

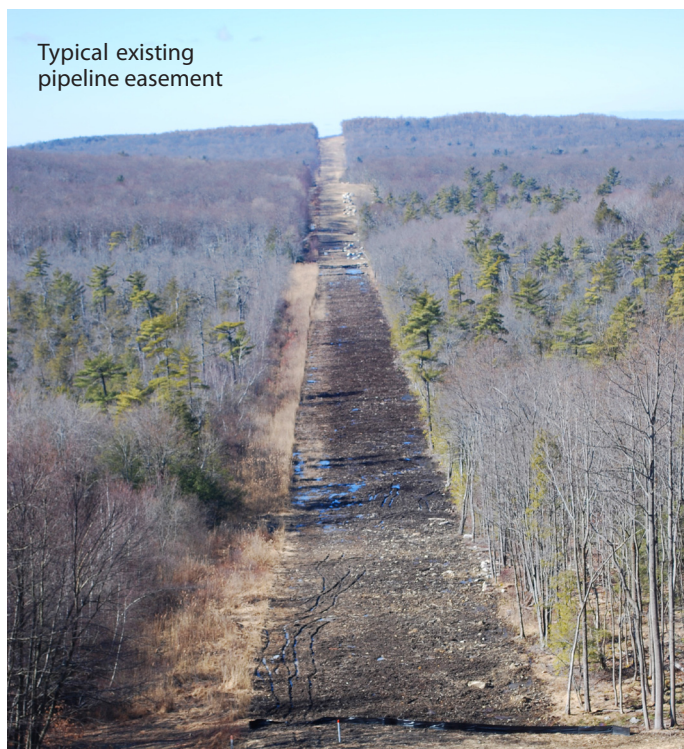
# If built, the proposed pipeline should be co-located with existing pipeline, utility, highway, or railroad easements

## **FERC (Federal Energy Regulatory Commission)**

- According to FERC, new gas transmission lines should be sited to "avoid forested areas and steep slopes...." *18 C.F.R. § 380.15(d)(3)*.
- "The use, widening, or extension of existing rights-of-way must be considered in locating proposed facilities." *18 C.F.R. § 380.15(d)(1)*.

## **NYS DEC (New York State Department of Environmental Conservation)**

- "NYSDEC requests that Constitution thoroughly analyze alternative routes that predominantly use existing utility corridors and rights-of-way (ROW) (including road and railroad ROW) for all or most of the proposed pipeline route in New York."
- Patricia J. Denoyers, NYS Department of Environmental Conservation, 9/25/13 letter to FERC.*
- Co-location would "avoid the catastrophic erosion events witnessed by NYSDEC staff in previous pipeline installations..." *DEC's 11/07/12 letter to FERC.*



## **USACE (United States Army Corps of Engineers)**

- "Additional details and documentation to support the reasons why the pipeline could not be constructed within the New York State Department of Transportation's (NYSDOT) "control access" area. It does not appear that this option was fully explored and the applicant provided no documentation or correspondence from the NYSDOT to support any determination or conclusions they may have made."
- Kevin Bruce, United States Army Corps of Engineers, 7/24/13 letter to FERC.*

## **"Constitution" Pipeline Company**

- Has not done what they have been instructed to do by federal and state authorities.
  - Only 9% of the proposed route would be co-located.
- "Routes that change course from existing rights-of-way will have more environmental opposition." *Canada's U.S. Ambassador, Pipeline & Gas Journal, December 2013, Vol. 240 No. 12.*

For more information please visit [www.StopThePipeline.org](http://www.StopThePipeline.org)