

TALKING POINTS FOR THE 102/105 HEARINGS ON THE ATLANTIC SUNRISE PIPELINE

Background Information

- The Atlantic Sunrise project would clear cut its way through eight Pennsylvania counties, impacting 2,200 acres of land during construction and permanently affecting 1100 acres of in 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 zone. The new pipeline would supply gas international exports out of Maryland and gas plants in North Carolina and Florida.

We ask that DEP deny the applications for Transco's Atlantic Sunrise Pipeline project due to the irreparable harm it would cause to the state's waterways and environment during construction and throughout its lifespan and beyond.

- This project has harmful environmental impacts, safety issues, air and climate change impacts, economic ramifications, permanent impacts on scenery and rural character of this region, and would threaten drinking water sources, groundwater wells, wetlands, springs and seeps, water quality, and septic systems.
- Aquatic resources have the potential to be impacted by many activities, including waterbody crossings, clearing, blasting, and water withdrawals for hydrostatic testing.
- Some of the resources within the project are high quality and sensitive resources, including Exceptional Value (EV) and trout streams.

Transco fails to discuss, except in the most basic terms, the impacts that can be expected from other human activity in the area. Transco's brief discussion of impacts is marred by the following shortcomings:

- Transco fails to adequately quantify impacts of other projects in the vicinity of the Atlantic Sunrise pipeline.
- Even when Transco acknowledges impacts from other activities, it does not explain how these effects will contribute to adverse impacts on water resources.
- For example, in its discussion of impacts to surface water resources in application to DEP, Transco admits that natural gas drilling creates the "potential ... for cumulative effects on surface waters affected within the same watersheds crossed by the Project." but does not provide any more information about these potential effects, because the information "was not readily available." *Transco Application for Luzerne County at 44.*

DEP has identified many technical deficiencies in the Transco application in nine deficiency letters sent by DEP.

- DEP staff needs to do a thorough technical review of Transco's responses to the deficiency letters for each permit application.
- EPA was concerned enough about the lack of information about the Atlantic Sunrise project in the Draft Environmental Impact Statement (DEIS) filed by Transco to FERC that EPA wrote:
 - "EPA is concerned about the amount of detailed information that has yet to be filed and is not evaluated in the DEIS. This includes surveys for land, rare species, historic resources, water supplies, air modeling, mitigation measures to manage and dispose of contaminated groundwater, proposed mitigation measures for source water protection areas, geotechnical feasibility studies for HDD [horizontal directional drilling] crossing locations and mitigation measures to minimize drilling risks, and a detailed aquatic resource compensatory mitigation plan. This information is relevant and critical to

evaluation of potential impacts. EPA is concerned that a fully informed decision may not be made without this information."

The Atlantic Sunrise pipeline will cross numerous wetlands. Some of the wetlands have not been identified by Transco, as DEP found.

- When a project will affect Exceptional Value wetlands, as Transco's Project will in several instances, DEP may not issue a water obstruction and encroachment permit unless "[t]he cumulative effect of this project and other projects *will not result in the impairment* of the Commonwealth's exceptional value wetland resources."
- To date, DEP has not found that Transco affirmatively demonstrated that Exceptional Value resources would not be impaired by the cumulative impact of the Project and all other potential or existing projects.

A report prepared by Key-Log Economics on the proposed Atlantic Sunrise pipeline shows enormous ecological damage.

- Key-Log Economics details true costs of the Atlantic-Sunrise pipeline -- costs which include the effects of the pipeline on property values, 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 ecosystem services value lost during construction are 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.
- "Benefits people obtain from ecosystems" is perhaps the simplest and most commonly heard definition of ecosystem services. These services can be identified quantified. Lost ecosystem service value includes the value of food production, water supply, air quality, erosion control, biological diversity, soil fertility, waste treatment.

Due to recent failures, explosions and problems, the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) is proposing vast changes to its safety regulations for the nation's proposed gas transmission pipelines.

- The regulations have not been finalized.
- Transco has not explained how it will upgrade the pipeline to meet these new requirements.

Transco will pay no county real estate taxes on this pipeline, unlike other gas distribution companies such as Columbia Gas (under Public Utility Realty Tax Act) .

- There will be no tax benefit to any of the municipalities and counties along the pipeline route.