

Stephen M. Tomasik  
DEC - Division of Environmental Permits  
625 Broadway, 4th Floor  
Albany, NY 12233-1750

\_\_\_\_\_, 2015

Application ID: 0-9999-00181/00009 - Water Quality Certification  
Application ID: 0-9999-00181/00010 - Freshwater Wetlands  
Application ID: 0-9999-00181/00011 - Water Withdrawal  
Application ID: 0-9999-00181/00012 - Excavation and Fill in Navigable Waters  
Application ID: 0-9999-00181/00013 - Stream Disturbance

Dear Mr. Tomasik:

The hilly regions of the Catskills and Southern Tier have experienced three 100-year floods in less than a decade. Scientists and lawmakers in New York, along with the NYDEC, acknowledge that the frequency of these flood events is projected to increase.

The proposed Constitution Pipeline (CP) would tear through these hilly, flood-prone regions, clear-cutting 1,000 acres of forested land, much of it on slopes.

According to a report by the Intergovernmental Panel on Climate Change (IPCC):  
“**Deforestation in hilly areas** often leads to decreased infiltration of water and consequently higher runoff and increased peak water discharges following rainfall events.... Most importantly, it **results in increased soil erosion, gully and ravine formation, flooding risk, and siltation of reservoirs and irrigation schemes.**”<sup>1</sup>

The impacts of CP’s massive clear-cutting of forestland, much of it on hillsides, would cause enormous amounts of runoff, erosion and siltation, violating all NYS Water Quality Standards, including 6 NYCRR §703.2 Narrative Water Quality Standards for turbidity, for flow and for suspended, colloidal and settleable solids. Protect New York’s water quality. Deny the 401 water quality certificate, or hold adjudicatory hearings.

Sincerely,

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Signature

Printed Name

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Address

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<sup>1</sup> [http://www.ipcc.ch/ipccreports/sres/land\\_use/index.php?idp=99](http://www.ipcc.ch/ipccreports/sres/land_use/index.php?idp=99)