

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 Constitution Pipeline (CP) would clear-cut 1,000 acres of forested land along its proposed route through four of New York's most flood-prone counties. This would equal the loss of between 400,000 and 1.2 million trees, depending on density of the plantings.¹

The root systems, canopies and leaf litter of trees help slow water runoff and reduce downstream flooding. CP's massive deforestation would serve to increase the frequency and severity of future flooding and increase the amount and velocity of water that runs into our creeks and rivers.² This, in turn, would increase turbidity; increase flow; and increase suspended, colloidal and settleable solids, thus violating 6 NYCRR §703.2 Narrative Water Quality Standards. Worse, the loss of so much forestland, much of it on slopes, could turn manageable and even ordinary rain events into locally catastrophic floods.

In rural areas, through which the majority of the pipeline would run, flooding typically contaminates fresh surface waters with road-salt, fuel oil, methane gas, barnyard and septic wastes, pesticides, fertilizers, other toxic chemicals, as well as saline water, oil or gas from abandoned oil or gas wells.³ Flooding in the town of Sidney further threatens downstream water quality with the danger of hazardous-waste contamination from the old Amphenol plant, located at a low elevation in the town. With these risks in mind, I urge you to deny the 401 water quality certificate, or hold adjudicatory hearings.

Sincerely,

Signature

Printed Name

Address

¹ <http://warnell.forestry.uga.edu/SERVICE/LIBRARY/for96-054/index.html>

² [http://www.forestry.gov.uk/pdf/woodland_flood_control_iale_paper_2006.pdf/\\$file/woodland_flood_control_iale_paper_2006.pdf](http://www.forestry.gov.uk/pdf/woodland_flood_control_iale_paper_2006.pdf/$file/woodland_flood_control_iale_paper_2006.pdf)

³ http://pubs.usgs.gov/gip/gw_ruralhomeowner/gw_ruralhomeowner_new.html