Craig Lehman – FERC Hearing Comments FINAL 08-04-14

Thank you for the opportunity to share my thoughts on the proposed Atlantic Sunrise Project.

I respectfully request that you do not issue a Certificate of Public Convenience and Necessity that includes the Central Penn South portion of the Atlantic Sunrise Project and instead substitute the Transco Looping CPL South Alternative. Since the Transco pipeline already has connectivity to the mainline near Station 195 in southeastern Pennsylvania, this approach would result in an expansion and upgrade of the existing Transco pipeline and eliminate the currently proposed greenfield pipeline segment through Columbia, Lancaster, Lebanon, Northumberland and Schuylkill counties.

I recommend this expand and upgrade approach to the proposed pipeline primarily because there is existing connectivity but also because it is consistent with Lancaster County’s targeted approaches toward development and growth, farmland preservation and transportation. I offer three examples of how our community is working to maximize the use of existing infrastructure and resources.

First, Lancaster County and partner municipalities have established Urban and Village Growth Areas. These were established as places where the community wants to target development and growth. The idea is to keep our older communities healthy and desirable places to live while reducing development and growth pressures on agricultural, natural and rural lands. As a result, Lancaster County has continued to benefit from economic growth while maintaining its small county feel and reputation.

Second, we have made a huge investment in farmland preservation as a targeted way to ensure the sustainability of our agriculture industry. As a result, Lancaster County is number one in the nation with more than 100,000 acres preserved. While more work needs to be done, we are on our way to ensuring that agriculture remains vital well into the future.

Third, limited transportation funding, even with the recent addition of new state dollars, has meant that the county has had to be strategic on how local transportation resources are utilized. Instead of funding large-scale capacity adding projects, resources have been targeted toward projects that improve the efficiency and effectiveness of our existing transportation system. One effort, currently underway, is the multi-municipal corridor signalization project to help improve traffic flow and reduce congestion in selected high-volume corridors in Lancaster County.

As you can see, all of these efforts are targeted and all focus on maximizing the use of existing infrastructure and resources. I personally believe that this same approach should be employed as it relates to the proposed Atlantic Sunrise Project.

Finally, I respectfully remind the Federal Energy Regulatory Review Commissioner (FERC) we are in the midst of a natural gas gold rush. As with past gold rushes, there are benefits like jobs and in this case potentially reduced natural gas prices for some consumers. With all gold rushes, there are always corporate profits, in some cases motivated by greed and in some instances blinded by hubris. However, with virtually every gold rush, there is future cost. Many times those costs show-up as unintended consequences. They may be environmental. They may be societal. They may even be economic as the rush inevitably goes from boom to bust. With these things in mind, I strongly encourage FERC to take a conservative approach to all new greenfield capacity adding projects especially when connectivity already exists.

Again, thank you for the opportunity to share my thoughts on the proposed Atlantic Sunrise Project. And again, I respectfully request that you do not issue a Certificate of Public Convenience and Necessity that includes the Central Penn South portion of the proposed Atlantic Sunrise Project and instead substitute the Transco Looping CPL South Alternative to eliminate the currently proposed greenfield pipeline segment through Columbia, Lancaster, Lebanon, Northumberland and Schuylkill counties.