

## **Comments to the Federal Energy Regulatory Commission (FERC)**

### **Bath County High School Scoping Meeting, Saturday, May 21, 2016, Hot Springs, VA**

My name is Suzanne Reichel and I am commenting today on Docket #CP15-554-000, the proposed Atlantic Coast Pipeline (ACP). My husband and I are intervenors with FERC for this Docket number. Our family owns a farm at 8667 Mill Creek Road, Millboro, VA 24460 in Bath County. We are in the crosshairs of the ACP, specifically the “Major Route Alternative” known as GWNF-6 and the “Armstrong Route Variation” that affects the Deerfield Valley of Bath and Augusta Counties.

The ACP has dominated our family life ever since February of this year when we received an ominous white envelope in the mail. The GWNF-6 route alternative passes within approximately 100 yards of our home, barn, garage, pond, and stream on our 71-acre farm at the southern end of the Deerfield Valley. This farm is a family retreat and future retirement home and investment. It took two years of looking to find this farm. Ironically, Dominion’s mammoth electrical power lines running from its Bath County Pumped Storage Station, the “largest pumped-storage power station in the world” (Wikipedia), eliminated several other properties from consideration because of ruined views and safety concerns.

We were looking for a safe and beautiful place to enjoy family time with our four children and eventually to retire to enjoy the beauty of the George Washington National Forest, the clean air and water, pristine mountainsides, and small-town community life. If the ACP is built, our farm will be neither safe nor beautiful any longer, and its value will be reduced. Given our farm’s proximity to the National Forests, the Homestead, Snowshoe, Wintergreen, great trout fishing, and other prime recreational attractions, we thought our investment in Bath County would be a sound one. We never dreamed that the dictates of Dominion and its ACP partners would threaten us with the deadly force of a

42-inch high pressure natural gas pipeline and the devastation of its construction and maintenance just yards from our house.

Imagine tucking your five-year-old daughter into bed in a “blast zone or “High Consequence Area.” This would be the 1,100 feet (by conservative estimates) on either side of a 42-inch pipeline, an area within which “survival of an explosion would be unlikely” ([www.friendsofnelson.com](http://www.friendsofnelson.com)). Why would anyone do that? Why would anyone knowingly buy or own property in a “blast zone?” Certainly not us. Yet, our house, barn, garage, and almost all of our land would be within this zone if the ACP is built. Dominion would have us believe that the threat of living in a “blast zone” or “High Consequence Area” is not even worth mentioning or discussing. In spite of the large number of pipeline accidents on record throughout the world, Dominion ignores this threat to property owners in all of their mailings regarding the ACP, their public relations information regarding the ACP, and website, [www.dom.com](http://www.dom.com).

On April 29, 2016, Spectra Energy’s natural gas pipeline exploded in Salem Township, Pennsylvania. It devastated about 40 acres of farmland and sent a 24.5-foot section of 30-inch diameter pipe flying through the air for a distance of 100 feet. Twenty-six year old James Baker is still in the hospital with third-degree burns over 75 percent of his body from the environmental impact of Spectra’s pipeline. According to [www.friendsofnelson.com](http://www.friendsofnelson.com), Mr. Baker “was 1500 feet from this much smaller and lower pressure pipeline; the home burned completely. There was significant residential property damage at 1/2 mile from the explosion.” Photographs of this event are easily located on the internet and show an enormous fire, charred remains of trees, and a great deal of scorched earth. It looks like a war zone.

Please look into the total number of people, including school-age children, and the total value of property falling within the ACP’s “blast zone” or “High Consequence Area,” conservatively estimated at 1100 feet wide along both sides of the entire length of the pipeline. Natural gas pipelines can and do

explode. The ACP's explosive nature must be considered in any environmental impact statement. We are strongly opposed to the ACP's proposed alteration of our Deerfield Valley environment and the proposed introduction *against our will* of this agent of potential devastation to human life.

Compounding our safety concerns is the fact that our property lies in an area of karst terrain and high erodibility. Please consider the Virginia Department of Emergency Management's report on Landslides in Virginia's mountainous western counties which states, under the heading of "Landslide Risk to Energy Pipelines:" "Soil movement associated with landslides can destabilize the structural supports of pipelines, possibly leading to pipeline ruptures. In Virginia, landslides can be expected to occur in conjunction with other hazard events such as flooding or earthquake, which also pose independent risks to pipelines (see section 3.7 and 3.13)."

In addition to our environmental concerns about living in a "blast zone" next to a natural gas pipeline in karst soil, please consider the public safety necessity of having at least one feasible evacuation route in place for all affected stakeholders along the proposed ACP route. The "Evacuation Zone" for a 42-inch natural gas pipeline is the approximately 3,583 feet on either side of the pipeline; this is the area within which "an unprotected human would need to move beyond in order to avoid burn injury in the event of an explosion or fire following a leak" ([www.friendsofnelson.com](http://www.friendsofnelson.com)). Our entire property is in the "Evacuation Zone" for the ACP according to the Environmental Mapping System on the website for the Dominion Pipeline Monitoring Coalition: <https://dpmc-gis.maps.arcgis.com/apps/webappviewer/index.html?id=86d265defe5543c095cc5b8c5ff9dbe6>

In our case, at the present time, there are three ways out of our immediate area by car. Incredibly, the proposed ACP route manages to cross all three evacuation routes in relatively close proximity to our home leaving us without a single reliable way to evacuate the area. We are essentially surrounded on

three sides by the ACP's Armstrong Variation, with the pipeline now proposed to run over 6/10 of a mile along our entire property line to the east, just yards away from our house.

We are also alarmed by the environmental threat of the ACP to our farm's clean water. When we first saw our farm, we were so happy about its beautiful spring-fed pond and stream. Now, given that we are in a documented karst area, our risk of water source contamination and destruction because of our proximity to the ACP route are great. To the south of our property, the proposed ACP route crosses at a high elevation such that runoff from pipeline construction and maintenance threatens our well, spring, spring-fed pond, and stream that flows into Mill Creek. We would be at increased risk from pollutants discharged into the environment during the various phases of pipeline work, sedimentation caused by runoff due to the destruction of thousands of trees, and disruption of the natural paths of spring water from Chestnut Ridge. There are many sources of energy that can heat water, but there is no substitute for water itself. To quote the late clean water advocate Terry Greenwood of Pennsylvania, "Water is more important than gas."

Dominion is so deep in denial about the real risks posed to homeowners by the ACP that one of their representatives made the stunning statement to me in a March 17, 2016 phone call that "our property is no longer impacted" by the ACP (because of the Armstrong variation). Although it is true that the *view* from our house and construction runoff into our pond should be less affected by the Armstrong variation, our safety and evacuation prospects and overall water quality concerns have not changed.

Even the Federal Emergency Management Association (FEMA) acknowledges on its website ([www.fema.gov](http://www.fema.gov)), when discussing "Hazard Mitigation Planning," that "pipeline accidents do occur, and the impacts to the community can be devastating."

There is no track record for a 42-inch natural gas pipeline in steep and rugged karst terrain anywhere in the United States. No matter what Dominion says about karst terrain being no obstacle to pipeline construction, they have never undertaken a project like the ACP before. We do not want to be guinea pigs here in Bath, Highland, Augusta, Nelson, Pocahontas, Randolph and other affected counties of Virginia and West Virginia. Bath County is a beautiful, highly-regarded tourist area.

We strongly object to becoming a “sacrifice zone” for the Atlantic Coast Pipeline. (For a pertinent analysis of “sacrifice zones” in America, please see *Days of Destruction, Days of Revolt* by Chris Hedges and Joe Saccio, published in 2012.) To give Dominion and its ACP partners the power of eminent domain over us to enrich themselves would be unfair, un-American, and a gross misuse of the principles behind eminent domain. Dominion’s self-serving claim that there is a public need for the ACP is being refuted more and more every day.

**In addition to these arguments against the ACP, I would like to make three brief but important statements:**

- 1) We bought our farm here because we were attracted to the beauty of the George Washington National Forest (GWNF) and were interested in being a part of enjoying it and advocating for it. **We urge the USFS to deny a right of way for the ACP. We are strongly opposed to a “right of way grant” to allow the ACP to cross and occupy National Forest lands.** The GWNF was formed almost 100 years ago to protect these pristine and priceless acres from development. The ACP threatens water quality both for the immediate Forest area as well as for population centers miles away that depend on it. Both the Atlantic Coast and Mountain Valley Pipelines threaten rare species, fragment habitat, isolate wildlife populations and increase forest edge. Pipeline construction mandates large clear-cut areas for perpetual maintenance. We are sure this involves

increased foot and vehicle traffic to keep these wide thoroughfares clear. These unnatural scars fragment the forest into smaller pieces and allow for the invasion of non-native species and disease. They threaten fragile karst topography and degrade scenic and recreational values.

- 2) **We support the denial of any amendment to the GWNF 10-year-plan to allow the ACP to cross the GWNF.** Any “utilities” need to comply with designated utility corridors already established for the abovementioned reasons and more.
  
- 3) **We respectfully ask that FERC conduct a Programmatic Environmental Impact Statement (PEIS) for the ACP and the other pipeline projects pending before FERC that affect the larger Allegheny-Blue Ridge area by transporting natural gas from the Marcellus and Utica Shale regions.** To consider each of these pending pipeline projects individually, as if “with blinders on,” ignores their cumulative impact that is only evident when they are considered in together, with “blinders removed.” A PEIS would provide citizens and FERC with an overall, more realistic look at all the facts of the situation to best serve the public good. The Institute for Energy Economics and Financial Analysis (IEEFA) recently published a report concluding that two natural gas pipelines proposed for construction from West Virginia into Virginia and North Carolina (ACP and Mountain Valley Pipeline) are “indicative of a rush toward industry overbuilding” ([www.ieefa.org](http://www.ieefa.org)).

As intervenors with FERC, my husband and I have spent countless hours reading government documents, newspaper articles, academic reports, FERC filings, etc. in an effort to educate ourselves about the environmental, economic, and other impacts of the proposed ACP. The more we read, the more we are convinced that America’s future lies with renewable energy sources rather than polluting

fossil fuels such as natural gas. To embrace this highly destructive and dangerous project to enrich Dominion and its Atlantic Coast partners at the expense of future generations is foolish. The fact that Dominion arrogantly announced to the media in March 2016 that steel pipe production was about to begin in April for the ACP is evidence enough of the way they view these scoping meetings and the FERC approval process. Our family still has faith in the process, and we hope that our pleas fall on honest ears at FERC. We respectfully ask that our concerns be heard and taken seriously so that the ACP's application for a Certificate of Public Convenience and Necessity will be denied. I am sure that if you were in our shoes, you would feel the same way.

And what would be the impact of not building the ACP? Existing pipelines would continue to carry away fracked gas from the Marcellus Shale region to users around the country. But in the GWNF, there would be a world of difference for all Americans to come and enjoy. Thank you for your time and consideration today.

Sincerely,

Suzanne S. Reichel

[the.reichels@comcast.net](mailto:the.reichels@comcast.net)

(804) 784-0505 (1301 Manakin Road, Manakin-Sabot, VA)

(540) 939-4059 (8667 Mill Creek Road, Millboro, VA)

(804) 301-5175 (cell phone)

