

TO: Lackawanna-Luzerne County MPO, Joint Coordinating and Technical Committee, Public Comments, July 15, 2020.

Thank you for your work to promote transportation infrastructure to benefit our region. And thank you for posting your draft documents and encouraging public input.

I am speaking on behalf of Protect Northern PA, a group of concerned residents in several counties in our area. I live in Glenburn Township, Lackawanna County.

While your committee is working diligently to promote safe and convenient mass transit, external forces are at work that could interfere with those plans. The purpose of my comments is to make you aware of those external hazards.

A chemical plant in Wyalusing Township, Bradford County, permitted by DEP, upon construction, intends to make 3.5 to 4 million gallons of liquified natural gas/methane (LNG) and move it by tanker truck, or rail, to a port in New Jersey for foreign export. The company is New Fortress Energy LLC, dba Bradford County Real Estate Partners LLC.

- Road hauling of LNG could involve 15 filled tankers of LNG, per hour, 24 hours per day, 365 days per year, traversing area roads. An equal number of tankers would be returning.
  - The roadways used are likely to be the same roadways that you designate for public transportation: Route 6-11 passing Keystone College and Clarks Summit; and/or Routes 29 and 309 through Dallas and Shavertown.
  - I see that your group, has considered the necessity that a transportation plan conforms to rules to control ozone. Adding a new source of steady industrial trucking is inconsistent with these efforts.
  - I see that your group, rightly, is looking at environmental justice concerns. These routes will pass close to schools and child-care centers, through areas of high population density and lower income. You can view these maps on our website. <https://protectnorthernpa.org/the-long-and-winding-route>
  - It is great that you intend to plan for bike routes in the future. As a regular cyclist, I find heavy tanker truck traffic to be incompatible with that.
- Rail hauling of LNG as 100-car unit trains is possible, using Norfolk Southern rail lines. Energy Transport Solutions, a subsidiary of New Fortress Energy, has been granted a special permit by the federal government to move LNG in 50-year-old-tech (DOT112C120W) rail cars, from Wyalusing PA to Gibbstown NJ. These tanker cars are old, as are the tracks, posing a risk to public safety. Of note, the Federal government completed a *Final* Rule regarding the movement of LNG by rail. It has many more safety requirements, than the special permit granted to ETS. (Information is on our website.)

Whether by road or rail, this volume of LNG poses hazards for both Lackawanna and Luzerne counties. The LNG cargo, if leaked, is flammable and explosive. Emergency responders will need to be prepared.

A group of your significance can make a difference. We encourage you to contact elected officials to ask them to put the health and safety of our communities above the profits of gas-industry investors. Specifically, Ask Governor Wolf to reopen and revisit the permitting process for the New Fortress Energy LNG facility so that it includes meaningful regional public participation. Sure, the permitting was done to conform to DEP processes for “gas processing” facilities. But that’s the problem: DEP’s processes have not caught up with the LNG-for-export industry.

Nor are DEP permit processes prepared to protect communities from petrochemical plants given tax incentives through legislation passed earlier this week, without an amendment to protect air quality and require meaningful public participation. Counties and municipalities should immediately implement protective land uses, zoning, and ordinances.

We encourage the public to reach out to us with questions and to engage with us to find solutions. We will be happy to send a speaker to local groups who would like more discussion. You will find much information on our website, **ProtectnorthernPA.org**.

Thank you for the MPO efforts to make northeast PA even a better place to live.

Diana Dakey, on behalf of Protect Northern PA  
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