

July 17, 2019

The Honorable Elaine L. Chao
Secretary
United States Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Re: Support for PHMSA Pipeline Advisory Committees

Secretary Chao:

Our organizations write to express support for the Department of Transportation’s Technical Pipeline Safety Standards Committee and Technical Hazardous Liquid Pipeline Safety Standards Committee – also known as the Gas Pipeline Advisory Committee (GPAC) and Liquid Pipeline Advisory Committee (LPAC), respectively. We are public safety and environmental advocates, emergency responders, labor representatives, and representatives of natural gas and liquid pipeline companies. We ask that you continue to convene PHMSA’s long-standing, statutorily-established advisory committees and for your strong endorsement of these advisory committees in your forthcoming report required under Executive Order 13875, “Evaluating and Improving the Utility of Federal Advisory Committees.”¹

The Pipeline Safety Act requires the Department to consult the pipeline advisory committees when developing regulations.² The committees are made up of representatives from the general public, state and federal government, and the industry. These diverse committees provide transparent recommendations to PHMSA and have demonstrated the ability to build consensus around complex regulatory issues and provide needed clarity in proposed regulations. For example, the GPAC and LPAC were pivotal in the review of PHMSA’s pending gas transmission, hazardous liquid, and gas gathering pipeline safety regulations.

The work of the GPAC and LPAC is far from complete. By bringing together representatives from the public, federal and state agencies, and the pipeline industry, the pipeline advisory committees continue to provide critical stakeholder input to PHMSA’s rulemaking process. Stakeholder consultation is particularly important when developing complex, technical pipeline safety regulations that have profound impacts on public safety, energy reliability, and the environment. Pipeline advisory committee meetings are public, ensuring transparency and providing a broad opportunity for input.

Thank you for your continued support of the important work of PHMSA’s pipeline advisory committees. We look forward to continuing to work with the Department to advance our shared goal of pipeline safety.

¹ 84 Fed. Reg. 28,711 (June 14, 2019).

² 49 U.S.C. 60115.

Cc: Howard "Skip" Elliott, Administrator, Pipeline and Hazardous Materials Safety Administration

Sincerely,

American Gas Association

American Petroleum Institute

American Public Gas Association

Association of Oil Pipe Lines

Environmental Defense Fund

International Association of Fire Chiefs

International Union of Operating Engineers

Interstate Natural Gas Association of America

Laborers' International Union of North America

Pipeline Safety Trust

**United Association of Union Plumbers, Fitters, Welders and HVACR Service Techs
of the United States and Canada**