

June 24, 2019

Via email to: [comments@spcregion.org](mailto:comments@spcregion.org)

Southwestern Pennsylvania  
Commission  
Two Chatham Center Suite 500  
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**Re: Written Comments by Breathe Project, Allegheny County Clean Air Now (ACCAN), Beaver County Marcellus Awareness Community (BCMAC), Center for Coalfield Justice, Clean Air Council, Clean Water Action, Climate Reality Pittsburgh and SWPA, Communities First - Sewickley Valley, Environmental Health Project, Environmental Integrity Project, FracTracker Alliance, Group Against Smog and Pollution (GASP), Lawrenceville Clean Air Now, Nine Mile Run Watershed Association, Ohio Valley Environmental Coalition, PennEnvironment Research & Policy Center, PennFuture, Rail Pollution Protection Pittsburgh (RP3), Sierra Club, and Women for a Healthy Environment**

Dear Chair Maggi and SPC Commissioners:

Thank you for the opportunity to comment on the proposed update to Southwestern Pennsylvania Commission's Long-Range Transportation and Development Plan, "Smart Moves for a Changing Region."

These comments are on behalf of the Breathe Project, Allegheny County Clean Air Now (ACCAN), Beaver County Marcellus Awareness Community (BCMAC), Center for Coalfield Justice, Clean Air Council, Clean Water Action, Climate Reality Pittsburgh and SWPA, Communities First -Sewickley Valley, Environmental Health Project, Environmental Integrity Project, FracTracker Alliance, Group Against Smog and Pollution (GASP), Lawrenceville Clean Air Now, Nine Mile Run Watershed Association, Ohio Valley Environmental Coalition, PennEnvironment Research & Policy Center, PennFuture, Rail Pollution Protection Pittsburgh (RP3), Sierra Club, and Women for a Healthy Environment.

The **Breathe Project** is a clearinghouse for information on air quality in Pittsburgh, southwestern Pennsylvania and beyond. We use the best available science and technology to better understand the quality of the air we breathe and provide opportunities for citizens to engage and take action.

**Allegheny County Clean Air Now (ACCAN)** is a citizen's watchdog group that works for better air quality in the Ohio Valley in the area including and around Neville Island.

The **Center for Coalfield Justice's** mission is to improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield residents; and to protect public and environmental health.

**Clean Air Council** is a member-supported, nonprofit environmental organization dedicated to protecting everyone's right to a healthy environment.

**Clean Water Action:** To protect our environment, health, economic well-being and community quality of life. Clean Water Action organizes strong grassroots groups and coalitions, and campaigns to elect environmental candidates and to solve environmental and community problems.

**Climate Reality Pittsburgh and SWPA** is a community of concerned Southwestern Pennsylvania citizens and neighbors who are addressing the climate crisis in our region, challenging sources of climate change pollution and supporting efforts for a renewable energy future.

**Communities First - Sewickley Valley** is a group committed to protecting health, safety, and the environment in the Sewickley Valley, and our focus is on the impact the spreading petrochemical/plastics industry will have on our communities.

The **Environmental Health Project** is a nonprofit public health organization that assists and supports residents of Southwestern Pennsylvania and beyond who believe their health has been, or could be, impacted by unconventional oil and gas development.

The **Environmental Integrity Project** is a non-profit, nonpartisan organization that empowers communities and protects public health and the environment by investigating polluters, holding them accountable under the law, and strengthening public policy.

**FracTracker Alliance** is a non-profit organization that studies, maps, and communicates the risks of oil and gas development to protect the planet and support the renewable energy transformation.

The **Group Against Smog and Pollution** works to improve air quality to protect human, environmental, and economic health in Southwestern Pennsylvania.

**Lawrenceville Clean Air Now (LCAN)** is a community group of people who live and work in the Lawrenceville neighborhood of Pittsburgh that aims to mobilize support for efforts to address local and county air pollution and protect public health.

The **Nine Mile Run Watershed Association** restores and protects its watershed ecosystem, while working regionally to support and implement resilient solutions for a healthier urban environment.

**Ohio Valley Environmental Coalition (OVEC)** is a nationally recognized grassroots organization dedicated to preserving and protecting our natural heritage. Our mission is to organize and maintain a diverse grassroots organization dedicated to the improvement and preservation of the environment and communities through education, grassroots organizing and coalition building, leadership development, strategic litigation and media outreach.

**PennEnvironment Research & Policy Center** investigates problems, crafts solutions, educates the public and decision-makers, and helps the public make their voices heard in debates over the quality of our environment and our lives.

**PennFuture** is a statewide environmental organization that advocates for clean air, clean water and a healthy climate.

**Rail Pollution Protection Pittsburgh** is a group of Pittsburgh residents committed to addressing the risk and negative impacts of rail proliferation where it conflicts with urban health, sustainability, and personal well-being.

**Sierra Club** is the nation's oldest and largest grassroots environmental organization with 30,000 members in PA, including over 6,000 in the greater Pittsburgh region.

**Women for a Healthy Environment:** Through educational programming, technical assistance and advocacy, Women for a Healthy Environment addresses environmental exposures that impact public health by advancing strategies and policies that create healthy communities, especially those where children live, learn and play.

We want to congratulate SPC for many excellent new ideas and principles that have been incorporated into the goals and framing for the draft of this plan. We also wish to express our extreme levels of concern about a

portion of this plan that appears to endorse the build out of the petrochemical industry in our region in the form of an Appalachian Storage Hub (ASH). We want to point out how your including the ASH in this plan undercuts the vision, credibility, and effectiveness of what otherwise could be a plan that we would otherwise endorse.

**1. There are many positive aspects of the *Smart Moves* plan for which we wish to express our support.**

This plan articulates as a priority a “Clean Air Strategy,” which foregrounds the importance of the need to “Support and encourage transportation projects and programs that will contribute to attainment or maintenance of the national ambient air quality standards (NAAQS) for ozone, carbon monoxide (CO), and particulate matter (PM).” We strongly endorse this as a priority, given the fact that our region still has a poor air quality problem.

Allegheny County is designated as a “nonattainment” area for fine particulates (PM 2.5) and Sulfur Dioxide, meaning it is out of compliance with the Clean Air Act. Allegheny County, designated as nonattainment for the 2012 PM<sub>2.5</sub> NAAQS, (with an effective date of April 15, 2015) was required to submit a Moderate area attainment plan to EPA no later than October 15, 2016. ACHD has still not met this deadline despite it being two years past the due date.

In 2017 (the latest qualified data), the air quality in Allegheny County was considered NOT GOOD for 203 days (more than 55% of the time). This builds off of the 189 NOT GOOD air days in 2016.

Based on an annual average for PM 2.5 spanning 2015 – 2017, eight of the 10 Pittsburgh regional monitors had PM 2.5 levels in the worst 20% ranking of the nation’s 775 monitors. Three of these ten monitors, such as the Liberty Monitor near Clairton, were in the worst 10% nationally.

For 2015 -2017, four of the Pittsburgh region’s 11 ozone monitors ranked in the worst 30% of the nation’s 1135 monitors ([Air Pollution Sources](#)).

A recent City Paper article described a report from the American Thoracic Society and New York University’s Marron Institute for Urban Management that stated that “the Pittsburgh region had the fourth most air-pollution related deaths of any metro area in the country. In 2017, the Pittsburgh region, which includes Allegheny County, all of its bordering counties, and Fayette County, suffered 232 deaths related to air pollution, according to the study’s estimates. This was the most of any region outside of California” ([Deto, City Paper](#)).

We know that health effects start showing up at levels above 8 ug/m<sup>3</sup> and that the World Health Organization sets 10 ug/m<sup>3</sup> as its recommendation for average annual PM. At this level 50% of Pittsburgh’s population is currently being exposed to annual PM levels above the 10 ug/m<sup>3</sup> guideline.

The transportation sector is the second largest contributor to our region’s particulate pollution, so this plan’s focus on improving regional air quality is laudable. Aiming for a health protective standard for air pollution should be kept in focus as a framework as decisions from this plan are moved forward.

The plan should also be commended for its willingness to recognize that the earth sustains us, as well as prioritizing tackling climate change, improving air quality, taking care of our water, and pursuing a sustainable and resilient community approach to planning. All of these goals and strategies set forth lenses that are pointed in the direction of long-term prosperity for our region through smart deployment of federal and partnership resources.

**2. The plan’s inclusion of an endorsement of an Appalachian Storage Hub is dissonant with the rest of the *Smart Moves* Plan.**

After 62 pages of thoughtful and laudable ideas in this report, the plan introduces a concept that sticks out like a sore thumb because of how dissonant it is with the rest of the report. In a text box that features a 19<sup>th</sup> century incandescent lightbulb as an icon, the report identifies an Energy Resources Strategy, articulated as: “Support the

identification and development of an “Appalachian Storage Hub” to promote the local use of locally-derived ethane feedstock.”

This idea of an ASH is an endorsement of a slow-moving, long-lasting recipe for harm for our region. The ASH idea stands in contrast with the ideas of sustainability, improvements in air quality, protecting our water, and supporting prosperity in our communities.

We have little time to stop the worst of the climate crisis, and a petrochemical hub would be a huge step in the wrong direction. We should be investing in clean energy, not fracking and plastics.

**3. The ASH concept is a direct threat to improving our region’s air quality, in contradiction to the air quality goals spelled out elsewhere in the *Smart Moves* plan.**

The construction of the Shell Petrochemical Plant will erase 30 years’ worth of regional air quality improvements. This plant would emit 522 tons per year of volatile organic compounds (VOCs) that will put our health at risk. The plant would be the second highest hazardous air polluter in the state would be the largest source of VOCs in Southwestern Pennsylvania ([2015 Toxic Release Inventory](#)).

Emissions from the plant will contain a toxic mix of pollutants – particulate matter, methane, sulfur dioxide and volatile organic compounds such as acrolein, benzene, toluene and naphthalene – that exacerbate symptoms of asthma and cause cancer ([PRETA Air Report](#)).

The ASH calls for at least 3 of these plants like the Shell facility to be built, if not more, in addition to pipelines, compressor stations, fractionation plants, and downstream processors, all of which have negative air quality impacts.

The petrochemical facility and ASH will increase the demand for “fracked” natural gas – requiring more than 1000 new fracking wells to be opened and a vast network of pipelines that will cross through communities within the blast-zone of homes, schools and communities ([FracTracker Alliance](#)).

Studies show that fracking wells close to people and communities results in serious health problems ([Physicians for Social Responsibility](#)).

**4. The ASH concept is a direct threat to our region’s ability to meet climate change goals, thereby putting our community at risk as having a reputation as being a destructive, worldwide climate polluter.**

In order to achieve Mayor Bill Peduto’s commitment of reducing Pittsburgh’s greenhouse gas emissions by 20% by 2023 and achieving 100% renewable energy by 2035, we must slow and stop the expansion of petrochemical plants, pipelines, compressor stations and ancillary industries in our region.

Planet-warming greenhouse gas emissions from the Beaver County Shell plant alone would wipe out all the reductions in carbon dioxide that Pittsburgh, just 25 miles away, is planning to achieve by 2035.

The Shell plant will emit 2.2 million tons/year of carbon dioxide equivalents, a climate change gas, which is equivalent to putting an additional 430,800 cars on the road each year ([EPA GHG Calculator](#)). The Shell petrochemical plant has the potential to emit as much CO<sub>2</sub> as the actual emissions of the Cheswick Power Plant, which burns coal, and three times as much hazardous air pollution as the Clairton Coke Works, one of Allegheny County’s most polluting industrial facilities, currently emits, ([PA DEP Air Permit Plan Approval No. 04-00740A](#)).

From an international perspective, endorsement of the ASH concept sets our region up for having a reputation for leading the world over the edge in terms of accelerating destruction of the planet by the increases in emissions

from greenhouse gases associated with methane releases, combustion of methane, and the use of other natural gas liquids, such as ethane, by turning them into plastics.

Petrochemical development in the U.S. will move the world in the opposite direction of climate change goals, adding nearly 1000 coal plants worth of greenhouse gasses to our atmosphere by 2050 alone. Petrochemical development will create 120 billion metric tons of carbon dioxide by 2050.

This increase in emissions will make it nearly impossible for the planet to stay below our global temperature change target of 2.3 degrees centigrade. Petrochemical development means that the world will be incapable of meeting the carbon emissions goals set by the Paris Accords. The environmental degradation and public health cost of petrochemical development will be more than \$54 trillion world-wide.

Nearly 90% of new oil and gas investments will rely heavily on hydraulic fracking as their primary means of fossil fuel extraction which will further exacerbate public health problems and environmental damage.

Upward of 60% of these new emissions will come from just two regions of the United States. The second largest contributor to these emissions will be the region of Pennsylvania, Ohio, and West Virginia known as the Appalachian Basin.

Methane and Carbon Dioxide are both dangerous greenhouse gases. Methane has an atmospheric warming potential of 20 to 30-times more than carbon dioxide, but its effects are short-lived (about 9-12 years). Carbon Dioxide can continue to cause global warming for more than 1000 of years.

Petrochemical investment in the Appalachian Basin alone is projected to produce almost 1/5th of the new emissions from the United States during this period. The carbon dioxide emissions enabled by these new drilling projects will prevent our ability to achieve a net decrease in U.S. emissions by 2050. Oil and gas production in the U.S. will be more than many of the next highest countries combined.

The *Smart Moves* plan already reserves \$275 million of highway and bridge funding to remediate the effects of extreme weather on our transportation system. Why would we pursue a strategy that will only exacerbate extreme weather by releasing huge quantities of greenhouse gas emissions while putting our region's reputation at risk?

**5. The ASH concept is a direct threat to our region's long-term prosperity, resiliency and sustainability goals by the way the petrochemical industry undermines local community investment and democratic decision making.**

The plant will require the construction the Shell Falcon Pipeline, a 97-mile pipeline that will transport volatile liquid ethane from the Shell Petrochemical Plant. The pipeline will cross three states, 22 townships and put many communities at risk: family homes, businesses, groundwater wells, public parks, conservancy-protected marshlands, schools, daycare centers, hiking and biking trails including the Montour Trail and the water service line of the Ambridge Reservoir ([FracTracker Alliance](#)).

Pennsylvania taxpayers will contribute \$1.65 billion in taxpayer dollars toward the construction of the plant which will bring in 600 permanent full-time jobs. This equates to a subsidy of \$2.6 million per job. This is a bad investment decision. Contrast this with New York State's commitment of \$1.5 billion for 40,000 renewable energy jobs in the state, or a subsidy of \$37,500 per job ([World Economic Forum](#)).

The [gas industry would build a BRIDGE to the destruction of our planet](#). Transitioning away from the oil and gas industry development will require bold action nationally and locally to stop fracking in communities and curb the development of petro-related industries.

Many people have spoken out at state and local governmental public hearings against the construction of the Shell plant, the Falcon Pipeline, and additional plants in Ohio and West Virginia. The vast majority of testimony continues to be in opposition to the development of the petrochemical industry ([Opposition Growing Against](#)

[Natural Gas Pipeline To Supply Beaver Co. Cracker Plant; Nearly 100 people attend public hearing regarding Shell's Falcon ethane pipeline; Most residents at Monaca hearing question Shell's planned pipeline; More opposition than support for Falcon pipeline during Washington County hearing](#)).

**We ask that SPC not include support for an Appalachian Storage Hub as a backdoor goal of this new plan, and that none of the region's transportation and infrastructure dollars go to supporting this destructive industry that does not create the prosperous future outlined throughout the vast majority of SPC's "Smart Moves" plan.**

The people of SWPA built this region to be the energy powerhouse that it is. We stand on the shoulders of the steelworkers and coal miners and industry engineers who helped to build this region. With creativity and innovation, we advocate for a transition to more sustainable and renewable energy industries in support of the health of workers, people and the planet. These goals are outlined elsewhere in SPC's report and are widely shared among the organizations that have signed on to this letter, and they should be expanded upon and invested in.

We advocate for the endorsement of policies that would support a transition to a sustainable economy in Southwestern Pennsylvania, not take us backwards by shackling our economy to the petrochemical industry that will inevitably lead to a loss of prosperity and sustainability.

Thank you for your commitment to improving our region's health, air, transportation, infrastructure, and prosperous future.

Sincerely,

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