

Air Coalition of Tunkhannock * Aquashicola/Pohopoco Watershed Conservancy * Berks Gas Truth * Breathe Easy Susquehanna County * Bucks Environmental Action * Chester County Sierra Club * Citizens for a Sane Energy Policy * Clean Air Council * Clean Water Action * Concerned Citizens of Lebanon County * Damascus Citizens For Sustainability * Delaware Riverkeeper Network * Green America * Greenbelt Climate Action Network * Lancaster Against Pipelines * Lancaster Farmland Trust * Lancaster Friends Meeting Environmental Concerns Committee * League of Humane Voters * Lebanon Pipeline Awareness * Mason Pipeline Committee * Mud and Maker * New Jersey Sierra Club * Omega-Alpha Recycling Systems * Paunacussing Watershed Association * Peace Action Network of Lancaster * Pennsylvania Campaign for Clean Water EV Committee * Pennsylvania Earth Guardians * Pennsylvania Sierra Club * Plains Township Residents Against PennEast * Potter's Farm * Protect Penn-Delco * Quittapahilla Watershed Association * Rachel Carson Council * Radnor Racquet Club * Responsible Drilling Alliance * Sane Energy Project * Schuylkill Pipeline Awareness * Shalefield Organizing Committee * StopNED * Unitarian Universalist Pennsylvania Legislative Advocacy Network (UUPLAN)

June 26, 2017

Governor Tom Wolf
Office of the Governor
508 Main Capitol Building
Harrisburg, PA 17120
jekarge@pa.gov
mchmielews@pa.gov

Secretary Patrick McDonnell
Department of Environmental Protection
Rachel Carson Building PO Box 2063
Harrisburg PA 17105-2063
pmcdonnell@pa.gov

Re: Direct the DEP to Protect Pennsylvania Local Businesses, Farms, Streams, Properties & Families - Deny the Atlantic Sunrise Gas Pipeline Chapter 102 and 105 Water Permits

Dear Governor Wolf & PA DEP Secretary McDonnell:

On behalf of **40 organizations that represent over 436,000 members in Pennsylvania and surrounding area businesses, community organizations, religious institutions, and environmental organizations**, we urge you to use your power and obligations under the Clean Water Act (CWA) and as Governor of Pennsylvania to protect the people and resources of Pennsylvania by denying the Chapter 102 and 105 water permits for the proposed 200-mile Atlantic Sunrise (AS) pipeline. If permits are approved, this pipeline would cut through eight counties of the Commonwealth and harm generations of Pennsylvanians.

We believe this denial is the only logical conclusion for a pipeline application that still is inadequate and incomplete. Transco, despite nine prior deficiency letters, is proposing blatant disregard for our very cleanest Exceptional Value and High Quality trout streams and wetlands. Its 136-mile greenfield route, extensive

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
drm@delawareriverkeeper.org
www.delawareriverkeeper.org

blasting and clear-cutting through sensitive farmland and forests, limestone karst, and communities is unacceptable.

Reasons these permits should be denied are solidly grounded by requirements of the CWA and Pennsylvania's Constitution that warrants the right of every Pennsylvanian to have a clean and healthy environment to thrive, and which is DEP's duty to uphold. In addition, larger cumulative and expansive economic and long-term sustained harms will come to Pennsylvania families if you allow this pipeline to be built. **The power is in your hands – we urge you to deny the permits based on the continued deficiencies and not allow the Atlantic Sunrise pipeline to be built.** Below is just a sampling of some key reasons this denial is well justified and supported by science:

- The Atlantic Sunrise pipeline would clear cut its way through eight Pennsylvania counties, impacting 2,200 acres of land during construction and permanently affecting 1,100 acres in permanent right-of-ways. There would be hundreds of crossings of wetlands and water bodies.
- The pipeline would affect 45,000 residents and 19,000 homes in the evacuation hazard zone. The new pipeline would supply gas to international exports out of Maryland and gas plants in North Carolina and Florida.
- A report by Key-Log Economics¹ on the proposed Atlantic Sunrise pipeline details true costs of the Atlantic-Sunrise pipeline – costs that include the effects of the pipeline on property value, the diminished value of ecosystem services, economic damages associated with increases in greenhouse gas emissions, and public health costs due to the release of toxins and smog-forming pollutants. **The report estimates the pipeline's total costs to the environment at between \$21.3 and \$91.6 billion.**
- The lost value and benefits Pennsylvania would lose from this pipeline in food production, water supply, air quality, erosion control, biological diversity, soil fertility and waste treatment is estimated to be \$6.2 to \$22.7 million, while annual costs for this diminished ecosystem would be approximately \$2.9 to \$11.4 million per year.
- Your own 48-person PA Pipeline Taskforce concluded better planning and **cumulative build out analysis of fracking infrastructure is needed**: “Pennsylvania will see as many as 30,000 miles of new pipeline built over the next 20 years to take ... gas resources of the Marcellus and Utica Shales to market,” the former DEP Secretary Quigley stated. “... the industry will add 20,000-25,000 miles of gathering lines, and an additional 4,000 to 5,000 miles of interstate pipelines will be built over the next 20 years.” There are over 10,323 unconventional gas wells permitted (as of March 2017). From January 1, 2000 to February, 7 2017 DEP logged 6,522 O&G violations within the Susquehanna River Basin².
- The Federal Energy Regulatory Commission (FERC), which certified the AS pipeline prematurely and without complete environment and economic information with its rubber stamp to allow eminent domain proceedings for private gain, is a rogue federal agency beholden only to the pipeline companies that fund it. DEP must uphold our state rights to clean air and clean water to hold this federal agency in check³.

¹ Key Log Report, FERC's Approval of Atlantic Sunrise Based on an Incomplete Picture of Economic Impacts, March 2017.

² Fracktracker Alliance, Susquehanna River Basin Impacts Project, <https://www.fracktracker.org/projects/susquehanna-river-basin-impacts-project/>

³ FERC Dossier, submitted to Congress by over 200 organizations representing 26 states, May 2017.

<http://www.delawariverkeeper.org/search/term/Dossier>

- With limited PADEP staff and proposed budget cuts, the PADEP cannot effectively, nor adequately, regulate this pipeline for the life of the project. General Fund support for DEP programs dropped from \$245.6 million in 2003 to \$148.8 million in 2016 – a 40 percent drop – and is significantly below 1994 levels – \$165.6 million. In FY 2017-18, General Fund support would increase slightly to \$152 million. These drops, despite the increase in Marcellus shale exploitation, are not protective of our Pennsylvania rights to clean water and a healthy environment. DEP’s Safe Drinking Water, Air Quality, Surface Coal Mine Regulation, Chesapeake Bay, Drinking Water and Clean Water State Revolving Fund and other programs have all been warned they lack sufficient staff resources to enforce minimum federal standards required by primacy and DEP.
- There are more than 685 peer-reviewed studies indicating harm from gas drilling. According to Physicians for Safe Energy (PSE), 72% of these research studies on water quality indicate potential, positive association, or actual incidence of water contamination; and 95% of all original research studies on air quality indicate elevated concentrations of air pollutants⁴. Air pollution already is ailing on many levels, with about 10.8% of Pennsylvania children and 9.8% of adults having asthma, causing harm and increased public health costs.⁵ Many of these studies are focused on Pennsylvania and have been the basis of Maryland passing a ban on fracking, New York passing a ban on fracking, and the Delaware River Basin Commission holding to a 6-year moratorium on gas drilling, with thousands speaking out for a permanent ban to be implemented.
- As the globe continues to realize climate change impacts, phasing out fossil fuel investments is the only logical sustainable path forward. Renewable jobs are already far outpacing fossil fuel jobs, and that is with a system that still largely favors fossil fuel interests through putting taxpayer money into the hands of the very profitable industry that is harming us and their workers. Natural gas is a harmful greenhouse gas, containing about 25 times as much global warming potential per pound CO₂ over a 100-year timeframe, and 86 times as much over a 20-year timeline. An October 2016 report by Synapse Energy Economics and EQ Research, “*Envisioning Pennsylvania’s Energy Future, Powering the Commonwealth’s Energy Needs with 100 Percent Renewables by 2050*,” outlines a clear path to zero emissions for Pennsylvania to switch to renewables. We have other clear and healthy paths forward for Pennsylvania that are possible and negate the need for shale gas drilling and pipelines.
- Financial stability of mid-stream pipeline companies continues to be tenuous.⁶
 - An expert report⁷ shines the light on habits, such as overbuilding of the pipeline industry, that need to be considered. The report finds: “*Existing natural gas pipeline capacity is going underutilized, even as companies propose new pipelines. A 2015 report by the Dept. of Energy found that from 1998 to 2013, existing pipelines in the U.S. had an average capacity utilization of 54%*”.
 - “*Southwestern Energy, based in the Fayetteville shale of Arkansas and in Appalachia, predicts overbuilt pipeline capacity by 2018. And vice president for Marketing and Midstream Operations for Range Resources, one of the largest Appalachian shale drillers, has stated that*

⁴ Physicians, Scientists and Engineers for Healthy Energy. <https://www.psehealthyenergy.org/our-work/publications/archive/the-science-on-shale-gas-development/>.

⁵ Centers for Disease Control and Prevention, “Adult Self-Reported Current Asthma Prevalence Rate (Percent) and Prevalence (Number) by State or Territory, BRFSS 2014,” available at <http://www.cdc.gov/asthma/brfss/2014/tableC1.htm> (last accessed January 2017).

⁶ Six directors and the Williams Chair resigning from the Williams company, <http://www.reuters.com/article/us-williams-board-idUSKCN0ZG35S> (June 30, 2016, Reuters).

⁷ Cathy Kunkel and Tom Sanzillo, “Risks Associated with Natural Gas Pipeline Expansion in Appalachia,” April 2016.

Range expects that “the Appalachian Basin’s takeaway capacity will be largely overbuilt by the 2016-2017 timeframe.”

- *“Kelcy Warren, CEO of Energy Transfer Partners (ETP), says: “The pipeline business will overbuild until the end of time. I mean that’s what competitive people do.” In a subsequent earnings call, he provided Barnett shale in Texas as an example: “There is no question there are certain areas that are overbuilt. For example, we overbuilt in the Barnett shale. The production peaked and it’s now down.”*

In addition, the overwhelming peer reviewed science indicating harm, expert reports, testimony from neighbors and Pennsylvanians already affected by pipelines, agency correspondences, investigative reports, and extensive public concern and comments need to be taken into account. For these reasons and the outlined impacts, the 40 organizations signed to this letter represented by over 436,000 members urge you to deny Transco’s Chapter 105 and Chapter 102 state permits now.

By putting the brakes on these pipeline projects and cumulatively reviewing these projects, you have the authority and power to choose to protect Pennsylvania residents and the environment for decades to come. We urge you to use your power and mission to do just that – for the benefit of all of us here in Pennsylvania who call it home.

Sincerely,

Audrey Gozdiskowski, Air Coalition of Tunkhannock
Jim Vogt, Aquashicola/Pohopoco Watershed Conservancy
Karen Feridun, Berks Gas Truth
Rebecca Roter, Breathe Easy Susquehanna County
Sharon A. Furlong, Bucks Environmental Action
Bernard Greenberg, Chester County Sierra Club
Deborah W. Andrew & Walter Cudnohufsky, Citizens for a Sane Energy Policy
Joseph Otis Minott, Esq. & Deirdre Lally, Clean Air Council
Myron Arnowitz, Clean Water Action
Pam Bishop & Doug Lorenzen, Concerned Citizens of Lebanon County
B. Arrindell, Damascus Citizens For Sustainability
Maya van Rossum, Delaware Riverkeeper Network
Todd Larsen, Green America
Lore Lyon Rosenthal, Greenbelt Climate Action Network
Malinda Clatterbuck, Tim Spiese, & Eva Telesco, Lancaster Against Pipelines
Karen Martynick, Lancaster Farmland Trust
Edward Shane, Lancaster Friends Meeting Environmental Concerns Committee
Carol Rivielle, League of Humane Voters
Ann Pinca, Lebanon Pipeline Awareness
Kathy Chapman, Mason Pipeline Committee
Stephanie Premich, Mud and Maker
Jeff Tittel, New Jersey Sierra Club
Bob Hamburg, Omega-Alpha Recycling Systems
William Tinsman, Paunacussing Watershed Association
Brad Wolf, Peace Action Network of Lancaster
Faith Zerbe, Pennsylvania Campaign for Clean Water EV Committee

Arianne Elinich, Pennsylvania Earth Guardians
Tom Torres, Pennsylvania Sierra Club
Michael Jacewicz, Plains Township Residents Against PennEast
Leah Zerbe, Potter's Farm
Christina Johnson, Protect Penn-Delco
Michael J. Schroeder, Quittapahilla Watershed Association
Dr. Robert K. Musil, Rachel Carson Council
Lloyd Goodman, Radnor Racquet Club
Robert Cross, Responsible Drilling Alliance
Kim Fraczek, Sane Energy Project
Faith Zerbe, Schuylkill Pipeline Awareness
Sierra Shamer, Shalefield Organizing Committee
Cathy Kristofferson, StopNED
Anita S. Mentzer, Unitarian Universalist Pennsylvania Legislative Advocacy Network (UUPLAN)

cc. PA state and federal legislators
Joseph J. Buczynski, PA DEP
Federal Energy Regulatory Commission
US Army Corps of Engineers
US Fish and Wildlife Service
PA Dept. of Conservation and Natural Resources
PA Fish and Boat Commission
Environmental Protection Agency
Delaware River Basin Commission
Susquehanna River Basin Commission