



August 14, 2017

Krishnan Ramamurthy
Acting Director
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
400 Market Street
Harrisburg, PA 17105

Re: Public comment on Transco's application to transfer and use
ERCs for the Atlantic Sunrise Pipeline

Dear Mr. Ramamurthy:

Our office represents the Adorers of the Blood of Christ, an international order of Catholic Sisters who own property in Lancaster County that is being condemned by Transco for the Pipeline. With me today is Sister Sara Dwyer, who is a permanent member of the Adorers and also the coordinator of the Adorers' Office of Justice, Peace, and Integrity of Creation. Sister Sara traveled from Washington D.C. to attend this hearing. Also here this evening is Sister Linda Fischer, who is a permanent member of the Adorers who resides at the Adorers' property in West Hempfield Township, Lancaster County, that is being condemned for the Pipeline.

It is the Adorers' deeply held religious belief that the Earth must be protected and preserved as part of God's creation. The Adorers have adopted a Land Ethic professing their belief that creation is a revelation from God; committing to a simple way of life that avoids harmful use of natural resources; and committing to protect the land that they own as a gift of beauty and a legacy for future generations. The Adorers also follow Pope Francis's Encyclical Letter on the environment which identifies the intensive use of fossil fuels, like natural gas, as contributing to the grave threat of climate change. We have filed a lawsuit in federal court asserting that the condemnation of the Adorers' private property for the construction and operation of a high-volume natural gas pipeline violates the Adorers' right to the free exercise of religion as protected by the Religious Freedom Restoration Act ("RFRA"). The approval of Transco's application to transfer emissions credit, permitting further degradation of air quality in Lancaster County where the Adorers own property, may also violate the Adorers' religious exercise rights under RFRA. I am providing a copy of the Adorers' amended federal complaint, along with their Land Ethic, with my comments.

The Adorers oppose Transco's application for the transfer of emission reduction credits to offset the more than 105 tons of nitrogen oxide pollutants that Transco is planning to emit in Lancaster County during construction of the Atlantic Sunrise Pipeline.

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We believe that Transco has under-estimated the amount of pollutants it will emit and that a new calculation should be required. Transco's emissions estimate was calculated using the EPA Motor Vehicle Emissions Simulator known as MOVES2014, which is outdated and may have resulted in a lower estimate of nitrogen oxide levels. MOVES2014 was released in October 2014. The EPA released new software known as MOVES2014a in November 2015, which incorporates significant improvements in calculating nonroad equipment emissions. MOVES2014a adds volatile organic compounds and toxics to the list of pollutants that can be directly estimated for nonroad equipment. It updates the gasoline fuels used for nonroad equipment to be consistent with those used for onroad vehicles. Importantly, the change in default fuels leads to an increase in nonroad NOx emissions in some locations.

Because new and more accurate software is available to calculate emissions – and this new software was available in 2015, long before Transco submitted its application to transfer ERCs – Transco should be required to recalculate its emissions forecast utilizing the latest technology and resubmit its calculation.

As to the source of the ERCs, we believe that Transco must submit a trajectory model based solely on Harford County, Maryland, where it is proposing to source the ERCs, and not based on another location where it is not sourcing ERCs. The trajectory modeling submitted by Transco was completed for Howard County – not Harford County – and Transco merely revised its analysis to incorporate Harford County. Transco should be required to complete a new study and submit a new trajectory model that applies exclusively to Harford County.

Air quality in Lancaster County is already a grave concern. The American Lung Association gave Lancaster a failing grade for short-term particle pollution – it is the 12th worst municipality in the country – and a “C” for ozone pollution. The level of pollution in our county poses health risks to our residents, especially children, the elderly, and those with respiratory conditions. Particle pollution can cause asthma, heart attacks, strokes, and even death. Transco is proposing to add more than 100 tons of pollution to our already toxic air, and it should not be allowed to do so, especially on the basis of questionable calculations and modeling.

Thank you for your time and consideration.

Very truly yours,

Sheila V. O'Rourke
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cc: Client