

Scoping Submission

May 21, 2016

Re: CP 15-554 GWNF-6

Richard Watkins, 5574 Sam Snead Hwy., Hot Springs, Virginia 24445

My family owns property that is in the evacuation zone for the proposed route. It is on Deerfield Road just south of Scotchtown Draft Rd. While even minor adjustments could increase or decrease the effect on our property, my concern is whether this pipeline is needed at all. It will have negative economic and environmental consequences.

Since we have been requested to provide reasonable alternatives ('We will also evaluate reasonable alternatives to the proposed project or portions of the project, ... ' page 7 of the FERC mailing of May 3), I am assuming that FERC will be responding to these with a PEIS (Programmatic Environmental Impact Statement). The only way to evaluate the alternatives reasonably will be through regional evaluation. I certainly would not find it reasonable to begin with the assumption that the Atlantic Coast Pipeline (ACP) is the only alternative. There are already pipelines completed and under construction that could provide natural gas to Virginia and North Carolina. Due to peak demand concerns, it is not surprising that the present pipelines deliver barely 60% of their capacity. As seen with the Bath County Pump Station, peak demand can be spread out in creative ways. It would seem to me that an obvious option would be storage facilities near major users. This would be particularly easy for the major planned users of ACP natural gas, electric generating plants. The amount of electricity generated by coal or natural gas can be reduced by using renewable resources like solar. We are fortunate in Bath County to have a forward looking rural electric cooperative, BARC, which has begun a program to allow up to 25% of a customer's electricity needs to come from a solar garden run by BARC.

The modification of the ACP route to come through Bath County had earlier been rejected by ACP and Dominion Power which is managing the project. I would request that they be required to submit a detailed statement explaining how each of their earlier objections have been overcome. If there is new technology for laying pipelines, let us know how it makes navigating steep slopes and karst topography safe. Will welds be tested where they are made or after the pipelines have been placed in their final position? We have been told that on the steepest slopes the pipeline will need to be moved into place using winches placed at the top of the ridges. This would seem to put extra stress on the welds (and risk damaging the protective coating on the pipelines). This relates to the safety of pipelines. Last month alone, there were 6 natural gas pipeline explosions.

The construction phase of the pipeline will require extra caution to protect rivers from sediment pollution. The concerns apply to needed roads, staging sites and the actual right-of-way. This will last until the pipeline right-of-way has been stabilized by plants. The clear streams and rivers could be permanently damaged by even temporary sediment pollution.

With the steep slopes, erosion will remain a concern for the life of the pipeline. When we add the needed use of herbicides to control plants along the right-of-way, river quality is endangered in multiple ways. Herbicide use also endangers the organic status of existing organic farming and livestock operations. Organic agriculture is one of the options for improving the local economy. The local

community college, Dabney S. Lancaster Community College, has just begun a sustainable agriculture program. Will they be reimbursed for the costs associated with a program that suddenly has lost much of its local value?

The pipeline right-of-way will both divide natural habitats and provide a pathway for animals to migrate. Migration of deer from parts of West Virginia with the chronic wasting disease to Virginia will be facilitated.

One thing that I noticed as I photographed the Transco Pipeline in Buckingham County was the large number of clear-cut timber operations near the path. While the clear-cutting is a reasonable approach to timber management in a rolling terrain like Buckingham County, it will not work in most of our area. I have not had time, due to the shortness of the scoping period, to determine whether the land for these forests were purchased after the pipeline lowered property values. Timber management of this type also alters the natural habitat dramatically. The reforestation is extremely dense to maximize the amount of timber produced. This provides little of the diversity needed for a healthy ecosystem.

These are just a few of the concerns that need to be weighed against the advantages of the ACP.

Thank you for allowing the chance to present our concerns and for focusing on reasonable alternatives.