

October 12, 2022

Via electronic mail (*RA-EPREGIONALPERMIT@pa.gov*)

Department of Environmental Protection
Regional Permit Coordination Office
Dominic Rocco, PE, Director
Rachel Carson State Office Building
400 Market Street, 10th Floor
Harrisburg, PA 17101

**Re: Comments on Transco Regional Energy Access Expansion Project's
Revised Applications for Permits for Water Obstructions and
Encroachments and for Erosion and Sediment Control**

Dear Mr. Rocco:

Citizens for Pennsylvania's Future, Clean Air Council, Delaware Riverkeeper Network, and the Brodhead Watershed Association, Tobyhanna Creek/Tunkhannock Creek Watershed Association, and the Aquashicola Pohopoco Watershed Conservancy, ("Commenters") respectfully submit these comments on the applications of the Transcontinental Gas Pipe Line Company, LLC ("Transco") for the Regional Energy Access Expansion Project ("the Project") for permits ESG02000160002, E40-780, E13-185, E48-435, and E09-998 ("Applications"). Commenters urge the Department to take these comments, as well as Commenters' prior submissions on these applications, into consideration and deny these permits.

PennFuture is a membership-based, non-profit, environmental organization dedicated to leading the transition to a clean energy economy in Pennsylvania and beyond. PennFuture strives to protect our air, water and land, and to empower citizens to build sustainable communities for future generations. A main focus of PennFuture's work is to improve and protect water resources and water quality across Pennsylvania, with particular emphasis on the Delaware River Basin, through public outreach and education, advocacy, and litigation.

Clean Air Council is a member-supported, non-profit organization that has been working to protect everyone's right to a healthy environment for over 50 years. The Council works throughout the Mid-Atlantic region and achieves its mission through public education, community advocacy, and government oversight to ensure enforcement of environmental laws.

From the New York Highlands to the Delaware Bay, the Delaware Riverkeeper Network (DRN) gives voice to the River and all the communities that depend upon a healthy watershed. Since 1988, DRN has stood as a vigilant protector and defender of the Delaware River and its tributaries, committed to restoring the natural balance where it has been lost and ensuring its preservation where it still exists.

The Brodhead Watershed Association (BWA) is an educational non-profit organization founded in 1989. BWA is dedicated to protecting and improving clean and abundant water resources in the Brodhead and Cherry creek watersheds in Monroe County, PA. The BWA assists municipalities, residents, businesses and groups with protecting natural resources through outreach, workshops, public programs, stream monitoring and baseline data collection.

Tobyhanna Creek/Tunkhannock Creek Watershed Association (TCTCWA) is an organization dedicated to responsible stewardship of water resources for the long-term benefit of all stakeholders within our watershed which is located in Monroe County, PA. TCTCWA believes that the condition of ground and surface waters, and the lands draining to them, must be managed thoughtfully, holistically, and inclusively as once they are degraded, restoration is often challenging if not impossible and involves expense that no one is willing to pay. TCTCWA is committed to principles of responsible development, seeking balance between the needs of economic and environmental health within our watershed

The Aquashicola/ Pohopoco Watershed Conservancy was formed in 2001 as a watchdog organization for both watersheds. The Conservancy is a non- profit group of all volunteers that do periodic water sampling on both streams. The Conservancy also does community outreach and education at local events to raise public awareness of the need for clean water and water related topics.

Commenters appreciate your consideration of these comments and hope they are helpful as you continue your review of application materials. The waterways that this pipeline would cut across are among the highest quality streams in the Commonwealth and are entitled under the law to the highest protections. Even allegedly temporary impacts to these waters still do significant damage to these resources: to the water quality, to the trout and other aquatic life that live there, and to the people who rely on these waters. This is especially true when temporary

impacts from construction are repeated over time, such as when new pipeline loops are added in similar locations. Such impacts tend to become more like permanent impacts but fall through the cracks when it comes to oversight. The Department must prevent multiple small cuts to special protection waters that add up to impacts that substantially degrade these valuable resources. Commenters request DEP incorporate their previous comments on Transco's previous applications (sent to the Department on October 18, 2021 and December 6, 2021) and we urge the DEP to use its authority and duties to deny these water permits for the irreparable harm it would cause to Pennsylvania water resources, the climate and the environmental harm to water resources this pipeline project would cause.

I. The Applications and Plans Do Not Provide for Adequate Oversight by the Department or for Adequate Accountability by Transco.

Despite Transco looking to cut across over multiple high-quality streams, there is still no requirement for oversight by way of water quality monitoring for these cuts. Without water quality monitoring data from before and after the permitted work, how is DEP ensuring degradation of these special protections waters is not occurring? This is especially important in light of the repeated and expanded cuts and impacts these pipelines inflict over time with multiple expansions.

Transco asserts: "Disturbed wetland, streams and floodways within the ROW will be returned to pre-construction grade and contour upon completion of construction." What monitoring and documentation is DEP requiring of Transco to ensure that before and after conditions remain the same? What in-stream monitoring is being conducted by Transco or the agency to ensure there are no harms or declines in water quality? Past records and monitoring data submitted by Commenters on other similar pipeline cuts in Pennsylvania demonstrate that declines in water quality occur as a result of pipeline construction, and yet there appears to be no additional measures or new BMP measures being taken by Transco to minimize harm that will come if this pipeline expansion is approved. Transco also asserts that thermal impacts to riparian buffers will be "negligible and localized." There is no indication for an adequate plan to monitor thermal impacts.

Commenters urge the Department, if this application is not denied, to at a minimum require specific, enforceable monitoring and reporting by Transco during and after construction, and we urge the Department to hold Transco to any and all replanting obligations.

II. The Applications Contain Multiple Inaccuracies and Omissions.

Commenters are concerned about the inaccuracies and material omissions in the Applications.

In both the Luzerne and Monroe County Chapter 105 applications, the same problem appears in the Compliance Review section of the Joint Permit Application Form. Transco checked "No" to the question "Is the applicant (owner and/or operator) currently in violation of any permits issued by the Department?" This form was dated March 3, 2022. As of March 31, 2022, the Department issued Transco an air pollution violation for Compressor Station 515.

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=334042
3. The enforcement status of that violation is currently unlisted. Until that violation is resolved, the Department should not issue additional permits to Transco.

Also in both Chapter 105 applications, under “Facility Information” on page 2 of 9, Transco should have checked, but did not check, “Air Emission Plant.” Transco’s project admittedly involves large increases in emissions from various air pollution sources. Section 4.8.4 of the FERC Final Environmental Impact Statement explains, “Operational emission increases from the Project would result from natural gas combustion turbines at Compressor Stations 505 and 515... Aboveground facilities, including the compressor stations, M&R stations, and pig launcher/receiver facilities along with the pipelines, would generate fugitive emissions of natural gas. Compressor station combustion sources include turbines, emergency engines, and heaters; and fugitive emissions could result from miscellaneous small storage tanks, truck loading, piping components, blowdown events, and pigging operations.” Therefore, this part of the Facility Information is inaccurate.

In the General Information Form for the Luzerne County application, Transco checks under “Coordination Information” that the project will not “involve a construction activity that results in earth disturbance in the area of the earth disturbance that are contaminated at levels exceeding residential or non-residential medium-specific concentrations (MSCs) in 25 Pa. Code Chapter 250 at residential or nonresidential construction sites, respectively.” *See also* Section 1-11 of the Chapter 102 application. However, according to eFACTS, Compressor Station 515, where construction is planned, is a brownfield site. *See* https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleFacility.aspx?FacilityID=779934. Commenters do not know whether the site has been fully remediated, but the Department should fully investigate that to determine whether special care must be taken for the earthmoving at that location.

In the August 11, 2022 updates to the Chapter 105 applications, Transco includes two sets of municipal notification correspondence in response to Requirement C: that for the April 2021 submission and that for the April 2022 submission. There is no evidence provided to confirm correspondence with the municipalities notifying them of the updated August 2022 applications, nor anything posted since then updating the municipal letters. The same is true for the stormwater and floodplain analysis correspondence provided in response to Requirements O and P.

More concerning than merely the lack of updated municipal correspondence, however, is the lack of return correspondence *from* the municipalities and counties commenting on the stormwater and floodplain analyses. 25 Pa. Code § 105.13(e)(1)(v)-(vi) specifically require the submission of “a letter from the county or municipality commenting on the analysis,” or in the case of floodplain management, specifically the municipality. Transco has only included outgoing letters, not incoming letters. Transco’s outgoing letters do not even ask for comment to be sent to Transco in response, suggesting instead that “any comments” be sent to the mailing address of the Department. To the contrary, it is the applicant’s obligation per the express language of the Pennsylvania Code to include work with the local governments and include responsive comments in the application itself. Transco here skipped those steps entirely, which

renders its Chapter 105 applications incomplete under the express language of 25 Pa. Code § 105.13.

And on Sheet 40 of 90 of the Regional Energy Lateral E&S Plans, there is no indication of the footprints of the Direct Pipe entry and exit locations, just zero-dimensional points. However, these installations have large footprints that should be indicated in the same way that the footprints of bore pits are indicated.

The Chapter 102 application suffers from its own inaccuracies and omissions.

On the final page of Section 1-1, Transco checks boxes for the different riparian buffer waivers it is requesting. It does not check the box for “The project is a redevelopment project which may include brownfields or use of other vacant land and property within a developed area for further construction or development.” This is the box that corresponds with the riparian buffer exception at 25 Pa. Code § 102.14(d)(2)(v). However, according to Section 1-7 (*see* Attachment 1), there are *twenty* separate crossings for which Transco makes that request.

In Section 1-4, at internal Section 1.2.1.1, Transco counts toward miles of colocation 1.1 miles of the Regional Energy Lateral that would be near the “Certificated PennEast Pipeline.” As the Department well knows, the PennEast Pipeline project is dead, so this would be entirely greenfield pipeline.

III. The Applications Do Not Adequately Account for the Needs of Wildlife, Including Threatened and Endangered Species.

There are significant bat species in the proposed project area, and the Transco applications do not sufficiently protect these species. Northern long-eared bats, Indiana bats, tri-colored bats, and little brown bats were documented in the project area. Indiana bats are federally endangered, while Northern long-eared bats are federally threatened. Tri-colored bats and little brown bats are proposed to be federally listed in the near future.

Transco’s proposed seasonal timing restrictions near hibernacula and summer roosting habitat are also insufficient. According to the applications, trees may only be cleared using non-mechanical equipment between November 16 and March 31; ground disturbance may only occur between April 1 and November 15. However, the term “ground disturbance” includes mechanized tree felling, which defeats the purpose of a seasonal timing restriction, since the entire calendar year is therefore technically open to tree felling.

The effects of tree felling can be permanent to wildlife. Transco asserts that, “*During operation, previously forested habitat (including forested wetlands) would not reestablish within the permanent right-of-way for the pipelines. The principal impact would be a shift in species use from those favoring forest habitat to those using either edge habitat or areas that are more open. It is not likely that the relatively small widening (generally an additional 25 feet) of existing permanently cleared rights-of-way would impede the movement of most forest interior species.*”

Although 25 feet may seem inconsequential, it is a significant distance to small animals such as salamanders, particularly when considered cumulatively with the amount of forest that was previously cut. Transco also states that, *“Long-term impacts on fishery resources could occur if the adjacent riparian vegetation does not recover.”* However, there are no provisions to mitigate these impacts on fishery resources in the event that the vegetation does not grow back. Furthermore, Transco’s plan to have stump sprouting be a major part of its “restoration plans” flies in the face of mitigating thermal impacts which is a requirement of anti-degradation. Additionally, construction of the Effort Loop would impact a total of 27 acres of habitat within the Long Pond Preserve IBA, of which 8.8 acres would be permanently impacted (i.e., forest converted to herbaceous cover). The conversion of one habitat type to another is significant, and no amount of mitigation can compensate for this habitat loss (see past comments for more detail on the significance of Long Pond Preserve area).

In addition, several vernal pools were documented in the project area, but no avoidance or mitigation measures are mentioned. Wetland W4-T3 in the Effort Loop has a vernal pool that contained two types of amphibian egg masses in it, but the surveyors did not identify which species they belong to. Furthermore, a timber rattlesnake den was confirmed within the project area. Proposed mitigation includes exclusion fencing, reconstructing rock habitat, and having an on-site biologist remove timber rattlesnakes away from the area. According to scientific literature, timber rattlesnakes often exhibit strong fidelity to their dens. Efforts to impede these animals from reaching their destination may stress or exhaust them to the point of death. Transco’s plans do not adequately account for the needs of these struggling species.

Finally, wood turtles are not included in the PNDI consultation because they are not threatened or endangered, but are a species of special concern in PA. It is claimed that mitigation measures included to protect other wildlife would universally protect wood turtles, but this is not accurate. Wood turtles are currently under review for federal listing by the U.S. Fish and Wildlife Service. Wood turtles have been documented on iNaturalist (a citizen science website/app) in some of the streams directly affected by the project and potential impacts to them should be considered and thoroughly reviewed.

IV. The Applications Undercount the Amount of Wetland Acreage for Which Compensation is Required and the Proposed Mitigation Plan is Fundamentally Flawed.

As an initial matter, the wetland delineation in Transco’s applications must be independently verified by the Department or through a jurisdictional determination by the U.S. Army Corps of Engineers. Inadvertent or purposeful mischaracterization of wetlands can result in the permanent loss of wetland acreage and functions without the appropriate oversight. While field-truthing by community members and environmental organizations can provide an important check on inaccuracies, the duty remains with the Department as trustee to account for the public natural resources impacted by any proposed action subject to the Department’s review. Thus, an undercounting of wetland acreage and functions can be prevented by appropriate verification and oversight. Army Corps field visits during prior Transco cuts during prior Transco Franklin Loop expansions helped document forested wetlands that had not been accounted for. The Department

should also investigate fully the timing of delineations in way of drought conditions that may have been affecting surveys when they were conducted by Transco's consultants.

Wetland impacts are also minimized throughout the applications by characterizing them as "temporary." Transco's definition of "temporary" is not clear - "restored upon completion of construction" could mean any point in the future. The critical question is, why isn't there a *temporal* limit on the definition of *temporary*? Under the definition included in Transco's applications, "temporary" impacts could include the entire time active installation of the pipeline is taking place, plus the time needed for restoration to be documented as successful—which could be up to five years, even if completely successful. Again, there is no guarantee or enforcement mechanism to ensure that these temporary impacts do not become permanent through failure to adequately restore water resources, or through future applications for construction or maintenance within the right-of-way. Because of this flexible definition of "temporary," acreage of permanent impacts to wetlands is undercounted. To be clear and as discussed by Commenters in past comments, cutting forested wetland trees (PFO wetlands) to expand a pipeline is not a temporary impact with regard ecosystem functions – this is especially important as many of the wetlands to be cut are designated Exceptional Value (EV), where no degradation is allowed.

The Department must also ensure that "temporary" impacts do not become permanent through future construction within the same wetlands. While collocation of pipelines may provide some convenience for the applicant, the Department must have a realistic understanding of what it means to continually upgrade and expand the devastating footprint of additional expansions to the same adjacent ROW from the perspective of the resources in and around the ROW. There are not many examples on the alignment sheets where Transco is working between its existing pipes and within the existing footprint – instead Transco acknowledges it is cutting additional (often forest) habitat adjacent to the already impacted expansive ROW. Denying the permits would prevent further degradation of these resources in an ever-expanding ROW scheme. Should the Department consider granting the permits requested in Transco's applications, conditions should be imposed to restrict future work and expansion of work in and beyond the ROW except in the case of an emergency.

The wetlands mitigation plan included in Transco's applications is also insufficiently protective of the public natural resources. It fails to include any enforceable contingency plan in the event of mitigation failure. There must be a time limit for successful mitigation, after which other mitigation sites must be explored.

Transco's compensatory mitigation proposal also misses the point of the compensatory mitigation requirements. The Perin mitigation site is 8 miles from the Effort Loop in a completely different county (Northampton) that is not affected by the pipeline. It is in the floodplain of Waltz Creek, which is a naturally reproducing trout stream. Therefore, wetlands that are hydrologically connected are considered Exceptional Value (EV). There is also a Bald Eagle nest located approximately 300 feet from the proposed mitigation site. The proposed mitigation includes an overall 5.23-acre wetland "enhancement area" with 4.23 acres of PFO

planting and 1.00 acres of PSS planting. These existing EV wetlands are PEM and PSS wetlands, and modifying them to count as mitigation is entirely inappropriate. The “enhancement” involves planting trees and shrubs in these wetlands, which would exacerbate succession into forested wetlands. The goals of the wetlands mitigation requirements are to create new wetlands to replace those destroyed as a result of the permitted action, not to transform an existing type of wetland into a different type of wetland. The emergent wetlands were deemed suitable habitat for the federally threatened bog turtle. Although Phase 2 and Phase 3 bog turtle surveys were conducted and no bog turtles were found, the conversion of these emergent wetlands would destroy their suitability for this species permanently. Allowing Transco to “enhance” preexisting wetlands to replace lost wetlands functions is only appropriate if the acreage and functions of the preexisting wetlands are also replaced. While “enhancing” an existing wetland may be easier for Transco than creating a new wetland with all of the necessary functions, those existing wetlands do serve an ecological purpose that must be replaced with new acreage if permitted to be altered. Transco could provide construction BMPs to avoid cutting PFO wetlands in the first place (such as operating in its already expansive existing footprint, employing more protective waterbody crossing technologies, replanting and protecting native shallow rooted shrub species near the center line, and replanting native trees and shrubs to be harmed). The Department could require these BMPs as part of the permit, and if the permit is to be granted then these protective BMPs should be included.

Furthermore, it is very common that National Wetlands Inventory (NWI) maps significantly undermap the number and extent of regulated wetlands in Pennsylvania. The extent of forested wetlands often is not readily determined from high-altitude aerial photographs. Furthermore, NWI maps were never intended to be accurate enough to be used for project site-specific regulatory purposes. Discrepancies regarding the location, extent, and nature of wetlands at various places along the proposed pipeline route may be due to sloppy recording, incompetent field delineation, inconsistency among field delineators, or some combination of those factors. There is no excuse for inaccurate identification of wetlands on any project site, yet it happens more often than necessary, even where the wetland consultants have the “appropriate” credentials and claim to have followed the relevant criteria and guidelines for wetland delineation. The Army Corps of Engineers has an established, straightforward, no-fee process/procedure (known as a jurisdictional determination, or JD) for checking the accuracy of wetland delineations for federal regulatory purposes.

PADEP uses the same methodology (25 Pa. Code § 105.451). The importance of Corps of Engineers review was highlighted recently when a proposed coal mine application was undergoing PADEP permit review. In the 1,867-acre surface facilities area for the proposed mine in southwestern Pennsylvania, the applicant’s wetland consultant identified 16 wetlands where the National Wetlands Inventory (NWI) had mapped only 2, a result which would seem to be more comprehensive. Following the Corps’ JD field inspections, however, a total of 44 wetlands were confirmed at the mine site. If the Corps had not examined the consultant’s wetland delineations, and if any of those additional 28 wetlands had been adversely affected by the mining project, those impacts would not have been recognized or mitigated. For the Transco

project, it is important that the Corps of Engineers field inspect and confirm the accuracy of the proposed delineation of all wetlands after the limits of the wetlands and Study Area have been clearly flagged.

V. The Applications Do Not Reasonably Address and Plan to Mitigate Geologic Hazards.

Commenters have serious concerns about Transco's approach to geologic hazards. As background, Attachment B to the Chapter 102 application discusses geologic hazards. Section 2.3 indicates that more than ten miles of the Regional Energy Lateral are categorized as having a high susceptibility to landslides, and more than five miles of the Effort Loop are categorized the same. This presents a major risk.

Rather than considering safer locations for installation of the project, the applicant presumes the route is immutable and continues the analysis from there. Specifically, Transco commissions a preliminary geohazard evaluation by its vendor CEC, which proposes that: "Based on the conclusions presented, the following geohazards warrant, in our opinion, supplemental investigations and potential site specific geohazard mitigation measures during and/or prior to pipeline installation:" *See* Section 4.1. This is in a report revised June 16, 2022, so it is current.

This approach presumes first that the route is fixed rather than including rerouting options as a method of hazard mitigation. This is irresponsible, given the significant hazards projected along the existing course. Moreover, rather than do the analysis *before* starting pipeline construction, CEC recommends—and it appears Transco intends to move forward with—a plan for further investigation potentially not until *during* pipeline installation. This sets Transco up for the need for changes to construction plans during construction—changes which would not be subject to meaningful public scrutiny.

Furthermore, one of the major hazards is the high risk of subsidence in areas with depth of cover less than 100 feet over mined areas. *See* Section 3.3. That is the case for a portion of the about two miles of pipe proposed for over the Lance (Checker) coal seam. In Section 4.3, rather than recommending or even discussing routing around areas of potential mine subsidence, CEC recommends moving ahead with construction and dealing with sinkholes "on an as-needed basis." This is unwise and could lead to pipe rupture and explosion.

VI. The Applications Do Not Demonstrate that the Requirements of the Department's Environmental Justice Participation Policy Have Been Met, and the Public Engagement Process Has Been Limited.

The Chapter 102 applications do not demonstrate that Transco has complied with the requirements of the Department's environmental justice participation policy, and the Department should ensure that the applicant has met the requirements of the policy before issuing the permits.

In the overall application for the Chapter 102 permits, Transco acknowledges that the pipeline traverses environmental justice communities (*see, e.g.,* Requirement O – Stormwater

Notifications and Receipts, section entitled “Project Information” for each county). Transco then appears to indicate that it has followed the environmental justice participation policy with the following text:

2. Have you informed the surrounding community prior to submitting the application to the Department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
 Method of notification: <u>1) Open house schedule mailed to affected parties;</u> <u>2) Newspaper advertisements of open houses placed in newspapers of general circulation in the Project area;</u> <u>3) Open houses (a mixture of virtual and in-person) held in the county of each major project scope item;</u> <u>4) Newspaper advertisements prior to commencement of construction, which will be placed in those same publications;</u> <u>5) Notification to businesses potentially affected by construction;</u> <u>6) Designation of a point of contact for stakeholder communication;</u> <u>7) A Project toll free telephone number for public inquiries; and</u> <u>8) A Project website with periodic updates of relevant information.</u>	

Transco appears to be stating either that it has provided all the methods of notification that it has filled in under “method of notification,” or that it has only provided the eighth item on the list (with the bullet point next to it). In either case, it is not clear that any of those actions, including the eighth item, a project website with periodic updates, were actually taken. Commenters are unaware of any open houses held in Monroe or Luzerne counties. While there is a project website that appears to be owned by Transco’s parent company, it does not refer to any DEP requirements, permits, or applications, and only mentions various issues associated with the Federal Energy Regulatory Commission. See <https://www.williams.com/expansion-project/regional-energy-access/>. Moreover, that site does not appear to have been updated since before the COVID-19 pandemic began; it references public hearings scheduled to be held in the second half of 2020, and Commenters do not believe that such hearings occurred. Commenters are unaware of any regularly updated website other than that maintained by the Department to provide updates on the permit applications that were submitted. Web updates may not also necessarily fully notify those impacted communities.

Moreover, with regard to other major public process concerns, DEP’s only public hearing was held on the evening of Yom Kippur, the holiest of Jewish holidays. DEP began the hearing at 7 pm, ended the hearing by 8:45pm, and did not appear to stay on the virtual webinar longer to determine if other commenters may sign in. DEP’s process of requiring 24-hour advance sign-up for the hearing limits participation in the process. While DEP did appear to circle back for commenters if they were not on the line initially, more must be done to make these hearings more inclusive for the public. This is especially important as the request for another formal extension of the public comment period by Delaware Riverkeeper Network (one of the commenters) was denied shortly after DEP issued the announcement of only one virtual hearing (on Yom Kippur) and a written comment deadline of October 12, 2022. Transco has had extensions granted by the DEP on the record throughout its application, while the public has not received the same courtesy.

Finally, DEP has not provided shape files or kmz layers on the pipeline portal to assist with public review and ease of public desk top review. Because the layers are given to DEP and

sister agencies, these layers should be provided at a minimum in kmz file format so the public can review maps with ease, especially in this age where virtual mapping is common.

VII. Commenters Have Identified Specific Issues with Many of the Proposed Stream Crossings in the Effort Loop.

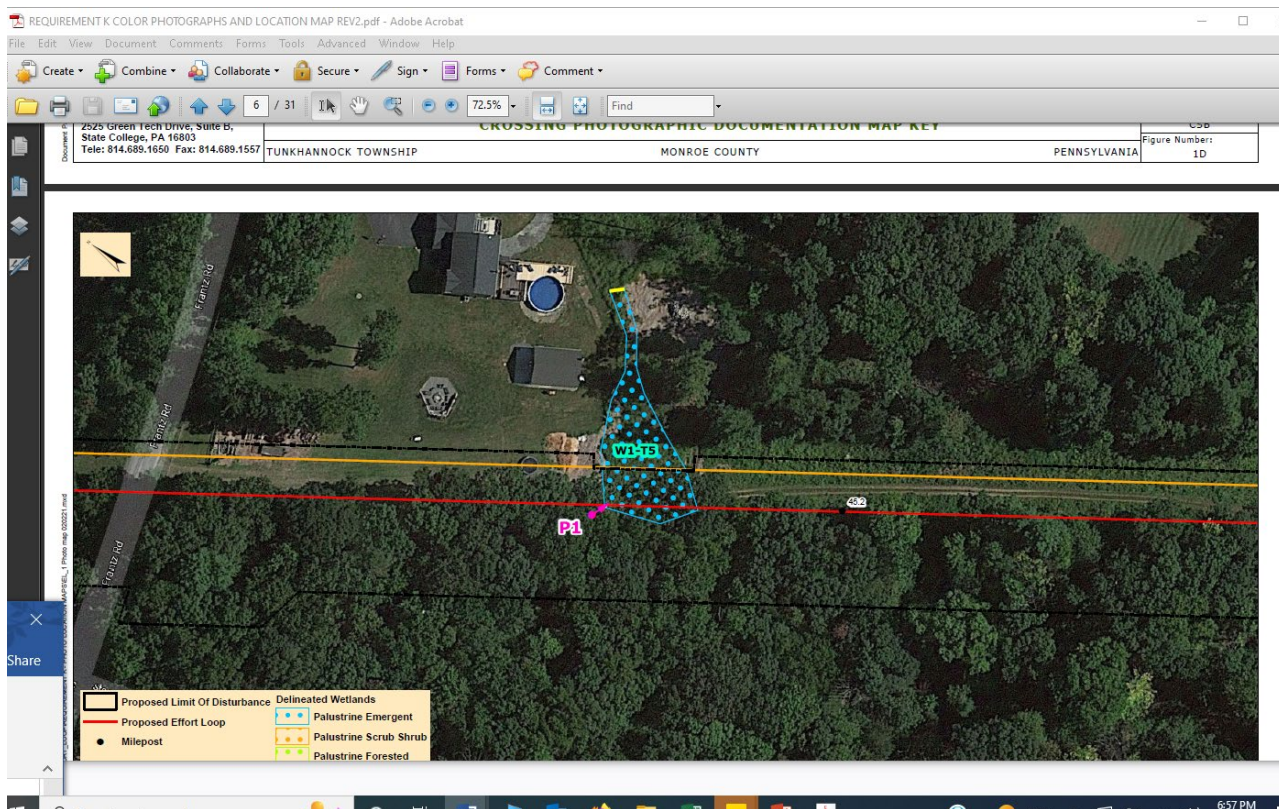
Transco asserts that approximately 78% of the proposed pipelines will be collocated with existing and/or certified ROWs. However, co-location comes with it just as many stream cuts as greenfield pipeline. Additionally, Commenters' review of the drawings and figures for the Effort Loop alone illustrates that Transco has, in multiple situations, disregarded even proposing to work WITHIN its existing expansive corridor.

Transco's response to DEP's deficiency letter regarding access road use for MP 2.9 to MP 4.9 is inadequate and insufficient. Transco claims that "*because the bridge does not require instream supports it will not impact Meadow Run.*" However past experience with timber crossings provide evidence that impacts do occur, both in terms of negative impacts to water quality (sedimentation, thermal impacts, smothering of habitats, vernal pool declines, etc.) as well as to possible water hydrology changes over time.

Next, AR-MO-006 (near MP 45.4) is a proposed access road, coming off of Dairy Lane, to access the pipeline. It appears to cut across S2-T5 and W2-T5 (palustrine emergent wetland, or PEM). It is unclear why this road is necessary, and why the existing pipeline corridor already present is not being used for construction and restoration traffic. The culvert drawing also appears to show that the road may be expanding in width. Transco should justify why this expansion of road may be necessary. This access road is denoted on the drawings as 21' to 30' wide. There is also an adjacent W3-T5 PEM south of the AR; this wetland could also see damage due to its close proximity to the proposed road.

W1-T5 is listed as palustrine emergent wetland. This may indeed be the case where the old pipeline ROW is present, but the cut to the south that is now being proposed would cut mature forest (PFO) and trees according to the aerial photograph supplied in the application (see picture below). Transco should not be permitted to continue to come back time and time again to extend the ROW into the adjacent forest and call each cut minor or temporary or change the classification of the wetland to fit the already harmed area. The Aquatic Resource Impact Table also reflects how this particular wetland area is large in extent – with over 1,795 sq ft of wetland listed as permanent impact and 144 sq. ft as being temporary impact. Cutting mature forest is never temporary, and PFO is likely the correct designation for this wetland crossing. The photograph provided includes an "eastern view of W1-T5 at crossing EL-1". However, it appears that this photograph is deceiving, because the ROW and pipe will be located to the southwest area of this location; the photograph only documents a partial vantage point of the portion of the site already harmed with the existing expansive ROW rather than the more unfragmented, forested and less-impacted area to the south of the existing ROW. The photograph was also taken early in the spring (March 26, 2020) before leaf-out of deciduous trees. Moreover, the photograph shows sedimentation and apparent tracks in the existing expansive ROW area. As noted in previous comments, pipelines often bring with them ATV

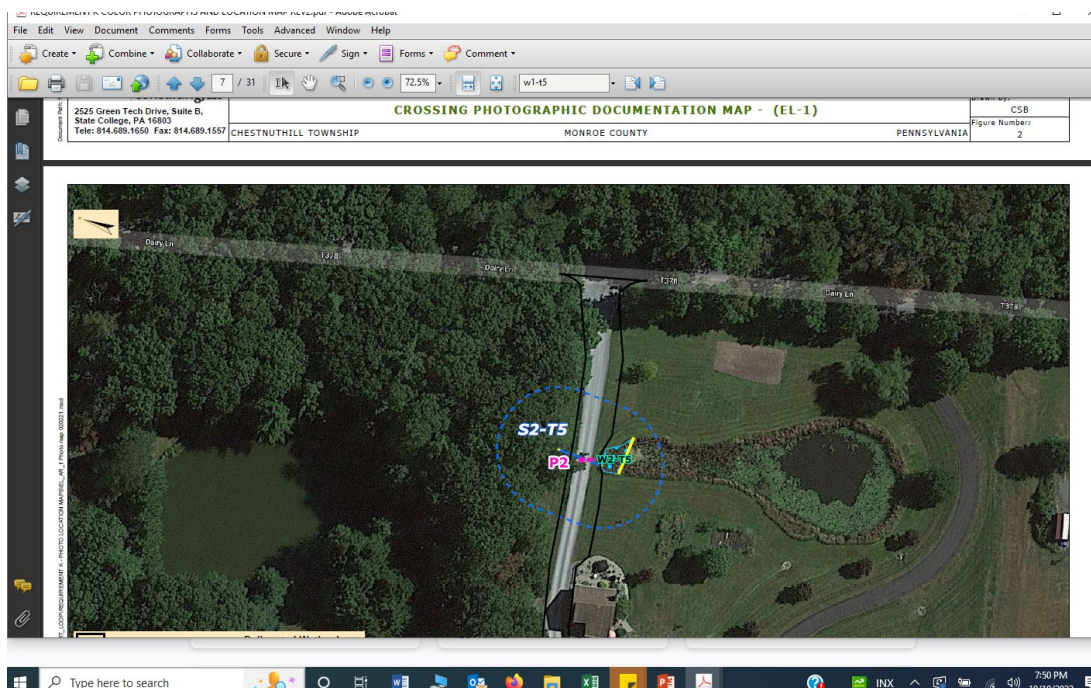
traffic and other access harms, making even clearer that the impacts associated with construction cannot be considered temporary.



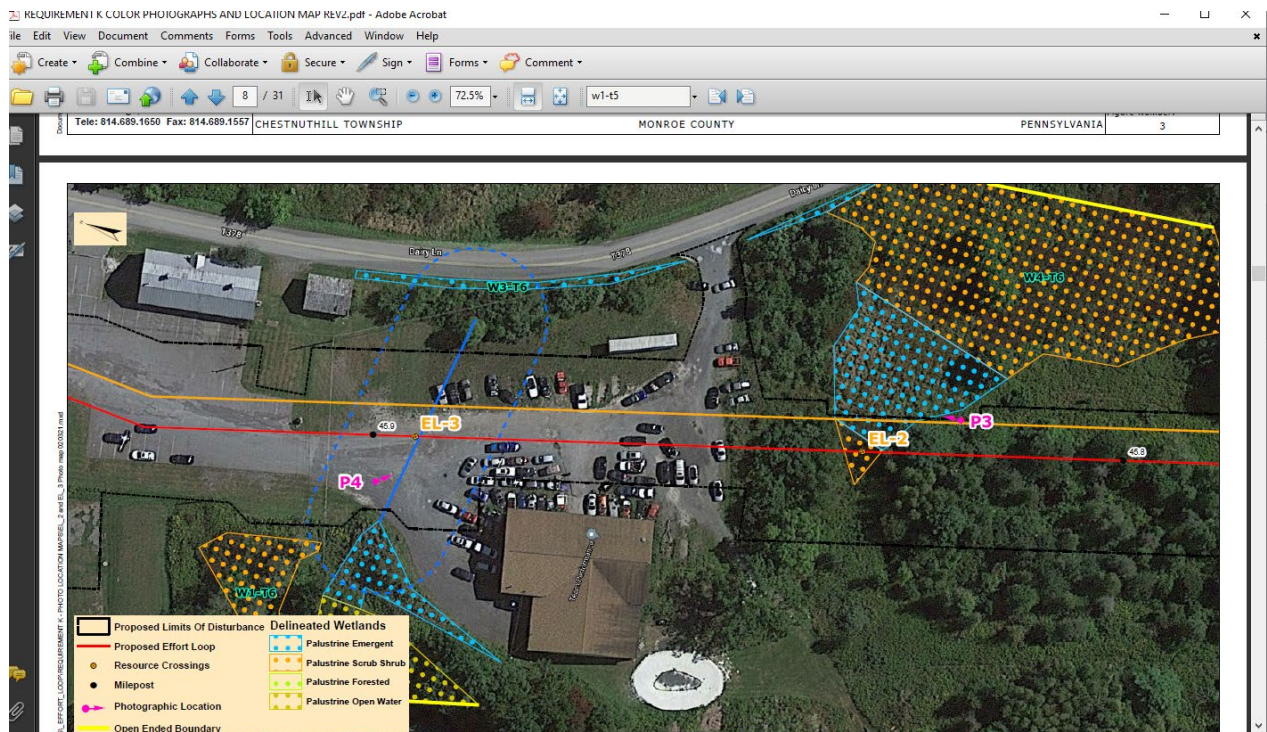
ID: Photo 1
Date: 3/26/20
Taken by: RN
Comments:
 This photo
 shows an
 eastern view of
 wetland W1-T5
 at Crossing EL-1.

Next, W2-T5 (wetland) along a proposed aquatic resource is missing from the Aquatic Resource Impact Table but it is included as S2-T5 (Dairy Lane area). Transco marks this

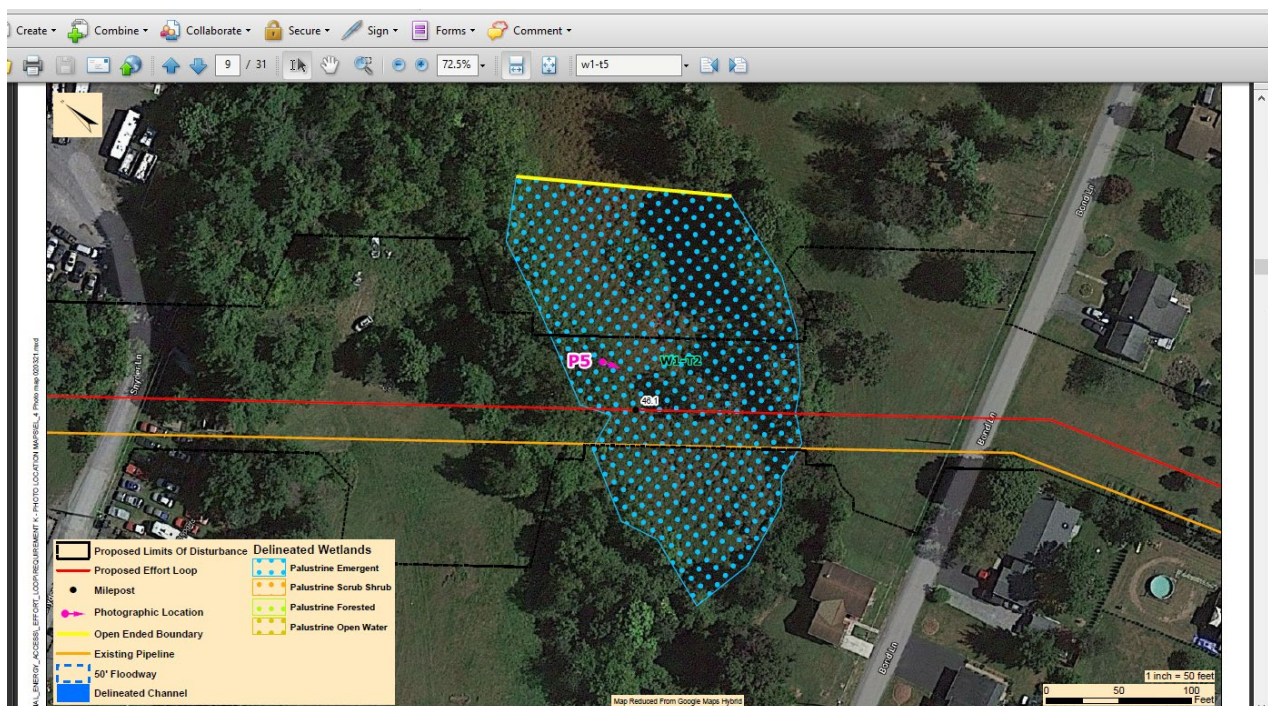
crossing as ephemeral and a temporary impact for a HQ-CWF UNT to McMichael Creek. Excavation is also proposed for this aquatic resource, which indicates to Commenters that Transco plans to widen the access road. It is unclear why Transco is not staying within the existing driveway for this access. There appear to be two large ponds and wetland complexes for this UNT as well as cattail (*Typha latifolia*) (outlined in the on the ground photos by Transco's consultant– not shown here) which is an obligate wetland species. These ponds and the species present suggest that the stream is not ephemeral in nature, and Transco's delineation as ephemeral may be in error. Also note the date of photos and the need to ensure current conditions at the time, such as drought conditions and potential extreme weather events. Delineation at dry times or drought times may change the perimeter mapping.



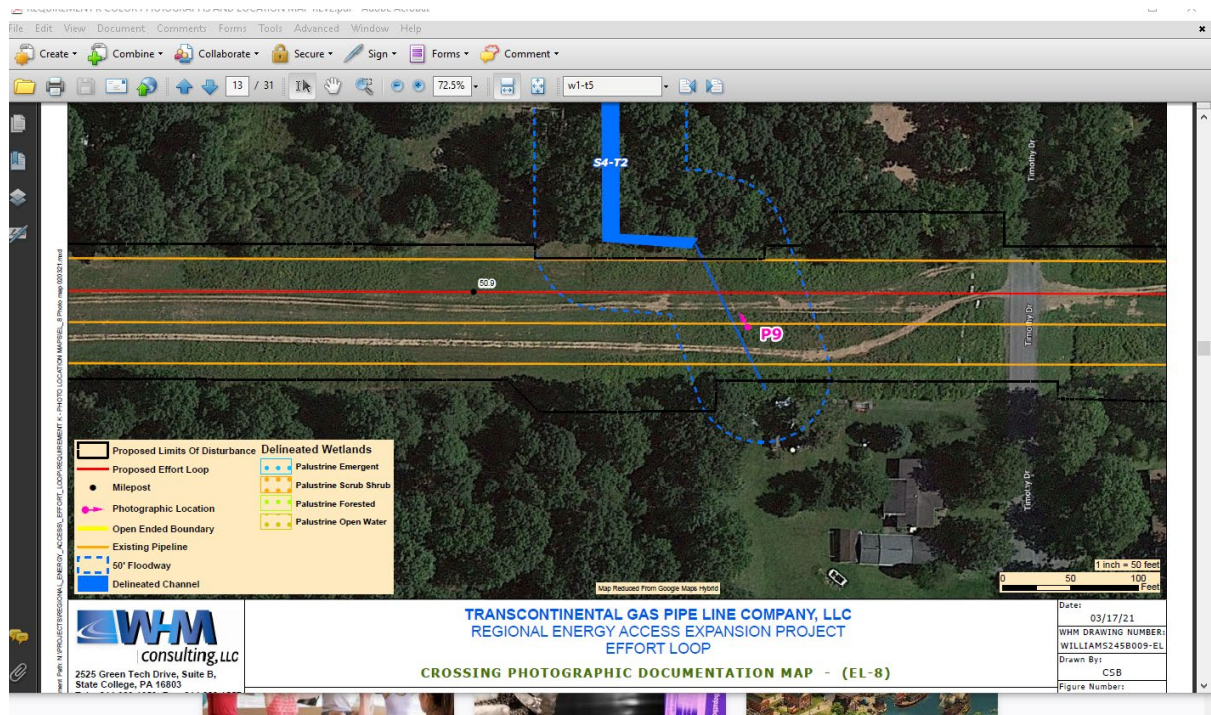
Next, Photo 3 for EL-2 again appears to be taken facing the existing ROW rather than the southerly direction where the new 42-inch line is proposed. The Aquatic Resource Impact Table lists this wetland as PSS. This is an EV wetland to be permanently or temporarily disturbed based on the table. Commenters urge that, if the permits are grant, that at a minimum DEP require replanting of native shrubs within this wetland as part of the restoration. (As discussed further below, using invasive exotic herbaceous species like barnyard grass or other exotic species should not be allowed for E&S measures.) Shallow rooted native shrubs have been planted on and nearby other pipeline corridors after past pipeline construction, and at a minimum this type of replanting should be required here.



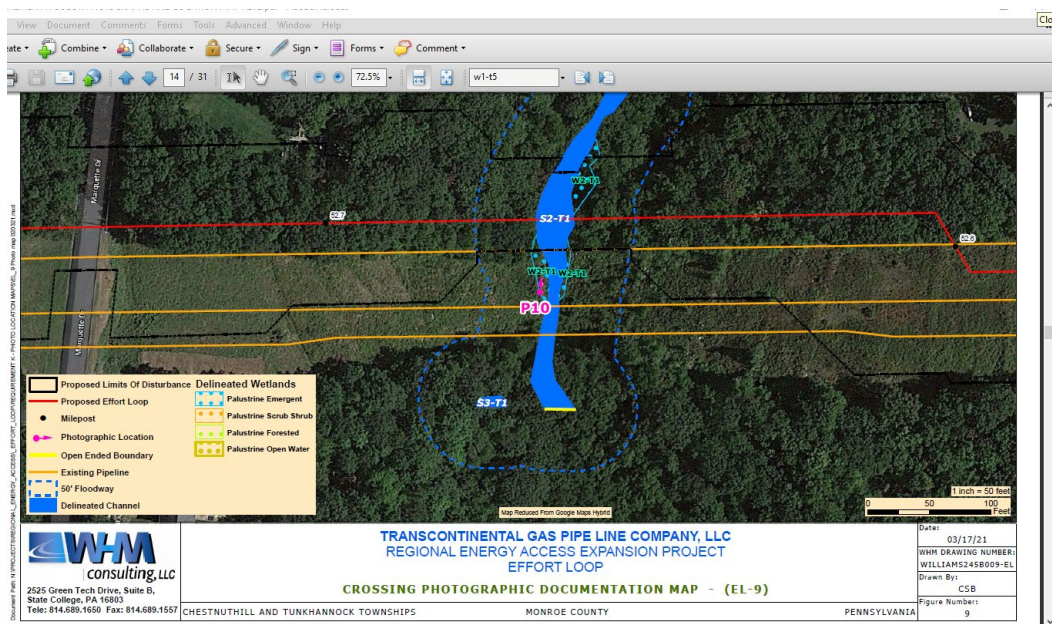
Next, W1 T2 is denoted as palustrine emergent wetlands (near MP 46.1 and east of Snyder Ln and west of Bond Ln) and EV wetlands. Because these wetlands are classified as EV, no degradation should be allowed under anti-degradation requirements. In its application, Transco only indicates that part of this complex will suffer permanent impacts. This attempt to parse out wetland types, seemingly to avoid mitigation, is deceiving and not in the interest in protecting EV wetlands. Dividing up connected wetland complexes undercuts the intent of wetlands protection and the spirit of the Chapter 105 regulations. If cuts occur through a part of a wetland complex, it cannot be disputed that adjacent wetlands are also impacted because of their hydrological connection. Transco's attempts to split up these wetlands suggests a disregard for the requirements for EV wetland protection that should not be condoned. The Department should deny these permits or require mitigation for the complete and adjacent sections of harmed wetland areas.



Figures 7, 8, and 9 show three existing yellow pipelines. It is not clear whether any of these pipelines are going to remain in service or be abandoned by Transco. If Transco intends to abandon pipeline in the existing ROW, it should have evaluated replacing the old pipeline routing with the new 42-inch line to avoid more increasing and expanding cuts, especially when the land to be consumed cuts through forest, which Transco acknowledges is the dominant community to be harmed. For example, Figure 9 also shows a drawing where Transco is putting the new 42-inch line between two of the existing northern pipelines. If Transco can work within the ROW in this instance, it should be able to work within the ROW in other places instead of expanding its impacts on environmental resources.

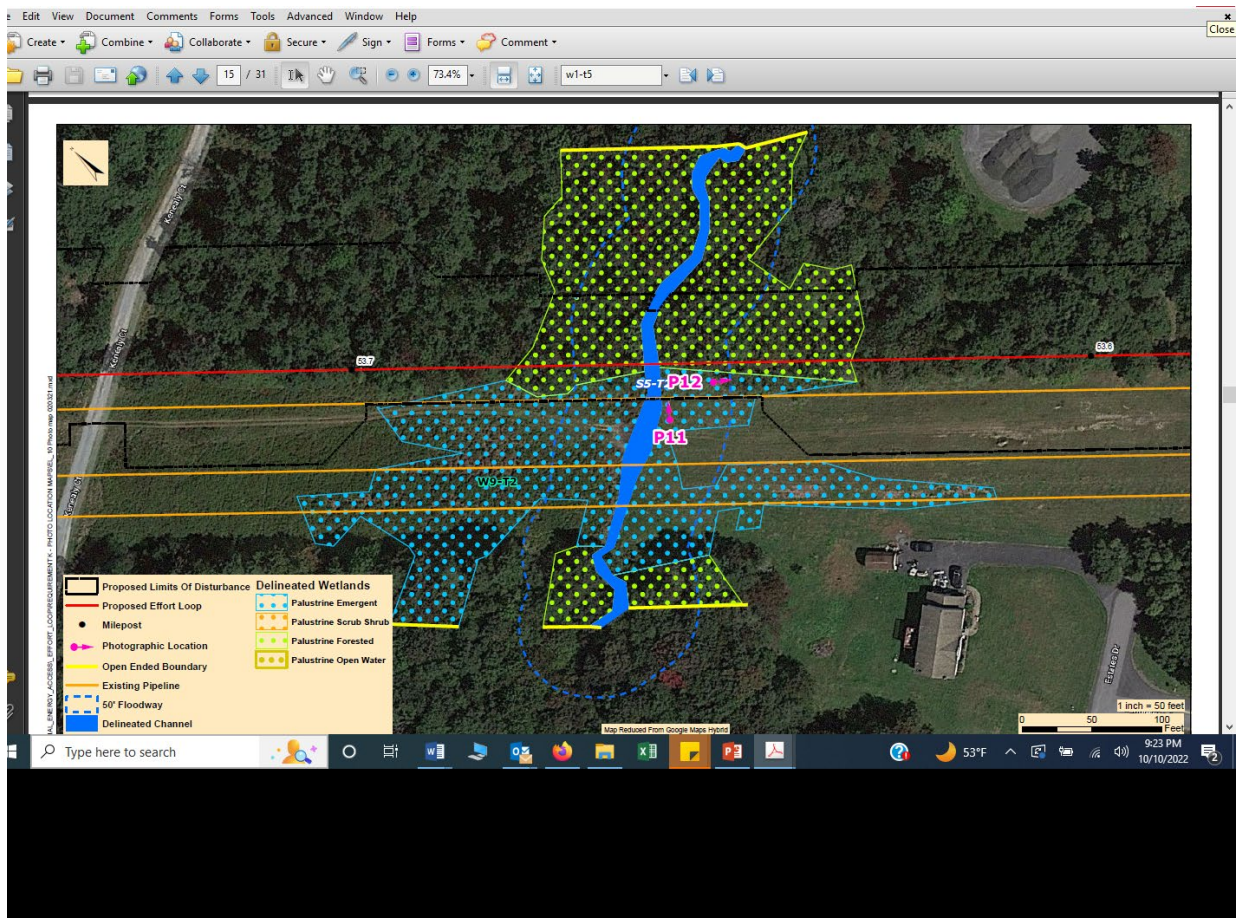


Next, Figure 9 provides an example of where Transco is proposing yet more expansion of the pipeline route. First it cuts to the north of existing ROW, but then at mile 52.6 it proposes cutting back over into the existing ROW to cut the new 42-inch line within the existing corridor. True collocation (within its already expansive corridor) would be much less detrimental if Transco proposed to work more in its existing corridor for larger parts of the project rather than grab wider and wider swaths of open landscapes adjacent to the existing expansive ROW that already scars the region. The applications demonstrate that Transco can operate within its existing ROW for parts of this alignment; DEP should consider requiring this at S2-T1 as well. S2-T1 is listed as an EV stream and an UNT to Poplar Run, yet Transco is proposing to widen the ROW clearing to the north, which appears from the map to be mature forest. Additionally, the photograph provided for this cut (P10) again is deceiving as it does not adequately show the adjacent forested area that will be cut.



ID: Photo 10
Date: 4/1/20
Taken by: CC
Comments:
 This photo shows a southwestern view of wetland W2-T1 and stream S2-T 1 at Crossing EL-9.

Figure 10 depicts again an attempt to delineate different wetland types in an apparent attempt to limit responsibility for mitigation. This figure labels both palustrine forested wetland as well as palustrine emergent wetland along the existing ROW. These are EV wetlands and UNT to Mud Run, an HQ stream. Moreover, Transco must recognize that its “emergent wetland conditions” are due to its own repeated harm. Again, DEP should consider requiring Transco to run any new pipeline in the existing impacted corridor rather than damaging additional forest to the north and explain any pipeline abandonment anticipated in the future by the company.





ID: Photo 11

Date: 4/1/20

Taken by: CG

Comments:
This photo shows a northeastern view of Stream S5-T2 at Crossing EL-10.



ID: Photo 12

Date: 4/1/20

Taken by: CG

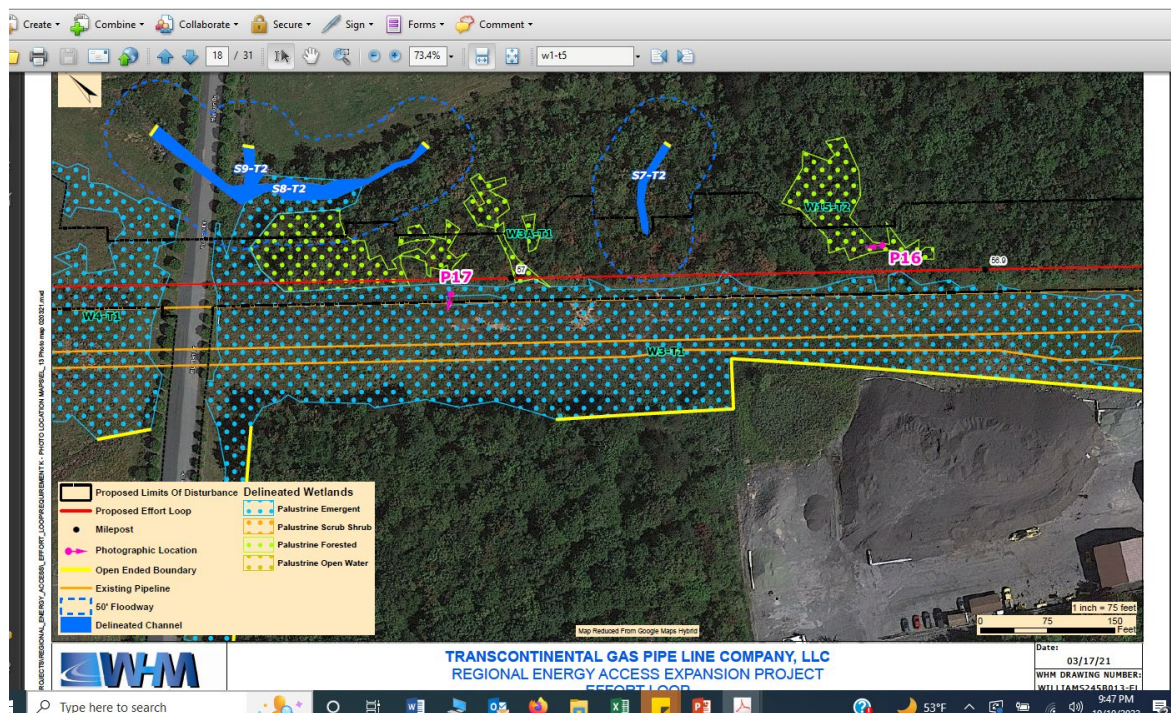
Comments:
This photo shows a southeastern view of wetland W9-T2 at Crossing EL-10.

WHM Consulting, LLC

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Similarly, Figure 13 again shows the new pipeline route proposed to the north of the existing three pipelines, despite palustrine forested wetland complexes that would be damaged. Photograph P17 is also facing in the direction of the existing damaged ROW presently maintained by Transco rather than capturing the conditions to the adjacent northern forest edge where Transco proposes to cut its new line. Again, there is no indication why Transco does not propose to work between and within its already expansive corridor, nor is there any indication as to the lifespan and fate of the existing three pipelines.



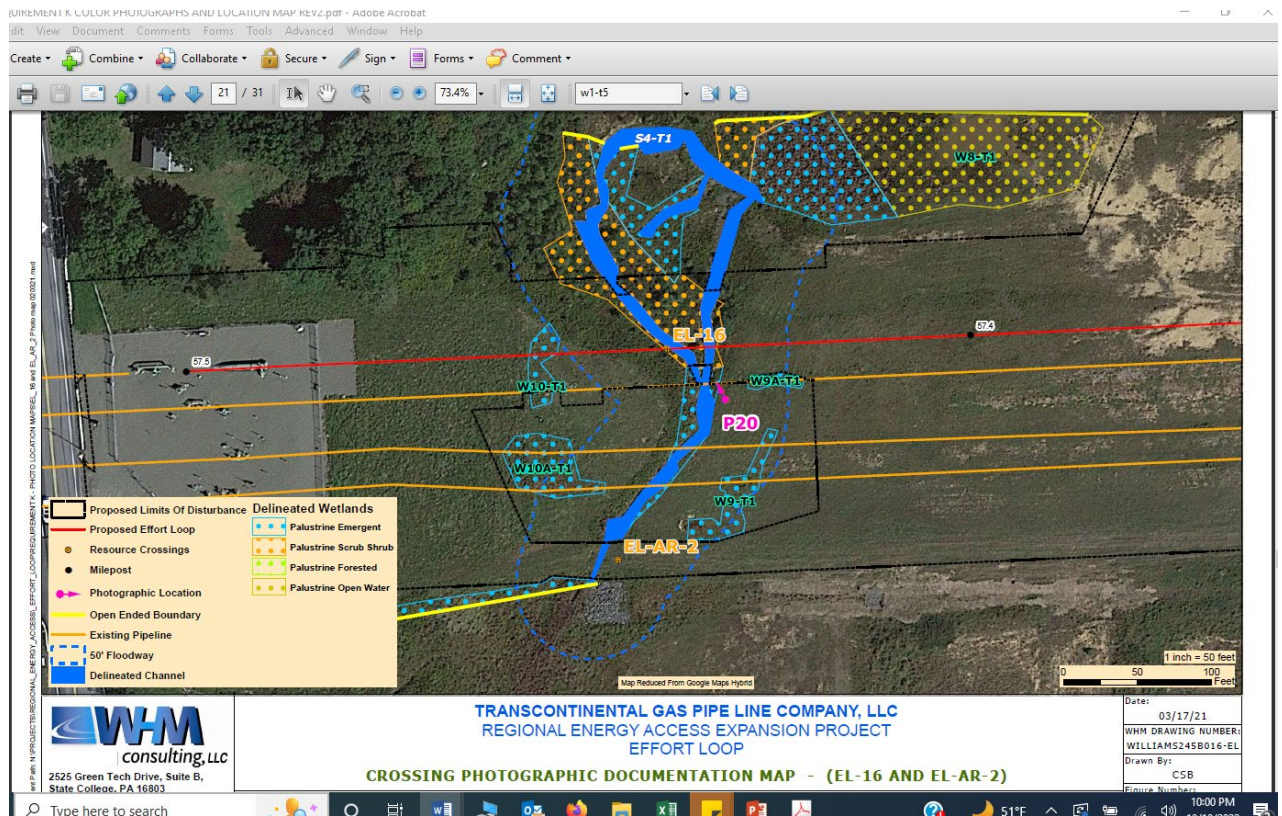
ID: Photo 17

Date: 4/6/20

Taken by: CC

Comments:
This photo
shows a
southwestern
view of wetland
W3-T1 at
Crossing REL-13.

In Figure 16, again Transco is proposing to cut north of the existing ROW which would increase the ROW footprint and harm to S4-T1, an UNT to Tunkhannock Creek that is designated HQ-CWF. Near MP 57.4-57.5, the new proposed pipeline would also cut across W10-T1, which consists of EV wetlands. Again, it is not clear why Transco does not propose to work within its existing ROW in this stretch of the pipeline to avoid water resource harms and stay within the boundaries it has already harmed. Photograph P20 also shows more of the existing ROW, instead of showing the forest in the backdrop that would be cut to expand the pipeline. These photographs are deceiving, and DEP should require Transco to operate in its existing ROW where possible.





VIII. The Department Should Require Additional Monitoring and Specific BMPs In Connection with the Chapter 102 Applications.

Commenters urge DEP to require additional monitoring of rain events and soil conditions. Rain gauges should be placed on site throughout the pipeline area and monitored regularly by the applicant and agencies to document weather conditions. This is important as in the past pipeline operators have cited flooding and blow outs of E&S practices on “unusual weather and catastrophic rain events”. With catastrophic climate destabilization, Pennsylvania is already facing more extreme weather events and extreme weather on a more routine basis. Operators must be prepared for deluges of rain and other phenomenon that were not common a decade ago but are now routine weather events.

With regard to erosion, Commentators have seen multiple violations where steep slopes voided of mature forests through pipeline construction cause erosion issues and blowouts that lead to sediment discharges into waterbodies and wetlands. These sediment violations smother the diverse benthic and aquatic life, especially in special protection and anti-degradation waters, that live there year round. For this pipeline, Transco notes 55 soil mapping units located within the LOD. Eleven of the 55 are designated as easily erodible and 18 of the 55 are designated as landslide prone/low strength. Preserving forests and soil profiles in these sensitive conditions and or ensuring forests are replanted would help avoid future problems and sedimentation to waterbodies. 25 of the 55 soil types are also noted to be corrosive to concrete/and/or steel. 22 of

the 55 soil types are a poor source of topsoil, which means that once these soils are disturbed along with the soil profiles and the natural mycorrhizae of the soils and herbaceous, shrub and tree layers, there will be irreparable harm to those soils. Past pipeline comments have pointed to scientific reports from Meliora and other experts documenting these problems. Commenters believe that the provisions outlined by Transco in section 4.1 will not prevent irreparable harm and the long-lasting impacts due to soil disturbance. Avoidance of disturbance of the soil layers thru HDD where appropriate and where forests exist could go a long way to avoiding many of these permanent impacts, especially if Transco does not work within its existing expansive ROW.

Commenters also suggest that DEP require specific BMPs to prevent runoff, sedimentation, and soil damage. Transco notes (p10) broad based dips “may be used in HQ/EV watersheds” for access road runoff control and sump with filter sock “should be utilized”. Commenters suggest DEP require these measures rather than leave them at Transco’s discretion. DEP should also require a schedule of monitoring and maintenance for sediment traps. Erosion control blankets to be used should not contain plastic; plastic E&S blankets can and have trapped wildlife and they are made from fossil fuels. Natural fiber E&S blankets should be required.

“Temporary” storing of timber mats or for parking and supplies for wetland crossings should be located on the already harmed pipeline ROW space in existence, not on newly cut mature forest areas deemed temporary or additional temporary work spaces.

Safety fencing used and E&S barriers should not be allowed to impede vernal pool species migrations during early spring and late summer as species return to or from their breeding grounds. In the past we have documented lagging mitigation practices by pipeline operators at the expense of the animals and aquatic life that call these regions home. In special protection watersheds, this type of disregard for sensitive species should not be allowed. Additional measures such as siltron pollution prevention fence and other recognized BMPs should be deployed in all special protection waterways and EV wetland regions.

IX. The Applications Do Not Demonstrate that the Requirements for Special Protection Waters Have Been Met.

First, Commenters note that there have been extensive and recent updates to Fish and Boat Commission’s Class A and naturally reproducing wild trout waters the last few months, some as recent as August 22, 2022. Transco and DEP must cross reference its list of impacted streams with FBC to ensure its lists outlined on Table 1 in E&S Narrative are accurate and up to date; presently the narrative is dated “revised as of July 2022.” Its critical these tables with existing uses and trout designations are accurate to ensure anti-degradation practices are required.

Next, the Department must ensure that the project does not harm these special protection waters. Waters are classified for “special protection” under Pennsylvania law where the water quality is such that it meets certain criteria set forth in the Chapter 93 regulations. Critically, classification as a special protection water - either HQ or EV - brings about additional water quality and antidegradation protections.

For the EV streams that may be impacted by the Project, DEP must ensure, prior to issuing the permit or approval, that the water quality of the stream will not be degraded. 25 Pa. Code § 93.4a(c). There can be no lowering of water quality. As Commenters discuss below, this is a high burden for Transco and the Department to prove, especially for pipelines causing open trenching, disturbance and limited “restoration” of riparian areas, and a state-wide history of leaks and water pollution. We are not convinced that Transco or the Department has met this high burden through its Chapter 102 or 105 permits.

For HQ streams, the water quality shall be maintained and protected, with one exception: where a person seeking a permit or approval that affects water quality is able to successfully demonstrate that a lower water quality is necessary to accommodate an important economic or social development. 25 Pa. Code § 93.4a(c). Thus, there is a litany of requirements that Transco must meet in order to be allowed to degrade the water quality of the stream. The Department has a duty to review these requirements and ensure, prior to issuing a permit or approval, that the Project conforms with the antidegradation protections for HQ streams. For those seeking permits to discharge to HQ waters, this means that prospective dischargers must do the following:

- Evaluate nondischarge alternatives to the proposed discharge. Examples of nondischarge alternatives would be the reuse or recycling of wastewater, infiltration of stormwater, or alternative site locations.
- Where no “environmentally sound or cost-effective” nondischarge alternatives are available:
 - Use the “best available combination of cost-effective treatment, land disposal, pollution prevention and wastewater reuse technologies” (ABACT requirement); and
 - Prove that the discharge will “maintain and protect the existing quality of receiving surface waters.” This is often referred to as the “non-degrading discharge” requirement.
- Where neither nondischarge alternatives nor non-degrading discharges are found to be feasible, successfully demonstrate to DEP that “allowing lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located” (the “SEJ” requirement). 25 Pa. Code § 93.4c(b).

If Transco is unable to demonstrate a “nondischarge” alternative, is unable to show that using ABACT will protect and maintain water quality, is unable to show that the proposed discharge will maintain and protect existing water quality, and is unable to provide an SEJ for its discharge, DEP must deny the requested permit or approval. Again, Commenters are not convinced that Transco or the Department have met the requirements that allow for the Project to be permitted or certified in HQ waters. The water-related considerations must include, but are not limited to: sensitivity of water use, including recreational water uses or drinking water uses; nature of the proposed discharge pollutants and their potential impact; the proposed degree of change in water quality; the proximity to wetlands or floodplains; discharge characteristics, such as long-term potential impacts; reliability of the proposed discharge treatment technology; additional positive or negative environmental impacts; and the applicant’s prior compliance record. DEP Antidegradation Manual, at 76-77. The social and economic considerations must

include, but are not limited to: the effect on public need or social services; the effect on public health or safety; the effect on quality of life; any potential employment opportunities; effect on tax revenues; and impacts on tourism. DEP Antidegradation Manual, at 78-79. These SEJ factors are limited “to the area in which the waters are located,” 25 Pa. Code § 93.4c(b), PADEP requires “[s]ite-specific cost calculations and documentation” to support a social and economic justification application.¹

There is no indication that the Department has considered these antidegradation criteria for the HQ waters which may be impacted by the project. Moreover, a review of Transco’s application materials shows that Transco has failed to consider the unique, site-specific conditions at each individual proposed stream and wetland crossing, and the corresponding potential adverse water quality impacts associated with stream crossings, including open-cut crossings. The application fails to comprehensively evaluate each stream crossing with regards to conditions such as water quality, erosive soils, existing land use and forested areas, existing slopes, riparian buffers, and the potential need for in-stream blasting. Lacking consideration of the site-specific conditions at each crossing, the application fails to require adequate location and construction recommendations to protect water quality, as well as construction techniques specific to conditions at each crossing. The proposed stream and wetland crossing locations, methods of construction, and long-term land use conditions appear to be based on the needs and preferences of Transco and not informed by site-specific conditions.

With respect to antidegradation requirements, it is unclear how the Department would ensure that benthic macroinvertebrate communities for these special protection waters will be evaluated and will not be degraded due to potential project impacts. There appear to be no more requirements than Transco stating that it would return the site to “previous conditions” but that has no connection to the diverse aquatic life that may be present at all of these stream cuts that are proposed – its only lip service. Ensuring that the benthic community will not be degraded should require strict monitoring requirements for each stream cut proposed, both pre- and post-construction. Past evidence and monitoring of other similar pipeline projects using similar engineering techniques with similar characteristics has shown changes in benthic community, changes in hydrology, changes in water quality chemistry such as thermal impacts/increased temperatures from deforestation to existing forested riparian buffers, sedimentation and smothering of benthic community habitat, and changes in vegetative quality and cover (where often invasive species move in). These detrimental impacts can cause cascading impacts to water quality further downstream, especially in sensitive headwater areas and small streams that are so critical to the larger watershed. This is the death by a thousand cuts that the rules for special protection waters are supposed to prevent. DEP should deny these permits.

¹ *Social or Economic Justification Request Review*, PADEP, SOP No. BMP-007 (Oct. 23, 2017), available at: <http://files.dep.state.pa.us/ProgramIntegration/PermitDecisionGuaranteePortalFiles/SOPs/AAMO/BMP-007%20SEJ.pdf>.

X. The Applications Do Not Demonstrate that the Requirements for Waiver of the Riparian Buffer Rules Have Been Met.

While Transco makes a claim for waiver of the riparian buffer rules due to being a linear project, it also seeks additional waiver due to the project being “necessary to abate a substantial threat to public health or safety.” *See* Section 1-1, last page. This waiver is not supported, as reference to the more fulsome Riparian Buffer Waiver Request in Section 1-7 shows.

The purpose of this pipeline project is for the profit of the shareholders of the publicly traded Williams Companies, Transco’s ultimate corporate parent. There is no threat to public health or safety that Transco cutting down riparian buffers is intended to abate. In Section 2.0 of 1-7, Transco explains that “Grading and tree clearing is proposed along Sugar Hollow Road outside of the 100’ buffer, but within the 150’ buffer on the opposite side of Sugar Hollow Road to improve the sight distance from the driveway, as a public health or safety issue, and to install the driveway and associated stormwater pipe work.” In other words, Transco intends to *create* a traffic hazard in the construction and design of its private driveway and then bootstrap a riparian buffer waiver request by claiming that it then needs to mow down riparian streamside forest to abate the hazard it created. Abating its own hazard does not fit within cited exception. That exception is for where “*The project* is necessary to abate a substantial threat to the public health or safety.” 25 Pa. Code § 102.14(d)(2)(i). The project is to install a pipeline, not to abate a hazard.

Transco’s narrative makes clear that it just did not want to change the plans for its workspace to accommodate the change in the protection status of Sugar Hollow Creek: “Since the original submission of the permit application the existing use of Sugar Hollow Creek changed from CWF, MF to HQ-CWF, MF with the designated use remaining CWF, MF.” *See* Section 1-7 at Section 2.0. Because Transco does not qualify for this riparian buffer rule exception, it needs to change that design.

Transco’s requested riparian buffer waiver for “access roads” under section 102.14(d)(1)(v) should also not be granted, because grading and temporary widening of these access roads goes beyond mere “road maintenance activities” and amount to an alteration of the existing access roads.

Finally, the riparian buffer waiver for the temporary contractor yard at Compressor Station 515 is not justified, as Transco does not explain why an alternative site outside of the riparian buffer cannot be utilized.

Thermal impacts from clearing adjacent forest along the already expansive ROW that Transco impacts, will degrade water quality yet again with this pipeline expansion. No waivers should be granted and native shrub plantings near the center line should be required if DEP does not deny these applications outright.

XI. The Department Should Not Allow Any Tree Felling or Other Construction Activities Prematurely.

It is premature for the Department to allow tree felling under these proposed authorizations because the project is still subject to evaluation in other states. The Department's authorizations at issue here are only one piece of a larger project that crosses state lines. As proposed, the project, in addition to all the components of the project in Pennsylvania, includes the installation of a new compressor station (Compressor Station 201) in Gloucester County, New Jersey, the installation of a gas turbine or electric motor-driven compressor unit at existing Compressor Station 505 in Somerset County, New Jersey, and also modifications at existing compressor stations, meter stations, interconnects, and ancillary facilities in Maryland and New Jersey. It is Commenters' understanding that not all of these out-of-state facilities and/or modifications have received final approval. For previous multi-state pipeline projects such as this, agencies have allowed tree felling and enormous damage has been done for projects that were never built (as with, for example, the never-built Constitution pipeline). At a minimum, no tree felling should take place until all permits for all parts of the project have been received.

XII. Additional Comments.

Commenters provide the following additional comments:

- In Monroe County E&S Plan Sheets 3 through 5 of 52, the contractor yard is proposed to be absurdly large—taking up most of one large farm field and part of another—with no apparent reason for the need to disturb so much land.
- In Monroe County E&S Plan Sheets 23 and 24 of 52, there are pre-existing waterbars from earlier pipeline construction, and then new waterbars that seem to be acting at cross-purposes to the pre-existing waterbars in terms of the direction they are sending the water. This does not seem to make hydrological sense.
- In Section 1-4 of the Chapter 102 application, internal Section 1.3.3.5 notes that topsoil will be separated from subsoil in agricultural lands. That should also be the case in natural lands such as forests and meadows, as well as the gardens and lawns of residential areas. In almost every ecologically productive location, different soil layers perform different ecological functions. Mixing biologically active topsoil with subsoil makes the ground surface less fertile for the vegetation and worsens animal habitat. Transco has ignored past information and expert reports provided to it regarding the use of other measures to preserve soil and herbaceous integrity (Leslie Sauers Report).
- The Department should require that only native plant species are used to stabilize soils, particularly given the linear nature of the pipeline. The applications indicate a plan to use Japanese millet and barnyard grass to stabilize wetlands temporarily. Barnyard grass has been observed outcompeting native pollinator plants and indigenous wetland and important native grasses in rain gardens and other areas of Pennsylvania and is a super seed producer. It should not be used to stabilize wetlands. Introducing invasive nonnative plant species like barnyard grass into EV wetlands biologically would impermissibly degrade the wetland. The use of only native seed mixes is especially important in wetland and stream complexes

because water can carry invasive seeds for miles, which impacts and degrades hydrology, biodiversity and riparian buffer health in the long term. Commenters also suggest working with Ernst Seed and the ERNMX-181 to include more early and late blooming flowering species. For example, aster species are limited to only 0.2 percent of the seed mix, whereas Indian grass is 31.1%. By increasing flowering late fall native plants, the herbaceous ROW will be more valuable for struggling and endangered pollinator species.

- The reforestation plan includes an indication that shrubs “may” be planted in the pipeline area. Shrubs should be required, rather than optional, in addition to the native tree plantings. This shrub requirement would lessen impacts to the ROW and create important habitat for birds and other wildlife. Additionally, shrubs hugging the pipeline center line can also help avoid ATV use, thermal impacts, and other expansive impacts for an already very large ROW with over three existing lines.

XIII. Conclusion

For all of these above reasons, as well as those provided in past submissions by Commenters to the Department and to Transo in connection with this pipeline, the Department should not issue the Chapter 102 and 105 permits for this expansion and should instead protect the freshwater resources that would be harmed by this ever expanding pipeline.

Sincerely,

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