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Sent: Tuesday, May 24, 2016 6:35 PM

To: Buczynski, Joseph

Subject: Transcontinental Pipe Line Company's (Transco) application for water obstruction and encroachment permits for its proposed Atlantic Sunrise Pipeline (FERC Docket: CP15-138).

Comment of Sondra Wolferman, Albrightsville, PA

Transco's environmental impact survey for the proposed Atlantic Sunrise pipeline project is heavily reliant on remote sensed data. In its overview of the draft Biological Assessment outline dated 5/19/2015, Transco stated that surveys completed to date identified only one bog turtle site within the project area, and that remote sensing technology was used to collect data on wetlands and chart wildlife habitats for the environmental impact survey.

The accuracy of ecological data collected remotely from aircraft or satellites has been questioned in numerous scholarly reviews. One such study concludes that, while high resolution satellite imagery can accurately identify open water wetlands, the technology falls short for other wetland classes, such as vernal pool deep or vernal pool shallow wetland communities. In one California study, only 52% of vernal pool deep communities, and 58% of vernal pool shallow communities were correctly classified using remote sensed data.

http://www.vernalpools.org/documents/Cutler%20etal%202006_Accuracy_Assessment_RemoteSensing_VernalPools.pdf

This could have serious consequences for wildlife communities along the route of the proposed Atlantic Sunrise pipeline, which crosses some of the most ecologically diverse habitats in Pennsylvania, in western Schuylkill County. Vernal pools, also known as ephemeral ponds, are temporary wetlands that fill annually from precipitation, surface water runoff, and rising groundwater. A large number of rare, endangered, and endemic species occur in vernal pool areas. Eggs are laid in the vernal pool. Juveniles leave the pool two or three months later to spend most of their lives in the uplands within a few hundred feet of the vernal pool, returning the following spring to breed. Bog turtles favor mucky soils with small ponds of groundwater and drier upland areas with low vegetation and sparse tree cover, such as those surrounding vernal pools. This habitat allows the turtles to thermo-regulate by burrowing into the mud to cool off or basking on emergent vegetation to absorb heat.

http://www.conservewildlifenj.org/downloads/cwnj_326.pdf

The Natural Areas Inventory of Schuylkill County---prepared by the Pennsylvania Science Office of the Nature Conservancy in 2003---documents several large-scale, high-quality environments in the ridge and valley province of western Schuylkill County that support populations of rare, threatened, and endangered plants and animals and aquatic species of special concern. These areas are now in the path of the proposed Atlantic Sunrise pipeline project. If remote sensing imagery cannot be trusted to classify vernal pool wetlands with even an 80% accuracy rating, then it is doubtful such imagery can provide reliable data on the status of species inhabiting those communities. A 50-75% accuracy rate for vernal pool identification is unacceptable in a project of this magnitude. Assuming that Transco's data is credible---and that there is only one location for bog turtles and no evidence of northern long-eared bats within the proposed pipeline project area---this data only confirms that those species are declining in greater numbers than was previously thought, and this alone is sufficient reason to deny Transco the water obstruction and encroachment permits to disturb any areas that, if left in a natural state, could potentially support regenerated populations of declining species. <http://www.naturalheritage.state.pa.us/.../schuylkill%20county%20nai%20003...>

Given the enormous scope of this project, Transco's 400-foot study corridor is insufficient to encompass the zone of potential impacts with regard to rare and endangered species such as the bog turtle and the northern long-eared bat. The impacts of forest fragmentation and the "edge effect" resulting from pipeline cuts can extend for thousands of feet beyond the edges of the pipeline ROW, allowing solar radiation to penetrate deep into forest interiors where many of those endangered plants and animals reside away from the dangers of invasive species and thermal impacts that could doom them to death and extinction. Given the potential for extreme ecological harm to habitats in western Schuylkill County, and the lack of precise enough data to avoid those impacts, I recommend that PADEP reject all remote-sensed ecological data and suspend its review of the project until the applicant has completed its application using only field verified data, at which time a new comment period should be opened for the public to review the application.