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April 28, 2015

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Room 1A  
Washington, DC 20426

RE: Atlantic Coast Pipeline and Supply Header, #PF15-6-000

Dear Ms. Bose,

The following comprise the comments of Wild Virginia on the Notice of Intent to prepare an Environmental Impact Statement regarding the Atlantic Coast Pipeline and Supply Header projects proposed by Dominion Transmission, Inc. and Atlantic Coast Pipeline, LLC (80 FR 12163) under Docket #PF15-6-000.

1. The Federal Energy Regulatory Commission (FERC) must prepare an Environmental Impact Statement (EIS) that addresses the full environmental, socio-economic, cultural, historic, and environmental justice impacts of the Atlantic Coast Pipeline, the Supply Header, the Mountain Valley Pipeline, the Appalachian Connector Pipeline and any other projects recent, pending, or foreseeable in the same geographic area, or with similar, overlapping, or connected purposes.

The potential cumulative impacts of these pipelines include:

- Attracting industries that would increase the industrial land uses in the region,
- Attracting more interstate and intrastate pipeline expansion through the region,
- Encouraging the development of shale gas drilling throughout the region,
- Clearing of forest habitat on public and private lands throughout the region, including habitat occupied by endangered and threatened species,
- Increasing the region's greenhouse gas emissions,
- Reduction in ecosystem services to Virginia communities,
- Adversely affecting the region's air quality,
- Impacts on the regional economies,
- Impacts on the national forest lands in the region, including the loss of forest habitat and the disruption of forest habitat connectivity,
- Harm to water quality and watershed providing drinking water.

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2. FERC must develop and consider alternatives that will avoid or minimize cumulative impacts for the entire region, including alternatives that highlight:

- no action,
- increased energy efficiency,
- expanded use of renewable energy for any increase in energy supply,
- use of existing or upgraded natural gas transmission infrastructure,
- construction of new pipelines in existing rights-of-way,
- elimination of need to condemn land through eminent domain,
- selection among other new pipelines proposed to serve the same function as the Atlantic Coast Pipeline (ACP), and
- a route that is consistent with the Land and Resource Management Plans of the George Washington and Jefferson National Forests.

3. FERC must conduct a thorough analysis of the purpose and need for the ACP and all related projects based on complete demand analysis in the present and in the reasonably foreseeable future extending through the life of the pipeline.

4. FERC must conduct a thorough analysis that assesses public benefits v. public costs that includes a county-by-county analysis. Impacts analysis must include both the construction and implementation phases over the entire life of the pipeline with regard to effects on

- property values,
- existing business income,
- potential business investment,
- insurance rates,
- community character,
- historical and cultural resources,
- ecosystem services,
- community human health, and
- cost of emergency services.

5. Given the ACP is being built for “redundancy,” FERC must complete a full economic analysis of the extreme likelihood that the ACP will provide large volumes of natural gas for markets outside the domestic US through export at Dominion’s Cove Point and proposed Chesapeake export terminals.

6. FERC must conduct a thorough economic analysis that assesses private benefits v. private costs given limited liability and projected earnings over the expected life of the pipeline. Analysis should include projected economic benefits to both the Atlantic Coast Pipeline, LLC, and each of its constituent partners.

7. FERC must conduct a thorough analysis that assesses the associated impacts to water resources from:

- water withdrawals from hydrostatic testing,

- construction through rivers, streams, ephemeral streams, floodplains, and wetlands,
- construction, maintenance, and use of access roads,
- effects on water table and wells, and
- water quality from sedimentation and accidents during construction and over the lifetime of the project.

8. FERC must conduct a thorough analysis that assesses the potential impacts from construction, operation, and maintenance resulting from:

- karst geology,
- orographic uplift and stalling weather patterns, and
- landslides and erosion from talus slopes.

9. FERC must do a thorough analysis that assesses the potential impacts from construction, operation and maintenance on intact mountain and valley viewsheds and their effects on recreation and tourist economies and the Blue Ridge Parkway and the Appalachian Trail.

10. FERC must provide a qualitative assessment of greenhouse gas (GHG) emissions and consider the climate change impacts of the pipeline resulting from increased greenhouse gas emissions. GHG emissions will increase global warming potential, harming both the local and global environments and, specifically for this discussion, the George Washington and Jefferson National Forests. The impacts of global warming include increased air temperatures, changes in precipitation patterns, melting and thawing of global glaciers and ice, increasingly severe weather events, such as hurricanes of greater intensity, and sea level rise. Other impacts that have already occurred, and are expected to increase in the future, include more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, harm to water resources, harm to agriculture, and harm to wildlife and ecosystems. These have dramatic consequences in the George Washington and Jefferson National Forests, the largest carbon sinks in the Commonwealth, which will decrease their capacity to sequester carbon in the future.

11. FERC must consider in detail the potential for the ACP to contribute to climate change both directly from the pipeline itself as well as from indirect contributions from other sources over the life of the project, including:

- emissions from fossil fuels burned to provide energy for construction and operation,
- emissions from leakages in fracking, drilling and extraction operations and throughout the transmission system including compression stations, condensate, liquifacation and export facilities, and
- emissions from end use of the natural gas carried by the ACP.

12. FERC must analyze and evaluate the human health impacts from the cumulative analysis of related pipelines, infrastructure, and extraction. Fracking operations, pipeline infrastructure, and compressor stations are a significant source of methane, volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). Exposure to this

pollution can cause eye, nose, and throat irritation, respiratory illnesses, central nervous system damage, birth defects, cancer, or premature death.

In addition to the chemicals injected into wells, fracking also impacts water quality by releasing contaminants into the groundwater that were formerly bound within rock formations. Much of the brine brought closer to the surface by fracking operations contains very high levels of radioactive materials. Finally, fracking can create blowback from existing wells, increasing the levels of toxic agents released by those leaking or uncapped wellheads.

13. FERC must thoroughly analyze the impacts of forest fragmentation from the proposed project and all access roads that will be necessary as part of the project. The George Washington National Forest contains some of the last contiguously forested areas in the East Coast, particularly Shenandoah Mountain, and some of the highest biodiversity in the northeastern US. Large, linear corridors created by the ACP would permanently fragment these areas of continuous high-quality forest and increase forest edge. The fragmentation of such large continuous blocks of habitat has been recognized as one of the most pervasive threats to native ecosystems. Fragmentation results in significant, long-term impacts on species and communities both within and adjacent to the proposed pipeline corridor, including:

- habitat loss for forest interior species, including neotropical migrants and amphibians,
- loss of bear denning sites,
- loss of high quality mast production for wildlife,
- increased predation and parasitism,
- increased light reaching the forest floor, decreased moisture and organic matter levels,
- increased range and populations of non-native invasive species, and
- changes in soil chemistry, associated micro biota, and nutrient cycling.

14. FERC must analyze the negative impacts to native brook trout populations and related restoration efforts related to construction, operation, and maintenance of the ACP due to disturbance, sedimentation and increases in water temperature.

15. FERC must fully analyze the impacts to watersheds and drinking water resources, both from the George Washington and Jefferson National Forests and from all other local and regional water districts, wells and surface waters that serve residents, families, and communities, and all water users downstream of affected watersheds.

16. FERC must fully analyze the potential harm to protected, sensitive, rare, threatened and endangered species along or near the route. This would include the project's potential impacts to mammals, reptiles, birds, invertebrates, and fish, their habitats, and the ecological systems that link them throughout the entire project area or other areas affected by the project. This must include an evaluation of the direct and indirect impacts from the project, including those from construction, operation, and decommissioning. Impacts to terrestrial and freshwater biology from combustion of the

natural gas must also be analyzed in the EIS, including impacts from the project's contribution to climate change on terrestrial and freshwater biological resources. There are several federally protected species that may be impacted by the proposed project, including the following:

- Dwarf wedgemussel (*Alasmidonta heterodon*): endangered
- James spiny mussel (*Pleurobema collina*): endangered
- clubshell mussel (*Pleurobema clava*): endangered
- snuffbox mussel (*Epioblasma triquetra*): endangered
- Tar River spiny mussel (*Elliptio steinstansana*): endangered
- Indiana bat (*Myotis sodalis*): endangered
- Virginia big-eared bat (*Corynorhinus townsendii virginianus*): endangered
- Northern long-eared bat (*Myotis septentrionalis*): threatened
- American chaffseed (*Schwalbea americana*): endangered
- Michaux's sumac (*Rhus michauxii*): endangered
- Northeastern bulrush (*Schpus ancistrochaetus*): endangered
- Pondberry (*Lindera melissifolia*): endangered
- Rough-leaf loosestrife (*Lysimachia asperulaevolia*): endangered
- Running buffalo clover (*Triofolium stoloniferum*): endangered
- Shale barren rock cress (*Arabis serotina*): endangered
- Eastern prairie fringed orchid (*Platanthera leucophaea*): threatened
- Small whorled pogonia (*Isotria medeoloides*): threatened
- Swamp pink (*Helonias bullata*): threatened
- Virginia spiraea (*Spiraea virginiana*): threatened
- Virginia sneezeweed (*Helenium virginicum*): threatened
- Red-cockaded woodpecker (*Picoides borealis*): endangered
- Roanoke logperch (*Percina rex*): endangered
- Cheat Mountain salamander (*Plethodon nettingi*): threatened
- Madison Cave isopod (*Antrolana lira*): threatened
- Bald eagle (*Haliaeetus leucocephalus*)
- Golden eagle (*Aquila chrysaetos*)

17. FERC has exceeded its authority and failed to implement and facilitate the National Environmental Policy Act (NEPA) process as required. Specifically, FERC has failed to provide sufficient opportunities and information to the public to allow for relevant informed and timely comments and adequate public participation.

- The March, 2015 public scoping meetings did not provide an adequate opportunity for all interested persons to comment as evidenced in Nelson County where over 130 participants were denied an opportunity to speak due to insufficient time allotted by FERC organizers. There is also overwhelming evidence that the project applicant was allowed to provide speaking slots for proponents at a time when those slots were not available to the general public. Such a process creates an unbalanced and inaccurate record of public concerns.

The applicant is not entitled to special or privileged access in the FERC scoping process.

- FERC failed to provide an open house in Buckingham County, the location of the only proposed compressor station in the entire Commonwealth and, therefore, likely to bear some of the most significant environmental impacts. FERC has failed to respond adequately to Buckingham county residents and elected officials despite numerous requests to hold a meeting in Buckingham.
- FERC has also failed to respond reasonably to the public in their requests to extend the scoping period beyond the April 28 date. Significant changes to the proposed route of the ACP were made during the course of the scoping period, frustrating the public's ability to identify significant site-specific issues for consideration in the EIS. The scoping process was announced by FERC and began on February 27, 2015. On March 17, 2015, Dominion submitted a new application to the U.S. Forest Service for a special use permit to survey more than 30 miles of proposed pipeline routes in the George Washington National Forest that had not previously been identified. Those new proposals came after many of the public scoping meetings had already occurred and left insufficient time for the public to adequately identify the significant issues that might be implicated by the construction of the ACP along those routes.
- Additionally, ACP LLC only recently publicized alternative routes in Nelson County. Such alternative routes dramatically expand the number of persons who may wish to participate in scoping meetings, and yet those along the newer routes have had much less time to learn the FERC process and their public participation rights. Citizens raised that issue with FERC and requested an extension to the scoping period, so that the public might determine the scope and the significant issues to be analyzed in the EIS as required by 40 C.F.R. §1501.7(a)(2).

FERC is clearly failing its responsibility to provide an open, transparent, timely and effective process for public participation in implementation of the National Environmental Policy Act.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Ernie Reed". The signature is written in a cursive, slightly slanted style.

Ernie Reed, President  
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