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Senate of Pennsylvania

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October 12, 2022

Pennsylvania Department of Environmental Protection
400 Market Street
P.O. Box 2063
16th Floor RCSOB
Harrisburg, PA 17101

RE: Public Comment on Chapter 102 and Chapter 105 Permit Applications for Transco's REAE Pipeline

To the Pennsylvania Department of Environmental Protection,

I am writing to encourage the Pennsylvania Department of Environmental Protection (DEP) to fully evaluate and carefully consider concerns regarding Transcontinental Gas Pipeline Company's (Transco) Chapter 102 (Erosion Control) permit application and Chapter 105 (Dam Safety and Waterway Management) permit applications for the Regional Energy Access Expansion (REAE) pipeline project.

As you know, this is an expansive project with a route traversing a sizeable area of the Commonwealth including seven counties, six of which are located in the Delaware River watershed. In addition to my home county of Chester, the REAE project will impact Delaware, Bucks, Northampton, Monroe, Luzerne, and York County in the Susquehanna River basin. Along the way, the pipeline would impact more than 100 Exceptional Value wetlands and nearly 40 Exceptional Value streams.

Given the size and scope of this project, as well as the fact that it calls for the use of open trench cuts and removing riparian buffers, it is safe to say that its potential for negative impacts on residents, communities, wildlife, and natural resources is sizeable. In turn, I strongly encourage DEP to give weight to the following factors in considering the permits:

- **Climate Change:** As we continue to face the growing impacts of climate change, we cannot ignore the fact that continued investment in fossil fuel infrastructure projects only further diminish our ability to meet our emissions reduction goals. Similarly, it's likely that the emissions, pollution, and related public health risks of these projects will be predominately borne by environmental justice communities. In weighing arguments in favor of this and other pipeline or fossil fuel infrastructure projects, I respectfully request that DEP consider Pennsylvania's ongoing failure to adequately invest in the clean

energy economy. According to a new report, the Commonwealth ranks 45th in the nation for percent growth in total solar, wind, and geothermal power generation since 2012.

- **Water Resources:** DEP must take specific steps and enact protections, including monitoring and enforcement to ensure that the project does not degrade the water quality of any Exceptional Value (EV) streams or wetlands. That includes collecting sufficient data ahead of time, including samples from potentially impacted waterways, to determine existing use or current conditions of those waterways.
- **Riparian Buffers:** The removal of forested buffers can have extensive impacts on waterways, including exposing them to runoff and raising downstream water temperature through exposure to direct sunlight. Cutting forests and riparian buffers also can lead to forest and habitat fragmentation, which must be considered both individually and cumulatively. In some cases, Transco appears to propose restoring or enhancing impacted wetlands by simply planting trees and shrubs, which would potentially turn them into forests. In others, Transco is seeking waivers to avoid restoring forested buffers entirely, making the impacts permanent.
- **Wildlife:** The project is proposed to be constructed within the habitat of several threatened and endangered plant and animal species including white-fringed orchid, Indiana bat, northern long-eared bat, timber rattlesnake, and bog turtle. In addition, environmental advocates note that Transco hasn't taken enough care to protect the wildlife in the area, highlighting that detailed wildlife surveys have not been conducted even though the federal government is considering listing several of the potentially impacted species endangered.

In addition, many of the streams that would be crossed by the project are cold-water trout streams, Class A or naturally reproducing trout streams that are very sensitive to degradation. DEP should require a complete antidegradation analysis as part of any permit consideration.

- **Geology:** DEP should require that any geologic hazards resulting from pipeline construction and operation be immediately reported and mitigated. Despite identifying potential hazards in its geologic report, Transco assumes that its routes are fixed and without considering rerouting as a hazard mitigation technique. Complete and extensive geologic investigations should be conducted before pipeline construction and installation to determine that Transco has selected an optimal route in terms of environmental impacts. In addition, Transco should be required to work with the Pennsylvania Department of Conservation and Natural Resources to utilize its extensive data on geology, including mapping and core samples, in determining the safest pipeline route and siting.

In the face of rising fuel prices and consumer costs, we all agree that Pennsylvania residents, families, and businesses need a low-cost, clean, and reliable source of energy. In addition, we support investments that create jobs, stimulate economic growth, and safely transport energy to domestic consumers.

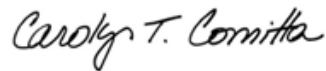
That said, such goals should be pursued in line with, rather than at the detriment of, our Constitutional obligation to protect and provide for the peoples' right to "a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment."

I strongly and respectfully request that DEP consider the aforementioned points in considering Transco's Chapter 102 and Chapter 105 applications for the Regional Energy Access Expansion (REAE) pipeline project.

Given the stakes that we all face from a growing reliance on fossil fuels, a warming climate, and air and water pollution, DEP should consider the overall and far-reaching environmental impacts this project poses regarding additional greenhouse gas emissions, water resources, natural resources, and environmental justice communities.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Carolyn T. Comitta". The signature is written in a cursive style with a clear, legible font.

Carolyn Comitta
State Senator – 19th District