is to allow Transco to bully landowners who cannot afford extensive legal expense to protect their properties and demand a reasonable alternative as the Elefant legal firm has accomplished.

IND505-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND505 –Walter and Robyn Kochan (cont'd)



IND506 – Justin and Susan Cappiello

20161018-5078 FERC PDF (Unofficial) 10/18/2016 12:19:37 PM

Justin & Susan Cappiello
1515 Ridge Road
Lancaster, PA 17603
10/17/2016

Honorable Chairman Norman C. Bay
Federal Energy Regulatory Commission
888First Street NE
Washington, DC 20426

Re: FERC Docket CP15-138

Leave for Motion to intervene out of time

Honorable Chairman Norman C. Bay,

My wife and I (Mr. and Mrs. Justin Cappiello) own the property located at 325 Conestoga Boulevard, Conestoga, PA, which is proposed to be crossed by the ("CPL") South, (ROW PA-LA-135-B.000) which is part of the Atlantic Sunrise Project ("Project"). We recently learned of a route variation which will more severely impact our property and are therefore requesting this motion to intervene out of time in order to more fully protect the investment in our property.

As no other entity has already been granted intervenor status to protect the interests of our property we remain the sole protector as it's owner and our participation is in the public interest.

"Our interest is not adequately represented by other parties in the proceeding." Id. at § 385.214(d)(1)(iii). FERC has adopted a general policy of allowing late intervention in natural gas proceedings so long as intervention is sought before a final order is issued. See, e.g., Cameron LNG, LLC, 118 FERC ¶ 61019 (Jan. 18, 2007).

(h) (1) "an interest which may be directly affected by the outcome of the proceeding" pursuant to Rule 214(b)(2)(ii), 18 C.F.R. § 385.214(b)(2)(ii); and (2) its "participation is in the public interest" pursuant to Rule 214(b)(2)(iii), 18 C.F.R. § 385.214(b)(2)(iii). The legal interests of the Cappiellos can only be protected by obtaining party status.

IND506 – Justin and Susan Cappiello (cont'd)

20161018-5078 FERC PDF (Unofficial) 10/18/2016 12:19:37 PM

IND506-1 | A recently submitted route variation (MOC-0297) would now impact forestland on our property which we believe to be part of the SHEW-CHNI lands.

While we are very grateful that the route may be moved so that the proposed HDD entry point at MP 12.1 is now off our property and away from the farmhouse occupied by an Amish family with 10 children and numerous captive animals, we now have new concerns with the proposed route variation.

We will itemize these concerns in a future filing and are only requesting intervenor status with this writing.

Sincerely,

Justin & Susan Cappiello

IND506-1 The Conestoga River Alternative would not cross the Safe Harbor East Woods species of concern core habitat or natural heritage area. See our analysis of the Conestoga River Alternative in section 3.3.2 of the EIS.

IND507 – Eric and Tracy Landis

20161024-5063 FERC PDF (Unofficial) 10/24/2016 1:07:16 PM

October 24, 2016

RE: OEP/DG2E/GAS2
Transcontinental Gas Pipe Line Company
LLC
Docket No. CP15-138-000

To: FERC

On Friday October 14th 2017, my wife and I received notification through a mailing from FERC with an enclosed map proposing a Conestoga River Alternative Route wrapping the pipeline through our property around two of our occupied residences and barn. FERC is evaluating alternative routes to Transco's proposed Central Penn Life North and South routes in PA, which are portions of the Atlantic Sunrise Project. Our property, 4459 Main Street, Conestoga, PA 17516, is identified as potentially being in the direct path of the alternative pipeline route (See map page 9 of 9 Central Penn Line South Route Deviation M-0297).

We purchased our 76 acre gentlemen's farm in 2001 to have a private, secluded residence. Over the past 15 years, we have dedicated much time developing wildlife habitats and preserving and protecting the natural state of our farm. Our property is a gentlemen's estate property with a primary residence, a guest house, and a barn in a setting very similar to a conservancy. We have streams, two natural spring-fed ponds and wooded areas that create the perfect habitat for natural plant species. Our property is home to wildlife like ring-neck pheasants, deer, turkey, foxes, turtles, frogs, bass, hawks, blue herons, muskrats, wood ducks and bald eagles just to name a few. (Our property is very similar to Shenks Ferry Wildlife Preserve which has been removed from the pipeline route for conservation reasons). In order to preserve our property's natural state and protect the environment, we implemented more sustainable farming practices to prevent erosion and runoff along with planting food plots for wildlife habitat and tall grasses for refuge.

IND507-1 In our opinion, our farm is one of the few unspoiled farms left in Conestoga. If the gas company would get their way, the ecological footprint on our preserved homestead will be changed forever; wildlife habitat will be destroyed, families will be at risk, and we will suffer a permanent loss in the value of our property.

IND507-2 In addition, the pipeline's proposed route comes **dangerously close** to our primary residence, tenant house, and barn. The pipeline is proposed to literally wrap around our living areas. According to the map we received, the South Route Deviation M-0297 would come within 210 feet of our tenant house and 360 feet of our primary residence and barn placing our family's lives and our tenant's life in harm's way in the event of an accident. An explosion in such proximity would surely result in imminent death.

IND507-3 There has also been talk about drilling horizontally underground from our property under the Conestoga River. The Pipeline and horizontal drilling would be an absolute tragedy for the environment on our property which is to include turning acres of our land into sludge ponds. Drilling will also effect underground springs and natural waterways. Our spring-fed ponds and wells could potentially dry up or become contaminated. In addition, generations of rare wildlife such as

IND507-1 See the responses to comments PM1-116 and PM2-90.

IND507-2 See the responses to comments PM1-13 and PM1-132.

IND507-3 See the responses to comments FA1-41 and FA1-49.

IND507 – Eric and Tracy Landis (cont'd)

20161024-5063 FERC PDF (Unofficial) 10/24/2016 1:07:16 PM

Blue Herons, Bald Eagles, ring-neck pheasants, and wild turkeys that are struggling to survive have made our property their home.

IND507-4 No private land owner should have their land devalued or be trespassed upon to suffer potential bodily harm or negative financial impact for the benefit of a for-profit company's own financial gain. Williams hopes of conducting their business through our property without our permission and without ownership of our property is wrong and unethical.

IND507-5 Transcontinental Gas Line Pipe Company cannot claim eminent domain rights to our property since they are not benefiting or servicing our community – in fact, the gas will be exported and not used in our country! The government never intended the right of eminent domain to be used in this way. The pipeline company is a for-private company, only benefiting themselves and their investors. This is unethical behavior/business practices and we are putting you on notice that under no circumstances will we ever consider allowing a pipeline to go through our property. There is no benefit to us and only risk. We are not going to allow a bomb to be underneath our ground, putting ourselves in harm's way nor allow our fields to be turned into sludge ponds.

IND507-6 We are asking your office to abandon the idea of the Proposed Conestoga Alternative Route (CPL South River Deviation M-0297) and find another method for Williams to transport their gas without violating our property rights or our neighbor's property rights. Furthermore, the original proposed route is straight and direct - making much more sense rather than using the CPL South River Deviation as a proposed route. The CPL South River Deviation proposed route proposed deviation is longer and would disturb more land area and effect more properties.

Please note we have put our attorneys on notice and we are prepared to take aggressive legal action to protect our property and fight this injustice!

Sincerely,



Eric L. Landis
Tracy S. Landis
4459 Main Street
Conestoga, PA 17516
Tele. 717-468-4560 (Eric's Cell)
Tele. 717-468-4593 (Tracy's Cell)

IND507-4 See the response to comment PM1-116.

IND507-5 See the response to comment PM1-5.

IND507-6 See our analysis of the Conestoga River Alternative in section 3.3.2 of the EIS.

IND508 – Larry and Mary Ann Wilson

20161025-5053 FERC PDF (Unofficial) 10/25/2016 1:25:03 PM

Larry Wilson, Harveys Lake, PA.
IND508-1 We have been told that you take into consideration, the property owners preferences for your gas line. I believe that you are planning on running the gas line, parallel to the electric line running in front of our property. If it would involve removing additional trees in that area, we would prefer that the line be run behind our home on the south side of the creek bed. Thank you for your consideration.

Larry and Mary Ann Wilson
217 Ten Point Ln
Harveys Lake Pa 18618

ph# 570-333-4312

IND508-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS.

IND509 – William B. Lamoreux

20161027-5131 FERC PDF (Unofficial) 10/27/2016 2:16:16 PM

William B Lamoreux, Harveys Lake, PA.
Dear Sir,

IND509-1 We have looked at your proposed pipeline route and have concluded we do not wish to grant you access across our land for the following reasons;
1) The pipeline will change the natural water flow across lands which will change the water table on our land causing us undue wetland and increased risk of flash floods. 2) will render 1 or more acres of our land unusable for residential development should we decide to sell parcels because of the pipeline and unperkable because of the water issue which is with about \$40,000 in net losses on 2 acres of land. 3) will disturb the harmony of native fauna and inconvenience us in many ways. Also there is no mention of toxins, process of pipeline removal, restoration of disturbed lands or any other such undesirables, all which would have a burden associated with them. Therefor My Wife Debra and I will seek to deny you access. Please do not trespass nor send any surveyors, nor position any equipment neither above nor below ground on our property.. Thank you, William and Debra Lamoreux.

IND509-1 See the responses to comments PM1-71, PM1-116, and PM1-132.

IND510 – Susan Farr

20161028-0013 FERC PDF (Unofficial) 10/28/2016

CP15-138

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St NE, Room 1A
Washington, DC 20426

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
2016 OCT 28 P 2:49
FEDERAL ENERGY
REGULATORY COMMISSION

October 25, 2016

Dear Ms. Bose,

I am writing to you regarding OEP/DG2E/Gas2, Transcontinental Gas Pipe Line Company, LLC, Docket No. CP15-138-000, Atlantic Sunrise Project, Central Penn Line North Alternative 12 West. The location is on the Monkey Hollow Rd., Northmoreland Twp., Pennsylvania.

Part of this "North Alternative 12 West" route" as shown in page 6 of 9 in the papers I received, cuts across a corner of my land and proceeds directly behind and along the southern edge my property. Doing this will take out a wide swath of trees that I greatly enjoy looking at from my back porch.

We built our home in 1971, choosing the area because of the rural setting surrounded by trees. I am a retired, widowed senior citizen and one of my favorite things is being on my back porch looking at the woods and animals. It is very peaceful and relaxing in my elderly years. Cutting everything down for about a 50 ft. path would terribly ruin my view and enjoyment.

IND510-1 | I know it seems feasible to turn toward the light line area but I don't know why the pipe line can't be moved much further back to the creek which runs way behind my property where I won't see. That way I can still enjoy nature from my back porch. I strongly request this be done. I don't want the pipe line directly behind my property. I have spoken to my neighbor who owns the property directly behind me and he agrees.

When this route takes a sharp turn it comes very close to 2 of my neighbors' homes beyond mine. They are also not thrilled with this alternate route because they too chose to build and live in the woods.

IND510-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS.

IND510 – Susan Farr (cont'd)

20161028-0013 FERC PDF (Unofficial) 10/28/2016

IND510-1
(cont'd)

Also, as I pointed out to the men that were walking my property, we are on a rock ledge that runs from across the road to the creek. This ledge is solid rock for about 180 ft. down. When we built, we couldn't dig down more than 18 inches for our foundation, so 23 truckloads of fill had to be brought in the raise the land up to our house. Because of this, our septic tank and sewer field had to be filled over with this dirt. The proposed gas line across the south eastern corner of my property would damage my sewer field. When we built our home, 45 years ago, a sand mound wasn't required but if the sewer field and tank had to be replaced, the cost would be more than I could afford on my fixed income. It would actually be impossible plus there would be no other location to put it.

I don't know why whoever selected this alternative route would run it so close to homes when there is plenty of wooded area behind us to locate it.

I am strongly requesting this section of the pipe line be moved further back. There is enough room to put it way back in the trees before or over the creek so I can keep my contentment of living in the woods and my neighbors would not be so affected.

Thank you,



Susan Farr
1830 Monkey Hollow Rd.
Harveys Lake, Pa. 18618
570-333-4401

IND511 – Stephen and Valorie Yatsko

20161031-5016 FERC PDF (Unofficial) 10/28/2016 10:42:20 PM

Stephen Yatsko
Valorie Yatsko
1988 Monkey Hollow Road
Harvey's Lake, PA 18618

October 28, 2016

VIA E-FILING AND US MAIL
KIMBERLY D. BOSE, SECRETARY
Federal Energy Regulatory Commission
888 First Street, NE, Room ID
Washington, DC 20426

**RE: PROPOSED TRANSCONTINENTAL GAS PIPE LINE COMPANY
ALTERNATIVE NATURAL GAS PIPELINE ROUTE
DOCKET NO.: CP15-138-00**

To whom it may concern:

We were identified as a landowner who will be affected by the path of an alternative pipeline route. We will not agree to this alternative route for the following reasons:

- IND511-1 | 1. It goes right through our back yard very close to our home and close to if not through our fish pond.
- IND511-2 | 2. On our side of the valley the ground is very saturated even in the summer months. Cutting trees would decrease the amount of water that is absorbed by them therefore leaving more water that will reach our house and foundation possibly creating water damage to our home and yard where we spend a lot of our time. And leaving our yard more saturated and unusable. The gully that runs along our property was carved out by all this water over time and in big storms it runs very high eroding it further.
- IND511-3 | 3. Cutting trees would increase the amount of wind that comes across our property which could damage our natural wood sided home or our shingled roof which we have had wind damage in the past.
- IND511-4 | 4. Cutting trees down would increase the noise. We live in the country for a reason! It is quiet and peaceful. Our privacy would also be diminished. We would be able to see our neighbors and they would be able to see us because the trees surround our home and they would

IND511-1 | Comment noted.

IND511-2 | See the response to comment PM1-132.

IND511-3 | Comment noted. Tree clearing would be limited to the construction right-of-way and temporary workspace. Due to the prevalence of forested habitats within the project area and the eventual regrowth of prior forested areas outside of the permanent right-of-way, we do not believe that construction or operation of the project would have a significant effect on the amount of wind blowing across the property.

IND511-4 | See section 4.11.2 of the EIS for an evaluation of noise impacts.

IND511 – Stephen and Valorie Yatsko (cont'd)

20161031-5016 FERC PDF (Unofficial) 10/28/2016 10:42:20 PM

IND511-4
(cont'd) need to be removed for the project and not allowed to grow back. Plus they would take a very long time to grow back after they had cut a swat to prepare the pipeline to be installed.

IND511-5 5. The aesthetic of our land would be gone. If we ever wished to sell our home it would drastically decrease the value of our property.

IND511-6 6. On the parcels without our home would be greatly affected also. The proposed line goes right across these parcels which would make them USELESS. If we were to try to sell them we would not be able to because you would not be able to sell them to someone to build a house/structure on because of the regulations on how close you can build to the pipeline or even where the land will perk to put a septic in.

Again we are against the proposed pipeline that encroaches our properties. We do not give any permission for anyone to enter our land.

Sincerely,

Stephen Yatsko
Valorie Yatsko

IND511-5 Comment noted. See the response to comment PM1-116.

IND511-6 See the responses to comments PM1-109 and PM1-170.

IND512 – Gloria Thomas and Jean Stromick

20161101-0021 FERC PDF (Unofficial) 11/01/2016

**Law Offices of
TAUNYA KNOLLES ROSENBLUM
ATTORNEYS & COUNSELORS AT LAW**

<p>TAUNYA KNOLLES ROSENBLUM*+ taunya@tkrlaw.com</p> <p>KATRINA FAUCETT* katie@tkrlaw.com</p> <p>FRANCES W. CROUSE Of Counsel fwc@hotmail.com</p>	<p>332 South Main Street PO Box 309 Athena, Pennsylvania 18810</p> <p>Telephone (570) 888-0660 Facsimile (570) 888-0660</p>	<p>*Also member New York Bar +Also member Florida Bar</p> <p>* United States District Court - Middle District of Pennsylvania</p>
--	---	---

October 28, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

**RE: Docket No. CP15-138-000
OEP/DG2E/Gas 2
Transcontinental Gas Pipe Line Company, LLC**

Dear Ms. Bose:

Please be advised I write this letter on behalf of Gloria Thomas and Jean Stromick. Their property is located at the intersection of Monkey Hollow Road and Broadway Road. The parcel is identified by Tax Parcel Number: 19-012-039-00-00-00-00 and consisting originally of approximately 33.956 acres, more or less.

Mrs. Stromick and Mrs. Thomas recently sold off the majority of their family land, keeping for themselves the field located at the intersection described above. In fact, a large portion of their original parcel remains under contract as of this date and has not yet been completed. Mrs. Stromick and Mrs. Thomas kept the beautiful open field specifically for future subdivision and sale of building lots. As proposed, the FERC line runs directly through the middle of their open field, bisecting the remaining land in two pieces. Obviously, this is going to have a significant impact on the value of the property.

IND512-1

IND512-2 Further, the access to the remaining property is from Monkey Hollow Road. Once the pipeline is placed down the middle of their parcel, there will be difficulty accessing the back half of their lands.

IND512-3 We understand that the FERC Lines are entitled to the use of Eminent Domain to obtain land. With that in mind, our intent is not to halt the project entirely, but relocating the pipeline along a property line would assist the landowners in retaining the value to the property and the future salability of the same.

ORIGINAL

2016 NOV - 1 A 9 43
RECEIVED
FEDERAL ENERGY REGULATORY COMMISSION

IND512-1 See the response to comment PM1-116.

IND512-2 See the response to comment PM3-94.

IND512-3 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS. See also the responses to comments PM1-1, PM1-109, and PM1-116.

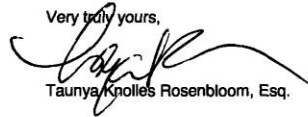
IND512 – Gloria Thomas and Jean Stromick (cont'd)

20161101-0021 FERC PDF (Unofficial) 11/01/2016

**Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Docket No. CP15-138-000
October 28, 2016
Page 2**

Mrs. Stromick and Mrs. Thomas would be happy to provide further information at the request of the Commission. Please feel free to contact me to arrange conversation with the landowners.

Very truly yours,



Taunya Knolles Rosenbloom, Esq.

TKR/

IND513 – Michael and Robin Yatsko

20161104-0019 FERC PDF (Unofficial) 11/04/2016

**Michael John Yatsko
Robin Lynn Yatsko
275 Brendan Lane
Harvey's Lake, Pa. 18618**

October 31, 2016

**Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE Room 1A
Washington, DC. 20426**

Reference Docket #CP15-138-000

Dear Kimberly D. Bose,

This letter is in regards of Reference Docket#CP15-138-000 for the Federal Energy Regulatory Commission. My name is Michael John Yatsko, of Centermoreland Pa. I am a concerned land owner over the Alternative Route gas line option and the impact it will have on my property. The intended gas line would run through the center of our property, which my family and I reside. We live in a secluded wooded area on a side of a mountain, The property was in the family for generations. I picked this area because of the nature, and the privacy value of the land. I grew up here and wanted that for my family.

IND513-1 The pipeline proposed would be in the center of our land. The pipeline would be in the area where my son plays, and hopefully in the future may build his future home. The idea of having a gas pipeline so close to the house is greatly concerning to our health, safety, and property value. The other concern we live on side of mountain, the clearing of trees causing a potential problem with damage with water run off. I am not giving permission for removal of the trees.

IND513-2 To my understanding, the 1st proposed pipeline is for a large property of a single owner of undeveloped land. The alternative route that is being proposed will go through family yards, sand mounds, ponds, and potential homes. I have spoke to several of my neighbors, they have great concerns about the impact the pipeline will have in their families lives. They are opposed to this as am I.

Sincerely ,

Michael John Yatsko
Robin Lynn Yatsko

ORIGINAL

**FILED
SECRETARY OF THE
COMMISSION**

2016 NOV -4 P 4:35

**FEDERAL ENERGY
REGULATORY COMMISSION**

IND513-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS. See also the responses to comments PM1-13, PM1-116, and PM1-132

IND513-2 Comment noted.

IND514 – Walter and Robyn Kochan

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

Kochan Response to 10/13/16 FERC Correspondence for CPL Alternate Route 12 West

IND514-1 Striking DEIS

First, since so much information was missing or erroneous in the DEIS at the time it was distributed, it should be stricken, and the public given adequate time to review the COMPLETE EIS --- not pieces sent in arbitrarily at Williams' convenience, but the entire picture and all at once, particularly since we, and many other landowners have learned of other mitigating factors in the meantime.

IND514-2 Improper Identification

We received FERC's October 13, 2016 letter stating "Your property has been identified as potentially being affected by the path of an alternative pipeline route. The route alternative locations are shown in Enclosure 1." On page 2 for CPL North it states, "Alternative 12 West would deviate from the proposed route at MP M-0142 0.35 and proceed north across Lake Catalpa Road where it would join an **existing pipeline right-of-way** for a distance of 0.9 mile..."

We have also noted that Transco/Williams' response states, "In advance of submitting a complete response to this data request, Transco is providing the Commission with a map and landowner mailing list for Central Penn Line (CPL) North Alternative 12A in Attachments 1 and 2, respectively. Please note that the attached route for CPL North Alternative 12A differs slightly from the route shown in the data request. Transco has adjusted the route to address constructability concerns identified through a preliminary engineering review of the route. The landowner mailing list includes all landowners within 75 feet of the adjusted centerline to allow for further refinement of the alternative alignment and workspace."

First, our (Kochan) property has not been consistently referenced for us to locate it on any map that we have received from FERC at any time. We have guessed it appears anywhere between milepost 24.3 to 26.8.

Secondly, although our residence is on Lake Catalpa Road, we have not received clear information of exactly how Alternate Route 12 West affects us since our property is not shown on any of the Route Alternative Maps in the mailing with Enclosure 1. This is alarming, particularly since Transco states the mailing list includes all landowners within 75 feet of the adjusted centerline. They seem to have more erroneous than correct information.



CPL North Alternative 12 West does not indicate relationship to Kochan property as prior maps do

IND514-1 See the response to comment PMI-70.

IND514-2 Comment noted. See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM



Street name is wrong. There are not 2 Scenicviews in the Goodleigh Manor Development. Presumably, they mean Meadowview.

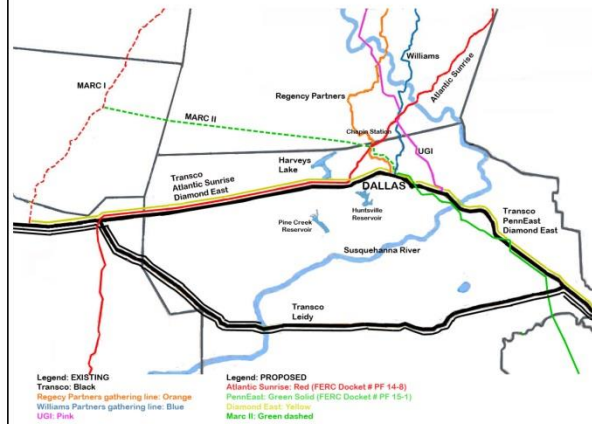
Atlantic Sunrise Project
Central Penn Line North Alternative 12 West

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-4 Co-locating Lines

The Nesbitt Alternative 12 West states the ASP would be co-located with another line until a certain point. There is absolutely no reason why the ASP cannot co-locate completely with pipelines already in place in our area --- and particularly when Transco/Williams already owns one of them. There are 3 EXISTING lines they can choose from as noted on the map below: Williams (blue), Regency Partners (orange) or UGI (pink) instead of creating yet another pipeline and one that will cross our steep side slope then back down to cross Route 309.



Tie in to our Property

FERC did not include PDF maps of Alternate Route 12 West in the CD for us to be able to enlarge to find our property, but instead sent a CD of the DEIS with old information. This does not make any sense. We want to know exactly how the proposed Alternate Route 12 West ties in with the most current route planned on our property. The last we knew, Williams accepted FERC's recommendation of Alternative Route 10A who requested a revised alignment sheet that incorporates CPL North Alternative 10A between MPs 25.6 and 25.9 --- but the language in Transco/Williams' proposed contract essentially states they can move the pipeline to wherever they want which includes their original route and which is not at all acceptable to us. We find this completely duplicitous.

IND514-4 See our analysis of the CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-4
(cont'd) **CPL North Alternative Routes 10 and 10A**

Due to our steep side slope already flooding during heavy rains and onto the public roadways, we have repeatedly requested the Atlantic Sunrise Pipeline (ASP) be moved off of our property completely, and connected directly between the Landview/Goodleigh Manor and Jackloski properties. While Williams refused these repeated requests, they strong-armed us by saying we could only suggest an alternate route from the existing entry point from Landview/Goodleigh Manor and the exit point to the Jackloski property which is how Route 10A was created --- because we took our time and interest to work *with* our neighbor, Ray Jackloski whose concerns weren't being addressed by Transco/Williams either. Still, Alternate Route 10A is not the best route to alleviate water damage to our property. Alternate Route 10 is at least above two of the retention ponds in Landview/Goodleigh Manor which would help reduce the runoff on our steep side slope. Unfortunately, the documentation supplied in this mailing from FERC does not indicate the tie in showing our property to Alternate Route 12 West.

We have also become aware that contrary to what Transco/Williams purports, Mr. Jackloski IS NOT UNDER CONTRACT for the ASP. He would also prefer the ASP be co-located with other lines and not be placed on his property. Therefore, the exit and entry points mandated to us by Transco/Williams are invalid.

The accompanying information shows that, Route 10 is further from our home where human beings and animals live and have done so for nearly 30 years. Any affected lots on Landview/Goodleigh Manor are EMPTY. No one lives there. No homes are built on this property. The accompanying FERC information states **Route 10** was not considered because it affected one more [EMPTY] building lot but indicates in the table (included here) **its construction right of way and forestland crossed would be less**. That is one more reason **Alternate Route 10 has less negative impact than Route 10A**.

Landview/Goodleigh has been having liquidation sales <http://backmountainland.com/> to try and get rid of these EMPTY building lots because they haven't been able to sell and develop this area as they originally planned. Transco/Williams could easily purchase the EMPTY lot affected for its pipeline, especially at reduced prices of 5 acres for \$29,900. We, on the other hand, cannot get back the tract of land the ASP will destroy. **We stand MUCH MORE TO LOSE than Landview/Goodleigh Manor does with an EMPTY building lot that they haven't been able to sell.** They would actually benefit by Transco/Williams purchasing it. **Route 10 would essentially benefit Landview/Goodleigh Manor, Kochans and Jackloskis.** It's simple common sense.

To reiterate our concerns, our property often floods after a significant rainfall and during spring snow melt and that flooding often extends onto Lake Catalpa Road and Pennsylvania Route 309 (PA 309). The right-of-way clearing along the proposed route would increase storm water runoff and exacerbate the flooding issues. **The Dallas Township Board of Supervisors submitted comments to FERC and verified that we live on a flood-prone property that is adversely affected during heavy rains. Dallas Twp. also reiterated that clearing the pipeline right-of-way along the proposed route could increase flooding in and around our property.**

As previously reported by FERC:

- CPL North Alternative 10 (Alternative 10) follows the same alignment as the proposed route

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-4 (cont'd) from MPs 24.3 to 25.6. At MP 25.6, the alternative turns and proceeds east for 0.1 mile following the southern property boundary of the Jackloski property to avoid bisecting his pasture and affecting his septic system. It then turns and proceeds north across our steep side slope of forestland and the Goodleigh Manor Subdivision. **Alternative Route 10 is shorter than Alternative 10A.** Alternative 10 would cross five UNDEVELOPED lots within the Goodleigh Manor Subdivision.

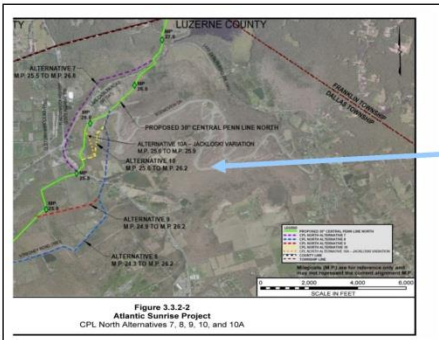
- CPL North Alternative 10A (Alternative 10A) follows the same alignment as the proposed route (and CPL North Alternative 10) to MP 25.6. The alternative then turns and proceeds east for 0.1 mile following the same alignment as CPL North Alternative 10 along the southern property boundary of the Jackloski property to avoid bisecting his pasture and affecting his septic system. From there, the alternative proceeds northwest to MP 25.9 where it **rejoins the proposed route**. It then follows the same alignment as the proposed route to MP 26.8. Alternative 10A would cross four UNDEVELOPED lots. While this is one less UNDEVELOPED lot within the Goodleigh Manor Subdivision, it is an UNDEVELOPED LOT – NOTHING EXISTS ON IT versus our home, outbuildings and property for where we have lived for nearly 30 years.

- The environmental comparison of Alternatives 10 and 10A are noted in Transco/Williams table 3.3.2-4:

TABLE 3.3.2-4
Comparison of the CPL North Alternatives 7, 8, 9, 10, and 10A to the Corresponding Segment of the Proposed Route for the Atlantic Sunrise Project

Environmental/Planning Factor	Unit	CPL North Alternative 7	CPL North Alternative 8	CPL North Alternative 9	CPL North Alternative 10	CPL North Alternative 10A	Proposed Route
Length	miles	2.8	2.7	2.8	2.8	2.8	2.8
Length adjacent to existing right-of-way (percent)	miles	1.0 (36)	1.3 (48)	0.6 (24)	0.4 (14)	0.5 (19)	0.5 (20)
Construction	miles	25.4	29.5	27.3	27.3	25.4	27.3
Forestland	miles	1.9	1.9	1.7	1.6	1.7	1.6
Agricultural land	miles	0.4	0.8	0.8	0.8	0.8	0.7
Residences within 100 feet of route	no.	3	3	1	0	0	0
Residences within 500 feet of route	no.	0	6	6	5	4	4
Watercourses crossed	no.	2	2	3	2	2	2
Wetlands crossed	no. (wet)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Road crossings	no.	4	0	0	0	0	0

Based on a 50-foot-wide construction right-of-way.



Alternate 10 is the only possibly acceptable alternative route for the ASP on Kochan property where it is more flat.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-5 Violated Ordinances

If this proposed Atlantic Sunrise Pipeline were a "gathering line," it would be violating our Dallas Twp. Ordinances. A simple piece of paper indicating whether a pipeline is a "gathering line" or a FERC approved line is not a reasonable basis for constructing a hazardous pipeline that breaks ordinances that serve to protect our community and environment. If Williams was honestly a good neighbor, they would adhere to the following Dallas Twp. Ordinances:

B. Stream channels, swales, springs and other lowland areas are resources that warrant restrictive land use controls because of flooding hazards to human life and property...

1. To the greatest practical extent the following activities shall be minimized:

a. Disturbance to streams and drainage swales.

b. Disturbance to year-round wetlands, areas with seasonally high water tables, and areas of surface water concentration.

C. Woodlands

Woodlands occur extensively throughout the Township, often in association with stream and wet areas, poor and erodible agricultural soils, and moderate to steep slopes.

Woodlands serve as a valuable resource in its ecological functions: i.e., in protecting steep slopes, erodible soils, maintaining stream quality and providing for wildlife habitats.

All subdivisions and land developments shall be designed and constructed in a manner which shall to the greatest practical extent:

1. Minimize the loss or degradation of woodland areas.

2. Preserve woodlands along roadways, property lines and lines occurring within a site such as streams, swales, stone fences and hedgerows shall be considered in the proposed design of the site.

3. Minimize disturbance or removal of woodlands occupying environmentally sensitive areas. This shall include but not necessarily be limited to, vegetation performing important soil stabilizing functions on wet soils, stream banks and sloping lands. No tree clearing, grading and/or earth disturbance (except for soil analysis for proposed sewage disposal systems) shall be permitted on a site prior to preliminary plan approval.

D. Slopes

Moderately sloping lands (15 to 25 percent) and steeply sloping lands (over 25 percent) are prone to severe erosion if disturbed. Erosion and the resulting overland flow of soil sediments into streams, ponds and public roads, are detrimental to water quality and aquatic life, and a potential hazard to public safety. Areas of steep slope shall be preserved in accordance with the following:

IND514-5 Comment noted. See the response to LA3-1.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-5
(cont'd)

1. All grading and earthmoving on slopes exceeding 15 percent shall be minimized.
2. No site disturbance shall be allowed on slopes exceeding 25 percent except grading for a portion of a driveway accessing a single family dwelling when it can be demonstrated that no other routing which avoids slopes exceeding 25

IND514-6

Documented Threats

FERC needs to base its decisions for granting pipelines on the truth of what is already happening with many of the pipelines it has approved, rather than rely on inaccurate data supplied by Transco/Williams (and other pipeline companies). In the few years since this process has begun for us, there have been 92 "reported" pipeline accidents in the U.S., 5 in Pennsylvania from 2014 to-date, and 13 involving Williams pipelines. This is REALITY. It is unconscionable that FERC **blanketly** grants certificates to any pipeline company much less **pipeline companies with poor safety records such as Transco/Williams**.

Just weeks ago, on October 21, 2016, a pipeline ruptured during heavy rains, flash floods and landslides in Lycoming County which is only 67 miles away from us. An estimated 55,000 gallons of gasoline spilled into a tributary of Loysock creek. (This occurred on a piece of land not nearly as steep as ours.) Several area towns had to shut off or alter their drinking water sources due to this Sunoco pipeline accident.

With Williams' poor safety record and a history of having their pipelines rupture from heavy rains and mudslides, FERC cannot rationally approve the ASP on our steep mountain slope. And especially when we have repeatedly stated our concerns for two-and-a-half years about historical flooding from our steep side slope. Flooding to two state roadways during heavy rains already occurs -- and this is before the ASP would necessitate dynamiting, disrupting natural streams and springs, and ripping out mature trees for an unnecessary pipeline.

Take another good look at these photos, FERC, and realize the harms way you are placing us in if you allow the ASP to be built on our steep side slope that has a history of flooding in heavy rains. Obviously, whatever engineering plans Transco/Williams presented to FERC for their pipelines that subsequently ruptured from mud shifting during heavy rains were inadequate. FERC cannot allow this to happen to us. The Department of Environmental Protection fining Williams for such a tragedy is not going to restore our home or property if FERC allows the ASP to be built on our property.



Flooding that caused Lycoming County Pipeline rupture of 55,000 gallons of gasoline into a tributary.



Receding waters on our property after heavy rains on our steep side slope flood our yard and public roadway.

IND514-6 See the response to comment PM1-13.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-6
(cont'd)

This recent Lycoming County rupture was detected *only after* a decrease in pressure and residents noticed a strong smell of gasoline. The proposed ASP for our property is on the steep hillside surrounding our home. We are senior Americans. We will not be continually checking the pipeline for safety. Nor should it be yet another burden forced upon us in this undemocratic process. By the time a rupture is detected, it will be too late. The placement of the ASP on our property puts us in the Blast/KILL zone where we would be incinerated. Immediately.

The DEP acknowledged the area of the Lycoming County rupture is **difficult to access safely because of heavy flooding**. Does FERC think our steep mountain is going to be any easier to access? If DEP stated they have to wait for "the flood waters to recede before determining the source of the rupture," which may not be for days since rain was expected to continue, how safe is that for us and the public? Our water, shallow well, and land will be contaminated.

Government data on pipeline spills shows Sunoco pipelines leak more often than any other operator, with 200 releases since 2010. How can FERC continue to grant any more certificates to a company with a substandard operating record? To do so is acting irresponsibly and intentionally putting the public at risk. **Transco/Williams also does not have an acceptable safety record and should not be granted anymore pipeline certificates until it can properly handle the lines it already has.** Transco/Williams prior rupture in Lycoming was due to "G5 - Material Failure of Pipe or Weld." With all the pipes they have already purchased from Turkey for their ASP project, and with their prior welds failing, does FERC really think we believe this pipeline will not be devastating to us?

With more extreme weather events and the streams on the mountain already known to flood our property, and tragic events already occurring and more frequently with pipelines, FERC cannot realistically grant Transco/Williams approval to dynamite through out steep side slope, disrupt the natural streams and springs, and rip out the mature trees that are already having a difficult time controlling erosion and flooding.

When the ruptured Sunoco pipeline was exposed to flood waters in 2011 during Tropical Storm Lee, sections of the rupture were replaced. Now, only 5 years later, this same pipeline has ruptured again. Obviously, this was poor engineering - TWICE. We cannot afford a similar disaster on our property. Do you really think we believe that once they destroy our land, if there is a problem with the pipeline and it destroys our home, that Williams is going to be responsive?

Let it be stated in the record, we are **COMPLETELY OPPOSED TO ANY PIPELINE BEING BUILT ON A STEEP SIDE SLOPE on our property.**

"Fuel lines should not be placed near or under streams in mountainous areas that flood violently," stated Lycoming County residents suffering from the most recent pipeline rupture in their area. The air has been so full of petroleum fumes that residents could taste it. **Two disasters in 5 years is not acceptable.** We have repeatedly told you, FERC, and Transco/Williams that our mountain does flood violently. To ignore this serious hazard and grant Transco/Williams permission to build the ASP on our steep side slope would be completely negligent and reckless.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-6
(cont'd) Presumably, FERC is getting enough industry money that it is blanketly granting pipelines then passing the buck to PHMSA to monitor them. Such as the Sissonville blow up in a rural area where inspections do not frequently occur. That line that exploded in Sissonville in 2012 **hadn't been inspected for 24 years**. "The first explosion blew a 73 pound chunk of rock through the air and through the roof of someone's house." **This is only one of too many examples of poor communication and haphazard operating and safety procedures that are causing accidents around our country due to unsafe pipelines.**



Fireball across Interstate 77 from
2012 pipeline explosion

The following list is only a fraction of pipeline accidents that FERC is partially responsible for by granting a certificate, and probably blanketly. This sampling of "Reported" Pipeline Accidents since 2014, highlights those in [Pennsylvania](#) and by [Transco/Williams](#)

2014:

1. (January) A fire at [Williams'](#) Windsor, New York compressor station **was the second in less than two years**.
2. (March 11) Repeated equipment failures at a gas transfer station on Sauvie Island serving Portland, Oregon caused several evacuations. **Gas releases went on for two months before the company notified residents. Residents complained that federal regulators failed to investigate until they brought political and media pressure.**
3. (March 31) a pipeline running to a [Williams Companies](#) LNG storage facility in Plymouth, Washington **exploded** and sent shrapnel flying that ruptured an LNG storage tank. Nearly **1,000 residents were evacuated** and **at least five employees at the facility were injured**.
4. (April 5) A 12-inch [Williams Companies](#) gas pipeline failed at a weld in Moundsville, West Virginia causing an **explosion and fire** that scorched trees over a 2-acre area near Moundsville. Several houses were evacuated.
5. (April 23) **an explosion and fire** hit a [Williams Companies](#) gas processing plant in Opal, Wyoming. **ALL residents of the town were evacuated**, and part of US Highway 30 was closed.
6. (May) The U.S. Chemical Safety Board expanded its investigation of safety practices at [Williams Companies](#) after the incidents in Washington, Wyoming, and Louisiana. The lead investigator for the Board said, **"With a strong corporate oversight of process safety, it would be very unlikely to have three incidents like this in a 12-month period."**
7. (June) A blast at a Louisiana chemical plant owned by [Williams](#) **killed two workers and injured 80**.

IND514 – Walter and Robyn Kochan (cont'd)

20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-6
(cont'd)

8. (July 10) a vent stack at a [Williams Field Services](#) gas pipeline compressor station in [Susquehanna County, Pennsylvania](#) **caught fire**. Minor damage was reported at other parts of the station.

2015:

- (April 9) Two [Williams Companies](#) pipelines broke within hours of each other in Marshall County, West Virginia.
- (April 14) Heavy rains in Marshall County, West Virginia **caused mud to shift and rupture two Williams pipelines**. Nearby Little Grave Creek was **contaminated with about 132 barrels of condensate**. **Five families were evacuated**. The following day the Department of Environmental Protection **fined Williams** for the leak.
- (April 28) **After two weeks of looking, Williams** finally located the source of the condensate leak. **Over 5,500 gallons of condensate leaked** during the first few days.
- (June 9) a [Transco Williams](#) 24-inch natural gas **pipeline ruptured** in [Lycoming County, Pennsylvania](#). About 130 individuals were evacuated from their homes. The cause was **Stress corrosion cracking**.
- (July 15) two workers were hurt by an explosion, when a bulldozer hit a 4-inch gas pipeline, at an EQT gas compressor station in [Worthington, Pennsylvania](#).
- (October 8) an **explosion** occurred at a [Williams Companies](#) pipeline facility in Gibson, Louisiana. **4 employees were killed, and, one other injured. The cause of the explosion was from procedure not being followed during welding work.**
- (October 25) **A state-designated inspector found 10 erosion and sedimentation control violations by Williams workers** during two recent inspections of the Rock Springs gas pipeline being built across 10 miles in [southern Lancaster County, Pennsylvania](#). **This followed a rain storm** that dumped more than 3 inches in the area over five days in late September and early October.

2016 (until October 21st):

- (April 29) a 30-inch Texas Eastern/Spectra Energy **pipeline exploded, burning alive a man who was running for safety**. It **destroyed his home and damaging several others**. The incident was reported at 8:17 a.m., near the intersection of Routes 819 and 22 in [Salem Township, Westmoreland County, Pennsylvania](#). Later, Spectra Energy Corp. announced plans to dig up and assess 263 miles of that pipeline, from Pennsylvania to New Jersey. **Corrosion had been detected at the failed seam 4 years before the rupture.**
- (October 21) an 8 inch Sunoco **pipeline ruptured** in [Lycoming County, Pennsylvania](#), **spilling about 55,000 gallons of gasoline into the Susquehanna River**. The river was running high at the time.

IND514-7

Unconstitutionality and Eminent Domain

Lastly, our Pennsylvania Supreme Court ruled that portions of the law restricting local zoning rights is unconstitutional, and struck down the use of eminent domain in the case of natural gas storage facilities. The court said that while some portion of storage may benefit the public, it was **primarily beneficial to business interests**. It is EXACTLY the same with the proposed Atlantic Sunrise Pipeline --- it is PRIMARILY TO BENEFIT BUSINESS INTERESTS; IT IS NOT TO BENEFIT THE PUBLIC in Dallas Twp., or Pennsylvania or the United States. The Atlantic Sunrise Pipeline is SOLELY TO BENEFIT THE POCKETS OF TRANSCO/WILLIAMS AND FERC EMPLOYEES. The Supreme Court correctly noted that **everything the citizens sought to be declared unconstitutional was declared unconstitutional**.

Article I Section 27 of our Pennsylvania constitution states: **“The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment.”** We are the people. We have a right to clean air, pure water, and to the

IND514-7 See the response to comment PM1-1.

IND514 – Walter and Robyn Kochan (cont'd)

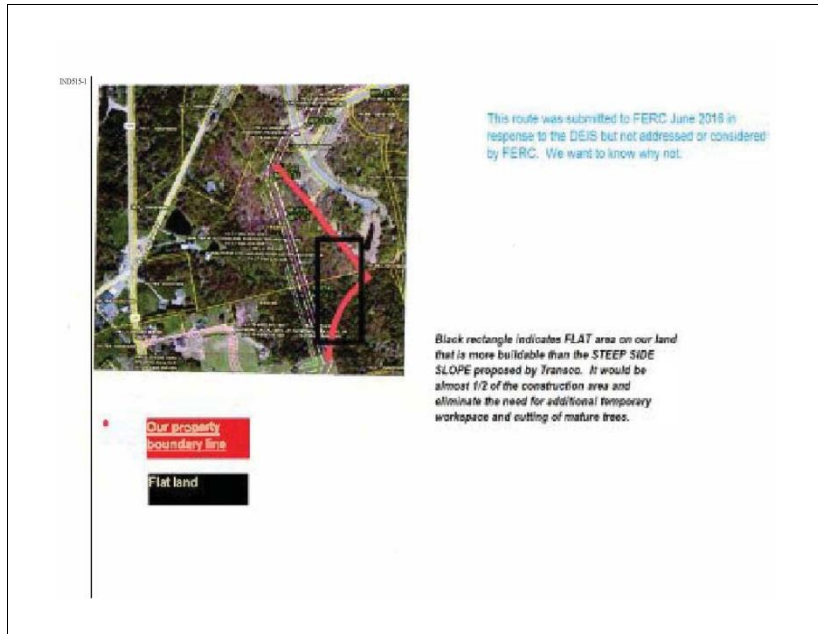
20161108-5134 FERC PDF (Unofficial) 11/8/2016 4:16:11 PM

IND514-7
(cont'd) preservation of our environment. For FERC to grant Transco/Williams a certificate for its ASP and a route through our property is violating our Pennsylvania constitution and our own rights on our property. Likewise, FERC approving the use of eminent domain for the Atlantic Sunrise Pipeline IS UNCONSTITUTIONAL. It is not for the public good. It is only for the greed of the industry.

We have no confidence in this project being handled fairly or competently. It has been complete obfuscation from the beginning and completely unconstitutional. To drastically move the pipeline only after a wealthy landowner hires an expensive law firm to state its case, and to ignore the common landowners pleas is prejudicial. We have repeatedly requested the route be moved as far away from our home, outbuildings and ponds as possible. Our local Dallas Twp. Ordinances explain exactly why that is so necessary for our safety and well-being. News stories of what is really happening with pipelines --- ruptures and spills, prove the dangers we face if the ASP is allowed to be built on the steep slopes surrounding our home and property. To disregard this information is devaluing life in favor of greed.

To underscore our response to Alternative Route 12 West, **WE ARE OPPOSED TO THE ATLANTIC SUNRISE PIPELINE BEING BUILT ON ANY STEEP SIDE SLOPE ON OUR PROPERTY.** After all of our obviously well-considered and valid points, we are requesting FERC to realign the ASP to co-locate with any of the three pipelines already in our community (one already owned by Transco/Williams) or our proposed Route 10 which is not on a steep side slope.

IND515 – Walter and Robyn Kochan



IND515-1 See the response to comment PM3-58.

IND516 – Walter and Robyn Kochan

20161110-5011 FERC PDF (Unofficial) 11/9/2016 9:55:25 PM

CPL NORTH ALTERNATIVE 12 WEST – 2 VARIATIONS

IND516-1 There is absolutely no reason why Transco/Williams cannot purchase the defunct Penn State Seed property along Route 309 North in Dallas Twp., PA that has long been for sale and would accommodate their Atlantic Sunrise Pipeline rather than rob and destroy existing landowners' properties --- except that Transco/Williams has not even attempted to use this as an alternative route because they are greedy and do not want to redo their work or pay for a tract of land when they can rob us and destroy our home and property instead.

Transco/Williams has depicted CPL North Alternative 12 West for the Nesbitt property to be rerouted to tie in with an existing right-of-way. There is no reason why the entire Atlantic Sunrise pipeline in the area be tied in with that right-of-way, particularly since Transco/Williams owns the existing right-of-way for the Chief line that was installed here a few years ago. The attached map shows 2 variations of CPL North Alternative 12 West that avoid the ASP crossing Lake Catalapa Road and ill-affecting Goodleigh Manor, Kochan and Jackloski properties, by purchasing the Penn State Seed property. These variations would also tie in to the existing ROW and eliminate switching back on Route 309 by instead running parallel with it as well as eliminate the problems with the Nesbitt, Kochan and Jackloski properties.

If FERC is going to follow its own regulation (18 CFR Section 380.15(d) **to require applicants to consider the use, widening or extension of existing rights-of-way**, and if FERC is concerned about protecting trees, then they must require Transco to investigate these variations in good faith because it is the only path in our area to mitigate environmental impact. To do otherwise, is to allow Transco/Williams to bully landowners who cannot afford extensive legal expense to protect their properties and demand a reasonable alternative as the Elefant legal firm has accomplished.

IND516-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND516 – Walter and Robyn Kochan (cont'd)



IND517 – Walter and Robyn Kochan

20161114-5103 FERC PDF (Unofficial) 11/13/2016 10:51:47 PM

Kochan 11-11-16 Response to Alternative 12 West Route

IND517-1 **Transco/Williams' Bad Information**

The Dallas Twp. landowners who have been intimidated, deceived and bullied by Transco/Williams do NOT WANT their properties and peace of mind destroyed for the Atlantic Sunrise (ASP), or any pipeline. This includes the Nesbitt property associated with Alternative 12 West and runs through the Byron and Bernstein properties.

Transco/Williams has wasted millions of dollars and everyone's time by not working with us landowners or our community. Instead their tactics are to blanket communities with propaganda --- lying that they work with us when nothing is farther from the truth. It is irrational for FERC to base its decision on information solely provided by Transco/Williams when most of that information is erroneous, outdated or incomplete.

IND517-2 **Alternative to Save Landowners' Properties and Decrease Environmental Destruction**

Transco/Williams already uses the nearby Chapin station (just over the Luzerne County line, in Wyoming County) to dehydrate and odorize their natural gas. There is absolutely no reason that Transco/Williams cannot co-locate their Atlantic Sunrise pipeline (ASP) with any of the existing pipelines in our area rather than destroy more of our community.

Co-locating the ASP would alleviate dynamiting steep side slopes and destroying acreage and natural springs from the Nesbitt, Goodleigh Manor/Landview, Kochan and Jackloski properties. It is well documented that steep side slopes are more hazardous for natural gas pipelines whether in construction or in adverse weather. The co-located route could be followed to the Wilke property who is okay with having the ASP on the "boundary" of his property, but not through it.

If FERC truthfully follows its own rules to investigate every potential route for less environmental damage, then there is no reason that Transco cannot follow their own existing line (in what use to be the Chief line). Those landowners had already agreed and were paid to have their land disrupted from the Chief pipeline. It has also come to our attention that there are new landowners in that area who would be willing to take Transco/Williams' blood money and have the ASP on their properties.

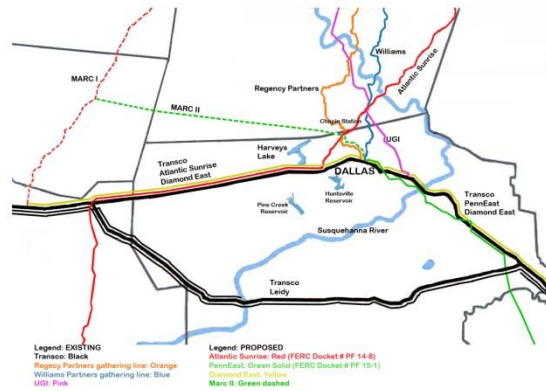
Again, for FERC's easy reference, this map indicates existing lines where Transco/Williams can co-locate their ASP.

IND517-1 See the response to comment PM1-22.

IND517-2 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND517 – Walter and Robyn Kochan (cont'd)

20161114-5103 FERC PDF (Unofficial) 11/13/2016 10:51:47 PM



FERC's Dreadful and Often Deadly Decisions

If FERC does not properly investigate every possible alternative route to avoid unnecessary destruction to landowners and/or the environment, and allows Transco/Williams (or any other pipeline for that matter) to arbitrarily place their pipeline where they want, without consideration to landowners and the environment, then you, FERC, have failed at your supposed goal to "Promote Safe, Reliable, Secure, and Efficient Infrastructure." **To allow the ASP to be built on the steep side slopes from the Nesbitt through the Kochan properties in particular is NOT SAFE, RELIABLE, SECURE or EFFICIENT.**

When you are making your decisions, FERC, about the proposed Atlantic Sunrise Pipeline, we strongly suggest you consider **all of the families and properties already destroyed by the industry who pays your salaries**. Instead of being ruled by greed, perhaps reality will guide your conscience. Unfortunately, this is only a small sampling of landowners whose lives, properties and health have been destroyed from pipelines and natural gas, many of whose situations are too closely linked to ours:

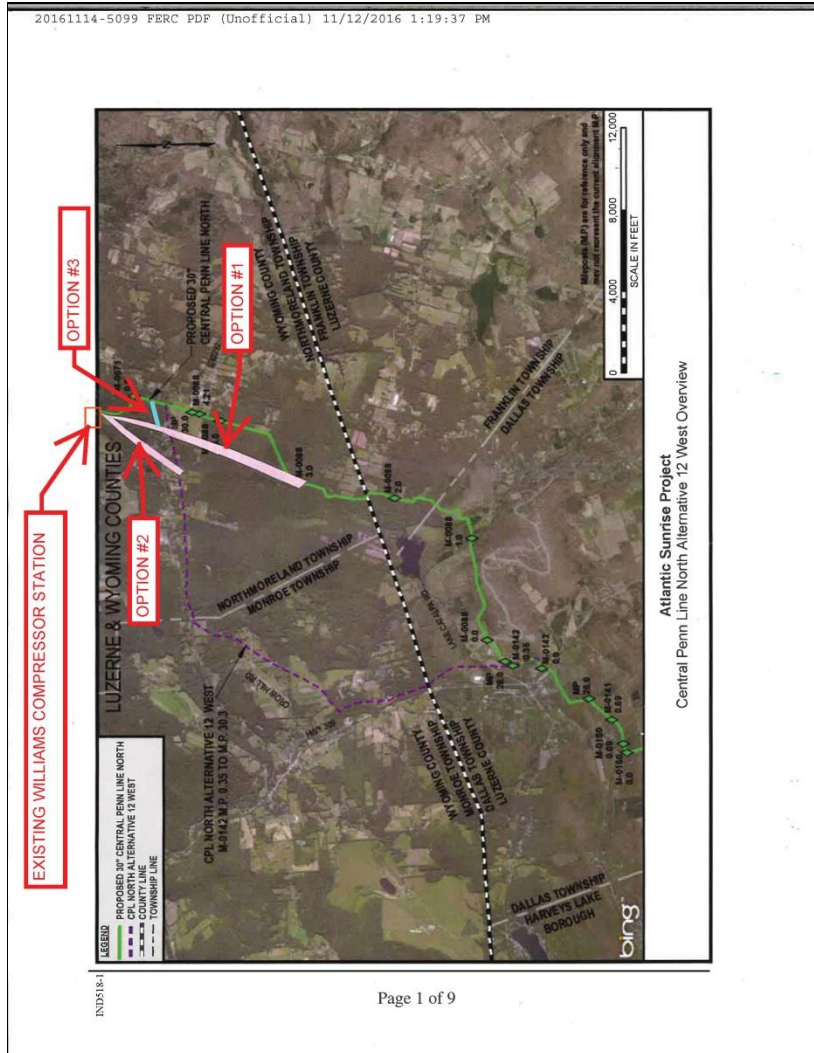
2. James and Karla Levy

Location: Bedford County, PA
Gas Facility: Spectra Energy Steckman Ridge storage field, **pipelines**, compressor stations
Exposure: **Water-methane**
Symptoms: Unknown, replacement water or relocated
http://www.spectraenergywatch.com/blog/?page_id=92&paged=2

IND517 – Walter and Robyn Kochan (cont'd)

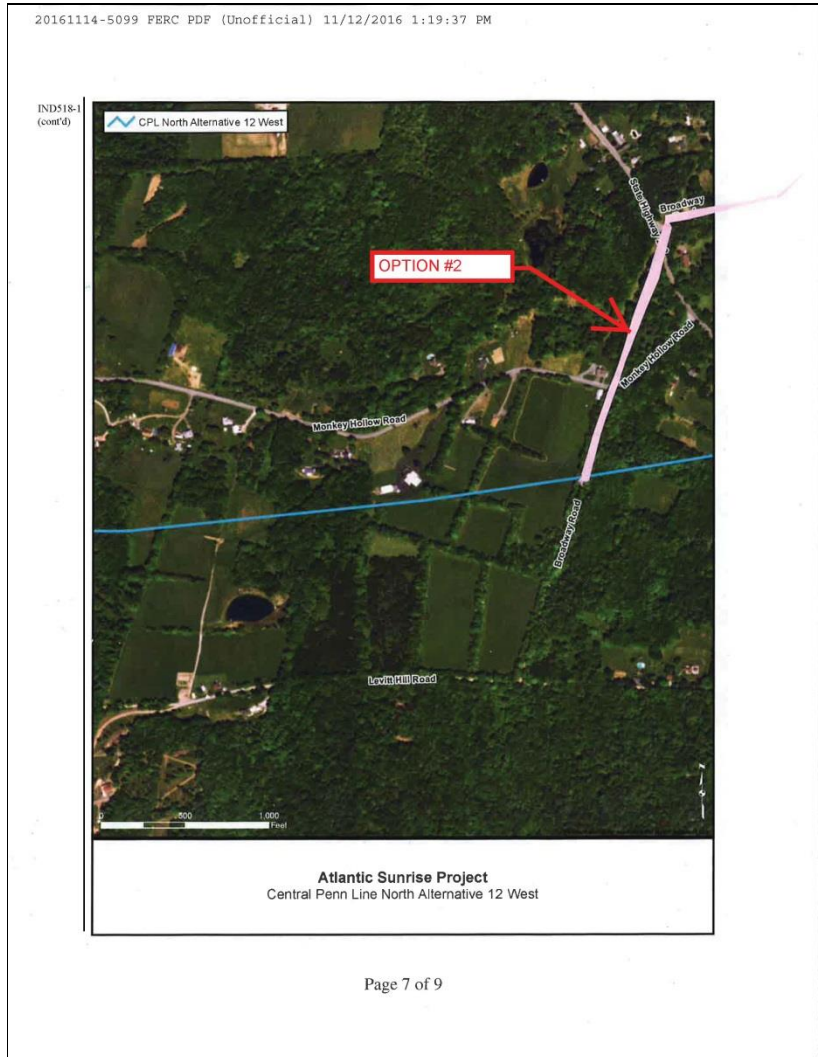
The attachments to this letter have been removed from this environmental impact statement. They are available for viewing on the Federal Energy Regulatory Commission's (FERC) website at <http://www.ferc.gov>. Using the "eLibrary" link, select "General Search" from the eLibrary menu, enter the selected date range and "Docket No." excluding the last three digits (i.e., CP15-138, PF14-8), and follow the instructions. For assistance please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at 1-866-208-3676, or for TTY, contact 202-502-8659. The Category/Accession number for this submittal is 20161114-5103.

IND518 – Anonymous

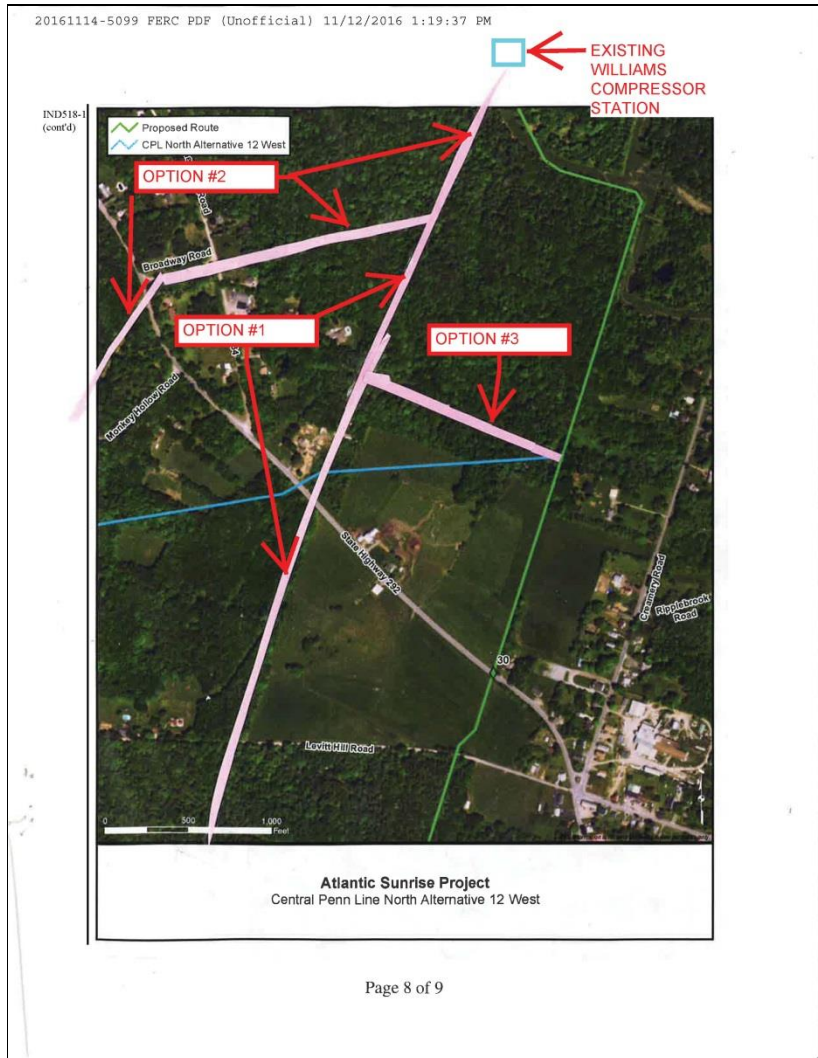


IND518-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND518 – Anonymous (cont'd)



IND518 – Anonymous (cont'd)



IND519 – Robert and Susan Stanski

20161114-5019 FERC PDF (Unofficial) 11/13/2016 9:55:46 PM

Mr & Mrs Stanski, Harveys Lake, PA.
DATE: 11/13/16

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: OEP/DG2E/Gas 2
Transcontinental Gas Pipe Line Company, LLC
Docket No. CP15-138-000

IND519-1 I am writing to express my strong opposition of the Central Penn Line North Alternative 12 West Route. This alternative route affects 51 different land owners. It crosses agricultural land, forestland, wildlife and wet lands. The proposed route of this Pipeline is running within 100 feet or less of resident's homes, and roads that school buses travel on. This pipeline does not provide any benefit to local residents, yet we are forced to absorb the adverse environmental and economic impacts, not to mention the safety risks during the construction phase and the dangers this pipeline presents in the event of leaks and explosions once fully operational.

The Central Penn Line South Route does not affect as many land owners and doesn't endanger the lives of as many people once it is fully operational. The landowners on the South Route were aware of the pipeline for the last year and a half, while the North Alternative Route was just informed about one month ago.

I strongly feel that if the North Alternative 12 West Route is picked over the Central Penn line the landowner should be entitled to a longer time to negotiate a right-of-way easement and compensation. An alternative route would be to run the pipeline along the back of our properties closer to Levitt Hill Road.

We as landowner were told that an alternative route was looked at because one individual didn't want the pipeline to run through their property. We hope that the Federal Energy Regulatory Commission would look at both routes and pick the one that doesn't impact as many human lives. Human lives should count as much as much as environmental impacts. We hope that the government protects everyone and not just the ones that can afford their own environmental studies.

I strongly urge you to carefully review both routes.
Thank You
Mrs. Susan Stanski and Mr. Robert Stanski

IND519-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND520 – Paul and Linda Littleford

20161114-5013 FERC PDF (Unofficial) 11/13/2016 10:07:35 AM

Paul J Littleford, Harveys Lake, PA.
As a concerned land owner I do not want the gas pipeline to go thru my property as close to my house and outbuilding as mapped. for the following reasons.

IND520-1|1- Safety, Too close to the house, out buildings and well.

IND520-2|2- Goes directly thru the center of the property causing limited further development. There is a lot of room to move it to the back line.

IND520-3|3- It will devalue our property and make it very difficult to resell.

IND520-4|4- There are many underground springs and it could cause drainage issues and possibly contaminate our well.

Sincerely,

Paul & Linda Littleford

IND520-1 See the response to comment PM1-13

IND520-2 See the response to comment PM1-132.

IND520-3 See the response to comment PM1-116

IND520-4 See the responses to comments PM1-174 and PM2-57.

IND521 – Holly Lambert

20161114-5012 FERC PDF (Unofficial) 11/13/2016 9:19:48 AM

IND521-1 | Holly Lambert, Monroe Twp., PA.
HI MY NAME IS HOLLY LAMBERT AND I DO NOT WANT THE PIPELINE TO RUN THROUGH
MY PROPERTY. I ALREADY HAVE ON PIPELINE FROM CHEIF GATHERING AND I HAVE NO
PROPERTY LEFT .

IND521-1

Comment noted. See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND522 – Robert H. Lowing

20161114-5010 FERC PDF (Unofficial) 11/12/2016 2:51:20 PM

Robert H. Lowing, Lancaster, PA.
Alisa M. Lykens, Chief
Re: OEP/DG2E/Gas 2
Transcontinental Gas Pipe Line Company, LLC
Docket NO. CP15-138-000

Dear Ms. Lykens,

Thank you for inviting me to comment on the proposed 42" Central Penn Line South Conestoga River Alternative (CPL, South Route Deviation M-0297).

The proposed Deviation M-0297 fails to mitigate the hazards to residents and environmental impacts created by the current proposed route it seeks to replace.

- IND522-1 1. The proposed deviation increases the negative environmental impact by including a major bridge over the Conestoga River at Safe Harbor Park in a hazard zone.
- IND522-2 2. Like the current proposal, the proposed deviation impacts the surrounding core habitat and the supporting landscape on both sides of the Conestoga River. The Safe Harbor East Woods in Manor Township is impacted as well as steep slopes of 15% or more in Conestoga Township.
- IND522-3 3. Like the current proposal, the proposed deviation intrudes upon 10.08 acres of open space in the Lancaster Conservation Agricultural Easement 9 and the Kauffman Easement in Manor Township.
- IND522-4 4. I have personally met a landowners in Manor Township who did not receive the OEP document (20161013- 20161027-5191(31755256).pdf informing them that their property was "potentially being affected by the path of an alternative pipeline route."
- IND522-5 5. A rational person would consider this impasse, created by a greenfield project, as another reason to implement the Western CPL South Alternative 3 (20160627-5118(31539430), co-aligning the CPLS pipe with the Texas Eastern Pipeline ROW in York county.

Respectfully,
Robert H. Lowing
Lancaster PA.

- IND522-1 See the response to comment PM1-13.
- IND522-2 Comment noted. See our analysis of the Conestoga River Alternative in section 3.3.2 of the EIS.
- IND522-3 Comment noted. See section 4.8.6.2 of the EIS for an evaluation of conservation easements crossed by the Project.
- IND522-4 Comment noted. A notice was sent to landowners whose property could potentially be affected by the alternative pipeline route.
- IND522-5 See the response to comment IND165-1.

IND523 – Mark and Malinda Clatterbuck

20161115-5003 FERC PDF (Unofficial) 11/14/2016 11:02:04 PM

Mark and Malinda Clatterbuck, Holtwood, PA.
Letter to the Federal Energy Regulatory Commission
Mark and Malinda Clatterbuck, Southern Lancaster County
Submitted: November 14, 2016
Re: CPL South Route Deviation #M-0297

IND523-1 We write today regarding the Williams/Transco "minor route deviation" (#M-0297) for the Central Penn Line South along the Conestoga River in southern Lancaster County. The newly proposed route, as well as the timing of the request, suggests an attempt by the industry to quietly side-step public opposition to the ASP project. Their letter suggests that an unspecified conservation easement is responsible for the requested route change. However, since scores of preservation and conservation easements are being violated by the ASP route, that's hardly a convincing explanation.

We think there may be another reason.

Dated October 7, 2016, the Williams/Transco re-route request was submitted the same week that local residents began publicizing plans to dedicate a blockade directly atop the (then-preferred) site where Williams intended to cross the Conestoga River in southern Lancaster County. The proposed 1.4-mile mini-reroute attempts to neatly circumvent the site of this blockade located on the property of landowners who adamantly oppose the ASP and have repeatedly refused to sign easements with the Williams. The property in question is an Amish-operated farm. On October 22, an estimated 200 local residents gathered at that site for a commitment ceremony and community meal, demonstrating the will of the county to make good on its promise to physically block the construction of this project if FERC fails to respect the will of local communities who stand in the proposed path of the ASP.

How have local communities expressed their will?

In 2014, in direct response to the proposed Atlantic Sunrise pipeline, 1700 residents of Conestoga Township and 800 residents of Martic Township (both in southern Lancaster County) signed statements urging our supervisors to pass ordinances banning new gas pipeline projects in our townships. In both cases, the supervisors refused to advertise the ordinances or hold a vote, in direct opposition to the combined will of 2500 residents.

We'd also like to remind FERC that, by early 2015, just over 6000 public comments had been submitted to your office regarding the ASP. Of those comments, 96.9% opposed the project. Among comments that were submitted by Lancaster County residents, 98.4% expressed opposition. If FERC honestly takes public comments seriously, as you claim, why was a favorable DEIS issued to Williams/Transco despite such overwhelming opposition to the project's necessity or desirability?

IND523-1 Comment noted. See our analysis of the Conestoga River Alternative in section 3.3.2 of the EIS.

IND523 – Mark and Malinda Clatterbuck (cont'd)

20161115-5003 FERC PDF (Unofficial) 11/14/2016 11:02:04 PM

IND523-1
(cont'd) FERC should know that community members in Lancaster County are fully committed to building as many blockades, encampments, and other sites of resistance as necessary to derail this project. Williams' disingenuous attempt to slip around merely the first public structure of defiance does not change the fact that the ASP faces mounting public outrage and organized resistance throughout the county, and indeed the state. This should come as no surprise to FERC, since local communities – for the past two years, in a variety of public forums – have passionately articulated the ways in which this pipeline threatens our health, safety, homes, water, farming heritage, forests, and rural way of life.

Lancaster's blockades and encampments – those already built, and those yet to come – should not be viewed by FERC as a request to consider additional minor re-routes, which are nothing more than a sham display of industry deference to "public comments." We have no interest in privileging one farm over another, one neighbor over another, one forest over another, or one river over another.

Instead, you should regard these physical sites of resistance as a declaration that local communities have rejected this project entirely. And as demonstrated at the recent dedication of The Stand along the Conestoga River, these communities are willing to make extraordinary sacrifices to ensure that this pipeline never gets built – even if, God forbid, FERC foolishly approves this unconscionable project.

Mark and Malinda Clatterbuck
Lancaster County, PA

IND524 – Nicole Chapin

20161115-5000 FERC PDF (Unofficial) 11/14/2016 5:11:09 PM

IND524-1
NICOLE CHAPIN, MONROE TWP, PA.
I am writing asking that you NOT use the alternate route through my family's land for the proposed pipeline.

While I understand we currently have a pipeline on our land we beg of you to not force us to allow another one. We have given a lot already.

The original plan to go on the border of Ms. Nesbitt's property seems the most likely route. This will not affect any homes. If you move to the alternate route it will be very close to my home (in my driveway) and will affect wet lands and a creek on our land. Not to mention the wildlife.

My family, my neighbors and I have worked very hard to maintain our property, to build homes and lives and raise our children in the said "alternate route".

Thank you for your time.

Nicole Chapin

IND524-1 Comment noted. See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND525 – Marla Parente

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Transcontinental Gas Pipeline Company, LLC) Docket No. CP15-138

**MOTION OF THE MARLA PARENTE 2009 TRUST TO INTERVENE IN
OPPOSITION TO THE ATLANTIC SUNRISE PIPELINE**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §385.214, the Trustee of the Marla Parente 2009 Trust ("Parente Trust"), owners of approximately 140 acres of land in rural Wilkes Barre, Pennsylvania that will be traversed by the CPL North Alternative 12 West ("CPL North"), move to intervene in the above captioned proceeding in opposition to CPL North (as described below) proposed by Transcontinental Pipeline Company, LLC ("Transco"). The impacted property owner, the Parente Trust, is entitled to intervene to protect its predominantly undeveloped tract of land, which includes a residential home, from the environmental harm, safety risks and disturbance that will likely result from the proposed Atlantic Sunrise Pipeline, and to defend its constitutionally-protected property rights from a taking if the project is approved, and the CPL North route is selected. This comment focuses on the insufficiency of Transco's October 17, 2016 response to FERC's October 6 Data Request, which provided general detail on the CPL North route.

I. SUMMARY

IND525-1 The Parente Trust concerns an impacted property located at 159 Parente Lane, Monroe Township Pennsylvania (the "Property"). The Trust submits this comment to outline the substantial defects in the Data Response submitted by Transco, and the current DEIS that must be addressed in a Revised or Supplemental Draft Environmental Impact Statement ("DEIS"), including, but not limited to, those deficiencies outlined in comment letters submitted by the

IND525-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS. Also see the response to comment IND114-1.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

IND525-11
(cont'd) Environmental Protection Agency (“EPA”) and the Department of the Interior (“DOI”).

Following the September 20, 2016 submission of comments by Ms. Geraldine Nesbitt, a landowner impacted by the proposed Central Penn Line North, Transco submitted two alternative routes to FERC, one of which is the CPL North discussed herein.¹ The CPL North route will consist of approximately 58.4 miles of 30-inch-diameter pipeline through Columbia, Luzerne, Wyoming, and Susquehanna Counties. CPL North will affect 869.2 acres during construction, and 296.3 acres during operations. FERC requested additional information regarding this alternative in its Data Request of October 6 (“Data Request”).² Transco responded to FERC’s inquiry on October 17 (“Data Response”), but failed to analyze with any specificity the conditions existing along the CPL North route.³ Correcting these deficiencies will require significant new analysis and the incorporation of high quality and accurate information regarding the Project’s impacts. Public scrutiny of environmental decision-making, informed by high quality and accurate information, is essential to the purposes of the National Environmental Policy Act (“NEPA”).⁴ The Commission must allow public scrutiny of these substantial changes in a Revised or Supplemental DEIS.

II. COMMUNICATION

All communications and service related to this Application should be directed to the

¹ *Transcontinental Gas Pipe Line Company, LLC submits Supplemental Information regarding the Atlantic Sunrise Project*, Docket No. CP15-138-000, Accession No. 20161007-5189 (October 7, 2016).

² *Letter requesting Transcontinental Gas Pipe Line Company, LLC to file a complete response within 20 days re the Environmental Data Request to assist in the analysis of the certificate application under CP15-138*, Docket No. CP15-138-000, Accession No. 20161006-3000 (October 6, 2016).

³ *Transcontinental Gas Pipe Line Company, LLC submits a response to FERC Staff’s October 6, 2016 Environmental Data Request and Supplemental Information regarding the Atlantic Sunrise Project*, Docket No. CP15-130-000, Accession No. 20161017-5155 (October 17, 2016).

⁴ “NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.” 40 CFR § 1500.1(b).

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

following persons:

Marla Parente 2009 Trust
c/o Robert Polishan
159 Parente Lane
Monroe Township, PA 18612
signrenderings@yahoo.com

Natara G. Feller, Esq.*
Ann Marie Belmont, Esq.
Feller Law Group, PLLC
159 20th Street Ste. 1B
Brooklyn, NY 11232
Phone: (212) 590-0145
Email: natarafeller@feller.law

III. PROCEDURAL HISTORY

On September 20, 2016 Ms. Geraldine Nesbitt, a landowner impacted by the proposed Central Penn Line North, submitted a comment regarding the Central Penn Line's proposed route through her property.⁵ In response to the concerns raised by Ms. Nesbitt, Transco submitted two alternative routes to FERC, one of which is the CPL North route discussed herein. FERC requested additional information regarding this alternative in its Data Request. Transco responded to FERC's inquiry on October 17, but failed to analyze with any specificity the conditions existing along the CPL North route.

In its Data Request, FERC sought information, including environmental, engineering, and economic analysis of an alternative alignment along CPL North.⁶ FERC requested the analysis should include this information so that a quantitative comparison could be made with Transco's proposed original route, which was cited through a larger, non-residential section of an adjacent property. Transco submitted its response on October 17, providing quantitative data and a Biological Assessment of the CPL North route, but did not include any specific considerations of

⁵ *Geraldine Turner Nesbitt Submission of Comments in Corps Section 404 and PaDEP Proceedings*, Docket No. CP15-138-000, Accession No. 20160921-5018 (September 20, 2016).

⁶ *Letter requesting Transcontinental Gas Pipe Line Company, LLC to file a complete response within 20 days re the Environmental Data Request to assist in the analysis of the certificate application under CP15-138*, Docket No. CP15-138-000, Accession No. 20161006-3000 (October 6, 2016).

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

the properties to be affected by route.⁷

IV. MOTION TO INTERVENE

The Parente Trust, owners of approximately 140 acres of land in rural Wilkes Barre, Pennsylvania that will be traversed by the pipeline. The Parente Trust moves to intervene in the above captioned proceeding in opposition to the CPL North route proposed by Transco. The property is largely undeveloped and has a residential structure on it.

Given Atlantic Sunrise Pipeline's considerable and direct impacts to the Parente Family property, the criteria for intervention under Rule 214(b)⁸ is satisfied. Intervention will enable the Parente Family to protect its interests and attempt to avoid or minimize harm to its property. The Parente Family's interests are not adequately represented by any other parties in this proceeding, and absent a grant of party status, the Parente Family's constitutionally protected property interests will go ignored.

V. ARGUMENT

IND525-2

A. **The Army Corps of Engineers Cannot Base Decisions on an Inadequate EIS**

The Biological Assessment contained in the October 17 Data Response to the FERC Data Request brought to light new information which must be opened to public comment. The Data Response also failed to address specific conditions existing on the Property which must be addressed in any environmental impact analysis. Therefore, the current DEIS is inadequate and a revised or supplemental DEIS is required.

⁷ *Transcontinental Gas Pipe Line Company, LLC submits a response to FERC Staff's October 6, 2016 Environmental Data Request and Supplemental Information regarding the Atlantic Sunrise Project*, Docket No. CPL5-130-000, Accession No. 20161017-5155 (October 17, 2016).
⁸ 18 C.F.R. §214(b)

IND525-2 See the response to comment IND525-1.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

1. Transco is Required to Prepare a Revised or Supplemental DEIS by the National Environmental Policy Act

IND525-2
(cont'd)

Transco is required to submit a supplemental Environmental Impact Statement ("EIS"), inclusive of the information provided in the Data Response. The DEIS as it stands now is inadequate due to the substantial amount of incomplete information and analysis brought to light in the Data Response.⁹ Due to the amount of information that Transco is required to submit after the close of the DEIS comment period, this information constitutes significant new information for which a Supplemental EIS "shall" be prepared.¹⁰

Only the issuance of a revised or supplemental DEIS that thoroughly analyzes this new information will satisfy public comment procedures, which "[encourage] public participation in the development of information during the decision-making process."¹¹ Simply adding this missing information as a submission under the FERC docket, or in the Final Environmental Impact Statement ("FEIS"), is insufficient as it does not allow the same degree of meaningful public participation as a revised or supplemental DEIS.¹²

By allowing Transco to supply this information at this juncture, after the comment period on the DEIS has closed, FERC has failed to supply information and analysis regarding the Project in a manner that facilitates meaningful analysis and public participation as required by NEPA.¹³

⁹ 40 C.F.R. § 1502.9(a) ("If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion. The agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action").

¹⁰ 40 C.F.R. § 1502.9(c)(1) (Agencies shall prepare supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts).

¹¹ *Half Moon Bay Fishermans' Mtg. Ass'n v. Carlucci*, 857 F.2d 505, 508 (9th Cir. 1988).

¹² *Id.* (citing *California v. Block*, 690 F.2d 753, 770-71 (9th Cir. 1982)); 40 CFR § 1500.1(b).

¹³ *League of Wilderness Defenders/Blue Mountain Biodiversity Project v. Comaughton*, 752 F.3d 755, 761 (9th Cir. 2014).

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

IND525-2
(cont'd) This information is relevant to environmental concerns and thus requires a Revised or Supplemental DEIS.¹⁴

2. Analysis of CPL North Environmental Conditions is Inadequate

The Data Response does not include any meaningful analysis of environmental conditions outside of the Biological Assessment. A revised or supplemental DEIS is needed to address these deficiencies, and to provide the public with a meaningful opportunity to comment on the new information addressed in the DEIS.

a. *The Project will not benefit entities that do serve a public gas or electric utility*

IND525-3 The Army Corps of Engineers ("USACE") is required to perform a public interest review, which is review of the benefits and detriments of the proposed project. USACE and FERC state in the DEIS, "[a]ccording to Transco, the purpose of the project is to provide an incremental 1.7 million dekatherms per day (MMdth/d) of year-round firm transportation capacity from the Marcellus Shale production area in northern Pennsylvania to Transco's existing market areas, extending to the Station 85 Pooling Point in Choctaw County, Alabama." The proposed project has only one shipper with two customers serving Japan and one gas marketer. Therefore, at the most, the project will only benefit three private entities that do not serve a public gas or electric utility that sells to the public.

The business and financial desires of those financially invested in the Atlantic Sunrise Pipeline ("ASP") should not be confused as a public benefit or in the public interests especially considering the significant impacts that will be caused by the project. The lack of public benefit or interest is augmented by the fact the project is subject to a 20-year contract, and once that

¹⁴ See *Marsh v. Oregon Natural Res. Council*, 490 U.S. 360, 372 (1989).

IND525-3 See the responses to comments PM1-51, PM1-113, PM1-116, PM1-132, and PM1-177.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

IND525-3
(cont'd) contract expires there is no guarantee that the applicant will not abandon the pipeline. Consequently, this project is a temporary project at best that will perpetually burden affected landowners by: (1) interfering with land uses; (2) diminishing property values; and (3) increased insurance costs. When these factors are weighed against the benefits to three private entities, it is clear that this project is not in the public interest as proposed.

b. *The Data Response fails to accurately catalog or analyze adverse impacts to historical and cultural resources existing on the CPL North Route*

IND525-4 The Data Response acknowledges “there is a moderate to high potential to encounter archaeological sites along the alternative route”. The regulation adopted to implement Section 106 of the National Historic Preservation Act (“NHPA”) requires that the USACE make a reasonable and good faith effort to identify historic properties, 36 C.F.R. Sec. 800.4(b); determine whether identified properties are eligible for listing on the National Register based on criteria in 36 C.F.R. Sec. 60.4; assess the effects of an “undertaking” on any eligible historic properties found, 36 C.F.R. Sec. 800.5, 800.9(a); determine whether the effect will be adverse, 36 C.F.R. Sec. 800.6, 800.9(b); and avoid or mitigate any adverse impacts. In other words, a valid NHPA analysis involves a “three-step process of identification, assessment, and mitigation.” *Mid States Coalition for Progress v. Surface Trans. Bd.*, 345 F.3d 520, 553 (8th Cir. 2003). However, no analysis of these sites is provided with the data request.

c. *The Data Response fails to provide information sufficient to demonstrate compliance with the requirements of the Migratory Bird Treaty Act (“MBTA”)*

IND525-5 The MBTA is a criminal statute which prohibits the taking and killing of migratory birds. The MBTA allows for misdemeanor and felony penalties for violation of the act. Section 703(a)

IND525-4 See the responses to comments CO9-9 and CO31-3.

IND525-5 See the response to comment IND114-27.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

IND525-5
(cont'd) of the MBTA states in pertinent part: “Unless and except as permitted by regulations ... it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, offer for sale, [or] sell ... any migratory bird.” The regulations which implement the MBTA *define* the term “take” as “to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect.” The list of migratory birds protected under the MBTA is located at 50 C.F.R. §10.13 (2015). The information submitted by the applicant fails to show any meaningful analysis of impacts to migratory birds on the CPL North route.

d. The Data Response fails to accurately catalog or analyze impacts to wetlands or water quality

IND525-6 It is a preliminary requirement that a permit applicant demonstrate that it has taken all appropriate and practicable steps to avoid and minimize adverse impacts to waters of the United States. 40 C.F.R. Sec. 230.91(c)(2). No such demonstration has been made regarding specific wetlands and waterways of CPL North. The *applicant's* characterization of the nature and type of impacts the project will cause have not been appropriately described making any mitigation plan for the project unacceptable. The Data Response also does not address groundwater dependent wetland systems or impacts to springs.

B. The CPL North Route Will Negatively Impact the Marla Parente 2009 Trust

As noted above, the USACE is required to perform a public interest review, which is a review of the benefits and detriments of the proposed project. However, the DEIS and the Data Response fail to provide even a surface-level analysis of important considerations such as the potential impacts on nearby wetlands, drinking water, and residential properties. Therefore, the current DEIS is inadequate due to the substantial amount of incomplete information and analysis

IND525-6 See sections 2 and 4 of the EIS for a description of wetland and waterbody construction techniques and mitigation measures. Also see the revised text in section 3.3.2 of the EIS and the response to PM1-70.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

IND525-6
(cont'd) brought to light in the Data Response.

1. The DEIS and Fails to Address Wetland Conditions and Water Quality on the Property

First, the DEIS fails to consider the potential impacts of the wetlands which are known to be on the Property. As noted in the map attached hereto as Exhibit A, the proposed alternate route of the pipeline would pass right along the wetland area denoted on the US Fishery and Wildlife Service survey. The existing DEIS has not explored any of the potential impacts of placing a pipeline so close to such the sensitive ecosystem existing on the Property. Given the nature and scale of this project, it cannot be assumed that there would be no impact on the adjacent wetlands located on the Property. Without examining what those potential impacts would be, the DEIS fails to meet the requirements of NEPA.

Second, the presence of wetlands suggests that the water table on the premises is relatively close to the surface. As such, it is likely that any leaks or spillage that may result from the proposed pipeline may have an impact on both surface and groundwater, potentially threatening the local drinking water supply. Again, without evaluating the potential risks to local ground and surface water, the DEIS cannot be found sufficient under NEPA.

2. Siting the Pipeline Through the Residential Property Will Detrimentially Impact Property Use and Value

IND525-7 As described in detail above, the DEIS has not addressed the potential impacts selecting this alternate route would have on nearby residents. Given the nature and scale of this project, there will be a large amount of commercial activity on the Property which is currently being used as a private residence. The presence of large-scale industrial and construction equipment would greatly impede the owners use and enjoyment of the property and will present potential health risks in the form of hazardous conditions, pollution, and added vehicular traffic. Without

IND525-7 See the responses to comments PM1-116, PM1-132, and IND114-1.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

IND525-7
(cont'd)

exploring these issues, the DEIS cannot be considered adequate under NEPA. Furthermore, impacted property owners along the CPL North Route must be given a meaningful opportunity to comment on the potential impacts of this alternative route through a supplemental or revised DEIS.

The CPL North's route through the Property directly effects their use and enjoyment of the property and will negatively impact property value. The Property owners have invested a significant sum of money into adding improvements to the property, which will be lost should the Pipeline be sited as proposed by the CPL North Alternative.

VI. Conclusion

Due to the new information submitted by Transco pursuant to FERC's Data Request, a supplemental or revised DEIS, along with the appropriate comment period, is needed. The Property, along with other impacted property owners along the CPL North route, are entitled to a revised or supplemental DEIS that addresses the specific environmental and safety concerns of the impacted landowners. The Data Response provided to FERC by Transco does little but generalize the conditions present along the CPL North route, and does not consider threats to public health and safety. A revised or supplemental DEIS must be issued.

IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

Further, for the reasons stated above, the Parente Trust requests that the Commission grant its intervention in the above captioned proceeding in opposition to the Atlantic Sunrise Pipeline and Alternative Route.

Respectfully submitted,

/s/ Natara G. Feller
Natara G. Feller, Esq.
Managing Member

/s/ Ann Marie Bermont
Ann Marie Bermont, Esq.
Associate

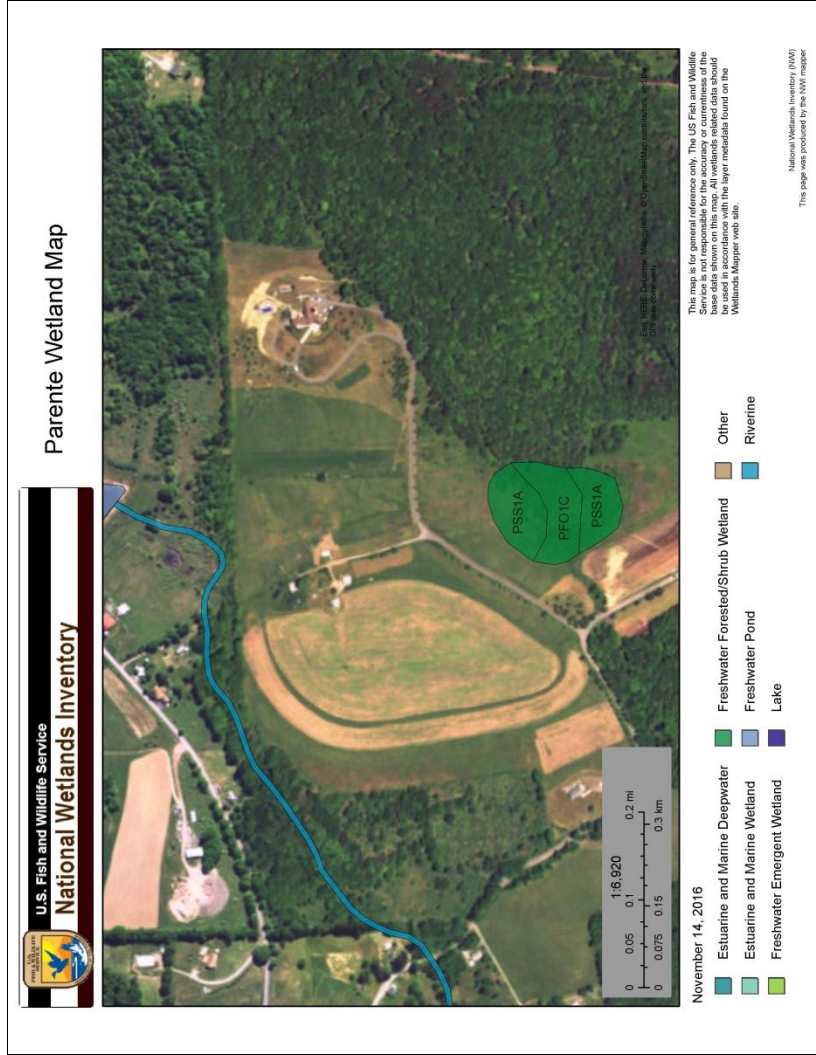
Feller Law Group, PLLC
159 20th St, Ste 1B
Brooklyn, New York 11232
Phone: (212) 590-0145
Email: natarafeller@feller.law

Counsel for Marla Parente 2009 Trust

Dated: November 14, 2016

IND525 – Marla Parente (cont'd)





IND525 – Marla Parente (cont'd)

20161114-5353 FERC PDF (Unofficial) 11/14/2016 4:13:35 PM

CERTIFICATE OF SERVICE

Wherefore on this 14th day of November, 2016, I caused to be served the foregoing Motion to Intervene electronically on all parties on the Commission's electronic service list in this proceeding, in accordance with Commission regulations.

/s/ Natara G. Feller

Natara G. Feller

IND526 – Geraldine Nesbitt



2200 Pennsylvania Avenue N.W. 4th Fl. E. Washington D.C. 20037 | 202-297-6100
7315 Wisconsin Avenue, Suite 400, Washington D.C. 20814
Carolyn@carolynelefant.com | LawOfficesofCarolynElefant.com | licensed in MD, DC, NY

November 14, 2016

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Alternative 12 West/Environmental Data Request—Atlantic Sunrise
Expansion (FERC Docket # CP15-138-000; OEP/DG2E/Gas 2)
PUBLIC VERSION

Dear Ms. Bose,

We¹ have the pleasure of representing and assisting Ms. Geraldine Nesbitt in connection with the Atlantic Sunrise Expansion project ("ASE") that is under consideration by the Federal Energy Regulatory Commission ("FERC"). Please accept this letter as Ms. Nesbitt's formal comments in response to FERC's October 13, 2016 notice and to FERC's October 6, 2016 Environmental Data Request to the applicant. We are also filing in conjunction with this letter privileged comments concerning cultural/historic resources. Ms. Nesbitt has repeatedly requested key information for her to be able to review the ASE. However, FERC and the United States Army Corps of Engineers ("USACE"), as a cooperating agency, have failed to be responsive impeding Ms. Nesbitt's access to critical information and otherwise precluded her ability to fully review and comment on the proposed ASE. FERC and USACE's actions in this regard have served to violate the Freedom of Information Act and Ms. Nesbitt's Due Process rights. Therefore, we reserve the right to provide additional comments after such time all the information requested is provided by FERC and the USACE.

¹ Carolyn Elefant of the Law Offices of Carolyn Elefant, PLLC; Mark Freed of Curtin & Heffner, LLP; and Wayne Flowers of Lewis, Longman & Walker, P.A.

IND526 – Geraldine Nesbitt (cont'd)

Page 2

IND526-1

The applicant's preferred alternative would unnecessarily result in severe, long-term impacts to environmental and cultural resources on Ms. Nesbitt's 3000+ acres of undisturbed, contiguous forested lands located in Luzerne and Wyoming Counties, Pennsylvania. Ms. Nesbitt previously filed Amended Public and Privileged Comments in response to the Draft Environmental Impact Statement ("DEIS"), dated May 2016, both of which we incorporate into this letter by reference. In response to FERC's request for additional information, we also filed comments (dated September 16, 2016; hereafter "Nesbitt 1st RAI Response"), which we also incorporate by reference. Finally, Ms. Nesbitt has submitted several filings to the USACE, which are incorporated by reference. In these these filings, we pointed out several practical alternatives that were either not considered or were dismissed without substantive explanation or justification. By letter dated October 6, 2016, FERC requested additional information from the applicant concerning an alternative alignment known as CPL North 12 West Alternative ("ALT-12W). The ALT-12W would replace the portion of the applicant's preferred alternative that crosses the Nesbitt property. On or about October 13, 2016, FERC provided Ms. Nesbitt notice that the ALT-12W was being considered and opened the opportunity for public commenting on same.

We are encouraged that FERC is considering the ALT-12W as it would greatly avoid/reduce the impacts to environmental and cultural resources. As discussed more fully below and in the attached reports, the ALT-12W is by far the environmentally superior route (Environmentally Preferable), not just overall, but on every environmental factor that FERC must consider when siting a pipeline. The applicant, in its response to the October 6, 2016 Environmental Data Request, attempts to discount the ALT-12W by proffering claims/data that are unsupported, inaccurate, misleading, and otherwise unpersuasive. The following comments and attached reports provide a more complete and accurate analysis comparing the applicant's preferred route to the ALT-12W, that is supported by data rather than bare conclusions or assumptions. For FERC to blindly accept the applicant's unsupported and inaccurate claims seeking dismissal of the ALT-12W (accepting the applicant's preferred alternative) would be arbitrary and capricious. Further, such an action by FERC would clearly violate the National Environmental Policy Act ("NEPA"), FERC's own regulations, the Clean Water Act ("CWA"), and the National Historic Preservation Act ("NHPA").

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyne@carolynelefant.com

IND526-1

See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND526 – Geraldine Nesbitt (cont'd)

Page 3

IND526-1
(cont'd)

I. DESCRIPTION OF CPL NORTH AND ALT-12W

A. CPL N (Nesbitt – applicant's preferred route, crossing the Nesbitt property)

The segment of CPL N that traverses Ms. Nesbitt's property, that ALT-12W would replace, is 4.23 miles long and does not collocate with any existing rights-of-ways or easements. Mrs. Nesbitt's property is the largest roadless forested tract in the Glaciated Low Plateau physiographic province (see previously filed *Appendix C – Terrestrial & Palustrine Communities of the Nesbitt Property*) of Wyoming and Luzerne counties with an extensive wetland complex (see *Figure 1* below), including forested wetlands. Ms. Nesbitt's family has been stewards of this property for over 120 years. Her property hosts 13 ecosystems. The CPL N crosses 7 habitat types as it travels north to south bisecting the Nesbitt property (see *Table 1* below). This results in impacts to 3 upland communities, 4 wetland communities, including PADCNR uncommon wetland communities (see *Appendix C – Nesbitt Property (CPL North Nesbitt Route) – Landuse Mapbook Overview*), and crosses 9 headwater streams.

Figure 1: CPL N (Nesbitt)



2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelephant.com

IND526 – Geraldine Nesbitt (cont'd)

IND526-1
(cont'd)

Table 1: CPL N (Nesbitt) Landuse

Landuse Abbrev.	Landuse Description	Miles	Feet
CP	Conifer Plantation	0.05	286.57
HM-PW	Hemlock Mixed Hardwood Palustrine Woodland	0.17	892.09
HMH-P	Hemlock Mixed Hardwood Palustrine	0.17	874.40
HROM	Hemlock\Red Oak\White Pine Mixed Forest	0.92	4,852.91
MFM	Mixed Forb Marsh	0.00	15.61
MWM	Mixed Forb Graminoid Wet Meadow	0.16	835.03
NH	Northern Hardwood	0.04	207.33
RD	Road	0.01	29.78
ROH	Red Oak - Mixed Hardwood	2.44	12,889.18
SP	Successional Pasture	0.26	1,365.33
WC	Watercourse	0.01	61.46

Within the alignment, 94% of the land impacted is forested and of that 58% is interior (core) forest. The habitats impacted include, Hemlock Mixed Hardwood Palustrine forests and Mixed Forb Marsh which are both Pennsylvania Uncommon wetland habitats. The CPL N alignment crosses 2,678 feet of wetlands, 3.95 miles of forested land, and 2.43 miles of interior forest.

The CPL N crosses 5 first-order headwater tributary streams, 4 headwater streams, 3 waterbodies that are adjacent or parallel to the proposed ROW, and multiple wetland complexes on the Nesbitt property (see *Appendix E – Meliora Water Quality Investigation*). Of the 5 stream complex crossings, 3 complexes contain easily erodible soils. One wetland crossing involves greater than 30% slopes. Approximate elevations along this route are 1100 to 1550 feet (NAVD 88).

A brief ecological survey of the Nesbitt tract recorded 22 amphibian and reptile species, 16 mammals, 13 Lepidopterans, 25 Odonates, 191 plant species, and 120 migratory bird species onsite (see previously filed *Amended Public Comments filed on behalf of Geraldine Turner Nesbitt, July 29, 2016*). Of these, 25 are identified as aquatic dependent species. The onsite investigations and the applicant's data have also determined 7 listed species occurrences on the Nesbitt property. Of these, 2 are known to occur within the CPL N alignment (Northern Long-Eared Bat roost sites and a location of *Alopecurus aequalis*). Other listed species such as the wood turtle (*Glyptemys insculpta*), and Jefferson salamander (*Ambystoma jeffersonianum*) occur on the property and could utilize wetlands within the CPL N alignment area. Downstream

IND526 – Geraldine Nesbitt (cont'd)

Page 5

IND526-1
(cont'd) segments with listed species potentially affected by impacts to streams such as Whitelock Creek include Perrins Marsh, which contains a population of Beck's Water Marigold (*Megalodoma beckii*). The CPL N alignment across Mrs. Nesbitt's property impacts two Pennsylvania Natural Heritage Areas (NHA), Lake Catalpa Swamp NHA and Perrins Marsh NHA.

B. Alternative 12 West (ALT-12W)

This alignment (see *Figure 2* below) is 5.4 miles long collocating for 1.61 miles and traverses a fragmented landscape that has been developed from forestlands. It includes roadways, rights-of-ways, residential lots, forest patches, pastureland, agriculture and all the attendant features of a developed landscape including ditches and stormwater facilities. The ALT-12W crosses 3 upland habitat types and is partially collocated along existing Midstream Pipeline alignments, electric transmission alignments and roadway rights-of-ways. It also utilizes pastureland and agricultural areas for much of its extent (see *Appendix B Alt12 West - Landuse Mapbook*).

Figure 2: Alternative 12 West



2200 Pennsylvania Avenue N.W., 4th Flr., E. Wash., D.C. 20037 | 202-297-6100 Carolyn@carolynelephant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 6

IND526-1
(cont'd) Within this alignment, 49% of the land impacted is forested and of that, just 6% is interior (core) forest. The habitats crossed by ALT-12W include, Hemlock-Red Oak-White Pine Mixed Forest, Northern Hardwoods, and Red Oak Mixed Hardwoods (see *Table 2* below). This alignment will impact 140 feet of wetlands, 2.80 miles of forested land, and 0.35 miles of interior forest (see *Appendix A Alternatives Comparison*).

Table 2: Alternative 12 West

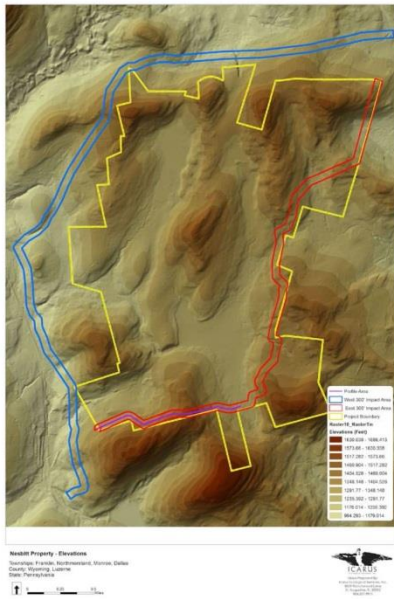
Landuse Abbrev.	Landuse Description	Miles	Feet
AG	Agriculture	1.89	9,958.03
HROM	Hemlock\Red Oak\White Pine Mixed Forest	0.39	2,085.42
NH	Northern Hardwoods	0.16	847.47
RD	Road	0.18	970.51
RES	Residential	0.21	1,133.65
ROH	Red Oak Mixed Hardwood	2.25	11,868.00
ROW	Right of Way	0.27	1,418.70
SP	Sucessional Pastureland	0.33	1,760.15
SW	Stormwater Facility	0.03	154.68
WC	Watercourse	0.05	257.13

The ALT-12W crosses 6 watercourses of which only one is a perennial stream (tributary of Leonard Creek). The other 5 are comprised of an intermittent stream, 3 dry ephemeral streams which convey water only during precipitation events, and a ditch. The ditch watercourse is located adjacent to Plattsburg Road (see Appendix E Meliora Professional Review and Comment). Of the 6 watercourse crossings, none contain easily erodible soils. Similar to the CPL N, one watercourse crossing for ALT-12W involves greater than 30% slopes. Approximate elevations along this route are 1100 to 1430 feet (NAVD 88). The terrain on Mrs. Nesbitt's property is more rugged and the changes in elevation are greater than that of ALT-12W (see *Figure 3* below).

IND526 – Geraldine Nesbitt (cont'd)

IND526-1
(cont'd)

Figure 3: Alternatives Terrain and Elevations Comparison



IND526 – Geraldine Nesbitt (cont'd)

Page 8

IND526-1
(cont'd)

II. **12 WEST COMPLIES WITH FERC'S REGULATIONS AND IS THE ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

When siting the ASE and implementing NEPA, FERC must comply with the criteria set forth in 18 C.F.R. §380.15. See *Minisink Residents for Environ. Pres.*, 762 F. 3d 97, 104 (D.C. Cir. 2014) (holding that FERC, and not merely the applicant, must comply with the requirements of Section 380.15). As demonstrated below, the ALT-12W complies with Section 380.15 while the applicant's preferred alternative falls well short of compliance. Section 380.15 provides:

- Impacts to scenic, historic, wildlife and recreational values **shall be avoided or minimized**²;
- Impacts to: (1) sites eligible for the National Register of Historic Places, (2) wetlands, and (3) scenic, recreational, and wildlife lands **shall be avoided to the extent practicable**³;
- Impacts to **forested areas** and steep slopes **should be avoided**⁴;
- Crossings of hills and other high points that are forested and visible from public areas **should be avoided**⁵;
- Collocation **must be considered**⁶; and
- The desires of landowners **should be taken into account**⁷.

² "The siting, construction, and maintenance of facilities **shall be undertaken in a way that avoids or minimizes** effects to [1] **scenic**, [2] **historic**, [3] **wildlife**, and [4] **recreational values**" (18 C.F.R. §380.15(a); emphasis added).

³ "In locating proposed facilities, the project sponsor **shall to the extent practicable, avoid** [1] places listed on, or **eligible for listing on, the National Register of Historic Places** . . . [2] **wetlands**, and [3] **scenic, recreational, and wildlife lands**. If routed near or through such places, **attempts should be made** to minimize visibility from areas of public view and **to preserve the character and existing environment of the area**" (18 C.F.R. §380.15(d)(2); emphasis added).

⁴ "Rights-of-way **should avoid forested areas and steep slopes where practical**" (18 C.F.R. §380.15(d)(3); emphasis added).

⁵ "Where **practical, rights-of-ways should avoid crossings hills and other high points at their crests** where the crossing **is in a forested area** and the resulting **notch is clearly visible in the foreground from areas of public view**" (18 C.F.R. §380.15(d)(9); emphasis added).

⁶ "The use, widening, or extension of existing rights-of-way **must be considered** in locating proposed facilities" (18 C.F.R. §380.15(d); emphasis added).

⁷ "The desires of landowners **should be taken into account** in the planning, locating, clearing, and maintenance of rights-of-ways and the construction of facilities on their property" (18 C.F.R. §380.15(b); emphasis added).

IND526 – Geraldine Nesbitt (cont'd)

Page 9

IND526-1
(cont'd)

When siting a pipeline, FERC's regulations clearly mandate special emphasis on avoiding impacts to: (1) historic properties and historic values; (2) wetlands; (3) wildlife lands/habitat and wildlife values; (4) forested areas and steep slopes; (5) scenic hilltops/high points; and (6) recreational areas and values. These avoidance requirements along with the mandatory consideration of collocation guides FERC in determining the Environmental Preferable alternative. As more fully discussed above, the ALT-12W is consistent with Section 380.15 siting provisions whereas the applicant's corresponding preferred route/alternative across the Nesbitt property significantly deviates from and fails to meet the required criteria found in Section 380.15.

A. Historic Properties Historic Values:

As more fully described in the attached archaeological report (*Privileged Archeological Comments*), the applicant's preferred route (CPL N) crossing the Nesbitt property: (1) would directly impact 66, ground-truthed cultural sites/historic resource (ceremonial stone landscapes and a marked gravesite) that occur within the 300 foot-wide pipeline corridor (150' on either side of the centerline, which the applicant calls the "level of disturbance"), and (2) would also impact over 500 historic properties that are within the surrounding Area of Potential Effect ("APE") on the Nesbitt property. It seems that the only avoidance measures the applicant proffers for their preferred alternative is to ignore the existence of these numerous, exceptional cultural resources, and to discount the significant religious and cultural value these resources have, particularly to culturally affiliated Indian Tribes. It is important to note that the applicant spent six (6) weeks on the Nesbitt property surveying archaeological resources but apparently failed to report the significance of the resources to FERC. However, in our Amended Public and Privileged Comments we informed FERC of the numerous, significant historic properties/cultural resources on the Nesbitt property. Despite the indisputable evidence of the resources on the Nesbitt property, the applicant continues to ignore the fact that such resources are present, and/or will be impacted if the applicant's preferred route is accepted on the Nesbitt property.

Conversely, the ALT-12W would avoid, consistent with Section 380.15, impacts to eligible historic properties and associated historic values. Ms. Nesbitt retained a professional archaeologist, Dana Ste. Claire, to evaluate both the ALT-12W and the applicant's preferred route. Mr. Ste. Claire's preliminary pedestrian survey did not discover any cultural/historic properties within the pipeline corridor for ALT-12W. While we ground truthed our archaeological evaluation/comparison, it appears the applicant did not. Instead the applicant relied upon a "predictive model"⁸ that the

⁸ See Williams Response to FERC Data Request re: CPL 12 West Alternative at p. 2, Access Number 20161017-5155 (referencing "predictive model").

IND526 – Geraldine Nesbitt (cont'd)

Page 10

IND526-1
(cont'd)

applicant fails to name or describe, or otherwise share the particulars thereof with FERC or the public. Further, the applicant simply proffers bald conclusions reportedly derived from their undisclosed modeling without any discussion of the model itself, the modeling methodology and any associated assumptions, or the results. The applicant's unfounded and unsupported bald conclusions regarding historic properties along the ALT-12W make any conclusions derived from it highly suspect. First, the applicant acknowledges the ALT-12W primarily crosses disturbed agricultural lands and collocates along already disturbed rights-of-way. Then, however, the applicant asserts, without justification or explanation, that these highly disturbed areas have a moderate to high probability of historic resources. As our attached archaeological report correctly points out, highly disturbed areas like agricultural lands and rights-of-way have a low probability for historic resources and any that may exist are likely compromised or damaged due to historic land disturbance. Therefore, it is apparent the applicant has overstated the likelihood of historic resources within the ALT-12W, and chosen to ignore the documented and verified historic resources within the applicant's preferred alternative.

Our Amended Privileged and Public Comments, along with our privileged comments filed in conjunction with this letter, demonstrate that the Nesbitt property landscape is dominated by culturally significant ceremonial/historic stone features. It is apparent that these stone features are not isolated sites and are spatially connected. These stone features define the unique character of the Nesbitt property hence justifying their potential inclusion as a cultural landscape or district in the National Register of Historic Places and their eligibility for listing as a World Heritage Site. These stone features are unique in their quantity and quality. Any impacts to these irreplaceable cultural/historic resources and the values they represent would be permanent. This is especially relevant with regard to the ceremonial stone features as the cultural practices associated with each unique feature cannot be recreated after the feature is impacted. Consequently, any impacts to these resources on the Nesbitt property would forever change the character of the property, in violation of Section 380.15(d)(2).

In summary, the ALT-12W would appropriately avoid impacts to eligible historic properties and the associated historic values in compliance with Section 380.15(a),(d)(2). The applicant's preferred route would significantly and permanently impact/destroy numerous historic properties and associated values. Therefore, ALT-12W is the Environmentally Preferable option for historic properties/cultural resources. The applicant's preferred alternative is being proffered without any avoidance measures. Instead, the applicant simply asks FERC to ignore the quantity and quality of the historic properties and values that would be impacted by the applicant's preferred alternative. Simply ignoring the resources, and thereby not accounting for them is not

IND526 – Geraldine Nesbitt (cont'd)

Page 11

IND526-1
(cont'd) equivalent to avoidance, and significantly fails to meet NEPA's requirement for a "hard look" and clearly violates FERC's siting regulations.

B. Wetlands

Section 380.15 requires the siting of pipelines avoid wetlands; a requirement that is also consistent with the CWA's requirement that non-aquatic dependent projects avoid wetlands. The ALT-12W would result in an 82% reduction in wetland impact as compared to the applicant's preferred alternative (*See attached Technical Report*). This represents an 82% avoidance over the applicant's preferred alternative that is feasible, capable, and practicable. As discussed in the attached report (*see Appendix E - Meliora Professional Review and Comment, also see Terrestrial and Appendix L - Palustrine Plant Communities of the Nesbitt Estate*), the wetlands on the Nesbitt property are of exceptional quality, in both ecosystem functional value and watershed importance. The applicant inaccurately and inexplicably represents that the wetlands within the ALT-12W are equally exceptional, providing no data to support this incorrect assertion. As the attached report (*see Appendix E*) demonstrates, the wetlands associated with the ALT-12W are small, disturbed areas that are generally discontinuous and scattered. Of the 209 acres of land within the ALT-12W (300-foot wide corridor the applicant considered), only 7.45 +/- acres of that are hydric rated soils (*see Appendix F - ALT 12 Soils*) found in 5 separate soil polygons throughout ALT-12W, 4 of the 5 in areas that have been disturbed by rural residential or agricultural uses. Consequently, these wetlands may provide little functional value, for both hydrologic functions and for functions supporting aquatic dependent species (low ecological value). Therefore, the ALT-12W represents more than just 82% avoidance of wetland impacts, but also a far greater avoidance of impacts to wetland functional values.

Further, the ALT-12W avoids impacts to wetland plant communities of special concern (designated by PADCNR). Two such communities exist on the Nesbitt property (Hemlock Mixed Hardwood Palustrine Forest Community and Mixed Forb Marsh) in addition to two Natural Heritage Areas (Lake Catalpa Swamp and Perrins Marsh, *see Appendix K*). No such communities/areas have been identified along the ALT-12W. The applicant's preferred alternative would cross and directly impact all four of these wetland plant communities of special concern and Natural Heritage Areas. In fact, the proposed ALT-12W would be the only instance where avoidance of these wetland plant communities of special concern and Natural Heritage Areas would occur, representing a 100% avoidance as recommended by the PADCNR and required by Section 380.15 and the CWA.

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 12

IND526-1
(cont'd)

In summary, the ALT-12W significantly avoids/reduces impacts to wetlands in compliance with Section 380.15(d)(2) and is therefore the Environmentally Preferable option for wetlands. The selection of the applicant's preferred alternative would violate FERC's regulations as well as the CWA.

C. Forest Areas, Interior Forest, and Rare Forest

As the attached reports document/support, forty-nine percent (49%) of the ALT-12W crosses forested areas as compared to the ninety-four percent (94%) crossing of intact forested areas by the applicant's preferred alternative on just the Nesbitt property alone (*See Appendix A - Comparison Table*). Consequently, the ALT-12W represents a 45% avoidance/reduction of forest impacts as compared to the applicant's preferred alternative⁹. More importantly, the ALT-12W only crosses 0.35¹⁰ miles of interior forest as compared to the 2.43 miles that would be crossed by the applicant's preferred alternative. Therefore, the ALT-12W is an 87% avoidance/reduction of interior forest impacts in compliance with Section 380.15.

Further, the cumulative impacts to forested areas would be significantly higher for the applicant's preferred alternative. Our desktop analysis of the unbroken interior forest on the Nesbitt property yields a total interior forest acreage of approximately 1,944 acres. Additionally, the Nesbitt forest is bordered by large forest stands that exist on neighboring properties increasing the total acreage to 2,774 acres of unbroken, canopied forest land that would be fragmented by the applicant's preferred alternative (*see Appendix H - Technical Review*). The significance of the forest areas on the Nesbitt property is augmented by the fact over 120 migratory bird species utilize the Nesbitt unbroken forest lands with over 100 of these species breeding on the property including Birds of Critical Concern (i.e., wood thrush, worm-eating warbler, Louisiana water thrush, and Canada warbler). The ALT-12W significantly avoids impacts to forest/interior forest dependent bird species including migratory birds. The ALT-12W also avoids impacts to forest/interior forest areas utilized by the Northern Long-eared Bat. Seven separate NLEB roost sites have been identified along a 2.1-mile segment of the applicant's preferred alternative crossing the Nesbitt property¹¹. The ALT-12W would completely avoid the forested areas utilized by this known concentration of NLEBs.

⁹ Conversely, it represents the applicant's preferred alternative is a 45% failure to avoid forest impacts as required by Section 380.15.

¹⁰ As noted later in Section V, the applicant erroneously calculated the interior forests crossed by the ALT-12W as being 0.9 miles when in fact, as demonstrated in our attached technical reports, only 0.35 miles will be crossed.

¹¹ An average of one roost site every 0.3 miles.

IND526 – Geraldine Nesbitt (cont'd)

Page 13

IND526-1
(cont'd)

Finally, the ALT-12W would avoid impacts to rare, protected forests. The applicant's preferred alternative would impact multiple Hemlock-Mixed Hardwood Palustrine Forest Communities located on the Nesbitt property. No such forest communities have been identified along the ALT-12W. Consequently, the ALT-12W represents a 100% avoidance/reduction in impacts to this rare and protected forest community.

As demonstrated above and in the attached reports, ALT-12W is compliant with Sections 380.15(d)(3) and is the Environmentally Preferable alternative for forests. The applicant's preferred alternative would blatantly violate FERC's requirement that impacts to forests and wildlife values the forests support must be avoided where practical.

D. *Wildlife Lands and Wildlife Values*

1. Aquatic Dependent Species

The wetland/stream areas associated with ALT-12W have been previously impacted and are located within an already fragmented landscape of roads, pastures, agriculture, and rural residential properties. Consequently, the ecological value these wetlands/streams provide to aquatic dependent species has been compromised, including but not limited to, detrital export and benthic systems. Further, species diversity and richness has already been impacted by surrounding disturbances such as roads, rights-of-ways, farmland, and nuisance/invasive species (see *Appendix M - Alternative 12 West Landcover Report*).

Conversely, the portion of the applicant's preferred alternative that ALT-12W would replace severely impacts undisturbed wetland and stream resources on the Nesbitt property. The Nesbitt property hosts headwater streams throughout the property which significantly contribute to the diversity of aquatic dependent species. Because these headwater streams differ wildly in physical, chemical, and biotic characteristics, they provide habitat for a range of unique resident and migrant species, including emerging and drifting insects. In only 12 days of field studies, more than 75 aquatic dependent species were identified onsite. Further, a rare Pennsylvania aquatic dependent listed plant species, Beck's water-marigold (*Megalodonta beckii*), is present within Perrins Marsh, which is downstream of the CPL North crossing of Whitelock Creek on Nesbitt's property and would be negatively impacted by the applicant's preferred alternative.

In summary, the ALT-12W is the Environmentally Preferable alternative for aquatic dependent species and complaint with Sections 380.15(a); (d)(3). The ALT-12W impacts would occur to already compromised wetland and stream areas and thus

IND526 – Geraldine Nesbitt (cont'd)

Page 14

IND526-1
(cont'd) impacts to aquatic dependent species will be significantly lower than the impacts from the applicant's preferred alternative, an alternative that would cause irreversible damage to high value wetlands and headwater streams on the Nesbitt property.

2. Listed Species (Excluding aquatic dependent and migratory birds)

The Nesbitt property hosts several listed species (wildlife and plant); including but not limited to: (1) Northern Long-Eared Bat ("NLEB"); 7 separate roost sites within the applicant's preferred alignment); (2) Early Coralroot; (3) Mountain Starwort; (4) Wood Turtle; (5) Eastern Ribbon Snake; (6) Jefferson Salamander; and (7) Short-awn Foxtail. These listed species will be vulnerable to direct and indirect impacts from the portion of the applicant's preferred alternative that will be replaced by ALT-12W. Conversely, the applicant did not identify any listed species associated with the ALT-12W. Our biologists conducted a pedestrian survey along ALT-12W, which also did not identify any listed species. Consequently, ALT-12W significantly reduces potential impacts to listed species as compared to the applicant's preferred alternative and contributes immensely to listed species avoidance.

In summary, the ALT-12W is clearly the Environmentally Preferable alternative for listed species and compliant with Section 380.15(a),(d)(3).

3. Migratory Birds

The Nesbitt property hosts 120 bird species with over 100 species breeding on the property, meeting the criteria for Important Bird Area (IBA) designation. In addition, four of the breeding species are Birds of Critical Concern (BCC). As noted earlier, the impacts proposed by the portion of CPL North that would be replaced by ALT-12W would severely impact large areas of unbroken interior forests. This would result in significant impacts to migratory bird utilization and breeding, as well as increase the impact of parasitic bird species, which thrive in habitat edges. Conversely, the applicant did not identify any migratory birds associated with the ALT-12W. Consequently, the ALT-12W would be a significant avoidance of impacts to migratory birds and migratory bird habitat (wildlife lands/values) as compared to the portion of the applicant's preferred alternative that would be replaced by ALT-12W.

In summary, ALT-12W complies with the Section 380.15(a), (d)(3) requirement that impacts to wildlife lands and values be avoided with respect to migratory birds. Therefore, ALT-12W is the Environmentally Preferable alternative with respect to migratory birds.

E. Collocation Consideration

IND526-1
(cont'd)

FERC's regulations require consideration of collocation of pipelines along existing rights-of-way establishing a preference for collocation. The reasoning is simple: collocation avoids/reduces environmental impacts. The loss of environmental functional values in greenfields is far greater than collocation because those existing rights-of-way have already experience the impacts. Consequently, collocation avoids and minimizes new impacts including those impacts listed in Section 380.15, EPA's (404(b)(1) Guidelines, and USACE's Public Interest review. Collocating along rights-of-ways that have previously impacted wetlands, other watercourses/waterbodies, and interior forests is significantly valuable in avoiding/reducing critical environmental impacts.

In the instant case, the ALT-12W route is collocated for 1.61 miles (28%) of its total length. Conversely, the portion of the applicant's preferred alternative that ALT-12W would replace has zero collocation (zero consideration of collocation). The use of collocation instead of greenfield construction will avoid/reduce ecological impacts associated with the creation of new forest corridors and edges (such as invasive species expansion, habitat fragmentation, and loss of interior forest migratory birds). The use of collocation avoids/reduces the overall ecological/hydrological impacts to wetlands and water crossings because the wetlands/water crossings along collocated areas of ALT-12W have been previously disturbed by the existing rights-of-way. The ALT-12W provides an 100% increase in collocation versus the portion of the applicant's preferred alternative that ALT-12W would replace. Consequently, ALT-12W is the environmentally superior route alternative by a wide margin over the applicant's preferred alternative and FERC should require the applicant to site along ALT-12W.

In summary, ALT-12W considers collocation whereas the segment of the applicant's preferred alternative that ALT-12W would replace completely fails to consider collocation. Collocation along ALT-12W significantly avoids/reduces environmental impacts. Consequently, ALT-12W complies with Section 380.15(d) and the applicant's preferred alternative does not. Therefore, ALT-12W is the Environmentally Preferable alternative with respect to collocation.

F. Crossings of forested hills and other high points publically visible

The applicant's preferred alternative route will cross at least one hilltop on the Nesbitt property (see *Appendix J*) that is both forested and visible from a nearby public road in violation of Section 380.15(d)(9). The applicant did not identify any forested, publicly visible hilltops along the ALT-12W route, and our pedestrian survey also did not discover any such crossings. Therefore, ALT-12W would avoid such crossings, in

IND526 – Geraldine Nesbitt (cont'd)

Page 16

IND526-1
(cont'd)

compliance with Section 380.15(d)(9) and thus is the Environmentally Preferable alternative as related to hilltop crossings.

G. Steep Slopes

The applicant states that a portion of ALT-12W will have side slopes of 30° without providing the actual length of the side slope segment or any survey data that confirm the presence 30° of slopes. The applicant fails to acknowledge that the preferred alternative across the Nesbitt property traverses similarly steep slopes, some of which are side slopes. Consequently, ALT-12W and the corresponding portion of the preferred alternative both include construction across steep side slopes. Such construction is just as feasible for the ALT-12W alternative as it is for the preferred route.

H. Landowner Considerations

Section 380.15(b) provides “**the desires of landowners** should be taken into account in the planning, locating, clearing, and maintenance of rights-of-way and the construction of facilities **on their property...**” (Emphasis added). While the applicant provides information regarding the proximity of landowners to the proposed ALT-12W right-of-way, the applicant completely fails to provide any information regarding the desires of landowners that will have the proposed pipeline on their property as required by Section 380.15(b). We have repeatedly commented on Ms. Nesbitt’s desires regarding the 4.23 miles of the applicant’s preferred alternative that crosses her property, which ALT-12W would replace. In addition, please consider Appendix N, which are letters from two landowners that would willingly host segments of ATL-12W, inviting the pipeline onto their property.

Section 380.15(b) requires FERC to consider the desires of landowners but these desires do not trump environmentally preferable alternatives¹². Instead, FERC’s precedent has been to consider impacts to landowners as short-term impacts (temporary). The key is whether ALT-12W would be an Environmentally Preferable alternative and not merely a shift of similar impacts from one landowner to another. As noted above, the environmental significance of the resources on the Nesbitt property are exceptional and significantly exceed the functional value of the resources that would be impacted by the ALT-12W. Further, impacts to the environmental/cultural resources on the Nesbitt property would predominately be long-term in nature such that pre-construction baselines would not return after the construction of the pipeline

¹² It should be noted that the applicant fails to discuss how the exact alignment of ATL-12W could be adjusted at points to avoid or minimize impacts to landowners.

IND526 – Geraldine Nesbitt (cont'd)

Page 17

IND526-1
(cont'd) (e.g., clearing and fragmentation of forests/ interior forests; destruction of historic properties within the corridor and associated values within the surrounding APE; impacts to wildlife such as migratory birds and other protected species; clearing of rare tree habitats; clearing of designated plant and wildlife areas/communities; impacts to headwaters/watersheds). There is no question that ALT-12W would be environmentally superior to the segment of the applicant's preferred alternative that would be replaced by ALT-12W. Therefore, selecting the ALT-12W would be siting the pipeline exclusively for environmental/cultural reasons and not a shifting of similar impacts.

III. CLEAN WATER ACT REQUIRES SELECTION OF ALT-12W

The Environmental Protection Agency's 404(b)(1) Guidelines provide that "[e]xcept as provided under section 404(b)(2), no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." 40 C.F.R. §230.10(a). An alternative is practicable if it is "available and capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purposes." 40 C.F.R. §230.10(a)(2). Further, where a project is not water dependent, practicable alternatives that do not involve discharges into special aquatic sites are presumed to exist unless clearly demonstrated otherwise, and all practicable alternatives to a proposed discharge that avoid a discharge into a special aquatic site are presumed to have less adverse impact on the aquatic ecosystem, unless clearly demonstrated otherwise. 40 C.F.R. § 230.10(a)(3). The ASE is not water dependent, and so it is the applicant's burden to prove, by clear and convincing evidence, the absence of a practicable alternative that does not involve a discharge into a special aquatic site. Absent such a showing, USACE may not permit wetland impacts for the ASE. See *Greater Yellowstone Coal. v. Flowers*, 359 F.3d 1257, 1269 (10th Cir. 2004).

Even assuming arguendo that there are no practicable alternatives that do not involve a discharge into a special aquatic site, USACE cannot legally permit the impacts to Ms. Nesbitt's property associated with applicant's preferred route because the ALT-12W Route, while involving discharges to aquatic sites (all of which have been previously disturbed), is practicable and would have significantly less impacts on aquatic ecosystems. 40 C.F.R. §230.10(a); See *Utahns for Better Transp. v. U.S. Dep't of Transp.*, 305 F.3d 1152, 1187 (10th Cir. 2002). As discussed in detailed in this letter and associated attachments, ALT-12W would significantly avoid/reduce impacts to aquatic ecosystems as compared to those impacts which would occur in the segment of the applicant's preferred alternative that the ALT-12W would replace.

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 18

IND526-1
(cont'd)

In order to permit the wetland impacts to Ms. Nesbitt's property, the applicant must demonstrate and the USACE must find (1) that the ALT-12W is impracticable because of cost, existing technology, and logistics; (2) that the aquatic impacts of the ALT-12W constitute a greater impact to the aquatic environment than do the impacts of the applicant's preferred route, or (3) that the ALT-12W, while having fewer impacts on the aquatic ecosystem, would have other significant adverse environmental consequences. 40 C.F.R. § 230.10(a). The applicant's own statement undermines any such conclusions. The applicant states in its response to FERC's Environmental Data Request that it "has not incorporated [the ALT-12W] into the proposed route due to constructability issues along state route 309, impacts to Leonard Creek, and the significantly greater number of affected landowners and residential impacts." Earlier in this letter, we demonstrated that the applicant's assertions grossly overstate the ALT-12W impacts and is also misleading with regard to construction limitations. Nonetheless, nothing in the applicant's statement amounts to an assertion, much less clear and convincing evidence, that: (1) the ALT-12W is either impractical, (2) has less impact on the aquatic ecosystem, or (3) has other significant adverse environmental consequences that do not exist in the preferred alternative. At best, the statement can be read, without any support, to say that the ALT-12W would be marginally more difficult to construct than the applicant's preferred route.

The applicant has failed to provide clear and convincing evidence that the ALT-12W, an alternative with less wetland impacts, is impracticable, and therefore USACE cannot permit and FERC cannot certify the wetland impacts to Ms. Nesbitt's property. "The burden of proof to demonstrate compliance with the § 404(b) permit [g]uidelines rests with the applicant, where insufficient information is provided to determine compliance, the [g]uidelines require that no permit be issued." *Utahns for Better Transp.*, 305 F.3d at 1187. "The test is whether the alternative with less wetlands impact is "impracticable," and the burden is on the applicant, with independent verification by the COE, to provide detailed, clear and convincing information proving impracticability." *Id.* at 1186. In *Utahns*, the Tenth Circuit considered a challenge to the USACE's issuance of §404 permits for a highway project. In finding the issuance of permits by the USACE to have been arbitrary and capricious, the Court held that the applicant, who rejected from consideration a less impactful alternative route because it claimed the route was in a more developed area and would cost more, failed to show that the rejected route was impracticable. *Id.* Like the applicant in *Utahns*'s, the applicant here has failed to meet its burden of showing that the ALT-12W is impracticable, and therefore the USACE and FERC cannot permit/certify the wetland impacts to Ms. Nesbitt's property.

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 19

IND526-1
(cont'd) Consequently, any decision by FERC to dismiss ALT-12W in favor of the applicant's preferred alternative clearly would violate the CWA.

IV. APPLICANT'S ARGUMENTS DISMISSING ALT-12W ARE UNSUPPORTED AND FLAWED

_____ In the applicant's response to FERC's Environmental Data Request (dated October 6, 2016), the applicant attempts to dismiss ALT-12W. The applicant's grounds for dismissing ALT-12W are cursory and superficial at best. The applicant grossly misrepresents both the data and impacts associated with ALT-12W as is more fully discussed in the next section. The ALT-12W represents a workable, and environmentally/culturally superior alternative for the construction/siting of the proposed pipeline. Despite the applicant's misrepresentations, its arguments dismissing ALT-12W boil down to three key items: (1) construction issues related to a short length steep slope; (2) impacts to a tributary of Leonard Creek; and (3) impacts to potentially affected landowners. The applicant's arguments are flawed for the following reasons:

A. Steep Slopes

The applicant's arguments regarding steep slopes are curious. As noted earlier, the applicant fails to disclose that its preferred route across the Nesbitt property would also cross steep slopes similar to those the applicant refers to for ATL-12W. Both slopes are 30° (or more). It is disingenuous to state that slope-related construction issues for ALT-12W are grounds for dismissing the alternative while being silent about the same issue being present on the preferred route on the Nesbitt property (and elsewhere on the project as a whole). Further, the applicant never claims that constructing the pipeline across the steep slopes is infeasible or impracticable. At best, these assertions are nothing more than stating the obvious, that such construction is more difficult than across gentle slopes. Considering the applicant's willingness to construct the pipeline across steep slopes on the Nesbitt property and elsewhere for the project as a whole, there is nothing remarkable about having to do it for ALT-12W.

Additionally, the significant environmental benefits of ALT-12W far outweigh the impacts associated with any extra work space (or potential additional cost) needed for steep slope construction. The substantial environmental benefits of ALT12-W include but are not limited to:

- a substantial increase in ROW co-location;

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 20

IND526-1
(cont'd)

- a significant reduction of forest acreage impacts;
- a significant reduction of interior forest acreage impacts;
- avoidance of fragmentation of the Nesbitt interior forest;
- a significant reduction of interior forest migratory bird impacts;
- a significant reduction of impacts to BCCs;
- increased adherence to the avian protection measures of the Transco Migratory Bird Plan;
- elimination of impacts to the Hemlock-Mixed Hardwood Palustrine Forest Community (a PADCNr plant community of special concern that Transco was asked to avoid);
- elimination of impacts to the Mixed Forb Marsh Community (a PADCNr plant community of special concern);
- avoidance of the PNHP Perrin Marsh NHA;
- avoidance of the PNHP Lake Catalpa Swamp NHA;
- avoidance of seven PA listed species;
- a reduced number of wetland complexes crossed (from 7 to 4);
- an 82% reduction of length of wetlands crossed;
- an 87% reduction in acres of palustrine forested wetland impacted by construction;
- an 88% reduction in acres of palustrine forested wetland impacted by operation;
- Avoidance of springs and significant headwater streams,
- reduced potential impacts on the Northern Long-eared Bat;
- avoidance of seven known NLEB roost sites; and
- avoidance of the most densely populated NLEB maternity roost site found during applicant's surveys.

It is also important to note that any additional cost is not a relevant factor in selecting between alternatives. In a prior decision (*Transwestern Pipeline*), FERC has explained how it addresses cost consideration versus environmental and engineering considerations:

How Transwestern reached the conclusion that the alternative route would be uneconomical is irrelevant to our decision. In comparing alternative routes, we make an independent decision on engineering and environmental issues, and condition a company's authorization on its implementing those measures that we deem to be required by the public convenience and necessity....

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 21

IND526-1
(cont'd)

We did note that Transwestern deemed the alternative route to be economically unacceptable, but this had no bearing on the outcome of our decision in this case. We routinely direct companies to adopt environmentally preferable alternatives to an initially proposed route as a condition of a project's authorization, regardless of whether the company prefers to accept the associated costs (and we routinely permit companies to then revise their rates to incorporate the additional costs attributable to the revised routing)¹³.

In summary, the applicant's arguments concerning steep slopes fails to point out that the applicant's preferred route would also have similar steep slopes. In addition, the numerous environmental benefits associated with ALT-12W far outweigh any environmental impacts associated with the steep slopes. Therefore, the applicant fails to provide any compelling reason why ALT-12W should be dismissed due to construction feasibility.

B. Leonard Creek

While there are numerous, outstanding environmental benefits associated with ALT-12W, the applicant offers only one environmental reason to dismiss ALT-12W; impacts to Leonard Creek. It is interesting that the crossing impacts the applicant overstates are actually associated with a tributary of Leonard Creek. Regardless, the ALT-12W impacts to this tributary are far less environmentally damaging than the crossings proposed on Ms. Nesbitt's property, especially the Whitelock Creek crossing. The ALT-12W will impact significantly less forested wetlands and most importantly avoid impacts to sensitive rare habitats associated with Whitelock Creek such as the Hemlock-Mixed Hardwood Palustrine Forest (a community of special concern). A critical difference between ALT-12W watercourses and CPL N (Nesbitt) watercourses are their respective current conditions (see *Appendix E - Meliora Review and Comment*). The ALT-12W contains only one third-order perennial stream, the remaining five are made up of impacted ephemeral watercourses, a compromised intermittent stream and a ditch. In contrast, CPL N (Nesbitt) would impact nine (9) headwater streams; five first-order¹⁴ headwater tributary streams and four headwater

¹³ Transwestern Pipeline, 122 FERC ¶61,165 (2008), P. 32; see also Algonquin, Amending Certificate, 157 FERC 61,011 (2016) (authorizing rate increase to cover costs of additional mitigation along alternative pipeline route); also National Fuel Gas Supply, 139 FERC ¶61,037 (2012), n. 18 ("We note that costs are legitimate concerns in project development, but it does not follow that environmental considerations are forsaken when a less costly measure is preferred.")

¹⁴ Strahler stream order is a form of classification based on the numerical measure of the branching complexity of a mathematical tree. In hydrology they are used to define stream size based on a hierarchy of tributaries. A first order stream is the smallest of the world's streams and consists of small tributaries.

IND526 – Geraldine Nesbitt (cont'd)

Page 22

IND526-1
(cont'd) streams, in addition to multiple wetlands associated with these aquatic community complexes.

Further, the segment of Leonard Creek that parallels ALT-12W completely runs alongside disturbed areas (i.e., rights-of-ways; roads, commercial development, agricultural lands, etc.). Consequently, the section of Leonard Creek tributary that ALT-12W would parallel has already been affected by its close proximity to SR 309 (50') and the existing pipeline (140'). The ALT-12W alignment would be separated from Leonard Creek by a large vegetative buffer. Due to the distance involved, it is unlikely that ALT-12W will actually affect this parallel portion of Leonard Creek. In addition, ALT-12W does not require any clearing of creek forest along this parallel route, whereas a significant amount of wetland forest must be cleared in order to cross Whitelock Creek including rare wetland forests.

In summary, the only environmental justification cited by the applicant for dismissal of ALT-12W is overstated and is far outweighed by the numerous environmental benefits ALT-12W provides.¹⁵ Consequently, the applicant has not provided a compelling reason why ALT-12W should be dismissed from an environmental perspective.

C. *Landowner Considerations*

In dismissing ALT-12W, the applicant only provides statistics of the number of landowners that are in proximity to ALT-12W. The applicant does not provide any detail regarding how or if any of the reported landowners would be impacted. As noted earlier in Section II, FERC's regulations require FERC to consider the desires of landowners that will actually have the pipeline on their property; however, the applicant does not provide any such information. Further, the applicant fails to disclose how many of these reported landowners are already impacted by existing rights-of-way (i.e., roads, utility easements, and existing pipelines). Consequently, the applicant's cursory claims are not persuasive. As noted in Section II above, we have provided FERC letters stating the desires of two affected landowners that would host ALT-12W

These are the streams that flow into and "feed" larger streams. First through third order streams are also called headwater streams and constitute any waterways in the upper reaches of the watershed. Typically, first order streams are much more sensitive to disturbance because they lack the robust size and flow of larger streams and therefore cannot overcome interference from sediment loading, temperatures changes, and removal of substrate.

¹⁵ See the summary list provided in the previous subsection, Subsection A.

IND526 – Geraldine Nesbitt (cont'd)

Page 23

IND526-1
(cont'd)

on their property and invite such a siting. In addition, we have stated Ms. Nesbitt's desires regarding the applicant's preferred alternative on numerous occasions.

As discussed in Section II above, ALT-12W represents an environmentally superior alternative avoiding/reducing impacts to numerous environmental and cultural/historic factors and is not merely a shift of similar impacts from one landowner to another. When comparing two alternatives, FERC's precedent is to select the alternative that is environmentally preferable and serves the stated project objective. The ALT-12W is clearly the Environmentally Preferable alternative and serves the stated project objective. Consequently, FERC must select ALT-12W.

The applicant appears to focus on the the number of residences within fifty feet of the workspace. The modest increase of the number of residences affected by ALT-12A (from 1 to 3) does not trump the environmental benefits that would be derived by ALT-12W. FERC's own decisions belie any contention that a relatively minor increase in impacts to residences renders an alternative route impracticable. For instance, in *Florida Gas Transmission Co. Transcon. Gas Pipe Line Corp. & Florida Gas Transmission Co. (Consol.)*, 64 FERC ¶ 61288 (Sept. 15, 1993), FERC considered alternative alignments for a gas line in Florida. Ultimately, FERC concurred with the selection of "the County Line Variation," a route that placed six residences within fifty feet of the construction right-of-way, over two alternatives which would have only placed three residences within fifty feet of the construction right-of-way. In so finding, the Commission noted that the County Line Variation crossed .9 mile of forested wetland and utilized directional drilling over a .1 mile segment to avoid impacting a cypress swamp. In contrast, the route originally proposed, while only placing three residences within fifty feet of the construction right of way, affected 1.2 miles of forested wetlands. Another route considered, but rejected, also only required three residences to be within fifty feet of the construction right of way, but affected 3.4 miles of forested wetlands, and the greatest amount of forested land. In concurring with the route's selection, the Commission noted "[t]he Final EIS concludes that, overall, the County Line Variation represents the least impact of the variations reviewed and the best compromise to crossing the Land O'Lakes area with minimal impact. The Commission concurs." *Id.* at 8. What was not discussed was whether a modest increase in numbers of homes within fifty feet of a construction right of way rendered the route impracticable. Rather, the Commission agreed that selection of the route with the least environmental impacts was warranted despite necessitating twice as many residences being within fifty feet of the construction right of way.

The *Florida Gas Transmission* decision is both instructive and directly on point with the ALT-12W consideration. According to the applicant, the ALT-12W would

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelephant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 24

IND526-1
(cont'd)

result in three residents being within fifty feet of the workspace as compared to one resident for the applicant's preferred alternative. Similar to the *Florida Gas Transmission* case, ALT-12W avoids/reduces significant impacts to forested wetlands including rare forested wetlands. However, the environmental benefits of ALT-12W does not stop with forested wetlands and far exceed the environmental factors considered sufficient enough in the *Florida Gas Transmission* decision to warrant a route that would increase the number of landowners affected. In summary, the ALT-12W offers the following environmental benefits:

- a substantial increase in ROW co-location;
- a significant reduction of forest acreage impacts;
- a significant reduction of interior forest acreage impacts;
- avoidance of fragmentation of the Nesbitt interior forest;
- a significant reduction of interior forest migratory bird impacts;
- a significant reduction of impacts to BCCs;
- increased adherence to the avian protection measures of the Transco Migratory Bird Plan;
- elimination of impacts to the Hemlock-Mixed Hardwood Palustrine Forest Community (a PADCNR plant community of special concern that Transco was asked to avoid);
- elimination of impacts to the Mixed Forb Marsh Community (a PADCNR plant community of special concern);
- avoidance of the PNHP Perrin Marsh NHA;
- avoidance of the PNHP Lake Catalpa Swamp NHA;
- avoidance of seven PA listed species;
- a reduced number of wetland complexes crossed (from 7 to 4);
- an 82% reduction of length of wetlands crossed;
- an 87% reduction in acres of palustrine forested wetland impacted by construction;
- an 88% reduction in acres of palustrine forested wetland impacted by operation;
- Avoidance of springs and significant headwater streams,
- reduced potential impacts on the Northern Long-eared Bat;
- avoidance of seven known NLEB roost sites; and
- avoidance of the most densely populated NLEB maternity roost site found during applicant's surveys.

IND526 – Geraldine Nesbitt (cont'd)

Page 25

IND526-1
(cont'd)

It is clear that ALT-12W is the environmentally superior alternative. Further, there is no basis for a finding ALT-12W impractical based upon the modest increase in numbers of residences affected. Therefore, FERC's regulations and precedent require selection of ALT-12W as the environmentally preferable alternative despite the modest increase in the number of landowners affected.

V. APPLICANT MISSTATES IMPACTS

In the October 6, 2016 FERC Data request to the applicant, FERC requested the quantitative comparison contain at least:

- a. the length of the pipeline (miles);
- b. the acreage of both the permanent and construction rights-of-way;
- c. the size and location of any non-typical work areas required;
- d. the number of residences within 50 feet of the edge of the construction right-of-way;
- e. the number of waterbodies and wetlands crossed, and the length of each crossing;
- f. the length of agricultural fields affected;
- g. the length of forest cleared; and
- h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

In responding to FERC's request, the applicant includes numerous data errors along with several misleading conclusions/assumptions. Throughout this letter we have noted several of the errors and offered accurate information to counter the applicant's errors. We have also provided a comparison table (Attached as *Appendix A*) that corrects all the errors embedded within the applicant's table included in its response to FERC's October 6, 2016 Environmental Data Request. It would be an exhausting effort to respond to every information error the applicant has submitted in its application and supplemental filings; however, the following briefly highlights key errors related to ALT-12W.

A. Forests

The applicant's preferred alternative crosses 3.95 miles of forested land on the Nesbitt property. The ALT-12W only crosses 2.8 miles of forest. The applicant's

IND526 – Geraldine Nesbitt (cont'd)

Page 26

IND526-1
(cont'd)

preferred alternative crosses 2.43 miles of interior forest while ALT-12W only crosses 0.35 miles of interior forest. In the DEIS, the applicant stated that “the amount of interior forests was determined based on the portion of the forest patch located more than 300 feet from the non-forested edges” and that the minimum threshold for an interior forest was 225 acres in size. Based on the applicant’s criteria, the applicant’s interior forest analysis erroneously reports 0.9 miles of interior forest crossed because the applicant calculates the entire amount of interior forest crossed by ALT-12W rather than just the portion that is more than 300 feet from a forest edge. The correct figure is 0.35 miles. This represents an 86% decrease in interior forest impacts. The total interior forest acreage of the Nesbitt property is 1,944 acres, which when combined with the forests that border the property increases to 2,774 acres of unbroken canopied forest. The applicant’s preferred alternative traversing the Nesbitt would irreversibly impact this interior forest. The comparison of 0.9 miles (ALT-12W) vs. 2.0 miles (CPL N) is incorrect. The correct comparison is 0.35 miles (ALT-12W) vs. 2.43 miles (CPL N).

The applicant states that ALT-12W is 0.5 miles longer than “the corresponding section of the proposed route” and would result in more land disturbance during construction. What the applicant fails to acknowledge is that the determining factor that guides selecting the environmentally preferable alternative is overall impacts to environmental functional values and not the size of an area. In the instant case, ALT-12W would impact predominately previously disturbed lands. In fact, ALT12W utilizes 44.00% more lands that have been previously disturbed than the applicant’s preferred alternative. (see **Appendix C – CPL N Alternative Comparison**). Conversely, approximately 94%¹⁶ of the applicant’s preferred alternative would cross undisturbed, native forest habitat (with only approximately 6% of the CPL N route on altered lands). Therefore, the applicant’s preferred alternative crossing the Nesbitt property would cause significant long-term forest impacts and land disturbance and thus, results in significantly higher loss of environmental functional values than ALT-12W regardless of the marginal difference in impact acreage.

B. Wetlands and Watercourses

The applicant claims that 8 waterbodies would be crossed based on remote sensing and not ground truthing. During October pedestrian surveys conducted by Icarus and Meliora, it was determined via ground truthing that 6 watercourses would be crossed. While the applicant erroneously attempts to characterize these water resources as exceptional, Icarus and Meliora documented the actual condition of all 6 and

¹⁶ 93.6%

IND526 – Geraldine Nesbitt (cont'd)

Page 27

IND526-1
(cont'd)

compared them to the watercourse crossings on the Nesbitt property. They found the 6 watercourses to include only 1 third-order perennial stream. Further, the crossing location for that third-order perennial stream has been previously impacted by an existing pipeline right-of-way, steep banks, a road crossing, farmland, and nuisance-invasive plant species (see *Appendix E – Meliora Surface Water Review*).

Additionally, the applicant emphasizes the fact that Leonard Creek is a wild trout stream, giving an overstated impression of the ALT-12W impacts. The portions of Leonard Creek that ALT-12W would parallel and/or cross have been previously disturbed. Several locations of Leonard Creek: (1) are less than 50 feet from a large highway; (2) parallel commercial highway frontage; and (3) been historically stocked with rainbow and brook trout (which outcompete native trout and thereby lowering the environmental value of the Creek). A recent USGS study has confirmed that stocking practices ultimately interfere with native trout fisheries, and that native trout are found in higher abundance in areas with high proportions of forest cover while Brown Trout are more abundant in areas with high proportions of agriculture¹⁷. The reach of Leonard's Creek that parallels the Midstream co-location of ALT-12W is located within an agricultural landscape.

The applicant also claims the Marsh Creek crossing should be considered of exceptional value. In fact, the ALT-12W Marsh Creek watercourse crossing is an ephemeral watercourse with no flow at the time of investigation, no defined channel, and no substrate. The remaining 4 watercourses crossed by ALT-12W include; a roadside ditch (adjacent to Plattsburg Road), one compromised (incised) intermittent stream, and two ephemeral streams that only flow during precipitation events. It should be noted that heavy precipitation events preceded the field review, were ongoing still at the time of review, and yet 3 of the 6 crossings were dry. Of the remaining 3, 1 (watercourse #6) had almost no observable flow, and of the two flowing, one was the ditch – which receives flow from Plattsburg road and agricultural lands. Which leaves only the third-order branch associated with Leonard Creek as the only *stream* with observable flow (see *Appendix E – Meliora Surface Water Review*).

In stark contrast to the low-quality crossings associated with ALT-12W, the applicant's proposed crossings on the Nesbitt property (CPL N) include 5 first-order headwater tributary streams and will directly impact an additional 4 headwater streams (see *Table 3*) along with 3 waterbodies that are adjacent or parallel to the proposed construction right-of-way. There are also multiple adjacent wetland areas associated

¹⁷ McKenna, James E., Michael T. Slattery, and Kean M. Clifford. Broad-Scale Patterns of Brook Trout Responses to Introduced Brown Trout in New York. *North American Journal of Fisheries Management*, Vol 33, 2013 – Issue 6.

IND526 – Geraldine Nesbitt (cont'd)

IND526-1 (cont'd) with the 5 major wetland crossing points. (See Appendix E – Meliora Surface Water Review). Furthermore, the habitats of these crossings include 3 Hemlock Mixed Hardwood Palustrine Forests, 1 Hemlock Mixed Hardwood Palustrine Woodland, 1 Mixed Forb Marsh, and 4 Mixed Forb Graminoid Wet Meadows. Both the Hemlock Mixed Hardwood Palustrine Forests and Mixed Forb Marsh are considered rare Pennsylvania habitats (see Appendix C – CPL North Nesbitt Route – Landuse Mapbook). Additionally, there are spring resources associated with 4 of the 5 major CPL N Nesbitt crossings. Appendix B – Hydrogeological Investigation (filed with Ms. Nesbitt's Amended Public Comments, July 29, 2016) detailed the presence of these springs and the lack of their identification by the applicant within the right-of-way. A second hydrogeological review is included with this submittal, which examines the ALT-12W route and supports the conclusion that the ALT-12W watercourses are "low hydraulic gradient streams that connect impacted landscape features and convey stormwater and baseflow from these impacted landscape features".

Table 3 - ALT 12 and CPL N Watercourses

Stream Crossings and Water Courses with Permanent Water Quality Impacts
CPL North Route and CPL Alternative 1.2 Route

Stream Crossing #	Additional Streams and Watercourses Adjacent to ROW	Number of Wetland Areas in ROW	Number of Additional Wetlands Adjacent to ROW	Stream #	Atlantic ID #	FA Chapter 12D Watercourse Definition	Landuse	Early Erodible Soils (E1 & E2)	>50% Slope
1	Zandbergen	2	8	58-00	W01-01-114-1001	Headwater Perennial Stream	Forest	Y	N
	LA			59-00	W01-01-114-1001	Headwater Perennial Stream	Forest	Y	N
	IB			60-00	W01-01-114-1001	Headwater Perennial Stream	Forest	Y	N
	IC			61-00	W01-01-114-1001	Headwater Perennial Stream	Forest	Y	N
2		1	5	13-00	W01-01-114-1001	Headwater Perennial Stream	Forest	Y	Y
3		3	8	140-00	W01-01-114-1001	Headwater Perennial Stream	Forest	N	N
4	Zandbergen	2	8	140-00	W01-01-114-1001	Headwater Perennial Stream	Forest	N	N
	IB			141-00	W01-01-114-1001	Headwater Perennial Stream	Forest	N	N
5	Zandbergen	3	5	173-00	W01-01-114-1001	Wetlands	Forest	N	N
	LA			174-00	W01-01-114-1001	Headwater Perennial Stream	Forest	Y	N
	IB			175-00	W01-01-114-1001	Wetlands	Forest	Y	N

CPL N12 Stream

Crossing #	Mile Marker	Identifying Description	FA Chapter 12D Watercourse Definition	Landuse	Early Erodible Soils (E1 & E2)	>50% Slope
1	0.75	Altered Edge of Watercourse	Intermittent Watercourse	Forest	N	N
2	1.50	Road side Edge of Watercourse	Intermittent Watercourse	Forest	N	N
3	2.25	Edge of Watercourse	Intermittent Watercourse (Mud or Sand)	Forest	N	N
4	2.75	Road side Unimproved Ditch	Ditch	Forest	N	N
5	3.50	Unimproved Ditch	Intermittent Watercourse (Mud or Sand)	Forest	N	N
6	6.75	Watercourse to Penn Marsh	Intermittent Watercourse	Forest	N	N

1. Identification per Atlantic Seaside Project Soil Erosion & Sediment Control Plan/Soil Restoration Plan for Sussex County, Sheets 22 and 23, last revised 12/2015 and Atlantic Seaside Project Soil Erosion & Sediment Control Plan/Soil Restoration Plan for Wyoming County, Sheets 2 and 3, last revised 12/2015

The applicant reports that ALT-12 W would impact 140 feet of wetlands while CPL N would impact 776 feet of wetlands. In fact, the portion of the applicant's preferred alternative traversing the Nesbitt property would impact 2,678 feet of wetlands.

IND526 – Geraldine Nesbitt (cont'd)

Page 29

IND526-1
(cont'd)

C. Co-location

The applicant states that 1.1 miles would be co-located, however there is additional co-location the applicant did not report. Portions of the proposed ALT-12W ROW is adjacent to existing road easements and rights-of-way associated with a residential street from Lake Catalpa (page 1 of 10 *Appendix B – CPL ALT12 West Landuse Mapbook*) and Plattsburg Road (page 4 of 10 *Appendix B – CPL ALT12 West Landuse Mapbook*). This additional co-location is approximately 0.51 additional miles of co-location bringing the total to 1.61 miles. This increases the percentage of co-location utilized by ALT-12W to 30%.

D. Listed Species and Migratory Birds

In its response, the applicant did not identify any listed species or migratory birds specific to the ALT-12W. Ms. Nesbitt's biologists conducted a pedestrian survey of ALT-12W and also did not identify any listed species or migratory birds. With regard to applicant's preferred alternative, the applicant did not accurately account for all the listed species on the Nesbitt property that would be impacted by the pipeline. The applicant's preferred alternative (CPL N) will impact two Natural Heritage Areas, Perrins Marsh NHA and Lake Catalpa Swamp NHA. Perrins marsh contains a population of Beck's water-marigold (*Megalodonta beckii*), a Pennsylvania endangered species. The applicant's preferred alternative will also impact Whitelock Creek which is the headwaters for Perrins Marsh. The Short-awn Foxtail (*Alopecurus aequalis*), a PNDI S3 (vulnerable) obligate wetland species is located within the alignment for CPL N (Nesbitt). The Jefferson Salamander (*Ambystoma jeffersonianum*) (PNDI S3), Wood Turtle (*Glyptemys insculpta*) (IUCN Endangered, PNDI S3S4), and Eastern Ribbon Snake (*Thamnophis sauritus*) (PNDI S3S4), were all located on the Nesbitt property and therefore could occur within the aquatic environments impacted by CPL N. The applicant did document the Northern Long-Eared Bat (NLEB) (*Myotis septentrionalis*) as having 7 roost sites within the CPL N (Nesbitt) alignment. Both Early Coralroot (*Corallorhiza trifida*) (PNDI S4) and Mountain Starwort (*Stellaria borealis*) (PNDI S3S4) were found on the property and could also occur within the alignment. In addition, over 120 migratory bird species were documented on the property, over 100 breeding migratory birds, and 4 confirmed BCC species.

E. Cultural Resources

The applicant's conclusions on cultural resources are gravely erroneous. The applicant states on page 2 of their response to FERC's Data Request that during field surveys on their preferred alternative (CPL N) they identified resources that were

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 30

IND526-1
(cont'd) determined to be eligible for listing on the National Register of Historic Places (NRHP). However, the applicant fails to acknowledge this admission in its response to FERC's Data Request when it presented a finding of no difference between ALT-12W and CPL N (see Table 1 of applicant's response). It is important to note that the applicant conducted a six week long survey on the Nesbitt property and recorded 88 cultural/historic features potentially eligible for listing on the National Register of Historic Places¹⁸. Despite the applicant's knowledge of existing cultural/historic features on the Nesbitt property, the applicant reported zero cultural/historic resources along its preferred alternative route across the Nesbitt property. As detailed in Ms. Nesbitt's privileged comments filed in conjunction with this letter, her archaeologist conducted an above ground cultural resources inventory of the applicant's preferred alternative crossing the Nesbitt property and identified 66 cultural/historic features. The archaeologist, Dana Ste. Claire, determined the majority of these 66 features were eligible for listing on the National Register of Historic Places.

With regard to ALT-12W, the applicant erroneously attempts to assert its predictive modeling indicates a moderate to high probability of archaeological resources along ALT-12W. As noted earlier, the ALT-12W predominantly traverses previously disturbed lands (i.e., rights-of-ways, roads, agriculture, residential development, etc.). As noted in our privileged comments, the probability of cultural/historic resources is low due the level of land disturbance that has occurred along ALT-12W. Ms. Nesbitt commissioned her archaeologist to ground truth ALT-12W and no above ground resources like those on the Nesbitt property were found. Again, due the level of ground disturbance, it is highly likely that any sub-surface archaeological materials would have be impacted. The applicant provides no explanation how its predicative modeling can explain how archaeological resources could survive all the previous ground disturbances or explain the absence of resources similar to those that dominate the Nesbitt property.

It is obvious that the applicant's assessment of cultural resources along the ALT-12W and CPL N are erroneous, in that they overstate the presence of resources along ALT-12W and completely ignore the existence of resources on the Nesbitt property along the applicant's preferred alternative.

¹⁸ The applicant surveyed Ms. Nesbitt's property for six weeks; however, their archaeologist curiously stopped taking field notes after the second day despite identifying 88 features in just two days of note taking.

IND526 – Geraldine Nesbitt (cont'd)

Page 31

VI. FERC'S OBLIGATION TO VERIFY FACTS

IND526-1
(cont'd)

The applicant has repeatedly submitted inaccurate and misleading information in its application and supplemental filings, many of which have made their way into the DEIS. Ms. Nesbitt has on numerous occasions pointed out key errors and provided accurate information for FERC's review. However, FERC has not provided any indication that it has considered Ms. Nesbitt's credible, supported corrective information and appears to be accepting, without thorough examination, the applicant's erroneous claims.

It is well settled that an agency conducting a NEPA analysis has a duty to independently verify information provided by the applicant, especially when the agency has been provided with contradictory information from a commenting entity. *See Van Abbema v. Fornell*, 807 F. 2d 633 (640) (1986). In *Van Abbema*, the Seventh Circuit considered a challenge to a permit issued by the USACE in connection with the construction of a coal transloading facility on the Mississippi River. Commenting parties challenged the economic justifications given by the applicant. The Court found that USACE's failure to independently verify the challenged material in its NEPA alternatives analysis rendered the issuance of permits arbitrary and capricious.

Along the lines of the *Van Abbema* case, Ms. Nesbitt has provided FERC and USACE, as a cooperating agency, specific, credible information that contradicts the information provided by the instant applicant. This contradictory information includes, but is not limited to, information related to impacts on historical resources, listed species, wetlands, watercourses, water crossings, collocation, plant species of special concern, forest/interior forests, migratory birds, and aquatic dependent species. The inaccurate information reported by the applicant underestimate impacts on the Nesbitt property and overestimate impacts associated with ALT-12W. These errors concern pertinent information concerning resources that FERC and the USACE are required to avoid and/or meaningfully consider. Therefore, the applicant's numerous errors matter and would defeat the purpose of the environmental impact statement subverting the purpose of NEPA to provide the decision makers and the public an accurate assessment upon which to evaluate the proposed project. Stated another way, presenting accurate information is necessary to ensure a well-informed and reasoned decision, both of which are procedural requirements under NEPA. *See Vt. Yankee Nuclear Power Corp. vs Natural Resources Defense Council*, 435 U.S. 519, 558 (1978). In order to take the required hard look under NEPA, any agency may not rely on incorrect assumptions or data in an EIS. *See Native Ecosys. Council vs U.S. Forest Serv.*, 418 F.3d 953, 964 and 965 (9th Cir. 2005). Ms. Nesbitt, in cooperation with four culturally affiliated Indian Tribes, has even extended an invitation to FERC and the USACE to visit her property so

IND526-2

IND526-2

See the revised text in section 4.10.1.3 of the EIS.

IND526 – Geraldine Nesbitt (cont'd)

Page 32

IND526-2
(cont'd) that the agencies may fulfill their duty to verify information and consult with these four Tribes that hold significant religious and cultural importance to the resources on Ms. Nesbitt's property. See our Amended Privileged Comments, which includes a letter from Doug Harris, Deputy Tribal Historic Preservation Officer with the Narragansett Indian Tribe, inviting FERC and the USACE to Ms. Nesbitt's property for formal government-to-government consultation and view the cultural/environmental resources on the property. To date, both FERC and USACE have chosen to ignore this Tribal request. Regardless, the invitation from both Mr. Harris and Ms. Nesbitt is still available for both agencies to verify the cultural and environmental resources while fulfilling their obligations under the National Historic Preservation Act to consult with any federally recognized Tribe that attaches religious and cultural significance to resources that will be impacted by the proposed undertaking.

The duty to independently verify facts is required by both NEPA and USACE regulations. See *Utahns for Better Transp. v. U.S. Dep't of Transp.*, 305 F.3d 1152, 1187 (10th Cir. 2002), as modified on reh'g, 319 F.3d 1207 (10th Cir. 2003); 40 C.F.R. § 1506.5(a); 33 C.F.R. Part 325, App. B. § 13. The continued failure of FERC and the USACE to discharge that duty will render the issuance of any subsequent certification and/or permit arbitrary and capricious.

IND526-3

VII. FERC'S OBLIGATIONS TO TAKE A HARD LOOK--BALD CONCLUSIONS

In the DEIS, FERC relied on numerous bald conclusions and assumptions proffered by the applicant regarding impacts, feasibility of alternatives, and the human environment. Ms. Nesbitt filed Amended Public Comments for the DEIS identifying the unsupported conclusions and assumptions. In its response to FERC's Environmental Data Request dated October 6, 2016, the applicant dismisses ALT-12W relying on several bald, unsupported conclusions/assumptions. In fact, the applicant simply provides statistics without any supporting documentation. There is no way to discern how the applicant's statistics were derived. The fact that our team has been able to clearly demonstrate several of the applicant's statistics are erroneous demonstrates that the applicant's information cannot be relied on. Reliance by FERC on the applicant's unsupported conclusions and assumptions would be arbitrary and capricious and a failure to take the required hard look.

The NEPA regulations specifically place a duty on both FERC and USACE to independently verify information submitted by the applicant in support of the project. The regulations state that "[t]he agency shall independently evaluate the information submitted and shall be responsible for its accuracy." 40 C.F.R. 1506.5. Further, USACE's own regulations state "[i]n all cases, the district engineer should document in

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelfant.com

IND526-3 See the response to comment IND526-1.

IND526 – Geraldine Nesbitt (cont'd)

Page 33

IND526-3
(cont'd) the record the Corps independent evaluation of the information (submitted by an applicant or a contractor) and its accuracy, as required by 40 CFR 1506.5(a).” 33 C.F.R. § Pt. 325, App. B. *Coalition for Healthy Ports v. Coal. for Healthy Ports v. United States Coast Guard*, No. 13-CV-5347 (RA), 2015 WL 7460018 (S.D.N.Y. Nov. 24, 2015), is instructive of what a sufficient independent evaluation entails. There, the Southern District of New York considered the adequacy of an inquiry made by the Coast Guard into induced growth modeling provided by CHTM Hill, an independent contractor of the project applicant. In finding that the Coast Guard satisfied its duty to independently evaluate information submitted by the applicant, the court noted

“[t]he Coast guard has done all that NEPA requires: it retained a qualified expert to conduct an induced demand study; it reviewed the methodology employed by this expert; it received assurances as to the quality of the data underlying its consultant’s methodology; it considered and responded to comments regarding its consultant’s methodology; and it determined, on the full record before it, that its consultant’s study provided a reasonably estimate of the induced growth demand effects of this project.” *Id.* at 12.

In the DEIS, FERC and USACE chose to rely on the bald conclusions of the applicant regarding impacts to both environmental and cultural resources, conclusions that are unsupported by any underlying data, studies, or model methodology. Such documentation is a prerequisite to FERC’s ability to conduct an adequate inquiry as required under NEPA. An agency may not rely on conclusory statements unsupported by data, authorities, or explanatory information. *Seattle Audubon Soc. v. Moseley*, 798 F. Supp. 1473, 1482 (W.D. Wash.), *supplemented*, 798 F. Supp. 1484 (W.D. Wash. 1992), *aff’d sub nom. Seattle Audubon Soc. v. Espy*, 998 F.2d 699 (9th Cir. 1993), and *aff’d in part, appeal dismissed in part sub nom. Seattle Audubon Soc. v. Espy*, 998 F.2d 699 (9th Cir. 1993). Blind reliance on material provided by applicant in the face of specific challenges would not fulfill FERC or USACE’s duty to take a “hard look” at alternatives and environmental impacts, and any resulting decision rendered by FERC or USACE would be arbitrary and capricious. *Van Abbema v. Fornell*, 807 F. 2d 633, 642 (7th Cir. 1986). This is would also be true if FERC and/or the USACE should blindly rely upon the applicant’s unsupported conclusions and assumptions proffered in its response to FERC’s Environmental Data Request dismissing ALT-12W.

One of more blatant and misleading bald conclusions proffered by the applicant dismissing ALT-12W is the erroneous conclusion that ALT-12W has a moderate to high probably for historic/cultural resources based upon the applicant’s so called “predictive site modeling for archaeological resources.” Nowhere does the applicant name or

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 34

IND526-3
(cont'd) describe the model. Further, no where does the applicant disclose the underlying assumptions, factors considered in the modeling, or how the model was run (different scenarios). We, much less FERC and the USACE, have no way of evaluating and commenting on the modeling. However, it is clear the applicant's "predictive modeling" is not accurate. On one hand the applicant acknowledges that the ALT-12W route runs predominately through areas that have already been subject to significant ground disturbance (i.e., existing rights-of-ways, agricultural, residential development, and roads). As our Privileged Archaeological report (filed in conjunction with this comment letter) demonstrates, highly disturbed areas like the proposed ALT-12W route would have a low probability of archaeological resources and even if any existed they would likely be significantly compromised due to the previous land disturbance and utilization. The applicant fails to explain how their predictive model somehow predicts archaeological resources surviving so much land disturbance. The reliability of the applicant's bald conclusions and apparent modeling is further put into question by the fact our archaeologist conducted a preliminary pedestrian survey of ALT-12W and did not discover any cultural/historic resources likely due to the significant, prior land disturbance along ALT-12W.

Conversely, the applicant represents there would be zero archaeological resources on the applicant's preferred route that the ALT-12W would replace. The applicant's preferred alternative crosses 4.23 miles of Ms. Nesbitt's property. As we have discussed multiple times in several filings, Ms. Nesbitt's property is 3000+ acres of undisturbed and unfragmented forest lands that has never been developed. Thus, it is highly questionable that the applicant would claim zero archaeological resources would be impacted by their preferred alternative. It is particularly curious how and why the applicant would continue this claim despite our previously filed Amended Public Comments and Amended Privileged Comments that discuss in detail numerous ceremonial stone landscape features located throughout the Nesbitt property including within the proposed pipeline corridor. We even included undeniable pictures of several of the features including intact serpent effigies that were 90' feet long and multiple intact cairnes. Still, the applicant claims zero resources would be affected by their preferred alternative. It is also important to note that the applicant spent six weeks surveying the Nesbitt property. The applicant's representative provided us copies of their archaeological field notes, which curiously stop after the second day of field surveys. Despite only covering two days of field notes, the applicant's archaeologists identified 60 cairnes, 28 stone walls, 3 structural foundations, and 8 other stone features on the

IND526 – Geraldine Nesbitt (cont'd)

Page 35

IND526-3
(cont'd)

Nesbitt property¹⁹. As our privileged archaeological report indicates, the identification of such features (especially considering the quantity) on one part of the property would mean there is a very high probability of archaeological resources on the rest of the property. However, the applicant, without any explanation claims the exact opposite.

We have included in the privileged comments filed in conjunction with this letter a map and corresponding field notes that precisely locate 66 archaeological/historic features within the corridor of the applicant's preferred alternative. This alone is undisputable proof that the applicant's "predictive modeling" is severely flawed and/or the applicant is providing self-serving, inaccurate/misleading information.

Where predictive modeling is used to analyze and predict impacts of alternatives, the underlying assumptions of the model must be disclosed. *N. Carolina Wildlife Fed'n v. N. Carolina Dep't of Transp.*, 677 F.3d 596, 605 (4th Cir. 2012). In *N. Carolina Wildlife Fed'n*, the Fourth Circuit considered a challenge to a NEPA analysis conducted by the North Carolina Department of Transportation and the Federal Highway Administration in connection with permitting construction of a toll road. As part of their NEPA analysis, the applicant agencies incorporated data generated by a travel demand model to analyze the no-build alternative required by NEPA. *Id.* at 599. The applicant agencies failed to disclose the underlying assumptions of the model, which incorporated build assumptions into the "no build" baseline, even in the face of comments questioning the underlying assumptions of the model. *Id.* at 600. In finding the NEPA analysis inadequate, the Court held that by "failing to disclose the underlying assumptions and by falsely responding to public concerns, the Agencies failed to take the required hard look at environmental consequences." *Id.* at 604. Similarly, the applicant in the instant case has relied on modeling to predict "a moderate to high probability" of encountering historic resources along the ALT-12W. This prediction is highly suspect in light of the fact that much of the ALT-12W is either collocated with existing infrastructure, agricultural land that has been actively farmed for years, and residential land. Without disclosure of the underlying assumptions and design of the model used, reliance on the data generated prevents USACE and FERC from conducting their required hard look.

VIII. CONCLUSION

Based on the foregoing and the attached technical reports, the ALT-12W is by far environmentally superior to the applicant' preferred alternative. The ALT-12W is

¹⁹ Please see our privileged comments, which include as an attachment the applicant's field notes, filed in conjunction with this letter.

IND526 – Geraldine Nesbitt (cont'd)

Page 36

IND526-3
(cont'd)

environmentally superior with regard to every relevant environmental factor. Consequently, the ALT-12W represents significant avoidance/reduction to environmental impacts when compared to the applicant's preferred alternative. While NEPA may be procedural in nature, FERC's regulations and the CWA are not mandating FERC select the Environmentally Preferable alternative. In the instant case, there is no question that ALT-12W is the Environmentally Preferable option because it would significantly avoid/reduce impacts to: (1) large areas of unbroken interior forest; (2) rare, protected wetland forests; (3) numerous listed species; (4) designated wildlife and plant areas/communities; (4) wetlands; (5) headwaters; (6) watercourses; (7) numerous springs; and (8) cultural/historic resources.

The applicant attempts to dismiss ALT-12W with cursory, bald conclusions that essentially boil down to three minor points concerning: (1) modest construction related issue over a short length steep slope; (2) impacts to a tributary of Leonard Creek that has been previously disturbed, and (3) landowner considerations. In asserting these three points, the applicant ignores all the beneficial aspects of ALT-12W. The applicant only proffers one environmental reason to dismiss ALT-12W. As the foregoing comments demonstrate, the applicant misrepresents the impacts to Leonard Creek and those impacts are significantly less than the impact that would result on the Nesbitt property from the applicant's preferred alternative. Additionally, the applicant's arguments concerning steep slopes fails to be persuasive considering similar steep slope (side slope) issues would occur on the Nesbitt property as well. Regardless, the modest difficulty resulting from constructing the pipeline along a steep slope are minor when compared to the numerous, overwhelming environmental benefits ALT-12W provides over the applicant's preferred alternative. Finally, the applicant fails to disclose how the reported landowners will be impacted or what their desires are. In any case, FERC's regulations and precedent require FERC to select the alternative that is environmentally superior and the modest increase in the number of landowners within 50 feet of the workspace does not trump selection of the environmentally superior alternative.

As demonstrated in this comment letter, ALT-12W is the environmentally/culturally superior alternative that serves the project objectives. The applicant has failed to provide any credible information to suggest ALT-12W is impracticable. Consequently, per FERC's regulations and other legal obligations, it is clear ALT-12W is the alternative FERC is required to select. Any reliance on the applicant's erroneous, unsupported assertions/information or dismissal of ALT-12W would be arbitrary and capricious violating NEPA, NHPA, CWA, and FERC's regulations. We strongly request FERC comply with its legal obligations and select the

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

Page 37

IND526-3
(cont'd) | Environmentally Preferable alternative, ALT-12W. Thank you in advance for your
time and consideration. Please contact us if you should have any questions or concerns.

Respectfully submitted,



Carolyn Elefant
LAW OFFICES OF CAROLYN ELEFANT PLLC

2200 Pennsylvania Avenue N.W. 4th Flr. E. Wash. D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND526 – Geraldine Nesbitt (cont'd)

List of Preparers

1. James Charles, The Nara Group, LLC
2. Thomas Estes, Icarus Ecological Services, INC
3. Brian Winchester, Icarus Ecological Services, INC
4. Kelly Mandello, Icarus Ecological Services, INC
5. Carolyn Elefant, The Law Offices of Carolyn Elefant, PLLC
6. Wayne Flowers, Lewis Longman & Walker, PA
7. Mark Freed, Curtin & Heefner, LLP

IND527 – Walter and Robyn Kochan

IND527-1 Kochan 11-14-16 Comments on Nesbitt CPL North Alternative 12 West

In regard to CPL North Alternative 12 West, there is no reason it can't eliminate Lake Catalpa Road. The accompanying CPL Alternate 12 West Variation indicates the options of 1 and 2 described below to avoid the ASP crossing Lake Catalpa Road at all and ill-affecting Goodleigh Manor, Kochan and Jackloski properties with Steep Side Slope destruction. The attached photographs show that Transco/Williams has 3 alternatives that would be less damaging than their intended routes, 2 of which are options from CPL North Alternative 12 West.

1. Co-Locate ASP from Chapin Plant, 1.1 miles (3 photos):

Co-locate the Atlantic Sunrise Pipeline from the Chapin Dehydration plant into its existing lines which is only 1.1 miles and already crosses over 1 hill. By co-locating with an existing ROW, it eliminates switching back/crossing over Route 309 (twice) and instead runs parallel with Route 309. This also eliminates the problems with the Nesbitt, Kochan and Jackloski properties and STEEP SIDE SLOPE destruction.

2. Across Route 309 from Chapin Plant, 1.2 miles (9 photos):

Construct the ASP across Route 309 from the Chapin Plant. The property at Falls Hill Road (across Route 309 from Chapin) is for sale, as is the VACANT Penn State Seed property which has been for sale for a very long time. All of this land (1.2 miles) is flat and low-lying with NO STEEP SIDE SLOPES, all the way to the intersection of Route 309 and Lake Catalpa Road. Purchasing vacant and flat land from willing landowners is far better than robbing and ruining the steep side slopes of existing landowners' properties.

3. North Side of Lake Catalpa Road, 1.2 miles (10 photos):

3. Keep their ASP on the opposite (north) side of Lake Catalpa Road which 1.2 miles from the intersection of Nesbitt Lane and Plattsburg Road to the intersection of Route 309 and Lake Catalpa Road. Within that distance, 1.0 miles is VACANT, including .2 miles between the intersection of Route 309 and Lake Catalpa/Mountain View Roads that enters the Goodleigh Manor/Landview development and VERY STEEP SIDE SLOPES.

In summary, there is NO REASON for Transco/Williams to cross Lake Catalpa Road from the Nesbitt property through the STEEP SIDE SLOPES of Goodleigh Manor and the Kochan property when these 3 alternatives exist and are on much flatter and/or vacant land, or could be co-located with one of the existing pipelines. All of these options do NOT cut across STEEP side slopes and disrupt the natural streams and springs to exacerbate flooding of the Kochan property and Route 309. They also avoid Goodleigh Manor and the Jackloski properties.

As previously stated, if FERC is going to follow its own regulation (18 CFR Section 380.15(d) to **REQUIRE APPLICANTS** to consider the use, widening or extension of **existing rights-of-way**, then FERC must require Transco to investigate these variations because they are the only ones that would mitigate environmental impact in our area.

IND527-1 See our analysis of CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS

IND528 – Walter and Robyn Kochan

20161115-5019 FERC PDF (Unofficial) 11/14/2016 11:17:52 PM

**Kochan 11-14-16 Clarification on Comments for CPL North
Alternative 12 West and Alternative 12 WestA**

IND528-1 Please be advised that due to the myriad of documents being offered in regard to the above noted alternate routes, and time delays, that all comments we have submitted regarding Alternative 12 West are also applicable to Alternative 12 West A. Needless to say, it has been extremely confusing with the varied route numbers but our comments apply to each no matter what.

IND528-1 Comment noted. See our analysis of the CPL North Alternatives 12, 12 West, and 12 East in section 3.3.2 of the EIS.

IND529 – Geraldine Nesbitt

20161123-5025 FERC PDF (Unofficial) 11/23/2016 8:53:32 AM



2200 Pennsylvania Avenue N.W. 4th Fl. E. Washington D.C. 20037 | 202-297-6100
7315 Wisconsin Avenue, Suite 400, Washington D.C. 20814
Carolyn@carolynelefant.com | LawOfficesofCarolynElefant.com | licensed in MD, DC, NY

November 23, 2016

The Honorable Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington D.C. 20426

Re: Atlantic Sunrise Expansion Project Docket CP15-138
Urgent Request for Extension of Time to Respond to
New Transco Filings and Demand for NEPA Compliance

Dear Ms. Bose,

Our law firm has the pleasure of representing Ms. Geraldine Nesbitt, an impacted landowner and intervenor, in connection with the Atlantic Sunrise Expansion Project currently under review by the Federal Energy Regulatory Commission (FERC) in the above-captioned docket. This letter responds to the recent filing by the applicant, Williams-Transco late in the day on November 14, 2016, the deadline for public comments on the CPL North 12 West Alternative (ALT-12W) that the Commission instructed Williams to evaluate by letter dated October 3, 2016.

IND529-1 Williams' last-hour changes to ALT-12W -- presumably timed so as to foreclose any meaningful comment subverts the NEPA process and undermines Ms. Nesbitt's timely filed comments because her comments were based on the ALT-12W alignment publicly noticed. Further, the applicant dubiously modifies the alternative route to make it so undesirable as to guarantee its rejection rather than avoid environmental impacts. As a result of these changes, the Commission must re-open the comment period through
IND529-2 December 10, 2016 and postpone the issuance of the final EIS at least until January 30, 2016. Failure to grant this relief violates both NEPA and Ms. Nesbitt's due process rights. Discussion follows.

IND529-1 We disagree. The alignment of CPL North Alternative 12 West that we public noticed and the alignment filed by Transco are comparable. Transco made minor changes to the alignment to address site-specific routing constraints and landowner concerns.

IND529-2 We disagree. We do not believe that extending the comment period would result in the identification of any new substantive issues.

IND529 – Geraldine Nesbitt (cont'd)

20161123-5025 FERC PDF (Unofficial) 11/23/2016 8:53:32 AM

Page 2

I. Background

On October 6, 2016 the Commission instructed Transco to "provide [within ten days] an environmental, engineering, and economic analysis of the alternative alignment" known as the ALT-12W. On October 17, 2016, Transco submitted a cursory analysis, offering a few vague and largely unsupported details regarding the environmental characteristics of the alternative. In the meantime, on October 13, 2016, the Commission sent notice regarding the ALT-12W to affected landowners, seeking further comment by November 14, 2016.

On November 14, 2016, Ms. Nesbitt filed lengthy comments in support of ALT-12W. The comments were supplemented by several environmental and (privileged) cultural resource reports describing the impacts of ALT-12W and demonstrating that this alternative was environmentally superior to the applicant's proposed route.

Also on November 14, 2016, Transco submitted supplemental information describing several modifications to ALT-12W and offering additional (and inaccurate) details about impacts. Transco's modifications and inaccurate information were designed to make ALT-12W appear to be a less attractive alternative, while the timing of the filing - on the last day of the comment period and available on the docket after 10PM - was designed to foreclose meaningful comment. The appropriate opportunity for the applicant to propose any deviations to ALT-12W was in their response to the October 6, 2016 Environmental Data Request, which would have allowed FERC to notice the alignment alternative that the applicant is asking FERC to reject. This would have given the public and affected landowners (including Ms. Nesbitt) the opportunity to comment on the alternative that would be up for consideration. If the applicant needed additional time to respond to the Environmental Data Request, then the applicant could have requested additional time rather than use the NEPA comment process as a shield to preclude meaningful public participation and poison the consideration of alternatives. As discussed, the Commission must not tolerate this conduct.

II. The Commission Must Allow Additional Time to Respond to New Information.

The Commission provided Transco ten days -- from October 6 through October 17, 2016 -- to evaluate the ALT-12W alternative and to compare the impacts to Transco's proposed route. In response, Transco submitted a cursory and vague analysis that Transco presented as complete and gave no indication that it intended to offer a

2200 Pennsylvania Avenue N.W. 4th Fl. E. Wash, D.C. 20037 | 202-297-6100 Carolyne@carolynelefant.com

IND529-3 See the responses to comments IND529-1 and IND529-2.

IND529 – Geraldine Nesbitt (cont'd)

20161123-5025 FERC PDF (Unofficial) 11/23/2016 8:53:32 AM

Page 3

supplement. Again, if Transco needed more time to respond to the Commission's October 6 letter, it should have requested more time. And if Transco believed that its response was incomplete, it should have disclosed in its filing as such and that it

IND529-4 intended to seek more time to file a supplement. Had Transco taken either of these two steps at the time, then FERC could have appropriately noticed the deviations to ALT-12W and given Ms. Nesbitt and other parties sufficient time to respond, rather than facilitate wasting their resources evaluating a route that would later be substantially changed at the applicant's whim.

Instead, Transco chose to withhold information regarding its modifications to the CPL ALT-12W route until the final day for filing comments. Moreover, instead of changing the alternative to further reduce impacts, Transco apparently set out to modify the route to increase environmental impacts, which is completely contrary to the requirements set forth in 18 C.F.R. §380.15. Instead of avoiding and minimizing impacts, Transco's modified CPL ALT-12-West route targets them -- for example, by doubling the number of wetlands impacted and crossing at least two more streams.

IND529-5 As a result, the Commission no longer has before it a comparison of Transco's original route and CPL ALT-12W proposed by Ms. Nesbitt, but instead, a comparison between the previous route and a brand new route that is significantly different from the CPL ALT-12W that Transco was instructed to evaluate. It is also important to note that Transco's reported environmental impacts are highly questionable and have not been supported by any credible documentation. It is apparent that in addition to targeting environmental resources to make ALT-12W unattractive, and their preferred route comparatively more attractive, the applicant also has overstated the environmental impacts/functional values associated with ALT-12W.

IND529-6 Transco's "bait and switch" -- i.e., its substitution of a new version of CPL ALT12-W at the last hour gravely prejudiced Ms. Nesbitt. Transco's untimely new route undermines Ms. Nesbitt's public participation via her extensive comments by preventing comments on the proposed changes in derogation of NEPA which is intended to foster, not foreclose meaningful public comment.

The Commission must either strike ALL of Transco's supplemental filing from the record or reopen the period for comment until at least December 10, 2016 and extend the deadline for release of the FEIS from December 30, 2016 to January 30, 2017. A refusal to either strike the filings or extend the comment period makes the Commission a willing collaborator with Transco in violating NEPA and offends all notions of fairness and due process by allowing Transco to manipulate the certificate

2200 Pennsylvania Avenue N.W. 4th Fl. E. Wash, D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

IND529-4 See the response to comment IND529-1.

IND529-5 See the response to comment IND529-1.

IND529-6 See the responses to comments IND529-1 and IND529-2.

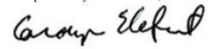
IND529 – Geraldine Nesbitt (cont'd)

20161123-5025 FERC PDF (Unofficial) 11/23/2016 8:53:32 AM

Page 4

process to its advantage. The public interest deserves better and the FERC's legal obligations require it.

Respectfully submitted,



Carolyn Elefant
FERC Counsel to Geraldine Nesbitt

2200 Pennsylvania Avenue N.W. 4th Fl. E. Wash, D.C. 20037 | 202-297-6100 Carolyn@carolynelefant.com

APPLICANT

A1 – Transcontinental Gas Pipe Line Company



Transcontinental Gas Pipe Line Company, LLC
Land, Permits & GIS Department
2800 Post Oak Boulevard (77056)
P.O. Box 1396
Houston, Texas 77251-1396
713/215-2000

May 18, 2016

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Kimberly D. Bose, Secretary

Reference: OEP/DG2E/Gas Branch 2
Transcontinental Gas Pipe Line Company, LLC
Atlantic Sunrise Project
Docket No. CP15-138-000
Environmental Report Supplemental Information

Ladies and Gentlemen:

Transcontinental Gas Pipe Line Company, LLC. (Transco) hereby submits the enclosed Supplemental Information Filing regarding the proposed Atlantic Sunrise Project. This submittal includes the following three primary components: 1) responses to recommendations provided by FERC in the Draft Environmental Impact Statement (FERC/EIS-0269D) for the Atlantic Sunrise Project; 2) an update to information previously submitted in supplemental filings dated June 8, 2015 and July 21, 2015; and 3) Transco's revised Biological Assessment.

This filing includes site-specific cultural resource information. In accordance with the Commission's regulations at 18 CFR § 380.12(f)(4), Transco requests that this information be accorded privileged treatment and placed in a non-public file. This filing also includes site-specific information regarding threatened and endangered species; Transco requests that this information be accorded privileged treatment and placed in a non-public file.

Consistent with § 385.2010 of the Commission's regulations, Transco is serving copies of this filing to each person whose name appears on the official service list for this proceeding.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
May 18, 2016
Page 2

If you have any questions regarding this filing, please contact Joe Dean at 713-215-3427 or joseph.dean@williams.com.

Respectfully,

Transcontinental Gas Pipe Line Company, LLC.

A handwritten signature in black ink, appearing to read "Joseph Dean". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Joseph Dean
Manager, Environmental Permitting

cc: Commission Staff

A1 – Transcontinental Gas Pipe Line Company (cont'd)



Transcontinental Gas Pipe Line Company, LLC

Supplemental Information Filing

Atlantic Sunrise Project

May 2016

A1 – Transcontinental Gas Pipe Line Company (cont'd)

TABLE OF CONTENTS

1	RESPONSES TO RECOMMENDATIONS IN THE DEIS	1
2	ADDITIONAL INFORMATION	6
2.1	SUMMARY OF ROUTE MODIFICATIONS INCORPORATED INTO THE PROPOSED ROUTE	6
2.1.1	Minor Alternative Summaries	13
2.2	PERMITS, LICENSES, APPROVALS AND CONSULTATIONS.....	23
3	BIOLOGICAL ASSESSMENT	28
4	NRCS EASEMENTS.....	29

LIST OF ATTACHMENTS

Attachment 1 Privileged Documents

Attachment 1-1	Cultural Resource Survey Reports Addendum 1 Report Addendum 2 Report
Attachment 1-2	Privileged Cultural Resource Correspondence
Attachment 1-3	2015 Northeastern Bulrush Survey Report
Attachment 1-4	2015 Phase I Bog Turtle Survey Report
Attachment 1-5	2015 Phase II and III Bog Turtle Survey Report
Attachment 1-6	Bog Turtle Telemetry Report
Attachment 1-7	Bog Turtle and Northeastern Bulrush Remote Sensing Report
Attachment 1-8	2014/2015 Timber Rattlesnake Survey Report
Attachment 1-9	Mussel Survey Report for the Susquehanna River Crossings
Attachment 1-10	2014/2015 Allegheny Woodrat and Eastern Small-footed Bat Survey Report
Attachment 1-11	State Listed Plant Survey Report
Attachment 1-12	2015 Mist Netting and Telemetry Report
Attachment 1-13	Biological Assessment
Attachment 1-14	Allegheny Woodrat and Eastern Small-footed Bat Addendum Report
Attachment 1-15	Allegheny Woodrat and Eastern Small-footed Bat Mitigation Plan
Attachment 1-16	2016 Timber Rattlesnake Survey Report

Attachment 2 Route Modification Figures

Attachment 3 Updated Agency Correspondence

Attachment 4 Final Biological Assessment (Public Version)

Attachment 5 Hibernaculum Monitoring Plan

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

LIST OF TABLES

Table 1-1	Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement	2
Table 2-1	Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC	7
Table 2-2	CPL North Alternative 12 Minor Route Alternative Comparison	17
Table 2-3	CPL South Alternative 28 Minor Route Alternatives Comparison	21
Table 2-4	Permits, Licenses, Approvals, and Consultations to be Applied/Requested for the Project	23
Table 4-1	Properties with FRPP Easements Crossed by the Project	29

A1 – Transcontinental Gas Pipe Line Company (cont'd)

LIST OF ACRONYMS AND ABBREVIATIONS

Agricultural Plan	Agricultural Construction and Monitoring Plan
BA	Biological Assessment
Certificate Application	Transco's certificate application filed with FERC on March 31, 2015
CPL	Central Penn Line
EIS	Environmental Impact Statement
FERC	Federal Energy Regulatory Commission
FRPP	Farm and Ranchland Protection Program
LOD	limits of disturbance
MP	milepost
NRHP	National Register of Historic Places
NRCS	Natural Resource Conservation Service
PHMC	Pennsylvania Historical and Museum Commission
Project	Atlantic Sunrise Project
Transco	Transcontinental Gas Pipe Line Company, LLC
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service

A1 – Transcontinental Gas Pipe Line Company (cont'd)

1 RESPONSES TO RECOMMENDATIONS IN THE DEIS

Section 5.2 of the draft Environmental Impact Statement (EIS) (FERC/EIS-0269D) contains a number of Federal Energy Regulatory Commission (FERC) Staff's recommendations for the Atlantic Sunrise Project (Project). Transcontinental Gas Pipe Line Company, LLC (Transco) is evaluating these recommendations, and will provide a response to each recommendation within the specified timeframe. Table 1-1 provides responses compiled by Transco to date.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT SUPPLEMENTAL INFORMATION FILING – MAY 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
May 16, 2016

FERC Recommendation Number	Recommendation	Response
A1-1	<p>Prior to the end of the draft EIS comment period, Transco shall file with the Secretary any route adjustments, workspace modifications, or mitigation measures developed through Transco's ongoing consultations with landowners for the following routes:</p> <p>a. Neil Bushong Deviation along Central Penn Line (CPL) South between mileposts (MPs) 20.8 and 21.4.</p> <p>b. Route Deviation M-0209 following an alignment along the western boundary of the Goehring property along CPL South between MPs 23.1 and 23.6.</p> <p>c. Route Deviation M-0169 along CPL South between MPs 56.9 and 57.1, and</p> <p>d. Route Deviation M-0246 along CPL South between MPs 13.0 and M-0152 0.4.</p> <p>Transco shall either incorporate these deviations or a route that avoids the resources of concern, or otherwise explain how potential impacts on resources have been effectively avoided, minimized, or mitigated. (Section 3.3.3)</p>	<p>Transco has incorporated the route deviations described in recommendations 18a, 18b, and 18d into CPL South. These route deviations are described in this supplemental information filing. Transco is reviewing the route deviation described in 18c, and will provide a response prior to the end of the draft EIS comment period.</p>
A1-2	<p>Prior to the end of the draft EIS comment period, Transco shall file with the Secretary any updated consultations with the FWS regarding migratory birds and a revised Migratory Bird Plan incorporating any additional avoidance or mitigation measures. (Section 4.6.1.3)</p>	<p>Transco submitted the final Migratory Bird Plan (Version 3) to the Federal Energy Regulatory Commission (FERC) on December 18, 2015. The United States Fish and Wildlife Service (USFWS) approved the plan and advised Transco that avoidance and minimization measures included in the plan are sufficient to address migratory bird concerns. Transco is continuing to consult with the USFWS regarding mitigation related to removal of migratory bird habitat. Updated information related to this consultation will be provided to FERC before the end of the draft EIS comment period.</p>
A1-3	<p>Prior to the end of the draft EIS comment period, Transco shall file with the Secretary all fall 2015 hibernacula survey results for the Indiana bat, and any avoidance and mitigation measures developed based on the results. (Section 4.7.2.1)</p>	<p>Transco is providing the results of all 2015 bat surveys in the final survey report in Attachment 1-12, and proposed avoidance and mitigation measures are included in the Biological Assessment in Attachment 1-13.</p>
A1-4	<p>Prior to the end of the draft EIS comment period, Transco shall file with the Secretary all fall 2015 hibernacula survey results for the northern long-eared bat, and any avoidance and mitigation measures developed based on the results. (Section 4.7.2.2)</p>	<p>Transco is providing the results of all 2015 bat surveys in the final survey report in Attachment 1-12, and proposed avoidance and mitigation measures are included in the Biological Assessment in Attachment 1-13.</p>

2

A1-1

Comment noted.

A1-2

The EIS has been revised to include the updated information provided in the Migratory Bird Plan.

A1-3

The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

A1-4

The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT SUPPLEMENTAL INFORMATION FILING – MAY 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
May 16, 2016

FERC Recommendation Number	Recommendation	Response
A1-5	Prior to construction. Transco shall file with the Secretary all survey results for the bog turtle, including any FWS comments on the surveys and their conclusions. The survey reports shall include: a. name(s) and qualifications of the person(s) conducting the survey; b. method(s) used to conduct the survey; c. date(s) of the survey; d. area surveyed (include the mileposts surveyed); and e. proposed mitigation that will substantially minimize or avoid the potential impacts. Transco must receive written approval from the Director of CEP before construction or use of mitigation may begin. (Section 4.7.2.3)	Transco is providing the results of all 2015 bog turtle surveys in the final survey reports in Attachment 1-4 and Attachment 1-5, the telemetry survey results in Attachment 1-6, and the remote sensing analysis results in Attachment 1-7. Proposed avoidance and mitigation measures are included in the Biological Assessment in Attachment 1-13.
A1-6	Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all survey results for the northeastern bluebird, including any FWS comments on the surveys and their conclusions, and proposed mitigation that will substantially minimize or avoid the potential impacts. Transco must receive written approval from the Director of CEP before construction or use of mitigation may begin. (Section 4.7.2.4)	Transco is providing the results of all 2015 northeastern bluebird surveys in the final survey report in Attachment 1-3, and the remote sensing analysis results in Attachment 1-7. Proposed avoidance and mitigation measures are included in the Biological Assessment in Attachment 1-13.
A1-7	Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all survey results for the Allegheny woodrat, permit requirements, agency correspondence, and avoidance or mitigation measures developed in consultation with the PGC. (Section 4.7.3.4)	Transco is providing the results of all Allegheny woodrat surveys in the final survey reports in Attachments 1-10 and 1-14, and a proposed mitigation plan in Attachment 1-15. Transco has requested concurrence from the Pennsylvania Game Commission (PGC) on the survey findings and proposed avoidance and mitigation measures. Transco will provide a copy of the final correspondence with PGC once it is received.
A1-8	Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all documentation of its correspondence with the PGC and any avoidance or mitigation measures developed with the agency regarding the eastern small-footed bat. (Section 4.7.3.4)	Transco is providing the results of all eastern small-footed bat surveys in the final survey reports in Attachment 1-10 and 1-14, and a proposed mitigation plan in the final survey reports in Attachment 1-15. Transco has requested concurrence from PGC on the survey findings and proposed avoidance and mitigation measures. Transco will provide a copy of the final correspondence with PGC once it is received.

3

- A1-5 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

- A1-6 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

- A1-7 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

- A1-8 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT SUPPLEMENTAL INFORMATION FILING – MAY 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
May 16, 2016

FERC Recommendation Number	Recommendation	Response
A1-9	Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all survey results for timber rattlesnake, permit requirements, agency correspondence, and avoidance or mitigation measures developed in consultation with the PFBC. (Section 4.7.3.4)	Transco is providing the results of all timber rattlesnake surveys in the final survey reports in Attachment 1-8 and 1-16. Transco has requested concurrence from the Pennsylvania Fish and Boat Commission (PFBC) on the survey findings and proposed avoidance and mitigation measures. Transco will provide a copy of the final correspondence with PFBC once it is received.
A1-10	Prior to construction. Transco shall include the results of any mussel surveys conducted within the Susquehanna River and any additional avoidance or mitigation measures included in Transco's site-specific horizontal directional drill contingency crossing plans. (Section 4.7.3.4)	Transco is providing the results of mussel surveys conducted in the Susquehanna River in Attachment 1-9. Correspondence with PFBC regarding the survey findings is provided in Attachment 3.
A1-11	Prior to construction of project facilities in Virginia. Transco shall file with the Secretary all documentation of its correspondence with the VDGF and any avoidance or mitigation measures developed with this agency regarding state-listed mussels in Virginia. (Section 4.7.3.5)	Transco is providing copies of its correspondence with the Virginia Department of Game and Inland Fisheries (VDGF) regarding state-listed mussel species in Attachment 3.
A1-12	Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of its consultations with the Natural Resource Conservation Service (NRCS) and the landowner regarding the proposed CPL South crossing of the Farm and Ranchland Protection Program (FRPP) easement near MP 12.4, including any proposed mitigation measures and copies of correspondence. (Section 4.8.6.2)	Transco is providing updates regarding its identification of Farm and Ranchland Protection Program (FRPP) easements crossed by the Project in Section 4 of this filing.

4

A1-9 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

A1-10 The results of these surveys have been incorporated into the EIS.

A1-11 Comment noted.

A1-12 This comment was superseded by comment A2-21.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
May 16, 2016

FERC Recommendation Number	Recommendation	Response
A1-13 50	<p>Transco shall not begin construction of facilities in Pennsylvania or use of staging, storage, or temporary work areas and new or to-be-improved access roads until:</p> <p>a. Transco completes the remaining archaeological and architectural surveys and files with the Secretary all remaining cultural resources survey and evaluation reports, any necessary avoidance or treatment plans that outline measures to avoid, reduce, and/or mitigate effects on historic properties, and the Pennsylvania SHPO's comments on the reports and plans;</p> <p>b. the ACHP is provided an opportunity to comment on the undertaking if historic properties would be adversely affected; and</p> <p>c. the FERC staff reviews and the Director of OEP approves all cultural resources survey reports and plans, and notifies Transco in writing that treatment plans/mitigation measures may be implemented or construction may proceed.</p> <p>All material filed with the Secretary containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE" (Section 4.10.5)</p>	<p>Transco is providing Addendum 1 and Addendum 2 to the archaeological and architectural survey report in Attachment 1-1. A copy of PHMC concurrence with the Addendum 1 report is provided in Attachment 3.</p>
<p>Key:</p> <ul style="list-style-type: none"> CPL = Central Penn Line EIS = Environmental Impact Statement FERC = Federal Energy Regulatory Commission FRPP = Farm and Ranchlands Protection Program PFDC = Pennsylvania Fish and Boat Commission PGC = Pennsylvania Game Commission PHMC = Pennsylvania Historical and Museum Commission VDGIF = Virginia Department of Game and Inland Fisheries USFWS = U.S. Fish and Wildlife Service 		

A1-13

Comment noted.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

2 ADDITIONAL INFORMATION

This Supplemental Information Filing provides information on route modifications and workspace changes incorporated by Transco that have not previously been filed with FERC. Route modifications and workspace changes were made to accommodate requests from landowners, agencies and public officials, as well as to avoid various sensitive resources and land uses. A summary of the route modifications is provided in Section 2.1; Section 2.2 includes the updated status of all permits, licenses, approvals, and consultations.

This Supplemental Information Filing does not include updated Resource Report tables and new alignment sheets for the proposed route and workspace changes. These materials will be submitted to FERC prior to the end of the draft EIS comment period. Transco's next supplemental information filing will also address the route alternatives recommended by FERC in the draft EIS as well as other opportunities to minimize impacts on the resources of concern on the corresponding sections of the proposed route. Transco is also reviewing other opportunities to minimize impacts to the equine facilities operated by Dr. Linda Quodomine, wetlands and waterbodies, residential areas and other sensitive resources.

2.1 SUMMARY OF ROUTE MODIFICATIONS INCORPORATED INTO THE PROPOSED ROUTE

Transco has incorporated 39 route modifications into the Project that have not previously been filed with FERC. The majority of the route modifications (37 of 39) are considered route deviations (i.e., minor adjustments to the proposed route, typically to avoid a specific feature); only two new minor route alternatives, Central Penn Line (CPL) North Alternative 12 and CPL South Alternative 28, are proposed. Table 2-1 lists the centerline modifications by Project component. Additional details on each alternative are in Section 2.1.1.

As listed in Table 2-1, Transco incorporated route modifications based on continuing negotiations with landowners, further engineering design, the results of environmental field surveys, and the results of civil survey of property boundaries. Transco has communicated these changes to the impacted landowners. The majority of these route modifications were in response to landowner requests.

As shown in Table 2-1, the 10.2 miles of route modifications on CPL North increased the total route length by 1.1 miles, while the 12.6 miles of route modifications on CPL South increased the route length by 0.3 mile. The Chapman Loop decreased in length by 0.4 mile to

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC

Reference ID	June 2015 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2015 Supplemental Alignment Sheets (miles/feet)	Maximum Distance between Route Modification and June 2015 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
CPL North							
#M-0066	2.1 - 2.3	Sugarloaf/Columbia	0.24 / 1,274	0.05 / 251	275	Avoid federally listed T&E plant species population	0
#M-0068 / CPL North Alternative 12	26.3 - 30.0	Dalles/Luzerne Northmoreland/Wyoming	4.21 / 22,205	0.55 / 2,884	5,132	Landowner request to be near property boundaries and cultural resource considerations	0
#M-0071	30.5 - 34.3	Northmoreland/Wyoming Eaton/Wyoming	3.69 / 19,530	0.00 / 0	26	Adjust portions centerline based on civil survey	0
#M-0063	44.9 - 45.1	Clinton/Wyoming	0.31 / 1,635	0.01 / 51	150	Align pipeline CN-MLV-05 and pipeline with station Compressor Station 605 design	0
#M-0067	53.9 - 54.1	Lenox/Susquehanna	0.15 / 775	0.01 / 31	50	Adjust centerline and PI to avoid and remove power pole from construction corridor	0
#M-0080	M-0051 0.2 - 50.5	Nicholson/Wyoming	1.68 / 8,323	0.44 / 2,300	1,615	Avoid cultural site	2
CPL North Total			10.18 / 53,742	1.06 / 5,527	N/A	N/A	2

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC

Reference ID	June 2015 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2015 Supplemental Alignment Sheets (miles/feet)	Maximum Distance between Route Modification and June 2015 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
CPL South							
#M-0224	2.4 - 2.7	Marion/Lancaster	0.30 / 1,580	0.00 / -5	9	Align centerline and workspace with property boundaries following civil survey	0
#M-0227	7.3 - 7.5	Marion/Lancaster	0.13 / 691	0.01 / 34	80	Align centerline and workspace with property boundaries following civil survey	0
#M-0248	13.1 - M-0152 0.4	Manor/Lancaster	0.47 / 2,484	-0.02 / -88	259	Landowner request to avoid property	2
#M-0206	14.2 - M-0188 0.0	Manor / Lancaster	0.06 / 331	-0.01 / -41	119	Landowner request to reduce impact on property and align with power line corridor	0
#M-0289	16.5 - 16.9	Manor/Lancaster	0.43 / 2,253	0.03 / 141	480	Landowner request to locate pipeline to avoid issues with future expansion	0
#M-0225	17.4 - 17.5	Manor/Lancaster	0.06 / 336	0.00 / -1	97	Align centerline and workspace with property boundaries following civil survey	0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC

Reference ID	June 2015 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2015 Supplemental Alignment Sheets (miles/feet)	Maximum Distance between Route Modification and June 2015 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
#M-0396 / CPL South Alternative 28	20.8 – 21.5	West Hempfield/Lancaster	0.46 / 2,448	-0.02 / -108	540	Shift alignment at Highway 30 crossing, and landowner request to avoid impacts on springs	0
#M-0209	23.1 – 23.7	West Hempfield/Lancaster	0.65 / 3,427	0.11 / 588	610	Landowner request to move centerline closer to property line, and further from home	0
#M-0308	30.3 – 30.5	Rapho/Lancaster	0.14 / 743	0.00 / 20	27	Avoid drainage culvert	0
#M-0278	35.6 – 35.9	Mount Joy/Lancaster	0.34 / 1,810	0.02 / 109	111	Landowner request to adjust permanent right-of-way to within 5 feet of landowner's property line	0
#M-0300	39.2 – 39.6	South Londonderry/Lebanon	0.26 / 1,391	-0.01 / -79	83	Shift the alignment away from stream	0
#M-0226	40.1 – 40.3	South Londonderry/Lebanon	0.24 / 1,255	0.00 / 12	28	Align centerline and workspace with property boundaries following civil survey	0
#M-0228	40.6 – 40.7	South Londonderry/Lebanon	0.14 / 750	0.00 / 7	28	Align centerline and workspace with property boundaries following civil survey	0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC

Reference ID	June 2015 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2015 Supplemental Alignment Sheets (miles/feet)	Maximum Distance between Route Modification and June 2015 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
#M-0211	M-0183 0.6 - M-0183 0.9	South Annville/Lebanon North Annville/Lebanon	0.50 / 2,664	0.00 / -8	167	Accommodate Highway 422 and Clear Springs Road expansion	0
#M-0229	49.4 - 49.6	East Hanover/Lebanon	0.22 / 1,144	0.01 / 54	66	Align centerline and workspace with property boundaries following civil survey	0
#M-0205	57.0 - 57.4	Union/Lebanon	0.43 / 2,268	0.00 / 1	100	Reduce impacts to Fort Indiantown Gap	0
#M-0230	57.5 - 58.2	Union/Lebanon	0.73 / 3,858	0.00 / 16	25	Align centerline and workspace with property boundaries following civil survey	0
#M-0301 / #M-0221	M-0221 0.2 - M-0221 0.3	Pine Grove/Schuylkill	0.51 / 2,672	0.00 / 8	56	Improve location of Dark Woods Road crossing	0
#M-0223	69.2 - 69.2	Pine Grove/Schuylkill	0.05 / 265	0.00 / -12	22	Align centerline and workspace with property boundaries following civil survey	0
#M-0316	75.12 - 76.1	Hegins/Schuylkill	1.00 / 5,279	0.00 / 24	118	Adjust centerline to avoid mine tunnel entrance	0
#M-0213	79.0 - 79.1	Hegins/Schuylkill	0.86 / 4,557	0.00 / -25	48	Minimize impacts to T&E species	0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC

Reference ID	June 2015 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2015 Supplemental Alignment Sheets (miles/feet)	Maximum Distance between Route Modification and June 2015 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
#M-0247	M-0190 0.8 - M-0194 1.2	Eldred/Schuykill East Cameron/Northumberland	0.41 / 2,167	0.05 / 269	370	Adjust centerline to parallel existing ROW through PGC land	0
#M-0252 / #M-0323	84.7 - 84.8	East Cameron/Northumberland	0.14 / 747	0.02 / 124	150	Adjust route to avoid cultural resource	0
#M-0240	85.8 - 86.1	Coal/Northumberland	0.36 / 1,924	0.01 / 38	383	Improve Highway 901 crossing	0
#M-0235	86.6 - 87.9	Coal/Northumberland	0.54 / 2,874	0.02 / 117	160	Reduce wetland and side slope impacts	0
#M-0271	92.2 - 92.4	Ralphi/Northumberland Cleveland/Columbia	0.26 / 1,352	0.05 / 270	415	Adjust centerline at Happy Valley Road	0
#M-0285	95.6 - 96.1	Franklin/Columbia	0.20 / 1,072	0.00 / 9	43	Adjust centerline to increase distance from residence	0
#M-0241*	103.4 - 103.7	Hemlock/Columbia	0.35 / 1,849	0.05 / 253	300	Adjust centerline to accommodate future transmission line projects	0
#M-0315*	104.8 - 105.0	Hemlock/Columbia	0.28 / 1,482	0.05 / 286	182	Adjust centerline to follow fence line	0
#M-0220*	105.5 - 106.0	Hemlock/Columbia	0.51 / 2,716	0.00 / -24	92	Landowner request to parallel edge of field	0
#M-0236*	M-0171 0.2 - M-0171 0.7	Hemlock/Columbia	0.49 / 2,585	0.01 / 35	103	Landowner request to accommodate potential future subdivision	0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with FERC

Reference ID	June 2015 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2015 Supplemental Alignment Sheets (miles/feet)	Maximum Distance between Route Modification and June 2015 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
#M-0214	107.3 - M-0195 0.2	Mount Pleasant/Columbia	0.43 / 2,282	-0.10 / -527	1,089	Landowner request to move pipeline away from residence	0
#M-0207	112.4 - 112.6	Orange/Columbia	0.21 / 1,131	0.01 / 56	77	Align centerline and CS-MLV-12 with Compressor Station 610 design	0
CPL South Total			12.64 / 66,895	0.29 / 1,573	N/A	N/A	2
TOTAL			22.82 / 120,637	1.35 / 7,100	N/A	N/A	4

Note:
* Transco recognizes that this route deviation is within a portion of the June 2015 Supplemental proposed route that would be replaced by CPL South Alternative 24C recommended by FERC in the draft EIS. Transco is evaluating this route alternative, and will provide an evaluation of this route prior to the end of the draft EIS comment period. If this alternative is adopted, this route deviation will no longer be needed.

Key:
CPL = Central Penn Line
ID = identifier
MP = milepost
N/A = not applicable
PGC = Pennsylvania Game Commission
ROW = right-of-way
T&E = threatened and endangered

A1 – Transcontinental Gas Pipe Line Company (cont'd)

2.5 miles. The length of the Unity Loop is unchanged from the June Supplemental Information Filing. No new landowners are affected by the route modifications on the Chapman Loop. The route modifications on CPL North and CPL South affect four additional landowners not included on previous mailing lists filed with FERC. A revised landowner line list and mailing list will be provided in a supplemental filing prior to the end of the draft EIS comment period. In order to facilitate their participation in the National Environmental Policy Act process, Transco notified these new landowners of the release of the draft EIS, comment meetings, and how to submit comments to FERC. In addition, Transco has negotiated with each of the newly affected landowners and has secured rights to install, operate, and maintain the pipeline across their properties.

2.1.1 Minor Alternative Summaries

CPL North Alternative 12

After submitting the June 2015 Supplemental Information Filing, Transco identified an alternative route on CPL North, CPL North Alternative 12, in Luzerne County based on the results of landowner requests and concerns, cultural resource surveys, and Native American tribal coordination on the previously proposed route between milepost (MP) 26.3 and MP 30.0. The location of this alternative is shown on Figure 10I-44 in Attachment 2.

Archaeological Survey

The June 2015 Proposed Route crosses contiguous properties owned by Ms. Geraldine Nesbitt between MP 26.3 and MP 30.0. Transco gained survey permission for the Nesbitt properties in August 2015. Prior to conducting archaeological surveys, Mr. Steve McDougal of the Pennsylvania Historical and Museum Commission (PHMC) informed Transco that the landowner and caretakers of the properties were concerned about the June 2015 Proposed Route. It was expressed to Mr. McDougal and subsequently to Transco representatives that there were numerous stone walls and stone features, including actual or potential stone piles (also referred to as cairns), along the route and throughout the properties.

Archaeological surveys were initiated by Transco on August 5, 2015. Mr. McDougal participated in a site visit on August 5, 2015, and spent the day with the property caretakers (Mr. Frank Taylor and Ms. Heather Taylor) and Transco's survey personnel. In addition to the stone features, Ms. Nesbitt and the Taylors expressed further concerns with the June 2015 Proposed Route, including proximity to the main house, crossing a meadow, and bisecting the properties. PHMC's initial concerns regarding the stone features warranted further field investigation and

A1 – Transcontinental Gas Pipe Line Company (cont'd)

route discussions with Ms. Nesbitt and the Taylors, which resulted in the proposed CPL North Alternative 12 Route along the eastern property boundary.

Transco completed archeological and aboveground historical structures surveys within a 300-foot-wide corridor along the June 2015 Proposed Route and CPL North Alternative 12 in August 2015. Both routes run generally in a northeastern direction from MP 0.0 of M-0088, terminating at Levitt Hill Road. The Nesbitt properties associated with both routes are primarily covered in mixed forest with moderately sloped terrain throughout, and the two survey corridors encompass portions of Luzerne and Wyoming counties.

The Phase I archaeological field reconnaissance investigated a total of 2,696 sample loci data collection points on both the June 2015 Proposed and CPL North Alternative 12 routes. The entire 300-foot-wide survey corridor for both routes was visually inspected for archaeological features, both buried and aboveground, while 1,518 shovel tests were excavated. Selection of the CPL North Alternative 12 Route was initially coordinated during the August 2015 surface reconnaissance with the property caretakers to specifically address landowner concerns and minimize impacts to cultural resources, including stone landscape features.

Transco continued coordination with PHMC from August 2015 through April 2016, as well as provided additional information to Native American Indian Tribes that were interested in further details gathered about the Nesbitt properties. Transco specifically coordinated in detail with Mr. Jesse Bergevin of the Oneida Indian Nation and Ms. Susan Bachor of the Delaware Tribe of Indians, as further discussed below under "Native American Coordination."

Based on survey results, discussions with the landowner and caretakers, and coordination with the PHMC and Native American Indian Tribes, Transco adopted the CPL North Alternative 12 Route. The June 2015 Proposed Route bisected the property and is within the viewshed of the main house, which is currently being recommended as Potentially Eligible to the National Register of Historic Places (NRHP) and a contributing element of the proposed Nesbitt Estate Rural Historic District (see Addendum 2, Volume I: Aboveground Report). There were no archeological resources found during site reconnaissance along the June 2015 Proposed Route. However, approximately 38 landscape features, including rock walls and stone piles, were identified by Transco during the archaeological surveys. In addition, the June 2015 Proposed Route is in proximity and adjacent to a large cairn field, which is of concern to the Oneida Indian Nation and Delaware Tribe of Indians.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

The CPL North Alternative 12 Route survey identified four archaeological resources, including three resources recommended as Not Eligible and one Potentially Eligible historic farmstead, which is being avoided by the limits of disturbance (LOD). All four of these resources are detailed in full in Addendum 2, Volume I: Phase I Archaeological Report provided in Attachment 1-1 of this filing. This route crosses approximately 50 stone landscape features, including rock walls and stone piles, of which many are dilapidated/compromised from current and past logging activities. However, in coordination with PHMC, Oneida Indian Nation, and Delaware Tribe of Indians, CPL North Alternative 12 was acceptable and preferred over the June 2015 Proposed Route.

In summary, Transco identified no archaeological resources during the August 2015 surveys along the June 2015 Proposed Route. However, approximately 38 stone landscape features, including rock walls and stone piles, or cairns were identified. Additionally, both Oneida Indian Nation and Delaware Tribe of Indian representatives were of the opinion that the June 2015 Proposed Route would be in proximity and in the viewshed of a large cairn field. Moreover, PHMC's coordination revealed this route to be in the viewshed of the main house, which is Potentially Eligible to the NRHP and a contributing element to the proposed Nesbitt Estate Rural Historic District. Transco subsequently developed and adopted a route alternative (CPL North Alternative 12) to avoid these resources and concerns. Transco completed survey of the alternative route, which revealed approximately 50 stone landscape features, as well as three archaeological resources recommended as Not Eligible, and one Potentially Eligible historic farmstead, avoided by the LOD. The alternative avoids the larger cairn field and its viewshed along the June 2015 Proposed Route, as well as minimizes adverse effects to other aboveground resources.

Native American Coordination

On June 23, 2014 and September 26, 2014, Transco sent 35 initial coordination letters to 25 Native American tribal entities and copies of the letters were provided in Appendix 4N of the March 2015 Certificate Application (Certificate Application). Subsequent to the transmittal of the coordination letters, Transco contacted each of the tribes to ensure that receipt of the letter, and to address any questions resulting therein. Of the original 25 tribes contacted, the Catawba Indian Tribe, Delaware Tribe of Indians, Oneida Indian Nation, and the Stockbridge Munsee Band of Mohicans requested copies of the Project cultural resources documentation, and each have provided written comments regarding the Project, which included the June 2015 Proposed Route only.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

On September 17, 2015, approximately two weeks after completion of the survey on the June 2015 Proposed and CPL North Alternative 12 routes, Transco sent informational coordination letters to the Catawba Indian Tribe, Delaware Tribe of Indians, Oneida Indian Nation, and the Stockbridge Munsee Band of Mohicans. Copies of these letters are provided in the agency correspondence in the Addendum 2 report (see Attachment 1-1). The focus of the letters was to provide further information about the Project's cultural resources survey, specifically as related to rock walls and stone piles. Both the Delaware Tribe of Indians and the Oneida Indian Nation expressed an interest in these resources and requested additional information in a series of e-mails and letters dated October 9 through November 12, 2015 (Delaware Tribe of Indians), and November 3, 2015 (Oneida Indian Nation). Information provided included survey results for both the June 2015 Proposed and CPL North Alternative 12 routes. Both tribal representatives responded that the CPL North Alternative 12 Route would satisfy landowner concerns regarding the June 2015 Route, as well as avoid tribal concerns. However, a site visit was recommended to review the alternative route only.

On November 20, 2015, a site visit was conducted along CPL North Alternative 12 involving the landowner's representative, Transco and its cultural resources consultants, Mr. Steve McDougal (PHMC), and Ms. Susan Bachor, Delaware Tribe Historic Preservation Representative. Mr. Jesse Bergevin, Historic Resources Specialist of the Oneida Nation, was unable to attend, but did remain in close contact with Ms. Bachor. The purpose of the on-site meeting was to examine the alternative route and address concerns of both the Delaware Tribe of Indians and the Oneida Indian Nation. During the site visit, Ms. Bachor reviewed one area of the proposed Alternative 12 Route, and verbally concluded that there would be no effect to properties of concern to the Delaware Tribe of Indians. Examination of a second area of the route indicated that there would be no viewshed effects to cairn fields located outside the LOD. Although the site visit did not include walking the June 2015 Proposed Route, Ms. Bachor discussed that the June 2015 Proposed Route would be a potential concern due to the route being within the viewshed and immediately adjacent to a large cairn field which may have significance to the Delaware Tribe of Indians. Previous conversations with Mr. Bergevin revealed similar concerns related to the June 15 Proposed Route.

On January 11, 2016, Mr. Bergevin discussed the survey of the Alternative 12 Route in a letter to Transco. He indicated that after a review of materials supplied by Transco (as discussed above), discussions with the Delaware Tribe of Indians and the PHMC, "it is my opinion that the features identified within the LOD... are not related to past Oneida land use."

A1 – Transcontinental Gas Pipe Line Company (cont'd)

On January 22, 2016, Ms. Bachor requested supplemental photographic and mapping information to complete her review of the Alternative 12 Route. On "February 1, 2015" (*sic* 2016), she concluded that, "Our review [of the Alternative 12 Route, as well as Wyoming County as a whole – inserted for clarity] indicates that there are no religious or culturally significant sites within the Area of Potential Effect. We have no objection to the proposed project as planned."

Other Environmental Resources

In addition to the cultural resource considerations, Transco conducted a comparative analysis of other environmental resource impacts between CPL North Alternative 12 and the June 2015 Propose Route. CPL North Alternative 12 is approximately 0.6 mile longer than the corresponding section of the June 2015 Proposed Route. This alternative route increases impacts on forested land and interior forests. Transco conducted stream and wetland surveys along both routes. CPL North Alternative 12 crosses 0.1 mile of wetlands, and would impact 1.8 acre of wetlands including 1.5 acre of forested wetlands. The June 2015 Proposed Route crosses 0.3 miles of wetlands, and would impact 3.6 acres of wetlands including 3.1 acres of forested wetlands. CPL North Alternative 12 crosses five streams while the June 2015 Proposed Route crosses eight streams. No residences are located within 50 feet of the construction workspace for either route. Table 2-2 provides a comparison of this alternative and the corresponding section of the June 2015 proposed route.

Transco has incorporated this alternative into the proposed route to minimize impacts to archaeological resources identified on the Nesbitt properties. The comparative analysis between the two routes did not identify any significantly greater impacts on other resources along CPL North Alternative 12.

Table 2-2
CPL North Alternative 12
Minor Route Alternative Comparison

Factor	CPL North Alternative 12	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Length of corresponding segment (miles)	4.2	3.7	+0.6
Co-location			
Length adjacent to Interstate Pipeline ROW (miles)	0.0	0.0	0.0
Length adjacent to Midstream Pipeline ROW (miles)	0.0	0.0	0.0
Length adjacent to electric transmission line ROW (miles)	0.0	0.0	0.0
Length adjacent to roadway (miles)	0.0	0.0	0.0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

**Table 2-2
CPL North Alternative 12
Minor Route Alternative Comparison**

Factor	CPL North Alternative 12	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Total length co-located (miles)	0.0	0.0	0.0
ROW Requirements			
Pipeline construction requirements (acres) ^a	48.7	42.4	+6.3
Pipeline operation requirements (acres) ^b	25.5	22.2	+3.3
Federal and State Land			
Federal lands crossed (number / miles)	0 / 0.0	0 / 0.0	0 / 0.0
State lands crossed (number / miles)	0 / 0.0	0 / 0.0	0 / 0.0
Land Use			
Forested land crossed (miles) ^c	3.7	2.8	+0.9
Forested land impacts (construction / operation) (acres) ^d	42.8 / 22.5	32.3 / 17.2	+10.5 / +5.3
Forest interior crossed (miles) ^e	1.9	1.0	+0.9
Forest interior impacts (construction / operation) (acres) ^e	22.4 / 11.4	11.4 / 5.9	+11.0 / +5.5
Agricultural land crossed (miles) ^f	0.0	0.0	0.0
Agricultural land impacted (construction / operation) (acres) ^g	0.0 / 0.0	0.0 / 0.0	0.0 / 0.0
Other Land Crossed (miles) ^h	0.5	0.9	+0.4
Other Land Impacted (construction/operation) (acres) ^h	5.9 / 3.0	10.1 / 5.0	-4.2 / -2.0
Residences within 50 feet of the construction workspace (number) ⁱ	0	0	0
Landfills, quarries, and other mining operations within 0.25 mile (number)	0	0	0
Waterbodies			
Waterbodies crossed (number) ^j	5	8	-3
Major waterbody crossings (number >100 feet)	0	0	0
Wetlands			
Total wetland complexes crossed (number) ^j	7	12	-5
Total wetland crossed (miles) ^j	0.1	0.3	-0.2
Palustrine forested wetland complex impacts (construction / operation) (acres) ^j	1.5 / 0.8	3.1 / 1.6	-1.6 / -0.8
Cultural Resources			
Sites crossed that are eligible or potentially eligible for listing on the National Register of Historic Places (number) ^k	0	0	0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

Table 2-2
CPL North Alternative 12
Minor Route Alternative Comparison

Factor	CPL North Alternative 12	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Other Physical Features			
Road crossings (number)	5	7	-2
Railroad crossings (number)	0	0	0
Other Environmental Features			
Steep slopes crossed (30 degrees or greater) (miles) ^g	0.0	<0.1	< -0.1
Side slope construction (miles) ^m	0.0	<0.1	< -0.1

^a Pipeline construction requirements based on a 100-foot-wide construction corridor and includes a 100-foot-long buffer at begin and end points.

^b Pipeline operation requirements based on a 50-foot-wide corridor in greenfield segments, and a 25-foot-wide corridor for segments co-located with Transco pipelines. Calculation includes a 50-foot-long buffer at begin and end points.

^c Forested land, forest interior, agricultural land, and other land crossed are based on geographic information system (GIS) centerline analysis using United States Geological Survey (USGS) National Land Cover Dataset (NLCD).

^d Forest land, forest interior, agricultural land, and other land impacted are based on GIS corridor analysis using USGS NLCD. Since multiple land use types may be present within the corridor, impact acreage for individual land uses will not be representative of distance crossed, which is based on centerline analysis.

^e Forest interior determined by assessment of forest cover from USGS NLCD, where forest interior was considered 300 feet from forest breaks and outer forest edge. Interior forest is a sub-type of Forested Land.

^f Other land based on USGS NLCD and includes land cover types: Barren Land, Developed High Intensity, Developed Low Intensity, Developed Medium Intensity, Developed Open Space, Emergent Herbaceous Wetlands, Herbaceous, Open Water, Shrub Scrub, Woody Wetlands.

^g Residences identified based on review of aerial photography; in cases where it was not clear whether a structure was a residence or other built feature (e.g., barn, storage facility), the structure was assumed to be a residence.

^h Waterbodies identified based on field surveys.

ⁱ Major waterbodies identified based on field surveys.

^j Wetlands identified using the field surveys.

^k National Register of Historic Places sites were identified using desktop data.

^l Length determined perpendicular to slope contour.

^m Length determined parallel with slope contour. Developed using USGS 10-foot contours.

Key:
 CPL = Central Penn Line
 ROW = right-of-way

CPL South Alternative 28

After submitting the June 2015 Supplemental Information Filing, Transco identified an alternative route on CPL South, CPL South Alternative 28, in Lancaster County based on the results of additional landowner negotiations, and engineering analysis on the previously proposed route between MP 20.8 and MP 21.5. In addition, FERC recommended that this

A1 – Transcontinental Gas Pipe Line Company (cont'd)

alternative be adopted in recommendation 18a in the draft EIS. The location of this alternative is shown on Figure 10F-19 in Attachment 2.

During engineering analysis of the previously proposed crossing of Highway 30, Transco determined that trenchless construction of this road crossing would require use of a modified horizontal directional drill instead of a conventional bore due to the topography at this crossing location. The highway is raised in this area creating a difficult road crossing that would require additional temporary workspace. Transco identified the alternative route in order to cross the road in a relatively flat area with less workspace.

Mr. and Mrs. Bushong expressed a preference for a route that avoided impacts to the springs and wetlands located on their property. These water features are used as cattle ponds by the landowner. The previously proposed route would cut off access to these areas during construction disrupting the landowner's operation. The landowner also expressed concerns regarding the previously proposed route's proximity to one of the residences on the property. The previously proposed route was approximately 138 feet from the residence and workspace under 90 feet.

In addition to the engineering and landowner considerations, Transco conducted a comparative analysis of environmental resource impacts between CPL South Alternative 28 and the June 2015 Propose Route. CPL South Alternative 28 is approximately 0.02 miles shorter than the corresponding section of the June 2015 Proposed Route. Both routes cross-agricultural land, and due to the similar length of each route, land use impacts would be comparable. This alternative route increases impacts on forested land and interior forests. CPL South Alternative 28 and the corresponding section of the June 2015 Proposed Route both cross one stream, and would impact approximately 0.1 acre of wetlands. No residences are located within 50 feet of the construction workspace for either route; however, one residence is within 100 feet of the corresponding section of the June 2015 Proposed Route. In addition, this alternative crosses two roads, while the corresponding section of the June 2015 Proposed Route crosses three roads. Table 2-3 provides a comparison of this alternative and the corresponding section of the June 2015 Proposed Route.

Transco has incorporated this alternative into the proposed route to address landowner concerns, and due to the engineering considerations at the crossing of Highway 30. The comparative analysis between the two routes did not identify any significantly greater impacts on environmental resources along CPL South Alternative 28.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

Table 2-3
CPL South Alternative 28
Minor Route Alternatives Comparison

Factor	CPL South Alternative 28	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Length of corresponding segment (miles)	0.5	0.5	0.0
Co-location			
Length adjacent to Interstate Pipeline ROW (miles)	0.0	0.0	0.0
Length adjacent to Midstream Pipeline ROW (miles)	0.0	0.0	0.0
Length adjacent to electric transmission line ROW (miles)	0.0	0.0	0.0
Length adjacent to roadway (miles)	0.0	0.0	0.0
Total length co-located (miles)	0.0	0.0	0.0
ROW Requirements			
Pipeline construction requirements (acres) ^a	5.7	5.6	+0.1
Pipeline operation requirements (acres) ^b	2.8	2.9	-0.1
Federal and State Land			
Federal lands crossed (number / miles)	0 / 0.0	0 / 0.0	0 / 0.0
State lands crossed (number / miles)	0 / 0.0	0 / 0.0	0 / 0.0
Land Use			
Forested land crossed (miles) ^c	0.0	0.0	0.0
Forested land impacts (construction / operation) (acres) ^d	0.0 / 0.0	0.0 / 0.0	0.0
Forest interior crossed (miles) ^{e-g}	0.0	0.0	0.0
Forest interior impacts (construction / operation) (acres) ^{h-e}	0.0	0.0	0.0
Agricultural land crossed (miles) ^f	0.3	0.2	+0.1
Agricultural land impacted (construction / operation) (acres) ⁱ	3.4 / 1.6	3.0 / 1.6	+0.4 / 0.0
Other Land Crossed (miles) ^{c,d}	0.2	0.2	0.0
Other Land Impacted (construction/operation) (acres) ^{h,i}	2.3 / 1.2	2.6 / 1.4	-0.3 / -0.2
Residences within 50 feet of the construction workspace (number) ^j	0	0	0
Landfills, quarries, and other mining operations within 0.25 mile (number)	0	0	0
Waterbodies			
Waterbodies crossed (number) ^k	1	1	0
Major waterbody crossings (number >100 feet) ^l	0	0	0

A1 – Transcontinental Gas Pipe Line Company (cont'd)

**Table 2-3
CPL South Alternative 28
Minor Route Alternatives Comparison**

Factor	CPL South Alternative 28	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Wetlands			
Total wetland complexes crossed (number) ^f	1	2	-1
Total wetland crossed (miles) ^g	0.0	0.0	0.0
Palustrine forested wetland complex impacts (construction / operation) (acres) ^h	0.0 / 0.0	0.0 / 0.0	0.0 / 0.0
Cultural Resources			
Sites crossed that are eligible or potentially eligible for listing on the National Register of Historic Places (number) ⁱ	0	0	0
Other Physical Features			
Road crossings (number)	2	3	-1
Railroad crossings (number)	0	0	0
Other Environmental Features			
Steep slopes crossed (30 degrees or greater) (miles) ^j	0	0	0
Side slope construction (miles) ^m	0	0	0

^a Pipeline construction requirements based on a 100-foot-wide construction corridor and includes a 100-foot-long buffer at begin and end points.

^b Pipeline operation requirements based on a 50-foot-wide corridor in greenfield segments, and a 25-foot-wide corridor for segments co-located with Transco pipelines. Calculation includes a 50-foot-long buffer at begin and end points.

^c Forested land, forest interior, agricultural land, and other land crossed are based on geographic information system (GIS) centerline analysis using United States Geological Survey (USGS) National Land Cover Dataset (NLCD).

^d Forest land, forest interior, agricultural land, and other land impacted are based on GIS corridor analysis using USGS NLCD. Since multiple land use types may be present within the corridor, impact acreage for individual land uses will not be representative of distance crossed, which is based on centerline analysis.

^e Forest interior determined by assessment of forest cover from USGS NLCD, where forest interior was considered 300 feet from forest breaks and outer forest edge. Interior forest is a sub-type of Forested Land.

^f Other land based on USGS NLCD and includes land cover types: Barren Land, Developed High Intensity, Developed Low Intensity, Developed Medium Intensity, Developed Open Space, Emergent Herbaceous Wetlands, Herbaceous, Open Water, Shrub Scrub, Woody Wetlands.

^g Residences identified based on review of aerial photography, in cases where it was not clear whether a structure was a residence or other built feature (e.g., barn, storage facility), the structure was assumed to be a residence.

^h Waterbodies identified during field survey and supplemented with remote sensing.

ⁱ Major waterbodies identified based on review of aerial photography.

^j Wetlands identified during field survey and supplemented with remote sensing.

^k National Register of Historic Places sites were identified using desktop data.

^l Length determined perpendicular to slope contour.

^m Length determined parallel with slope contour. Developed using USGS 10-foot contours.

Key:
CPL = Central Penn Line
ROW = right-of-way

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

2.2 PERMITS, LICENSES, APPROVALS AND CONSULTATIONS

Table 2-4 includes the updated Resource Report 1, Table 1.6-1 to include the status of all permits, licenses, approvals and consultations. Updated agency correspondence for the Project is provided in Attachment 3.

Table 2-4
Permits, Licenses, Approvals, and Consultations to be Applied/Requested for the Project

Permit/Approval	Administering Agency	Status
Federal		
Certificate of Public Convenience and Necessity	FERC	Pre-filing initiated on April 4, 2014; formal application submitted in March 31, 2015
CWA Section 404 Permit/ Section 10 River and Harbor Act	USACE, Baltimore District	Section 404/10 application for Pennsylvania facilities submitted April 9, 2015
	USACE, Norfolk District	Application submitted February 6, 2016
Consultation for: Threatened and Endangered Species; Migratory Bird Treaty Act; and Bald and Golden Eagle Protection Act	USFWS, Pennsylvania Field Office	Consultation initiated in March 2014 and is ongoing
	USFWS, Chesapeake Bay Field Office	Clearance received October 6, 2014
	USFWS, Asheville Field Office	Consultation initiated in April 2014 and is ongoing
	USFWS, Raleigh Field Office	Consultation initiated in April 2014 and is ongoing
	USFWS, South Carolina Field Office	Clearance received February 19, 2015
USFWS, Virginia	Consultation initiated in April 2014 and is ongoing	
Appalachian Trail Crossing Consultation	NPS	Consultation initiated on April 2014 and is ongoing
Interstate Agencies		
Water Allocation Permit	SRBC	Applications Submitted November 25, 2015 and January 8, 2016

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

**Table 2-4
Permits, Licenses, Approvals, and Consultations to be Applied/Requested for the Project**

Permit/Approval	Administering Agency	Status
Pennsylvania (State)		
CWA 401 Water Quality Certification	PADEP, Regional Bureaus of Watershed Management	Permit received April 5, 2016.
Chapter 105 Application	PADEP, Regional Bureaus of Watershed Management	Unity and Chapman Loops - Applications submitted on August 7, 2015. Permit issued for Chapman Loop on April 29, 2016. CPL North and CPL South – Applications submitted on August 28, 2015
Chapter 102 ESCGP-2 Application	PADEP, Bureau of Land and Water Conservation, Division of Stormwater Management and Sediment Control County Conservation Districts	Unity and Chapman Loops, and Compressor Stations 517 and 520 - Applications submitted on August 7, 2015. Permit issued for Compressor Station 517 on October 9, 2015 and for Chapman Loop on April 29, 2016. CPL North and CPL South – Applications submitted on August 28, 2015
CWA Section 402 NPDES – Hydrostatic Test Water Discharge Permit/Approval (PAG-10)	PADEP, Bureau of Water Quality Protection	Application anticipated to be submitted in the 4th quarter of 2016
Submerged Land License Agreement	PADEP, Regional of Watershed Management	Application submitted as part of the Chapter 105 Application.
Aid to Navigation Plans	PFBC	Application anticipated to be submitted in 3rd quarter of 2016
Stream Blasting Permit	PFBC	Application anticipated to be submitted in 3rd quarter of 2016
Highway Occupancy Permit	PennDOT	Application anticipated to be submitted in the 2nd quarter of 2016
Consultation (Rare Plant Species)	PA DCNR	Clearance received February 23, 2016
Consultation (Rare Aquatic and Amphibian Species)	PFBC	Clearance received January 28, 2016
Consultation (Rare Mammalian and Avian Species)	PGC	Consultation initiated in March 2014 and is ongoing
State Park Right-of-Way License	PA DCNR	Application was submitted on April 30, 2015
State Game Land Right-of-Way License	PGC	Application was submitted on September 4, 2015
Section 106, National Historic Preservation Act Consultation	PHMC, Bureau of Historic Preservation	Consultation initiated in March 2014 and is ongoing

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

**Table 2-4
Permits, Licenses, Approvals, and Consultations to be Applied/Requested for the Project**

Permit/Approval	Administering Agency	Status
Air Quality Request for Determination	PADEP Bureau of Air Quality	Compressor Station 605 – RFD approved July 17, 2015 Compressor Station 610 – RFD approved October 1, 2015 Springville Meter Station – RFD approved July 17, 2015 Zick Meter Station – RFD approved July 17, 2015 West Diamond Regulator Station – RFD approved February 8, 2016 River Road Regulator Station – RFD approved January 20, 2016
Air Quality Plan Approval (minor)		Compressor stations 517 and 520 – Application submitted in March 2015
Maryland		
Permit for Stormwater Management Associated with Construction Activity	Howard County Conservation District	Application was submitted October 21, 2015
Soil Erosion and Sediment Control	Howard County Conservation District	Application was submitted October 21, 2015
Maryland Joint Permit	MDE	Permit received October 13, 2015
NPDES Hydrostatic Discharge Permit	MDE	Application anticipated to be submitted in the 3rd quarter of 2016
Rare Species Clearance	MDE	Clearance received May 30, 2014
SHPO Categorical Exclusion	MHT	Clearance received November 12, 2014
Air Permit Change Notice	MDE	Permit received March 17, 2016

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

Table 2-4
Permits, Licenses, Approvals, and Consultations to be Applied/Requested for the Project

Permit/Approval	Administering Agency	Status
Virginia		
Soil Erosion Plans Associated with Construction Activity	VDEQ	Application submitted February 2, 2016
VPDES Hydrostatic Discharge Permit	VDEQ	Application anticipated to be submitted in the 4th quarter of 2016
Rare Species Clearance	VDCR	Consultation initiated April 2014 and is ongoing
	VDGIF	Clearance received August 26, 2015
CWA Section 404/401- NWP12	USACE Norfolk District	Application submitted February 6, 2016
Section 106, National Historic Preservation Act Consultation	VDHR	Concurrence received November 12, 2014 and December 22, 2015
502(b)(10) Notifications	VDEQ	Not applicable – Transco has determined that the change does not trigger notification requirements in Virginia
North Carolina		
NPDES General Stormwater Construction Notification	NCDENR, Division of Energy, Land and Mineral Resources	Notification anticipated to be submitted in 3rd quarter of 2016
NPDES Hydrostatic Discharge	South Carolina Department and Environmental Control	Application anticipated to be submitted in the 4th quarter of 2016
Rare Species Clearance	NCWRC	Consultation initiated in April 2014 and is ongoing
SHPO Categorical Exclusion	NCDCR	Clearance received October 23, 2014
502(b)(10) Notifications	NCDENR, Division of Air Quality	Not applicable – Transco has determined that the change does not trigger notification requirements in North Carolina
South Carolina		
NPDES General Stormwater Construction Notification	South Carolina Department and Environmental Control	Application anticipated to be submitted in the 3rd quarter of 2016
NPDES Hydrostatic Discharge	South Carolina Department and Environmental Control	Application anticipated to be submitted in the 4th quarter of 2016

A1 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – MAY 2016

**Table 2-4
Permits, Licenses, Approvals, and Consultations to be Applied/Requested for the Project**

Permit/Approval	Administering Agency	Status
Rare Species Clearance	South Carolina Department of Natural Resource – Natural Heritage Program	Consultation initiated in April 2014 and is ongoing
SHPO Categorical Exclusion	South Carolina Department of Archive and History Center	Clearance received October 21, 2014

Key:

CPL = Central Penn Line
 CWA = Clean Water Act
 DRBC = Delaware River Basin Commission
 ESCGP = Erosion and Sediment Control General Permit
 FEREC = Federal Energy Regulatory Commission
 MDE = Maryland Department of the Environment
 MHT = Maryland Historical Trust
 NCDENR = North Carolina Department of Environment and Natural Resources
 NCDCCR = North Carolina Department of Cultural Resources
 NCWRC = North Carolina Wildlife Resources Commission
 NHPA = National Historic Preservation Act
 NPDES = National Pollutant Discharge Elimination System
 NPS = National Park Service
 PA DCNR = Pennsylvania Department of Conservation and Natural Resources
 PADEP = Pennsylvania Department of Environmental Protection
 PGC = Pennsylvania Game Commission
 PFBC = Pennsylvania Fish and Boat Commission
 PennDOT = Pennsylvania Department of Transportation
 PHMC = Pennsylvania Historical and Museum Commission
 SHPO = State Historic Preservation Office
 SRBC = Susquehanna River Basin Commission
 VDCR = Virginia Department of Conservation and Recreation
 VDEQ = Virginia Department of Environmental Quality
 VDGIF = Virginia Department of Game and Inland Fisheries
 VDHR = Virginia Department of Historic Resources
 USACE = U.S. Army Corps of Engineers
 USFWS = U.S. Fish and Wildlife Service

A1 – Transcontinental Gas Pipe Line Company (cont'd)

3 BIOLOGICAL ASSESSMENT

Transco previously provided Versions 1 and 2 of the Draft Biological Assessment (BA) to FERC on July 21, 2015, and September 25, 2015, respectively. Since that time, Transco completed additional threatened and endangered species surveys and continued its consultation with the United States Fish and Wildlife Service (USFWS). In addition, the USFWS issued the final 4(d) rule for the northern long-eared bat on January 14, 2016. Transco met with the USFWS and FERC on January 28, 2016, to discuss the impacts of the final 4(d) rule on the Project; the final BA was developed based on these additional consultations with the USFWS. The privileged version of the BA is provided in Attachment 1-13. Transco is also filing a public version of the BA, which is provided in Attachment 4.

As noted in the final BA, Transco has revised the effects determinations for the northern long-eared bat and northeastern bulrush from *may affect, and is likely to adversely affect*, to *may affect, but is not likely to adversely affect*. The revised effects determinations are based on additional field data and new mitigation measures developed in consultation with the USFWS.

Through recent consultation with the USFWS, and as noted in the final BA, Transco is conducting long-term monitoring of the portals associated with the known northern long-eared bat hibernaculum crossed by the Project. The USFWS has approved the hibernaculum monitoring plan. The approved plan is provided in Attachment 5.

A1 – Transcontinental Gas Pipe Line Company (cont'd)

4 NRCS EASEMENTS

At the time of filing its Certificate Application, Transco had identified one property containing Natural Resource Conservation Program (NRCS) Farm and Ranchland Protection Program (FRPP) easement holdings crossed by the Project. Since March 2015, Transco continued to conduct title searches to determine if any additional NRCS easement holdings were crossed, and identified three additional properties that contain FRPP easements. Table 4-1 lists all tracts containing FRPP easements that have been identified to date. In addition, Transco provided shapefiles to NRCS on June 30, 2014. Transco also requested shapefiles from NRCS during meetings with NRCS in 2014 and NRCS declined to provide their shapefiles. Due to the latest letter filed on the docket by NRCS, Transco has again requested shapefiles of Pennsylvania NRCS easement holdings in the area of the Project from NRCS as referenced in the NRCS letter to FERC on April 11, 2016, in order to determine if any additional NRCS easement holdings are crossed by the Project.

Table 4-1
Properties with FRPP Easements Crossed by the Project

Facility / County	Tract	Easement Type	MP
CPL South			
Lancaster	PA-LA-139-B.000	FRPP	12.7 – 12.7
Lancaster	PA-LA-372-B.000	FRPP	M-0164 0.0 – 34.5
Lebanon	PA-LE-067.000	FRPP	44.5 – 45.0
Schuylkill	PA-SC-108.000	FRPP	80.3 – 80.5
Key:			
CPL = Central Penn Line			
FRPP = Farm and Ranchland Protection Program			
MP = Milepost			
WRP = Wetland Reserve Program			

FRPP conservation easements are addendums to agricultural preservation easements granted either to the Commonwealth of Pennsylvania or to a county Agricultural Lands Preservation Board. All of the underlying easements, whether to the Commonwealth or to a county board contain a provision specifically permitting the landowner to continue to grant easements for natural gas pipelines across the preserved land. Each of the underlying easements for the properties listed above contain the following provision:

The granting of rights-of-way by the Grantor [the landowner] ... in and through the subject land for the installation, transportation, or use of lines for ... gas, oil or oil

A1 – Transcontinental Gas Pipe Line Company (cont'd)

products is permitted. The term "granting of rights-of-way" includes the right to construct or install such lines.

Tract PA-SC-108.000

In addition to the above provision that specifically allows the landowner to grant rights-of-ways for natural gas pipeline easements, the conservation easement for Tract PA-SC-108.000 contains a one-line addendum that states:

Should the Commonwealth and/or Schuylkill County fail to continue on with the easement purchase program statewide, then the United States Department of Agriculture [USDA] shall have the right to enforce the terms of the easement.

There is no conflict between the USDA interest in the property and the Project, since the conservation easement program continues statewide, and the grant of rights-of-way for natural gas pipeline easements are specifically permitted by the conservation easement.

Tracts PA-LA-139-B.000, PA-LA-372-B.000, PA-LE-067.000

The conservation easements for the remaining three tracts in Table 4-1 contain the provision above, which specifically permits the Grantor to grant rights-of-way for natural gas pipelines. All three of the landowners have entered into agreements to grant the rights-of-way needed for the Project.

Those three conservation easements contain the same addendum identifying the interest of the USDA in the conservation easement, and each addendum contains a paragraph about utilities which states:

3. Utilities. The granting of rights of way by the Grantor.... in and through the subject land for the installation, transportation, or use of, lines forgas, oil or oil products is permitted, provided the location of activities and structures, permitted under this provision, is consistent with the agricultural viability and the protection of soils purposes as articulated in this Agricultural Conservation Easement. The granting of rights of way includes the right to construct or install such lines, provided any excavation of soils to install such lines is returned to the original topography promptly upon completion of the construction or installation, and methods are taken to control soil erosion. To the greatest extent practicable, such utility rights-of-ways shall be sited to protect the impact to prime, unique and important soils. **After the Agricultural Conservation Easement is recorded, granting of utility rights-of-way on the subject land may only occur through the condemnation process,** which is subject to the review by the Agricultural Lands Condemnation Approval Board in accordance with 3 P.S. Section 913, **unless the condemnation is exempt from review under that section.** If the proposed condemnation is exempt from review by the Agricultural Lands Approval Board [sic], **the Grantees shall give notice of this fact to the United States Department of Agriculture....**

A1 – Transcontinental Gas Pipe Line Company (cont'd)

Since the landowners of the three tracts with this provision in the conservation easements have all agreed to grant the rights-of-way for the Project, no condemnation will occur. Further, the granting of rights-of-way for federal natural gas pipeline projects approved by FERC is specifically exempted from review by the Agricultural Lands Condemnation Approval Board in accordance with 3 P.S. Section 913, which provides:

(b) Approval required for condemnation by a political subdivision, authority, public utility or other body. --No political subdivision, authority, public utility or other body having or exercising powers of eminent domain shall condemn any land within any agricultural security area for any purpose, unless prior approval has been obtained from Agricultural Lands Condemnation Approval Board **The condemnation approvals specified by this subsection shall not be required for an underground public utility facility that does not permanently impact the tilling of soil or for any facility of an electric cooperative corporation or for any public utility facility the necessity for and the propriety and environmental effects of which has been reviewed and ratified or approved by the Pennsylvania Public Utility Commission or the Federal Energy Regulatory Commission**, regardless of whether the right to establish and maintain such underground or other public utility facility is obtained by condemnation, or by agreement with the owner.

3 P.S. §913(b).

Finally, the Project will not permanently impact the tilling of the soil on the three tracts, and the Project will not impact the prime, unique, or important soils except for temporary disturbance. To minimize impacts to the existing agricultural use of these properties, Transco developed an Agricultural Construction and Monitoring Plan (Agricultural Plan) for the Project. The Agricultural Plan documents the measures Transco will follow to minimize and mitigate effects on agricultural lands. These construction methods are also described in Section 4.8.4 of the draft EIS.

The Addendum to each of the conservation easements also requires the "Grantees" to provide notice to the USDA of the exemption of the Tracts from review by the Agricultural Lands Condemnation Approval Board. "Grantees" is defined in each of the conservation easements to mean the county Agricultural Security Board. While Transco does not know if such notices were made to the USDA by the county Agricultural Security Boards, the USDA has been receiving notices regarding the Project since its inception, and has been on the list of stakeholders since May 2, 2014.

A2 – Transcontinental Gas Pipe Line Company



Transcontinental Gas Pipe Line Company, LLC

Supplemental Information Filing

Atlantic Sunrise Project

June 2016

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

TABLE OF CONTENTS

1	RESPONSES TO RECOMMENDATIONS IN THE DRAFT EIS	1
1.1	RESPONSE TO FERC RECOMMENDATION NUMBER 15	9
1.2	RESPONSE TO FERC RECOMMENDATION NUMBER 17	11
1.3	RESPONSE TO FERC RECOMMENDATION NUMBER 18	15
1.4	RESPONSE TO FERC RECOMMENDATION NUMBER 21	16
1.5	RESPONSE TO FERC RECOMMENDATION NUMBER 22	17
1.6	RESPONSE TO FERC RECOMMENDATION NUMBER 33	19
1.7	RESPONSE TO FERC RECOMMENDATION NUMBER 44	20
1.8	RESPONSE TO FERC RECOMMENDATION NUMBER 45	21
1.9	RESPONSE TO FERC RECOMMENDATION NUMBER 46	24
1.10	RESPONSE TO FERC RECOMMENDATION NUMBER 48	28
1.11	RESPONSE TO FERC RECOMMENDATION NUMBER 49	29
1.12	RESPONSE TO FERC RECOMMENDATION NUMBER 53	32
2	ADDITIONAL INFORMATION	33
2.1	ROUTE MODIFICATIONS	33
2.2	WORKSPACE MODIFICATIONS	33
2.3	ABOVEGROUND FACILITIES	33
2.4	ACCESS ROADS	37
2.5	ALIGNMENT SHEETS, DRAFT EIS TABLES, AND RESIDENTIAL CONSTRUCTION PLANS	38
2.6	PROJECT LOCATION MAP	38
2.7	LANDOWNER LINE LISTS	38
3	TRANSCO COMMENTS ON THE DRAFT EIS	39

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

LIST OF ATTACHMENTS

Attachment 1 – FERC Alignment Sheets

1A – CPL North

1B – CPL South

1C – Unity Loop

1D – Chapman Loop

1E – Mainline A and B Replacements

Attachment 2 – Updated Draft EIS Tables

Attachment 3 – Allegheny Woodrat and Eastern Small-footed Bat Mitigation Plan (Privileged)

Attachment 4 – Updated Agency Correspondence

Attachment 5 – Route Modification Figures

Attachment 6 – Site-Specific Crossing Plans

Attachment 7 – Geophysical Survey Report for Potential Dump Site

Attachment 8 – Residential Construction Plans

Attachment 9 – Updated Project Location Map

Attachment 10 – Updated Landowner Line Lists (Privileged)

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

LIST OF TABLES

Table 1-1	Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement June 24, 2016	2
Table 1-2	CPL South Alternative 24D Minor Route Alternative Comparison	13
Table 1-3	Crossing Plans for Federal, State, and Municipal Lands, and Recreation Areas within 0.25 Mile of the Project	21
Table 1-4	Properties with NRCS Easements Crossed by the Project	24
Table 1-5	Land Use Types and Visual Receptors Associated with the Proposed Communication Monopole	30
Table 2-1	Route Modifications Incorporated into the Proposed Route not Previously Filed with the Federal Energy Regulatory Commission	34
Table 2-2	Relocated and New Mainline Valve Locations Since the June 2015 Supplemental Information Filing	37
Table 3-1	Air Quality Modeling Analysis for Compressor Stations 517, 520, and 190	40

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

LIST OF ACRONYMS AND ABBREVIATIONS

Agricultural Plan	Agricultural Construction and Monitoring Plan
ATON	Aids to Navigation
AT	Appalachian Trail
Bureau	Bureau of Abandoned Mine Reclamation
Certificate Application	Transco's certificate application filed with FERC on March 31, 2015
CPL	Central Penn Line
EIS	Environmental Impact Statement
ELRC	Eastern Land and Resource Company
EPA	U.S. Environmental Protection Agency
FERC	Federal Energy Regulatory Commission
FRPP	Farm and Ranchland Protection Program
HDD	horizontal directional drill
I-80	Interstate 80
LOD	limits of disturbance
MAOP	maximum allowable operating pressure
MLV	mainline valve
MP	milepost
MOU	memorandum of understanding
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PADCNR	Pennsylvania Department of Conservation and Natural Resources
PADEP	Pennsylvania Department of Environmental Protection
PADEP-CW	PADEP – Northeast Regional Office – Department of Clean Water
PFBC	Pennsylvania Fish and Boat Commission
PGC	Pennsylvania Game Commission
PHMC	Pennsylvania Historical and Museum Commission
Project	Atlantic Sunrise Project
psig	pounds per square inch gage
RCP	Residential Construction Plan
ROW	right of way
SWAPP	<i>Source Water Assessment & Protection Program</i>
SWPA	source water protection area

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

SWPP	source water protection plan
Transco Procedures	Project-specific Wetland and Waterbody Construction and Mitigation Procedures
Transco	Transcontinental Gas Pipe Line Company, LLC
UDECP	Unanticipated Discovery of Environmental Contamination Plan
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service

A2 – Transcontinental Gas Pipe Line Company (cont'd)

1 RESPONSES TO RECOMMENDATIONS IN THE DRAFT EIS

Section 5.2 of the draft Environmental Impact Statement (EIS) (FERC/EIS-0269D) contains a number of recommendations from the Federal Energy Regulatory Commission's (FERC's) staff for the Atlantic Sunrise Project (Project). Transcontinental Gas Pipe Line Company, LLC (Transco) provided responses to some recommendations in the May 2016 supplemental information filing. Table 1-1 provides responses compiled by Transco to date. Sections 1.1 through 1.12 provide detailed responses to several of the recommendations.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
June 24, 2016

FERC Draft EIS Recommendation Number	Recommendation	Response
A2-1	13 Prior to the end of the draft EIS comment period , Transco shall file with the Secretary a revised alignment sheet that incorporates CPL North Alternative 5 between MPs 24.2 and 24.6 into the proposed route. (Section 3.3.2)	Transco has incorporated CPL North Alternative 5 into the proposed route. The revised alignment sheets for this portion of the Project are provided in Attachment 1A (sheet numbers 50 through 51).
A2-2	14 Prior to the end of the draft EIS comment period , Transco shall file with the Secretary a revised alignment sheet that incorporates CPL North Alternative 10A between MPs 25.6 and 25.9 into the proposed route in consultation with landowners Kochans, Jackoski, and the Goodleigh Manor Subdivision. (Section 3.3.2)	Transco has incorporated CPL North Alternative 10A into the proposed route. The revised alignment sheets for this portion of the Project are provided in Attachment 1A (sheet numbers 53 through 54).
	15 Prior to construction across the Byron property along CPL North between MPs 23.3 and 23.8 , Transco shall develop and file with the Secretary, for review and written approval by the Director of OEP, a schedule for construction and restoration activities on the Byron property that minimizes conflict with the planned public use of the property. Transco shall develop the restoration activities in consultation with the Byrons. (Section 3.3.2)	Please see Section 1.1 for a response to this recommendation.
A2-3	16 Prior to the end of the draft EIS comment period , Transco shall file with the Secretary a revised alignment sheet that incorporates CPL South Alternative 22 between MPs 8.4 and 10.2 into the proposed route. (Section 3.3.2)	Transco has incorporated CPL South Alternative 22 into the proposed route. The revised alignment sheets for this portion of the Project are provided in Attachment 1B (sheet numbers 17 through 21).
	17 Prior to the end of the draft EIS comment period , Transco shall file with the Secretary a revised alignment sheet that incorporates CPL South Alternative 24C between MPs 102.1 and M-0171 0.5 into the proposed route. (Section 3.3.2)	Please see Section 1.2 for a response to this recommendation.

2

A2-1 Comment noted.

A2-2 Comment noted. See our revised analysis in section 3.3.2 of the EIS.

A2-3 Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
June 24, 2016

FERC Draft EIS Recommendation Number	Recommendation	Response
A2-4	<p>18 Prior to the end of the draft EIS comment period, Transco shall file with the Secretary any route adjustments, workspace modifications, or mitigation measures developed through Transco's ongoing consultations with landowners for the following routes:</p> <ul style="list-style-type: none"> a. Neil Bushong Deviation along Central Penn Line (CPL) South between mileposts (MPs) 20.8 and 21.4; b. Route Deviation M-0209 following an alignment along the western boundary of the Goehring property along CPL South between MPs 23.1 and 23.6; c. Route Deviation M-0169 along CPL South between MPs 56.9 and 57.1; and d. Route Deviation M-0248 along CPL South between MPs 13.0 and M-0152.0.4. <p>Transco shall either incorporate these deviations or a route that avoids the resources of concern, or otherwise explain how potential impacts on resources have been effectively avoided, minimized, or mitigated. (Section 3.3.3)</p>	<p>Transco has incorporated the route deviations described in recommendations 18a, 18b, and 18d into CPL South. These route deviations were described in the May 2016 supplemental information filing. Please see Section 1.3 for a response to recommendation 18c.</p>
	<p>21 Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of its consultation with the PADEP and include any updates to its Abandoned Mine Investigation and Mitigation Plan regarding proposed mitigation measures to manage and dispose of contaminated groundwater. (Section 4.3.1.7)</p>	<p>Please see Section 1.4 for a response to this recommendation.</p>
	<p>22 Prior to the end of the draft EIS comment period, Transco shall file with the Secretary proposed mitigation measures Transco will implement to protect all Zone A source water protection areas. (Section 4.3.2.2)</p>	<p>Please see Section 1.5 for a response to this recommendation.</p>
A2-5	<p>28 Prior to the end of the draft EIS comment period, Transco shall file with the Secretary additional justification for the ATWS associated with the waterbodies identified in bold in table K-5 in appendix K of the draft EIS. (Section 4.3.2.6)</p>	<p>Transco's additional justification for the ATWS associated with the waterbodies identified in bold in Table K-5 in Appendix K of the draft EIS is provided in the updated Table K-5 in Attachment 2.</p>
A2-6	<p>29 Prior to the end of the draft EIS comment period, Transco shall file with the Secretary additional justification for the ATWS associated with the wetlands identified in bold in table L-2 in appendix L of the draft EIS. (Section 4.4.5)</p>	<p>Transco's additional justification for the ATWS associated with the wetlands identified in bold in Table L-2 in Appendix L of the draft EIS is provided in the updated Table L-2 in Attachment 2.</p>

3

A2-4 Comment noted.

A2-5 Section 4.3.2.6 of the EIS has been revised to include this updated information.

A2-6 Section 4.4.5 of the EIS has been revised to include the updated information.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILINGS – JUNE 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
June 24, 2016

FERC Draft EIS Recommendation Number	Recommendation	Response
33	Prior to the end of the draft EIS comment period. Transco shall file with the Secretary any updated consultations with the FWS regarding migratory birds and a revised Migratory Bird Plan incorporating any additional avoidance or mitigation measures. (Section 4.6.1.3)	Please see Section 1.6 for a response to this recommendation.
34	Prior to the end of the draft EIS comment period. Transco shall file with the Secretary all fall 2015 hibernacula survey results for the Indiana bat, and any avoidance and mitigation measures developed based on the results. (Section 4.7.2.1)	Transco provided this information in the May 2016 supplemental information filing.
35	Prior to the end of the draft EIS comment period. Transco shall file with the Secretary all fall 2015 hibernacula survey results for the northern long-eared bat, and any avoidance and mitigation measures developed based on the results. (Section 4.7.2.2)	Transco provided this information in the May 2016 supplemental information filing.
36	Prior to construction. Transco shall file with the Secretary all survey results for the bog turtle, including any FWS comments on the surveys and their conclusions. The survey reports shall include: a. name(s) and qualifications of the person(s) conducting the survey; b. method(s) used to conduct the survey; c. date(s) of the survey; d. area surveyed (include the mileposts surveyed); and e. proposed mitigation that will substantially minimize or avoid the potential impacts. Transco must receive written approval from the Director of OEP before construction or use of mitigation may begin. (Section 4.7.2.3)	Transco provided this information in the May 2016 supplemental information filing.
37	Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all survey results for the northeastern bullrush, including any FWS comments on the surveys and their conclusions, and proposed mitigation that will substantially minimize or avoid the potential impacts. Transco must receive written approval from the Director of OEP before construction or use of mitigation may begin. (Section 4.7.2.4)	Transco provided this information in the May 2016 supplemental information filing.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT		SUPPLEMENTAL INFORMATION FILING – JUNE 2016	
Table 1-1 Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement June 24, 2016			
FERC Draft EIS Recommendation Number	Recommendation	Response	
A2-7	38 Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all survey results for the Allegheny woodrat, permit requirements, agency correspondence, and avoidance or mitigation measures developed in consultation with the PGC. (Section 4.7.3.4)	Transco provided final Allegheny woodrat survey reports, including a draft mitigation plan, in the May 2016 supplemental information filing. Transco subsequently modified the mitigation plan based on coordination with the PGC. The revised final mitigation plan is provided in Attachment 3. A copy of the final PGC clearance letter is provided in Attachment 4, along with a contact report related to the PGC project review.	
A2-8	39 Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all documentation of its correspondence with the PGC and any avoidance or mitigation measures developed with the agency regarding the eastern small-footed bat. (Section 4.7.3.4)	Transco provided final eastern small-footed bat survey reports, including a draft mitigation plan, in the May 2016 supplemental information filing. Transco subsequently modified the mitigation plan based on coordination with PGC. The revised final mitigation plan is provided in Attachment 3. A copy of the final PGC clearance letter is provided in Attachment 4, along with a contact report related to the PGC project review.	
A2-9	40 Prior to construction of project facilities in Pennsylvania. Transco shall file with the Secretary all survey results for timber rattlesnake, permit requirements, agency correspondence, and avoidance or mitigation measures developed in consultation with the PFBC. (Section 4.7.3.4)	Transco provided final timber rattlesnake survey reports in the May 2016 supplemental information filing. A copy of the final PFBC clearance letter is provided in Attachment 4.	
A2-10	41 Prior to construction. Transco shall include the results of any mussel surveys conducted within the Susquehanna River and any additional avoidance or mitigation measures included in Transco's site-specific horizontal directional drill contingency crossing plans. (Section 4.7.3.4)	Transco provided the results of mussel surveys conducted in the Susquehanna River and correspondence with PFBC regarding the survey findings in the May 2016 supplemental information filing.	
A2-11	42 Prior to construction of project facilities in Virginia. Transco shall file with the Secretary all documentation of its correspondence with the VDGF and any avoidance or mitigation measures developed with this agency regarding state-listed mussels in Virginia. (Section 4.7.3.5)	Transco provided copies of its correspondence with the VDGF regarding state-listed mussel species in the May 2016 supplemental information filing.	

A2-7 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

A2-8 The results of these surveys and proposed avoidance and mitigation measures have been incorporated into the EIS.

A2-9 The results of these surveys and information from the consultation letter have been incorporated into the EIS.

A2-10 The results of these surveys and information from the consultation letter have been incorporated into the EIS.

A2-11 Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
June 24, 2016

FERC Draft EIS Recommendation Number	Recommendation	Response
44	Prior to the end of the draft EIS comment period, Transco shall consult with the landowner/developer of the ELRC commercial development and file with the Secretary any mitigation measures Transco will implement to minimize impacts on the ELRC development, including copies of correspondence. (Section 4.8.3.2)	Please see Section 1.7 for a response to this recommendation.
45	Prior to the end of the draft EIS comment period, Transco shall file with the Secretary an update of the status of the development of the site-specific crossing plans for each of the recreation and special interest areas listed as being crossed or otherwise affected in table 4.8.6-1. The site-specific crossing plans shall include, as applicable: a. site-specific timing restrictions; b. proposed closure details and notifications (e.g., reroutes, signage, public notices); c. specific safety measures; and/or d. other mitigation to be implemented to minimize effects on the recreation areas and their users during construction and operation of the Project. In addition, the site-specific crossing plan for SCL 206 shall include specific safety measures to be implemented during work activities in the vicinity of the on-site shooting range. (Section 4.8.6.1)	Please see Section 1.8 for a response to this recommendation.
46	Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of its consultations with the Natural Resource Conservation Service and the landowner regarding the proposed CPL South crossing of the Farm and Ranchland Protection Program easement near MP 12.4, including any proposed mitigation measures and copies of correspondence. (Section 4.8.6.2)	Please see Section 1.9 for a response to this recommendation.
48	Prior to the end of the draft EIS comment period, Transco shall file with the Secretary updated information regarding the identified landfill adjacent to the CPL South right-of-way near MP 66.9, including any mitigation measures that Transco will implement to avoid the landfill site or address any contamination that is encountered. (Section 4.8.7)	Please see Section 1.10 for a response to this recommendation.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
June 24, 2016

FERC Draft EIS Recommendation Number	Recommendation	Response
49	<p>Prior to the end of the draft EIS comment period, Transco shall file with the Secretary a detailed description of the proposed communication towers associated with Compressor Station 605/CN-MLV-05, the River Road Regulator Station/CS-MLV-01, and Compressor Station 610/CS-MLV-12 along with mitigation measures (such as design, color, or lighting) that Transco will implement to minimize the portions visible from nearby residences. The mitigation measures should take into consideration Mr. Mathias's comments regarding the design and visual screening at Compressor Station 610.</p> <p>In addition, Transco shall include an assessment of the visual effects that will result from construction of the two new communication towers (at CS-MLV-08 and CS-MLV-09) proposed in its July 21, 2015 supplemental filing. This assessment must include:</p> <ul style="list-style-type: none"> a. the closest sensitive receptor (residence); b. approximate distance and direction to the receptor; c. existing land use; and d. proposed mitigation measures to reduce visibility. (Section 4.8.8.2) 	<p>Please see Section 1.11 for a response to this recommendation.</p>
53	<p>Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of an air quality screening (AERSCREEN) or refined modeling analysis (AERMOD or EPA-approved alternative) for all of the emission-generating equipment (including existing equipment) at Compressor Station 190, if Compressor Station 190 is not in operation for a substantial time during the monitoring period between February and July 2016. The results shall indicate the local modeled ambient emissions, plus the modeled incremental increase in emissions of criteria pollutants from the modifications. Transco shall include supporting calculations and provide a narrative explaining the justification for the modeling methodology. (Section 4.11.1.3)</p>	<p>Please see Section 1.12 for a response to this recommendation.</p>

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 1-1
Transco's Responses to FERC Staff's Recommended Mitigation in the May 5, 2016 Draft Environmental Impact Statement
June 24, 2016

FERC Draft EIS Recommendation Number	Recommendation	Response
A2-12 S9	Prior to the end of the draft EIS comment period, Transco shall file with the Secretary a revised table of class locations based on route changes it has adopted or based on route changes that we recommended Transco incorporate into the proposed route. (Section 4.12.1)	The revised table of class locations is provided in the updated Table 4.12.1-1 in Attachment 2.
<p><i>Key:</i></p> <ul style="list-style-type: none"> ATWS = additional temporary workspace CPL = Central Penn Line EIS = Environmental Impact Statement ELRC = Eastern Land and Resource Corporation EPA = U.S. Environmental Protection Agency FERC = Federal Energy Regulatory Commission FRPP = Farm and Ranchlands Protection Program MP = milepost DEP = Department of Environmental Protection PFBC = Pennsylvania Fish and Boat Commission PGC = Pennsylvania Game Commission PHMC = Pennsylvania Historical and Museum Commission VDGIF = Virginia Department of Game and Inland Fisheries USFWS = U.S. Fish and Wildlife Service 		

8

A2-12

Table 4.12.1-1 in the EIS has been updated to include the revised and current class locations based on the route changes since the draft EIS was issued.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-13

1.1 RESPONSE TO FERC RECOMMENDATION NUMBER 15

Prior to construction across the Byron property along Central Penn Line (CPL) North between MPs 23.3 and 23.8, Transco shall develop and file with the Secretary, for review and written approval by the Director of Office of Energy Projects, a schedule for construction and restoration activities on the Byron property that minimizes conflict with the planned public use of the property. Transco shall develop the restoration activities in consultation with the Byrons. (Section 3.3.2)

Transco understands that the Byron property is occasionally used for public purposes, including high school and intercollegiate cross-country meets and biological studies by a local university. Despite multiple requests beginning in April 2014, Transco has been unable to obtain specific information from the Byron's regarding the location or timing of the cross-country races, biological field studies, or other public uses of their property.

Transco has not received any specific information regarding portions of the Byron property which are used for biological field studies. In addition, Transco has been unable to obtain permission to conduct environmental surveys necessary to evaluate habitats within the Project corridor on the Byron property. As a result, Transco has been unable to evaluate the potential impacts to specific habitats studied by the local university or identify any specific measures that could be implemented to avoid or minimize these impacts. In general, Transco does not expect construction or operation of the Project to prevent the use of this property for biological field studies. Based on the desktop analysis completed for this area, the Project is not expected to impact any areas of exceptional research potential or habitats that are unique to the construction right-of-way. The proposed project will affect a relatively small portion of the 180-acre property (i.e., 5.8 acres or 3.2% during construction, and 3.2 acres or 1.8% during operation), leaving most of the property undisturbed and available for use during any future biological field studies.

Based on review of publically available information, the cross-country course and parking area used on the Byron property during the Mid-American Conference championship on October 31, 2015, was greater than 1,000 feet south and east of the proposed pipeline route. Assuming other cross-country events utilize the same course or a course in the same general area, Transco does not expect construction or operation of the proposed pipeline to conflict with any planned cross-country events on the Byron property.

Transco will continue to coordinate with the Byron's and attempt to obtain more specific information regarding the location and timing of proposed public uses of their property that might

A2-13

Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-13
(cont'd)

be adversely affected by construction or operation of the Project. Transco has not identified any such conflicts to date. However, should Transco obtain more detailed information regarding the public use of this property, Transco will provide FERC a schedule for construction and restoration activities that minimize conflict with the planned public use prior to construction.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-14

1.2 RESPONSE TO FERC RECOMMENDATION NUMBER 17

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary a revised alignment sheet that incorporates CPL South Alternative 24C between MPs 102.1 and M-0171 0.5 into the proposed route. (Section 3.3.2)

Transco recognizes the potential to adversely impact operation of equine facilities on Tracts PA-CO-093.000, PA-CO-095.000 and PA-CO-106-.000 by constructing the pipeline along the current proposed route. As such, Transco is actively evaluating Alternative 24C as recommended by FERC in the draft EIS. Transco has secured survey access and completed both routing and detailed environmental surveys for 10 of the 37 tracts along the alternate route. Transco has also completed a desktop feasibility study for the Interstate (I) 80 crossing along Alternative 24C. Key findings are discussed below.

The crossing of I-80 was a key driver in the selection of the current proposed route. Transco routed the pipeline to a location where the width of the interstate's median, and the surrounding topographic conditions, allowed for a relatively low-risk conventional bore crossing. Transco's assessment of FERC's proposed Alternative 24C thus focused on the constructability of the I-80 crossing.

Transco noted in its responses to the FERC July 9, 2015 data request filed July 29, 2015 that Alternative 24C would cross I-80 in an area with steep embankments, which would cause difficulties during construction. Transco performed an additional desktop evaluation and determined that a conventional bore of I-80 along the Alternative 24C alignment (as presented in the DEIS) would not be feasible due to topographic conditions and bore length. Transco then assessed the potential for a horizontal directional drill (HDD) construction method across I-80.

In its desktop evaluations of Alternative 24C, Transco determined that the HDD crossing of I-80 would have an increased risk of failure. This determination was largely a result of elevation differential and HDD length. The elevation difference between HDD entry and exit locations on I-80 crossing for Alternate 24C is approximately 319 feet, which would create 1,275 horizontal feet of "dry hole", where drilling fluid is unable to reach some locations of the bore. The primary risks associated with dry hole include hole collapse (drilling fluid pressure helps to maintain the stability of the bore hole after reaming), and insufficient lubrication to the cutting head.

Transco then reviewed the approximately 0.5-mile stretch of I-80 from Columbia Mall to Little Fishing Creek to identify a crossing that would reduce the risk of failure. Through a

A2-14

Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-14
(cont'd)

combination of site reconnaissance and desktop evaluation, Transco identified a potentially suitable location to complete an HDD crossing of I-80 approximately 700 feet east of the Alternative 24C crossing location. Transco is currently completing geotechnical surveys to verify the suitability of geologic conditions for an HDD crossing at this location. Transco expects to make a final determination on the I-80 HDD crossing by August 2016.

As noted above, Transco has also completed field routing surveys on several parcels along Alternative 24C in order to identify a constructible route that minimizes environmental impacts to the greatest extent possible. Several route adjustments have been made along the Alternative 24C alignment to avoid sensitive resources and land uses. Based on these adjustments, and combined with the new I-80 crossing location described above, Transco has developed a new proposed minor route alternative that achieves the same purpose as Alternative 24C, which Transco has identified as Alternative 24D. Figure 10F-20 shows the Alternative 24D route in relation to the June 2015 proposed route and the FERC recommended Alternative 24C.

Table 1-2 provides a comparison of Alternative 24D to the corresponding section of the June 2015 proposed route. To allow for a more accurate comparison of the June 2015 proposed route and the previous alternative route comparisons submitted by Transco, the actual workspace has been used for impact calculations instead of the assumed 100-foot corridor used in the previous alternative comparison. A combination of field and remote-sensed data was used to compare potential impacts to waterbodies and wetlands from both routes.

Alternative 24D is approximately 0.4-mile longer than the June 2015 proposed route, but increases co-location by 1.1 miles. Due to its greater distance, the alternative route would impact an additional 29.1 acres of land during construction, including an additional 19.3 acres of forestland. The alternative route would also require an additional seven road crossings. However, the June 2015 proposed route would cross more waterbodies (eight additional crossings) and wetlands (3 additional crossings) than Alternative 24D.

Transco is prepared to adopt ALT 24D pending confirmation that a trenchless crossing of I-80 along the reroute is feasible. As noted above, Transco expects to make a final determination on the feasibility of the I-80 crossing by August 2016. Transco will file this determination with FERC in a supplemental filing, anticipated in August 2016. If Transco adopts Alternative 24D, updated FERC alignment sheets will also be included with the supplemental filing. If a feasible trenchless crossing of I-80 on Alternative 24D cannot be identified, then

A2-14

Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

A2-14
(cont'd)

Transco will work with the landowners on its original proposed route to minimize impacts to the operation of equine facilities.

Table 1-2
CPL South Alternative 24D
Minor Route Alternative Comparison

Factor	CPL South Alternative 24D	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Length of corresponding segment (miles)	4.9	4.5	+0.4
Co-location			
Length adjacent to Interstate Pipeline ROW (miles)	0.0	0.0	0.0
Length adjacent to Midstream Pipeline ROW (miles)	0.0	0.0	0.0
Length adjacent to electric transmission line ROW (miles)	2.0	0.9	+1.1
Length adjacent to roadway (miles)	0.0	0.0	0.0
Total length co-located (miles)	2.0	0.9	+1.1
ROW Requirements			
Pipeline construction requirements (acres) ^a	96.0	66.9	+29.1
Pipeline operation requirements (acres) ^b	29.6	27.2	+2.4
Federal and State Land			
Federal lands crossed (number / miles)	0/0.0	0/0.0	0/0.0
State lands crossed (number / miles)	0/0.0	0/0.0	0/0.0
Land Use			
Forested land crossed (miles) ^c	1.9	1.3	+0.6
Forested land impacts (construction / operation) (acres) ^d	36.1/11.4	16.8/7.8	+19.3/+3.6
Forest interior crossed (miles) ^{e,g}	0.1	0.1	0.0
Forest interior impacts (construction / operation) (acres) ^{d,g}	2.3/0.7	2.6/0.6	-0.3/+0.1
Agricultural land crossed (miles) ^c	2.5	2.8	-0.3
Agricultural land impacted (construction / operation) (acres) ^g	52.9/15.5	44.0/17.2	+8.9/-1.7
Other Land Crossed (miles) ^{e,f}	0.4	0.4	0.0
Other Land Impacted (construction/operation) (acres) ^{d,f}	7.0/2.7	6.1/2.2	+0.9/+0.5
Residences within 50 feet of the construction workspace (number) ^g	3	3	0
Landfills, quarries, and other mining operations within 0.25 mile (number)	2	0	+2
Waterbodies			
Waterbodies crossed (number) ^h	2	10	-8
Major waterbody crossings (number >100 feet)	1	2	-1

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

A2-14
(cont'd)

Table 1-2
CPL South Alternative 24D
Minor Route Alternative Comparison

Factor	CPL South Alternative 24D	Corresponding Section of June 2015 Proposed Route	Difference from Proposed Route
Wetlands			
Total wetland complexes crossed (number) ¹	3	6	-3
Total wetland crossed (miles) ¹	<0.1	0.2	-0.2
Palustrine forested wetland complex impacts (construction / operation) (acres) ¹	0.0	0.0	0.0
Cultural Resources			
Sites crossed that are eligible or potentially eligible for listing on the National Register of Historic Places (number) ⁴	0	0	0
Other Physical Features			
Road crossings (number)	18	11	+7
Railroad crossings (number)	0	0	0
Other Environmental Features			
Steep slopes crossed (30 degrees or greater) (miles) ¹	<0.1	0	+<0.1
Side slope construction (miles) ^{1m}	0.1	0	+0.1

^a Pipeline construction requirements based on a preliminary workspace design. This workspace may be modified if an alternative is incorporated into the proposed route.

^b Pipeline operation requirements based on a 50-foot-wide corridor in greenfield segments, and a 25-foot-wide corridor for segments co-located with Transco pipelines. Calculation includes a 50-foot-long buffer at begin and end points.

^c Forested land, forest interior, agricultural land, and other land crossed are based on geographic information system (GIS) centerline analysis using United States Geological Survey (USGS) National Land Cover Dataset (NLCD).

^d Forest land, forest interior, agricultural land, and other land impacted are based on GIS corridor analysis using USGS NLCD. Since multiple land use types may be present within the corridor, impact acreage for individual land uses will not be representative of distance crossed, which is based on centerline analysis.

^e Forest interior determined by assessment of forest cover from USGS NLCD, where forest interior was considered 300 feet from forest breaks and outer forest edge. Interior forest is a sub-type of Forested Land.

^f Other land based on USGS NLCD and includes land cover types: Barren Land, Developed High Intensity, Developed Low Intensity, Developed Medium Intensity, Developed Open Space, Emergent Herbaceous Wetlands, Herbaceous, Open Water, Shrub Scrub, Woody Wetlands.

^g Residences identified based on review of aerial photography; in cases where it was not clear whether a structure was a residence or other built feature (e.g., barn, storage facility), the structure was assumed to be a residence.

^h Waterbodies identified based on field surveys and remote sensing analysis.

ⁱ Major waterbodies identified based on field surveys and remote sensing analysis.

^j Wetlands identified using the field surveys and remote sensing analysis.

^k National Register of Historic Places sites were identified using desktop data.

^l Length determined perpendicular to slope contour.

^m Length determined parallel with slope contour. Developed using USGS 10-foot contours.

Key:
CPL = Central Penn Line
ROW = right-of-way

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-15

1.3 RESPONSE TO FERC RECOMMENDATION NUMBER 18

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary any route adjustments, workspace modifications, or mitigation measures developed through Transco's ongoing consultations with landowners for the following routes:

- a. Neil Bushong Deviation along CPL South between MPs 20.8 and 21.4;
- b. Route Deviation M-0209 following an alignment along the western boundary of the Goehring property along CPL South between MPs 23.1 and 23.6;
- c. Route Deviation M-0169 along CPL South between MPs 56.9 and 57.1; and
- d. Route Deviation M-0248 along CPL South between MPs 13.0 and M-0152 0.4.

Transco shall either incorporate these deviations or a route that avoids the resources of concern, or otherwise explain how potential impacts on resources have been effectively avoided, minimized, or mitigated. (Section 3.3.3)

As noted in Table 1-1, Transco has incorporated the route deviations described in recommendations 18a, 18b, and 18d into CPL South. These route deviations were described in the May 2016 supplemental information filing.

Transco developed route deviation M-0169 to avoid a previously recorded archaeological resource near CPL South MP 57.0. During the Pennsylvania Historical and Museum Commission's (PHMC's) review of this resource on November 24, 2015, the PHMC made a preliminary determination that the resource was not eligible for the National Register of Historic Places (NRHP). This preliminary determination was confirmed by the PHMC in their formal response to the Addendum 1 Archaeological Resource Survey report dated March 8, 2016 (see Agency Correspondence provided with the May 2016 supplemental information filing). Since this resource is not eligible for the NRHP, Transco has not adopted route deviation M-0169.

A2-15

Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-16

1.4 RESPONSE TO FERC RECOMMENDATION NUMBER 21

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of its consultation with the PADEP and include any updates to its Abandoned Mine Investigation and Mitigation Plan regarding proposed mitigation measures to manage and dispose of contaminated groundwater. (Section 4.3.1.7)

On April 24, 2016 Transco consulted verbally with two departments within the Pennsylvania Department of Environmental Protection (PADEP) Bureau of Abandoned Mine Reclamation (Bureau) regarding the management of mine pool groundwater and potentially contaminated soil associated with mine tailings. While the Bureau does not have regulatory authority relating to the management of contaminated groundwater or soil, the Bureau indicated a very low potential to encounter either form of contamination at the depth of excavation in either Schuylkill or Northumberland counties.

Transco further consulted verbally with the PADEP – Northeast Regional Office – Department of Clean Water (PADEP-CW) and was provided the same guidance; adding that a slightly greater risk of encountering contamination exists in Northumberland County than in Schuylkill County. Transco will continue to coordinate with PADEP-CW to develop a plan for treatment and discharge of contaminated groundwater during construction. Transco will provide this plan in its Implementation Plan prior to the start of construction..

A2-16

Section 4.3.1.7 of the EIS has been revised to include this updated information.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-17

1.5 RESPONSE TO FERC RECOMMENDATION NUMBER 22

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary proposed mitigation measures Transco will implement to protect all Zone A source water protection areas. (Section 4.3.2.2)

Transco received regulatory guidance regarding Zone A source water protection areas (SWPAs) from the PADEP South-Central Regional Office, as documented in the contact report dated January 20, 2015, provided in Volume 3, Agency Correspondence, of Transco's certificate application filed with FERC on March 31, 2015 (Transco Application). Additionally, Transco reviewed the PADEP guidance document 383-5000-001, *Source Water Assessment & Protection Program (SWAPP)*. Based on these sources, it is Transco's understanding that PADEP does not prescribe specific mitigation measures for activities within Zone A SWPAs. These sources indicate that the SWAPP, a document submitted to the U.S. Environmental Protection Agency (EPA) and bearing the same name as the guidance document, "...describes how Pennsylvania assesses all drinking water sources serving public water systems for the potential for contamination. The assessments are to help 'narrow down' and prioritize the potential sources for contamination to a public drinking water source to support voluntary local, source water protection programs" (PADEP 2000). PADEP explained that SWPAs are a tool provided to the intake operators to assist in their development of source water protection plans (SWPPs) for each drinking water source.

The City of Lebanon Water Authority and Red Lion Borough Water Authority provided Transco with a copy of their SWPPs. These documents were included in Volume 3, Agency Correspondence, of the Transco's Application. Transco reviewed the plans and noted that activities of primary concern within their assessment areas are agricultural runoff, transportation related runoff and spills, and acid mine drainage. The plans do not identify construction impacts as a concern. Transco contacted the remaining operators with SWPPs and did not receive a response.

Measures included in the Project-specific Wetland and Waterbody Construction and Mitigation Procedures (Transco Procedures) provided with the responses to the FERC May 19, 2015 data requests filed June 8, 2015 will minimize sedimentation and turbidity, minimize streambed and bank disturbance, and limit the time it takes to complete in-stream construction in Zone A SWPAs. Transco will cross waterbodies with flowing water present at the time of construction using dry-ditch or trenchless construction methods to the greatest extent

A2-17

Section 4.3.2.2 of the EIS has been revised to include this updated information.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-17
(cont'd)

practicable. To minimize sedimentation during pipeline construction across each waterbody, trench spoil will be placed at least 10 feet away from water's edge, unless impractical due to topography. Erosion controls will be placed around spoil piles to prevent sediment from flowing into waterbodies. Per the Transco Spill Plan for Oil and Hazardous Materials provided in Volume 3, Environmental Construction Plan of the Certificate Application, refueling and transferring of liquids will occur only in pre-designated locations that are on level ground and at least 100 feet from any wetland or waterway, thereby preventing contamination of waterbodies within Zone A SWPAs.

For each surface water intake operator with a Zone A SWPA crossed by the Project, Transco is also developing a notification plan in coordination with the operator to be used in the event of an unanticipated spill or release during construction. The notification plans will contain specific points of contact and procedures to be implemented in the event of a spill. Transco will submit the notifications plans to FERC prior to construction.

Reference

Pennsylvania Department of Environmental Protection (PADEP). 2000. Document 383-5000-001. Source Water Assessment & Protection Program. Accessed online at: <http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-47521/383-5000-001.pdf>.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-18 | **1.6 RESPONSE TO FERC RECOMMENDATION NUMBER 33**

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary any updated consultations with the FWS regarding migratory birds and a revised Migratory Bird Plan incorporating any additional avoidance or mitigation measures. (Section 4.6.1.3)

Transco met with the United States Fish and Wildlife Service (USFWS) and FERC on January 28, 2016 (see meeting notes provided with Agency Correspondence in the May 2016 supplemental information filing) to discuss the Migratory Bird Plan. USFWS indicated that the current Migratory Bird Plan (Version 3 provided to FERC on December 18, 2015) demonstrates that Transco has minimized impacts to migratory birds to the extent possible. As stated in the Migratory Bird Plan, Transco is continuing to consult with the USFWS regarding voluntary mitigation related to removal of migratory bird habitat. Transco and the USFWS are currently developing a memorandum of understanding (MOU) which will specify the voluntary conservation measures that will be provided to offset the removal of upland forest and indirect impacts to interior forests. Transco will submit the final MOU to FERC in a supplemental filing, anticipated in August 2016.

A2-18

The additional information on FWS consultation has been incorporated into the EIS.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-19 **1.7 RESPONSE TO FERC RECOMMENDATION NUMBER 44**

Prior to the end of the draft EIS comment period, Transco shall consult with the landowner/developer of the ELRC commercial development and file with the Secretary any mitigation measures Transco will implement to minimize impacts on the ELRC development, including copies of correspondence. (Section 4.8.3.2)

Transco initiated contact with MFS, Inc., d/b/a Eastern Land & Resource Company (ELRC), in March 2014 to discuss concerns related to the proposed pipeline route and planned development on the ELRC property. Contact efforts were unsuccessful until October 2015. As part of the contact efforts, Transco requested layout plans for the proposed development to evaluate potential rerouting options. No plans or additional information were provided by ELRC despite multiple additional requests by Transco, and no plans were found during a search of public records. ELRC representatives ultimately agreed to meet on February 25, 2016, at which time they provided a plan for development of a convenience store along the proposed pipeline route, which was dated December 23, 2015. Transco subsequently developed three route deviations to avoid the development shown on the plan and submitted those route alternatives to ELRC on March 31, 2016 and June 3, 2016, for review. These route deviations are referred to as M-0386, M-0387 and M-0413, and are shown on Figure 10I-78 in Attachment 5.

Transco is now engaged in discussions with ELRC regarding the proposed route deviation options submitted on March 31, 2016, and the additional alternative submitted on June 3, 2016. ELRC has not indicated that any of these route modifications were acceptable, so Transco has not yet adopted a route deviation on the ELRC property. Transco will continue to seek input from ELRC regarding their preferred alternative and hopes the routing issues will be resolved by July 2016. If route deviation is adopted, Transco will submit updated alignment sheets for the ELRC property in a supplemental filing, anticipated in August 2016.

A2-19

Comment noted. See the response to comment CO4-1.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-20

1.8 RESPONSE TO FERC RECOMMENDATION NUMBER 45

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary an update of the status of the development of the site-specific crossing plans for each of the recreation and special interest areas listed as being crossed or otherwise affected in table 4.8.6-1. The site-specific crossing plans shall include, as applicable:

- a. site-specific timing restrictions;
- b. proposed closure details and notifications (e.g., reroutes, signage, public notices);
- c. specific safety measures; and/or
- d. other mitigation to be implemented to minimize effects on the recreation areas and their users during construction and operation of the Project.

In addition, the site-specific crossing plan for SGL 206 shall include specific safety measures to be implemented during work activities in the vicinity of the on-site shooting range. (Section 4.8.6.1)

Transco developed or is in the process of developing crossing plans for the recreation areas affected by the Project. Table 1-3 provides a summary of all areas listed in table 4.8.6-1 in the draft EIS, and the status of the crossing plan for each area.

Table 1-3
Crossing Plans for Federal, State, and Municipal Lands, and Recreation Areas within 0.25 Mile of the Project

Facility / Designated Areas	Crossing Plan Status
CPL North	
Ricketts Glen State Park	Plan pending, see text below
SGL 206	Plan pending, see text below
CPL South	
Fishing Creek Scalpy Hollow Nature Preserve	Recreation area will not be affected by the Project, so no plan is being developed
Enola Low Grade Trail	Plan provided in Attachment 6
Conestoga Trail	Plan provided in Attachment 6
Lebanon Valley Rail-Trail	Plan provided in Attachment 6
Horse-Shoe Trail	Plan provided in Attachment 6
Swatara Creek Water Trail	Plan pending, see text below
Swatara State Park	Plan pending, see text below
SGL 211	Plan pending, see text below
Appalachian National Scenic Trail	Plan pending, see text below
Twin Grove RV Resort and Cottages	Recreation area will not be affected by the Project, so no plan is being developed
SGL 229	Plan pending, see text below
Rausch Creek Off-Road Park	Plan pending
SGL 132	Plan pending, see text below

A2-20

Section 4.8.6.1 of the EIS has been revised to include the updated information regarding recreation and special interest areas.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

A2-20
(cont'd)

Table 1-3

Crossing Plans for Federal, State, and Municipal Lands, and Recreation Areas within 0.25 Mile of the Project

Facility / Designated Areas	Crossing Plan Status
SGL 084	Plan pending, see text below
Anthracite Outdoor Adventure Area	Plan pending, see text below
Chapman Loop	
Sproul State Forest	Plan pending, see text below
Mainline A and B Replacements	
Manassas National Battlefield Park	Recreation area will not be affected by the Project, so no plan is being developed
Prince William County Designated Open Space	Plan provided in Attachment 6
Key: CPL = Central Penn Line RV = recreational vehicle SGL = State Game Land	

Pennsylvania State Parks and State Forests

Transco submitted right-of-way (ROW) permit applications for Rickett's Glen State Park and Sproul State Forest to the Pennsylvania Department of Conservation and Natural Resources (PADCNR) in late April 2015. Transco met with PADCNR in July 2015 and March 2016 to discuss the Project crossing of PADCNR lands, including impact minimization measures. Transco continues to coordinate and address PADCNR concerns and expects the ROW licenses for these crossings to be issued in the fourth quarter of 2016. Once the ROW licenses are issued, Transco will develop site-specific crossing plans for each PADCNR land, incorporating all required conditions of the licenses related to timing restrictions, notification measures, safety measures, and other mitigation measures. The crossing plans will be submitted to FERC with Transco's Implementation Plan.

Pennsylvania State Game Lands

Transco submitted ROW applications for Pennsylvania State Game Lands 084, 132, 206, and 211 to the Pennsylvania Game Commission (PGC) in September 2015. Transco expects PGC to issue ROW licenses for these crossings by the third quarter of 2016. Once the ROW licenses are issued, Transco will develop site-specific crossing plans for each game land, incorporating all required conditions of the licenses related to timing restrictions, notification measures, safety measures (including specific safety measures requested at SGL 206), and other mitigation measures. The crossing plans will be submitted to FERC with Transco's Implementation Plan.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-20
(cont'd)

Appalachian Trail

The Project crosses the Appalachian Trail (AT) within Pennsylvania State Game Lands 211. Transco submitted a ROW application for Pennsylvania State Game Lands 211 to PGC in September 2015 (see Attachment 6). Direct impacts to the trail will be avoided by using a directional bore for the crossing, and the trail will remain open for the duration of construction. Once the ROW license is issued for the State Game Lands 211 crossing, Transco will develop a site-specific crossing plan for the AT, incorporating all required conditions of the license related to timing restrictions, notification measures, safety measures, and other mitigation measures. The crossing plan will be submitted to FERC with Transco's Implementation Plan.

Swatara Creek Water Trail

Transco has met with Pennsylvania Fish and Boat Commission (PFBC) regarding the need for Aids to Navigation (ATON) Plans at several crossings, including Swatara Creek. To minimize impacts to recreational use of Swatara Creek, Transco will use signs and buoys to advise boaters of the construction, in accordance with an approved ATON Plan. Transco will submit the approved ATON Plan for Swatara Creek to FERC with Transco's Implementation Plan.

County and Local Trails

Transco's crossing plans for county and local trails crossed by the Project are provided in Attachment 6.

Anthracite Outdoor Adventure Area

Transco has obtained an easement agreement from Northumberland County to cross the Anthracite Outdoor Adventure Area (AOAA). In accordance with this agreement, Transco is developing a plan to cross the AOAA. Transco will provide the plan to FERC in a supplemental filing, anticipated in August 2016.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-21

1.9 RESPONSE TO FERC RECOMMENDATION NUMBER 46

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of its consultations with the Natural Resource Conservation Service and the landowner regarding the proposed CPL South crossing of the Farm and Ranchlands Protection Program easement near MP 12.4, including any proposed mitigation measures and copies of correspondence. (Section 4.8.6.2)

Since submitting the May 2016 supplemental information filing, Transco has continued to research the Natural Resource Conservation Service (NRCS) easement holdings crossed by the Project. This discussion contains updated information and replaces the information provided in May 2016.

At the time of filing its Certificate Application, Transco had identified one property containing NRCS Farm and Ranchland Protection Program (FRPP) easement holdings crossed by the Project. Since March 2015, Transco continued to conduct title searches to determine if any additional NRCS easement holdings were crossed, and identified three properties with NRCS interests, although not all are part of the FRPP Program. In addition, Transco provided shapefiles to NRCS on June 30, 2014. Transco also requested shapefiles from NRCS during meetings with NRCS in 2014 and NRCS declined to provide their shapefiles. In response to the latest letter filed on the docket by NRCS on April 11, 2016, Transco again requested shapefiles of Pennsylvania NRCS easement holdings in the area of the Project in order to determine if any additional NRCS easement holdings are crossed by the Project.

NRCS provided shapefiles to Transco on May 23, 2016 that identified one additional NRCS easement. The easement is not part of the FRPP and does not include a FRPP addendum. Table 1-4 lists all tracts containing NRCS easement holdings that have been identified to date.

Table 1-4
Properties with NRCS Easements Crossed by the Project

Facility / County	Tract	Easement Type	Mileposts
CPL South			
Lancaster	PA-LA-139-B.000	FRPP	12.7 – 12.7
Lancaster	PA-LA-372-B.000	FRPP	M-0164 0.0 – 34.5
Lebanon	PA-LE-067.000	FRPP	44.5 – 45.0

A2-21

Section 4.8.6.2 of the EIS has been revised to include the updated information regarding NRCS easements.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-21
(cont'd)

Table 1-4
Properties with NRCS Easements Crossed by the Project

Facility / County	Tract	Easement Type	Mileposts
Lebanon	PA-LE-051.100	NRCS	42.5 – 42.6
Schuylkill	PA-SC-108.000	NRCS	80.3 – 80.5

Key:
 CPL = Central Penn Line
 FRPP = Farm and Ranchland Protection Program
 NRCS = Natural Resource Conservation Service

NRCS conservation easements are addendums to agricultural preservation easements granted either to the Commonwealth of Pennsylvania or to a county Agricultural Lands Preservation Board. All of the underlying easements, whether to the Commonwealth or to a county board contain a provision specifically permitting the landowner to continue to grant easements for natural gas pipelines across the preserved land. Each of the underlying easements for the properties listed above contain the following provision:

The granting of rights-of-way by the Grantor [the landowner] ... in and through the subject land for the installation, transportation, or use of lines for ... gas, oil or oil products is permitted. The term "granting of rights-of-way" includes the right to construct or install such lines.

The Project will not permanently impact the tilling of the soil on any of the tracts, and the Project will not impact the prime, unique, or important agricultural soils except for temporary disturbance. To minimize impacts to the existing agricultural uses, Transco developed an Agricultural Construction and Monitoring Plan (Agricultural Plan) for the Project provided in Volume 3, Environmental Construction Plan of the Certificate Application. The Agricultural Plan documents the measures Transco will follow to minimize and mitigate effects on agricultural lands. These construction methods are also described in Section 4.8.4 of the draft EIS.

Tract PA-SC-108.000

In addition to the above provision that specifically allows the landowner to grant rights-of-ways for natural gas pipeline easements, the conservation easement for Tract PA-SC-108.000 contains a one-line addendum that states:

Should the Commonwealth and/or Schuylkill County fail to continue on with the easement purchase program statewide, then the United States Department of Agriculture [USDA] shall have the right to enforce the terms of the easement.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-21
(cont'd)

There is no conflict between the USDA interest in the property and the Project, since the conservation easement program continues statewide, and the grant of ROWs for natural gas pipeline easements are specifically permitted by the conservation easement.

Tract PA-LE-051.100

In addition to the above provision that specifically allows the landowner to grant rights-of-ways for natural gas pipeline easements, the conservation easement for Tract PA-LE-051.1200 contains an addendum that states:

In the event the Pennsylvania Department of Agriculture fails to enforce any of the terms of this easement [or other interests in land], as determined in the sole discretion of the Secretary of the United States Department of Agriculture, the said Secretary of Agriculture and his or her successors and assigns shall have the right to enforce the terms of the easement through any and all authorities available under Federal or State law. In the event that the Pennsylvania Department of Agriculture attempts to terminate, transfer, or otherwise divest itself of any rights, title, or interest in this easement [or other interests in land] without the prior consent of the Secretary of the United States Department of Agriculture and payment of consideration to the United State, then, at the option of such Secretary, all right, title and interest in this easement [or other interests in land] shall become vested in the UNITED STATES of AMERICA.

There is no conflict between the USDA interest in the property and the Project, since there are no provisions in the easement which the Pennsylvania Department of Agriculture is required to enforce in connection with the Project. The granting of ROWs for natural gas pipelines and their construction is specifically permitted by the easement.

Tracts PA-LA-139-B.000, PA-LA-372-B.000, PA-LE-067.000

The conservation easements for the remaining three tracts in Table 1-4 contain the provision above, which specifically permits the Grantor to grant rights-of-way for natural gas pipelines. All three of the landowners have entered into agreements to grant the rights-of-way needed for the Project.

Those three conservation easements contain the same addendum identifying the USDA's interest in the conservation easement, and each addendum contains a paragraph about utilities which states:

3. Utilities. The granting of rights of way by the Grantor... in and through the subject land for the installation, transportation, or use of, lines for ... gas, oil or oil products is permitted, provided the location of activities and structures, permitted under this provision, is consistent with the agricultural viability and the protection of soils purposes as articulated in this Agricultural Conservation Easement. The granting of rights of way includes the right to construct or install such lines, provided any excavation of soils to

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-21
(cont'd)

install such lines is returned to the original topography promptly upon completion of the construction or installation, and methods are taken to control soil erosion. To the greatest extent practicable, such utility rights-of-ways shall be sited to protect the impact to prime, unique and important soils. **After the Agricultural Conservation Easement is recorded, granting of utility rights-of-way on the subject land may only occur through the condemnation process,** which is subject to the review by the Agricultural Lands Condemnation Approval Board in accordance with 3 P.S. Section 913, **unless the condemnation is exempt from review under that section.** If the proposed condemnation is exempt from review by the Agricultural Lands Approval Board [sic], **the Grantees shall give notice of this fact to the United States Department of Agriculture...**

Since the landowners of the three tracts with this provision in the conservation easements have all agreed to grant the rights-of-way for the Project, no condemnation will occur. Further, the granting of ROWs for federal natural gas pipeline projects approved by FERC is specifically exempted from review by the Agricultural Lands Condemnation Approval Board in accordance with 3 P.S. Section 913, which provides:

3 P.S. §913(b). Approval required for condemnation by a political subdivision, authority, public utility or other body. --No political subdivision, authority, public utility or other body having or exercising powers of eminent domain shall condemn any land within any agricultural security area for any purpose, unless prior approval has been obtained from Agricultural Lands Condemnation Approval Board **The condemnation approvals specified by this subsection shall not be required for an underground public utility facility that does not permanently impact the tilling of soil or for any facility of an electric cooperative corporation or for any public utility facility the necessity for and the propriety and environmental effects of which has been reviewed and ratified or approved by the Pennsylvania Public Utility Commission or the Federal Energy Regulatory Commission,** regardless of whether the right to establish and maintain such underground or other public utility facility is obtained by condemnation, or by agreement with the owner.

The Addendum to each of the conservation easements also requires the "Grantees" to provide notice to the USDA of the exemption of the tracts from review by the Agricultural Lands Condemnation Approval Board. "Grantees" is defined in each of the conservation easements as the county Agricultural Security Board. While Transco does not know if such notices were made to the USDA by the county Agricultural Security Boards, the USDA has been receiving notices regarding the Project since its inception, and has been on the list of stakeholders since May 2, 2014.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-22

1.10 RESPONSE TO FERC RECOMMENDATION NUMBER 48

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary updated information regarding the identified landfill adjacent to the CPL South right-of-way near MP 66.8, including any mitigation measures that Transco will implement to avoid the landfill site or address any contamination that is encountered. (Section 4.8.7)

Transco completed a geophysical investigation to evaluate the extent of buried waste materials associated with a suspected railroad bed landfill located near CPL South MP 66.8. A copy of the geophysical investigation report is provided in Attachment 7. Transco understands that the tracks and rails were removed but that waste materials (trash) were buried to an approximate 40-foot depth near the former rail line. Anecdotal information from the property owner indicates that the buried waste materials may include tree stumps, tin cans, household wastes, tires, and home appliances.

The geophysical survey results indicate that subsurface debris may be encountered within the pipeline workspace. Transco's UDECP provided in Volume 3, Environmental Construction Plan of the Certificate Application will direct the appropriate actions to be followed in the event that subsurface debris is encountered during construction. All excavated subsurface debris will be managed in accordance with applicable state and federal solid waste management regulations.

A2-22

Section 4.8.7 of the EIS has been revised to include the updated information regarding the previously unidentified landfill.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-23

1.11 RESPONSE TO FERC RECOMMENDATION NUMBER 49

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary a detailed description of the proposed communication towers associated with Compressor Station 605/CN-MLV-05, the River Road Regulator Station/CS-MLV-01, and Compressor Station 610/CS-MLV-12 along with mitigation measures (such as design, color, or lighting) that Transco will implement to minimize the portions visible from nearby residences. The mitigation measures should take into consideration Mr. Mathias's comments regarding the design and visual screening at Compressor Station 610.

In addition, Transco shall include an assessment of the visual effects that will result from construction of the two new communication towers (at CS-MLV-08 and CS-MLV-09) proposed in its July 21, 2015 supplemental filing. This assessment must include:

- a. the closest sensitive receptor (residence);
- b. approximate distance and direction to the receptor;
- c. existing land use; and
- d. proposed mitigation measures to reduce visibility. (Section 4.8.8.2)

Station 605

The communication tower for Compressor Station 605 will be a 190-foot-tall free-standing lattice tower. The station itself is surrounded by forested land on three sides, which provides partial visual screening for the nearest residence, approximately 1,700 feet west of the proposed communication tower location. To minimize visibility, the communication tower will be located toward the back of the property. However, due to its height (190 feet), the tower will be partially visible from the residence.

Outdoor lighting for the new compressor station will be limited to the minimum amount required for security during unmanned nighttime operation. The main gates, yards, and all building entry and exit doors will have lighting for security, but the communication tower will not have any lighting. All station lighting will have directional control, or be in a downward position to minimize the visibility in the direction of local residences, while maintaining Occupational Safety and Health Administration (OSHA) standards for lighting.

Station 610

The communication tower for Compressor Station 610 will be a 190-foot free-standing lattice tower. Existing land cover surrounding Compressor Station 610 is upland forest to the north and east, and agricultural land to the south and west. The closest residence is approximately 750 feet west of the proposed communication tower. In coordination with the landowner, Transco has agreed to provide additional screening on the southern side of the

A2-23

Section 4.8.8 of the EIS has been revised to include the updated information regarding visual resources.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-23
(cont'd)

property to minimize the visibility of the communication tower; however, due to its height (190 feet), the tower will be partially visible from the residence.

Mr. Mathias' property is approximately 3,300 feet east of the station. The existing tree line on the east side of the station will provide partial visual screening; however, due to its height (190 feet), the tower will be partially visible from the residence.

Outdoor lighting for the new compressor station will be limited to the minimum amount required for security during unmanned nighttime operation. The main gates, yards, and all building entry and exit doors will have lighting for security, but the communication tower will not have any lighting. All station lighting will have directional control, or be in a downward position to minimize the visibility in the direction of local residences, while maintaining OSHA standards for lighting.

River Road Regulator Station

The communication tower for the River Road Regulator Station is no longer proposed. Transco will utilize an existing communication monopole at the adjacent Rock Springs backpressure regulator station.

Mainline Valves CS-MLV-08 and CS-MLV-09

Transco is proposing to install a communication monopole at mainline valves (MLVs) CS-MLV-08 and CS-MLV-09 on CPL South. A summary of the surrounding land use and nearest sensitive visual receptors at these sites is provided in Table 1-5.

Table 1-5
Land Use Types and Visual Receptors Associated with the Proposed Communication Monopole

Facility ID	Milepost	Proposed Monopole Height (feet)	Closest Sensitive Receptor	Approximate Distance and Direction to Receptor	Existing Land Use
CPL South					
CS-MLV-08	67.7	90	Private residence	350 feet south	Agricultural
CS-MLV-09	80.8	90	Private residence	1,500 feet northwest	Agricultural
Key: CPL = Central Penn Line MLV = Mainline valve					

MLV CS-MLV-08 and the associated communication monopole will be located in a rural residential area with scattered forests. Existing forested areas will provide partial visual

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-23
(cont'd)

screening between the monopole and the nearest residences to the northeast and to the south.
The monopole should only be visible above the tree line. The monopole will not have lighting.

MLV CS-MLV-09 and the associated communication monopole will be located in an agricultural area adjacent to an existing junk yard. Due to the monopole's proximity to a salvage yard, any impacts to existing views from nearby residences will be minimal. The monopole will not have lighting.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-24

1.12 RESPONSE TO FERC RECOMMENDATION NUMBER 53

Prior to the end of the draft EIS comment period, Transco shall file with the Secretary the results of an air quality screening (AERSCREEN) or refined modeling analysis (AERMOD or EPA-approved alternative) for all of the emission-generating equipment (including existing equipment) at Compressor Station 190, if Compressor Station 190 is not in operation for a substantial time during the monitoring period between February and July 2016. The results shall indicate the local modeled ambient emissions, plus the modeled incremental increase in emissions of criteria pollutants from the modifications. Transco shall include supporting calculations and provide a narrative explaining the justification for the modeling methodology. (Section 4.11.1.3)

Transco has been collecting ambient air quality monitoring data at Station 190 since September 20, 2015, and will continue to collect data through the end of July 2016. Transco will file the results of the ambient air quality monitoring data collection efforts at Station 190, including FERC's requested 'scale up' analysis representative of Station 190's potential local ambient impacts at full load, in August 2016.

A2-24

Comment noted.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

2 ADDITIONAL INFORMATION

2.1 ROUTE MODIFICATIONS

Transco has incorporated 15 route modifications into the Project that have not previously been filed with FERC. Three of the route modifications are minor alternatives recommended by FERC in the draft EIS. The remaining 12 route modifications are considered route deviations (i.e., minor adjustments to the proposed route, typically to avoid a specific feature). Table 2-1 lists the centerline modifications by Project component.

As listed in Table 2-1, Transco incorporated route modifications based on continuing negotiations with landowners, further engineering design, results of environmental field surveys, and results of civil survey of property boundaries. Transco has communicated these changes to the impacted landowners. The majority of these route modifications were in response to landowner requests, or based on further facility design at aboveground facilities.

No new landowners are affected by the route deviations. Five new landowners are affected on CPL South along CPL South Alternative 22.

2.2 WORKSPACE MODIFICATIONS

In Transco's previous filings, a 10-foot-wide permanent easement area was proposed at the Project's three HDD areas (CPL North MP 34.9 to MP 35.1, CPL South MP 12.1 to MP 12.7, and CPL South MP 99.3 to MP 100.0). Transco determined that a wider permanent easement will be required in these areas. Transco is requesting a 50-foot-wide permanent easement in these areas. Transco is not proposing any surface disturbance within these areas, and there will be no increase in the limits of disturbance (LOD) due to the wider easement.

2.3 ABOVEGROUND FACILITIES

Transco determined that additional workspace and an access road will be required at Compressor Station 520. The additional workspace will be used as a laydown area during construction. The revised workspace and access road will be shown on topographic mapping to be provided in a supplemental filing, anticipated in August 2016.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with the Federal Energy Regulatory Commission

Reference ID	June 2016 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2016 Supplemental Route (miles/feet)	Maximum Distance between Route Modification and June 2016 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
CPL North							
#M-0115	0.0 – 0.0	Sugarloaf / Columbia	0.00 / 21	0.00 / 0	17	Aligns CPL North with West Diamond Regulator Station demarcation point	0
#M-0141 / CPL North	24.1 – 24.7	Dallas / Luzerne	0.70 / 3,674	0.14 / 784	850	Minor alternative recommended by FERC in the draft EIS	0
#M-0142 / CPL North	25.6 – 25.9	Dallas / Luzerne	0.35 / 1,872	0.08 / 402	590	Minor alternative recommended by FERC in the draft EIS	0
#M-0120	M-0071 1.1 – M-0071 1.2	Northmoreland / Wyoming	0.03 / 170	0.00 / -12	28	Improves angle of road crossing at Schoolhouse Road	0
#M-0119	57.3 – 57.3	Lenox / Susquehanna	0.01 / 72	0.00 / -17	19	Aligns CPL North with Zick Meter Station facility design	0
CPL North Total			1.10 / 5,809	0.22 / 1,137	N/A	N/A	0
CPL South							
#M-0350	28.1 / M-0162 0.0	Rapho / Lancaster	0.06 / 292	-0.01 / -40	82	Avoid impacts to future development, per landowner request	0
#M-0351	80.3 – 80.4	Eldred/Schuykill	0.13 / 669	0.00 / 15	45	Avoids Sunoco easement	0

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with the Federal Energy Regulatory Commission

Reference ID	June 2016 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2016 Supplemental Route (miles/feet)	Maximum Distance between Route Modification and June 2016 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
#M-0352	0.0 – 0.0	Dunmore/Lancaster	0.03 / 173	0.00 / -14	32	Aligns CPL South with River Road Regulator Station demarcation point	0
#M-0353	125.1 – 125.2	Sugarloaf/Columbia	0.11 / 589	0.01 / 42	5	Aligns CPL South with West Diamond Regulator Station demarcation point	0
#M-0354	5.3 – 5.5	Martic/Lancaster	0.23 / 1,210	0.01 / 49	125	Reduces impacts to a wetland by shifting the PI outside of the wetland	0
#M-0360	112.3 – M-0207 0.2	Orange/Columbia	0.27 / 1,404	0.02 / 91	130	Aligns CPL South with Compressor Station 610 facility design	0
#M-0388	54.3 – 54.7	Union/Lebanon	0.44 / 2,336	-0.01 / -32	140	Avoids stormwater management area, per landowner request	0
#M-0389	19.8 – 20.0	West Hempfield/Lancaster	0.16 / 885	0.00 / -5	20	Avoids existing PPL pole	0
#M-0390	M-0179 0.1 – 101.4	Montour/Columbia	0.17 / 876	0.01 / -35	60	Landowner request to modify workspace	0

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

Table 2-1
Route Modifications Incorporated into the Proposed Route not Previously Filed with the Federal Energy Regulatory Commission

Reference ID	June 2016 Supplemental MP	Township/County	Route Modification Length (miles/feet)	Difference in Length from June 2016 Supplemental Route (miles/feet)	Maximum Distance between Route Modification and June 2016 Supplemental Route (feet)	Reason for Route Modification	Number of New Landowners Affected
#M-0405 / CPL South Alternative 22	8.4 – 10.0	Conestoga/Lancaster	1.71 / 9,034	0.11 / 582	2,000	Minor alternative recommended by FERC in the draft EIS	5
CPL South Total			3.31 / 17,470	0.12 / 653	N/A	N/A	5
TOTAL			4.41 / 23,279	0.34 / 1,790	N/A	N/A	5

Key
 CPL = Central Penn Line
 EIS = Environmental Impact Statement
 ID = Identifier
 MP = milepost
 N/A = not applicable
 PPL = Pennsylvania Power and Light

A2 – Transcontinental Gas Pipe Line Company (cont'd)

In addition, Transco relocated five MLVs, and added one additional MLV to the Project. These MLV changes are listed in Table 2-2, including the justification for these changes. These MLV locations are shown on the revised alignment sheets provided in Attachment 1.

Table 2-2
Relocated and New Mainline Valve Locations Since the June 2015 Supplemental Information Filing

Reference ID	June 2015 Supplement Milepost	Relocated Milepost	Reason for Change	Number of New Landowners Affected
CPL North				
#M-0114	NA	35.3	New proposed MLV	0
#M-0076	35.8 ^a	35.8 ^a	Reduces the amount of cut and fill required for MLV	0
CPL South				
#M-0267	29.7	29.9	Maintains 100 foot clearance between the road and the MLV	0
#M-0272	80.5	80.8	Provides additional distance from residence	0
#M-0276	102.5 ^a	102.5 ^a	Reduces the amount of cut and fill required for MLV	0
Unity Loop				
#M-0006	120.3 ^a	120.3 ^a	Avoids excessive fill	0
Note: * This MLV is being relocated less than 250 feet resulting in no change in the nearest milepost. Key: MLV = mainline valve NA = not applicable				

2.4 ACCESS ROADS

To ensure access along the route modifications and based on additional access road design, Transco has modified the locations of some access roads and the associated workspaces. Nine access roads have been removed from the Project since the June 2015 supplemental information filing, as it was determined that these roads were not needed for construction. Seven new access roads have been added to those identified in the June 2015 supplemental information filing. Appendix D from the draft EIS in Attachment 2 provides the revised list of access roads and associated workspaces. Access road locations and workspaces are also shown on the alignment sheets provided in Attachment 1.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

2.5 ALIGNMENT SHEETS, DRAFT EIS TABLES, AND RESIDENTIAL CONSTRUCTION PLANS

A2-25 | Transco revised the alignment sheets, draft EIS tables and Residential Construction Plans (RCPs) that were affected by route modifications and workspace changes since the June 2015 supplemental information filing. Attachment 2 includes updated draft EIS tables that were affected by route modifications and workspace changes; any tables not affected, and therefore unchanged, are not included. All revised draft EIS tables have been formatted to indicate changes that have occurred since the June 2015 supplemental information filing. All new or modified information is indicated in **bold red text**, and removed features are marked as ~~strikethrough text~~. Likewise, the updated mapping includes new alignment sheets (Attachment 1) and RCPs (Attachment 8) only for route modifications and workspace changes. Transco is updating the topographic maps for the Project, and will provide this mapping in a supplemental filing, anticipated in August 2016.

2.6 PROJECT LOCATION MAP

Transco revised the Project Location Map to reflect the current route, and scope of the Project. The updated Project Location Map is provided in Attachment 9.

2.7 LANDOWNER LINE LISTS

Transco revised the landowner line lists and mailing lists to reflect the current route and Project workspaces, and these lists are provided in Attachment 10 as privileged information. All new or modified information is indicated in **bold red text**, and removed features are marked as ~~strikethrough text~~.

A2-25

The affected tables have been revised throughout the EIS.

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT		SUPPLEMENTAL INFORMATION FILING – JUNE 2016	
3 TRANSCO COMMENTS ON THE DRAFT EIS			
Transco reviewed the draft EIS for consistency with its previous filings and the currently proposed Project, and offers the following comments.			
A2-26	<u>Page 1-10, Electric Transmission Lines to Proposed Compressor Stations</u>	<p>This section indicates that the combined estimated length of the electrical transmission lines to Compressor Stations 605 and 610 would have a combined length of about 1,000 feet. Based on discussions with PPL Electric Utilities, Transco notes that the current estimated length of these electric transmission lines is 4.3 miles for Compressor Station 605 and 1.8 miles for Compressor Station 610.</p>	A2-26 Section 1.4 of the EIS has been revised.
A2-27	<u>Page 4-197, New Source Review and Prevention of Significant Deterioration</u>	<p>This section describes, in detail, the prevention of significant deterioration applicability to the Project. Transco would like to clarify that emission sources for the Project are also subject to Nonattainment New Source Review.</p>	A2-27 Section 4.11.1.2 of the EIS has been updated to clarify the applicability of Nonattainment New Source Review.
A2-28	<u>Pages 4-204 to 4-205, Compressor Station 517 and Compressor Station 520</u>	<p>This section indicates that emission offsets are needed at Compressor Stations 517 and 520. This is due to the requirement in Pennsylvania to purchase offsets for contemporaneous increases in thresholds are exceeded. Transco would like to clarify that these stations are not subject to Lowest Achievable Emission Rate requirements.</p>	A2-28 Comment noted.
A2-29	<u>Page 4-205, Compressor Station 190</u>	<p>This section states that Best Available Control Technology and emission offsets are not applicable to the emission increase at this facility. Transco notes that this is inaccurate, and should read Lowest Achievable Emission Rate and emission offsets are not applicable to the emission increase at this facility.</p> <p>Page 4-215, AERSCREEN Modeling Analysis</p> <p>This section states that FERC used the maximum air quality impacts for each pollutant from the monitored concentrations at each site and added the modeled impacts associated with the proposed modifications to Compressor Stations 517 and 520 for a comparison to the NAAQS. Transco would like to clarify that the predicted maximum impacts post-project are equal to the predicted modeled concentrations (AERSCREEN) of the proposed new equipment plus the maximum onsite monitored ambient concentration as of the DEIS issuance. According to the form of the NAAQS standard, ambient monitored data is collected and compared to the</p>	A2-29 Section 4.11.1.2 of the EIS has been updated to clarify that Lowest Achievable Emission Rate is not applicable to the emission increases at Compressor Station 190.
39			

A2 – Transcontinental Gas Pipe Line Company (cont'd)

ATLANTIC SUNRISE PROJECT

SUPPLEMENTAL INFORMATION FILING – JUNE 2016

A2-29
(cont'd)

numerical form of the standard for longer periods of time (e.g. one year or three years). This is not an indication of conformance with the NAAQS, merely it is intended to identify a maximum potential local impact prior to DEIS issuance.

Table 3-1
Air Quality Modeling Analysis for Compressor Stations 517, 520, and 190

Pollutant	Averaging Period	Modeled AERSCREEN Concentration ($\mu\text{g}/\text{m}^3$)	EPA Regional Ambient Monitored Background ($\mu\text{g}/\text{m}^3$)	Total AERSCREEN Modeled Concentration (Regional Background) ($\mu\text{g}/\text{m}^3$)	Maximum Onsite Ambient Concentration ($\mu\text{g}/\text{m}^3$)	Predicted Maximum Impacts Post Project ¹ ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)
Compressor Station 517							
NO ₂	1-hour	49.1	62.1	111.2	117.9	167.0	188.7
	Annual	4.9	Not available	4.9	Not available	--	100
SO ₂	1-hour	1.3	49.8	51.1	44.5	45.8	196
	3-hour	1.3	Not Available	1.3	29.1	30.4	1,310
CO	1-hour	44.3	2,062	2,106.3	8,988	9,032.3	40,000
	8-hour	39.9	1,489	1,528.9	2,347	2,386.9	10,000
PM ₁₀	24-hour	5.2	27	32.2	Not available	--	150
PM _{2.5}	24-hour	5.2	24	29.2	Not available	--	35
	Annual	0.5	9.2	9.7	Not available	--	12
Compressor Station 520							
NO ₂	1-hour	32.1	62.1	94.2	45.3	77.4	188.7
	Annual	3.2	Not Available	3.2	Not available	--	100
SO ₂	1-hour	0.8	49.8	50.6	12.8	13.6	196
	3-hour	0.8	Not Available	0.8	12.3	13.1	1,310
CO	1-hour	29.0	2,062	2,091.0	1,156	1,185.0	40,000
	8-hour	26.1	1,489	1,515.1	985	1,011.1	10,000
PM ₁₀	24-hour	2.1	27	29.1	51.8	53.9	150
PM _{2.5}	24-hour	2.1	24	26.1	24.3	26.4	35
	Annual	0.4	9.2	9.6	Not available	--	12
Compressor Station 190							
NO ₂	1-hour	32.2	82.8	115.0	--	--	188.7
	Annual	3.2	Not available	3.2	--	--	100
SO ₂	1-hour	0.9	26.2	27.1	--	--	196
	3-hour	0.9	Not available	0.9	--	--	1,310
CO	1-hour	43.0	1,031.0	1,074.0	--	--	40,000
	8-hour	38.7	1,031.0	1,069.7	--	--	10,000

A2 – Transcontinental Gas Pipe Line Company (cont'd)

A2-29
(cont'd)

Table 3-1
Air Quality Modeling Analysis for Compressor Stations 517, 520, and 190

Pollutant	Averaging Period	Modeled AERSCREEN Concentration ($\mu\text{g}/\text{m}^3$)	EPA Regional Ambient Monitored Background ($\mu\text{g}/\text{m}^3$)	Total AERSCREEN Modeled Concentration (Regional Background) ($\mu\text{g}/\text{m}^3$)	Maximum Onsite Ambient Concentration ($\mu\text{g}/\text{m}^3$)	Predicted Maximum Impacts Post Project ¹ ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hour	3.5	27	30.5	--	--	150
PM _{2.5}	24-hour	3.5	21	24.5	--	--	35
	Annual	0.4	8.3	8.7	--	--	12

Note: $\mu\text{g}/\text{m}^3$ = microgram per cubic meter
¹ According to the form of the standard, ambient monitored data is collected and compared to the numerical form of the standard for longer periods of time (i.e. 3 years). For the purposes of predicting a maximum impact, this column represents the maximum monitored concentrations, inclusive of the modeled concentrations for the proposed new equipment. This is not an indication of compliance with the NAAQS, merely intended to identify a maximum potential local impact prior to FEIS issuance.

A2-30

Page 4-217, Zick Meter Station

This section states that operation emission estimates were not provided to FERC. Transco provided operational emission estimates to FERC with the request for determination filed in the July 2015 supplemental information filing.

A2-30

Table 4.11.1-15 in the EIS has been updated to include emission estimates for the Zick Meter Station.