

CP21-94-000

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

Dear Ms. Bose,

I am writing to urge the Federal Energy Regulatory Commission (FERC) to deny the approval of Transco's Regional Energy Access Expansion pipeline (docket number CP21-94-000.) This project would inflict irreparable harm to pristine streams, forests, and other natural resources. The Draft Environmental Impact Statement (DEIS) is woefully inadequate and fails to address the scope of negative effects that would result from this project.

The project would impact 114 Exceptional Value (EV) wetlands and 37 High Quality (HQ) streams. Many of the streams that would be crossed by the project are cold water trout streams that are very sensitive to degradation. Some of these streams include Tunkhannock Creek, Pohopoco Creek, McMichael Creek, Mud Run, and the unique and sensitive Long Pond Pocono area of Monroe County - all of which have special protection designations.

Transco fails to factor in not just the impacts of the fragmentation of the forest for these particular pipeline segments, but also by other cuts in the same region, either by Transco on its other pipeline pieces or by other pipeline/linear projects both within and outside the watershed. The removal of healthy forested buffers along the many stream crossings proposed by Transco REAE must be assessed – individually and cumulatively. Transco does not have all of its required permits from state agencies and has not provided adequate mitigation measures and the continued segmenting of small projects is not acceptable or appropriate.

An Environmental Impact Statement (EIS) must describe the environmental impacts of the proposal, including any possible alternatives and irreversible impacts should the proposal be carried out. In this draft EIS, FERC concludes that the environmental impacts of the REAE project would be "less than significant" **except for** the project's climate impacts. FERC acknowledges that the project's downstream emissions (16.62 million metric tons of carbon dioxide equivalent) exceeds FERC's own significance threshold for GHG emissions. FERC must justify why a project with emissions higher than its significance threshold should be considered the best alternative. The project would also impact 114 Exceptional Value (EV) wetlands and 37 High Quality (HQ) streams, including cold water trout streams. FERC also acknowledges that environmental justice communities would predominantly bear the impacts from this project. This project actively hinders goals on reducing greenhouse gas emissions that Governor Tom Wolf set in 2019. Despite these impacts, FERC bizarrely believes the project should move forward.

For these reasons, FERC should deny the Transco REAE project. The EIS is an incomplete assessment and does not consider or appropriately value the full scope of its impacts to the environment and to environmental justice communities.

Thank you.