

Anne Marie Garti

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FERC
888 First Street, NE
Washington, D.C. 20426

Re: comment on the proposed route for the Constitution Pipeline, Docket number: PF12-9-000.

According to the regulations promulgated by the Federal Energy Regulatory Commission (FERC), new natural gas transmission lines should be sited “in a way that avoids or minimizes effects on scenic, historic, wildlife, and recreational values.”¹ In addition, FERC asks utility companies to “avoid forested areas and steep slopes. . . .”²

Williams Partners, L.P. (“Williams”) and Cabot Pipeline Holdings, LLC (“Cabot”) totally ignore these regulations as the proposed pathway of their Constitution Pipeline would repeatedly climb and descend steep slopes, run at or near the top of hills and ridges, cut a path through mature second growth forests and wetlands, and disrupt fertile farmland.³ In addition, approximately one-third of the entire route would require rock excavation, which means jackhammers and/or blasting would be a critical and disruptive component of the construction process.⁴

To comply with FERC’s regulations, the proposed pipeline – if it is needed at all – should be co-located with existing gas or electric easements.⁵ Williams and Cabot have submitted Draft Resource Report No. 10 on alternatives. However, the only sites under consideration are mere off-shoots along the proposed route. Williams and Cabot should be studying the many existing easements that currently serve the northeast, which is their target market. A pipeline running through the hills, valleys, forests, wetlands and farmland just to the west of the Delaware watershed would unnecessarily destroy this pristine area.

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¹ 18 C.F.R. §§ 380.15(a), (d)(2) (2012).

² *Id.* at § (d)(3).

³ According to Resource Report No. 1, Table 1.3-2, there are 77 distinct locations with slopes over 30 degrees: 24 in PA and 53 in NY.

⁴ According to Resource Report No. 1, Table 1.3-4, there are 39.9 miles where the bedrock is near the surface of the earth. The length of the proposed pipeline is 120.6 miles.

⁵ 18 C.F.R. § 380.15(d)(2). (“The use, widening, or extension of existing rights-of-way must be considered in locating proposed facilities.”)

Document Content(s)

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