



# Broome County Environmental Management Council

Debra A. Preston, County Executive

*The views expressed herein represent those of the Environmental Management Council only. They do not necessarily reflect the views of the Broome County Executive, the County Administration, the County Legislature or any County Department.*

February 19, 2015

Mr. Stephen M. Tomasik  
New York State Department of Environmental Conservation  
DEC - Division of Environmental Permits  
625 Broadway, 4th Floor,  
Albany, NY 12233-1750

**RE: Comments on the Environmental Impact Statement for the Proposed Constitution Pipeline and Wright Interconnect Projects**

Dear Mr. Tomasik:

The Broome County Environmental Management Council (BCEMC), a citizen's advisory group to County government on environmental matters, reviewed the *October 2014 Environmental Impact Statement for the Constitution Pipeline and Wright Interconnect Projects*.

With respect to the content of the EIS, the BCEMC commends the efforts to mitigate impacts to the ecology and wildlife affected by the proposed project. We appreciate and thank you for extending the comment period so that the EIS could be fully reviewed.

Considering the aforementioned, the BCEMC offers the comments and recommendations organized into the following sections:

1. Energy Conservation, Efficiency and Global Warming Potential
2. Cumulative Impacts
3. Sensitive/Significant Ecological Resources

### **Energy Conservation, Efficiency and Global Warming Potential**

Although improved practices have reduced natural gas losses from pipelines, compressor stations and other natural gas infrastructure, these reductions pale in comparison to the natural gas losses associated with the extraction infrastructure at unconventional shale gas well sites. Studies have shown that the losses at these gas fields leak so much methane into the atmosphere, that the Global Warming Potential (GWP) of natural gas originating from these sites is greater than that associated with coal (reference EIS section 3.1, page 3-3, 4th paragraph). With energy conservation initiatives, the greatest growth in energy consumption will be in the electricity sector (reference EIS section 3.1, page 3-3, 2nd paragraph). In the northeast natural gas already is a greater player than coal in electrical power generation, expanding natural gas use for growing demand for electrical energy will only further exasperate attempts to reduce our carbon footprint (reference EIS section 3.1.1, page 3-4, 2nd paragraph). To meet goals such as NY's plans to reduce greenhouse gases by 50% in the next 15 years, more emphasis **MUST** be placed upon renewable energy resources in conjunction with a modernized, decentralized and smart power grid.

### **Cumulative Impacts**

Broome County Office Building . 60 Hawley Street . P.O. Box 1766 . Binghamton, New York 13902

Phone: (607) 778-2116 . Fax: (607) 778-6051 . [www.gobroomecounty.com](http://www.gobroomecounty.com)

Although the *relative* surface and ecological impact of this project is small with respect to the total existing infrastructure for transportation and energy, this project will still have adverse ecological impacts, as currently proposed. The reality is that this is just another project amongst many more to come. With future growth of transportation and energy infrastructure a sure thing, it is imperative that each project be planned to have as minimal an impact as possible (reference EIS section 4.13, page 4-216). For this reason, we recommend that every attempt be made to avoid land that is deemed ecologically significant, including those lands where investment has been made to preserve natural sanctuaries of one type or another. For example, in Bucks County of southern Pennsylvania, residents pay town income taxes for the purpose of investing in, and maintaining, open space which is now threatened by the proposed PennEast (natural gas) pipeline.

### **Sensitive/Significant Ecological Resources**

Fragmentation of forested land is the most obvious, and perhaps most significant, impact of pipelines. Reducing the width of these cuts from 110 feet to 100 feet (reference EIS section 4.5.3, page 4-71/83) reduce the impacted area 9% but there is little evidence that this will mitigate the adverse effects of fragmentation in terms of increased predation. The proposal to monitor for invasives for a three year period (reference EIS section 4.5.3, page 4-74) is a sound practice, but with only grasslands replacing the former wooded land, invasives will still come in time. We recommend that serious consideration be placed upon allowing natural regeneration of woody shrubs rather than grassland species. These will provide a habitat and ecology more reflective of the former wooded status. The pipeline could be placed at least 6 feet deep, and larger (mast) tree species such as oaks with deeper growing tap roots could be harvested before growing too large. It should be mentioned here that if this practice was to be adopted, then white-tail deer browsing may need to be controlled in some regions.

Sensitive fisheries (reference EIS section 4.6.2.2, Table 4.6.2-1, page 4-94 may suffer increased mortality during drought conditions, so conditions other than spawning times are potentially just as relevant when selecting the best time to perform construction in and around streams and other water bodies.

And finally, wetland construction or disturbance (reference EIS section 4.4.2, page 4-61) may be less adverse at certain times of the year (dry conditions may result in less problematic work conditions). And similarly to sensitive fish species, the best times to disturb sensitive amphibian, insect and reptilian life should be considered when planning these portions of the construction.

Thank you for your consideration of these comments; we hope that they provide some constructive benefit.

Sincerely,

A handwritten signature in cursive script that reads "William Heaviside". To the right of the signature, there are initials "BH/bl" written in a smaller, less legible hand.

William Heaviside  
Chair, Broome County EMC

BH/agl/bl