

## Comments of Sierra Club Pennsylvania Chapter

My name is Thomas Au. I am conservation chair of the Pennsylvania Chapter of Sierra Club. The Sierra Club, a national environmental and conservation organization, has more than 25,000 active members in Pennsylvania. 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 right of ways, and crossings hundreds of wetlands and streams. The pipeline would affect 45,000 residents and 19,000 homes in the evacuation zones.

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 during construction and throughout its lifespan. This project has harmful environmental impacts, safety issues, air and climate change impacts, economic ramifications, and permanent impacts on the character of this region. DEP has identified many technical deficiencies in the Transco applications in nine deficiency letters. DEP staff needs to conduct a thorough review of the Transco's responses. I think you will find that the applications do not adequately address DEP's concerns.

Water resources have the potential to be impacted by many activities, including crossings, clearing, blasting, and water withdraws for hydrostatic testing. Some of the resources within the project area include Exceptional Value (EV) wetlands and trout streams. According to Transco's own report, this pipeline will cross 35 trout streams in Lebanon County alone. When a project affects an exceptional value wetland, DEP may not issue a permit (under 25 PA Code Section 105.18a) unless the project is water dependent and unless the project *will not have an adverse impact on the wetland*. In addition, DEP must determine the 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 has met these requirements.

I have a report here prepared by Key-Log Economics on the proposed Atlantic Sunrise pipeline that shows enormous ecological damage from this project. Key-Log Economics details true costs of the pipeline -- costs which include the effects of the pipeline on property values, the diminished value of ecosystem services, and economic damages. Lost ecosystem services includes the value of food production, water supply, air quality, erosion control, biological diversity, soil fertility, and waste treatment. Dirty air and dirty water have economic costs. The report estimates the pipeline's lifetime costs to the environment at between \$21.3 and \$91.6 billion. I am submitting a copy of the Key-Log report with my comments today.

We urge DEP to consider the total cost to the environment from this project in reviewing these permits. The Sierra Club will be submitting additional written comments.