



**Lower Delaware Wild & Scenic Partnership River (LDW&S)**

Richard Dodds, Management Council Chairman

c/o Delaware River Greenway Project (DRGP)

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[www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org)

February 4, 2019

Policy Office  
Department of Environmental Protection  
400 Market Street  
Harrisburg, PA 17101

To Whom It May Concern:

*RE: Adelpia Pipeline Gateway Project Public Comment  
Submitted Electronically @ [www.ahs.dep.pa.gov/eComment](http://www.ahs.dep.pa.gov/eComment)*

This proposed Adelpia Gateway Pipeline Project would have a negative impact on the Lower Delaware Watershed and is inconsistent with our River Management Plan goals. To protect the special values of the Lower Delaware River we strive to:

- Maintain existing water quality in the Delaware River and its tributaries from measurably degrading and improve it where practical;
- Preserve and protect the River's outstanding natural resources, ... including buffer areas in the river corridor and along tributaries;
- Preserve and protect the character of historic structures, districts and sites, including landscapes, in the river corridor;
- Encourage recreational use of the river corridor that has a low environmental and social impact and is compatible with public safety, the protection of private property and preservation of natural and cultural qualities of the river corridor;
- Identify principles for minimizing the adverse impact of development within the river corridor;
- Preserve open space as a means of maximizing the health of the ecosystem, preserving scenic values, and minimizing the impact of new development; and
- Educate citizens, landowners, and the next generation who will provide leadership and stewardship.

One of our partnership organizations, The Delaware Riverkeeper Network (DRN), submitted comprehensive comments regarding the Gateway Project to the Federal Energy Regulatory Commission on June 1, 2018. We acknowledge the intent of Riverkeeper's submission since these comments are generally consistent with the mission of our River Management Plan.

Our broad concerns include: (1) The size and scope of the construction activity will have a damaging effect on the health and vitality of the Delaware River watershed. Pipeline projects, in construction and operation, create noise

and air pollution, cause degradation of water quality and stream habitats, and degrade the functions and values of the ecosystems traversed. We ask for complete and final information regarding the scope, size, capacity, feasibility, and design of the proposed Project in order to meaningfully assess its impacts. (2) We encourage a thorough systems alternative analysis, including a NO Action Alternative. (3) Water resources including surface water, groundwater and wetlands impacts must be fully considered, including a full accounting of the number of waterways and wetlands to be altered. (4) The potential for chemical contamination of water resources and resulting adverse impacts to water resources must be adequately assessed. The destruction of naturally vegetated buffers along all wetlands and waterways must be given full consideration. (5) The pending socioeconomic impacts on communities by the pipeline are significant and require thorough analysis under the National Environmental Policy Act (NEPA). Analysis must also include examination of all potential air quality issues and the upstream and downstream impacts of this proposed pipeline. (6) Impacts to land use must be fully assessed and avoidance of forested land and preserved open space must be given full consideration. Impacts to fishery ecosystems, wildlife, vegetated habitats & their dependent species, especially the endangered and threatened plant and animal species, must be thoroughly catalogued and considered. Invasive species impacts, existing and anticipated must also be examined. (7) Public safety analysis must address the risk of converting an older, abandoned pipeline from oil to gas. (8) We hope to see an environmental impact statement published in advance of final project approvals.

Thank you for your consideration.

On behalf of the board,  
*Richard Dodds*  
Chairman

*The Wild and Scenic Rivers Act was passed by Congress in 1968 with the goal of protecting the free-flowing condition of rivers. The Lower Delaware was designated in 2000 as a Wild and Scenic River from river mile 193.8 to the northern border of the City of Easton; from south of the Gilbert Generating Stations to north of the Point Pleasant Pumping Station; from South of the Point Pleasant Pumping Station to 1,000 feet north of the Route 202 Bridge; from 1,750 feet south of the Route 202 bridge to Washington Crossing. Some of the tributaries in the Lower Delaware were also designated including Tinicum Creek (headwaters of two upper branches to the Delaware River confluence), Tohickon Creek (downstream of Lake Nockamixon to the Delaware River confluence), and Paunacussing Creek (portions passing through Solebury Township to the Delaware River). The Musconetcong River (3.5 mile stretch from Saxton Falls to Route 46 and the 20.7 mile stretch from King's Highway Bridget to the railroad tunnels at Musconetcong Gorge).*