March 31, 2017

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Nathaniel J. Davis, Sr.
Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Floor 1A
Washington, DC 20426

Re. ACP Docket Number CP15-554

Dear Mr. Davis, FERC Commissioners, and Citizens of the United States of America:

I am writing you to comment on the Draft Environmental Impact Statement (DEIS) for the proposed Atlantic Coast Pipeline (ACP). My numbered comments will include a range of general overview statements and specific. It will also inflect emotion, passion, and my Christian faith in some of my comments even as I am aware that FERC may be dismissive of these feelings.

Maps will be appended at the end of these pages of my comments.

As public servants, FERC ultimately should be beholden to justice. I expect and respect integrity.

A. My Personal Connection as a Stakeholder.

Our house is less than 600 yards from the proposed ACP. (See maps at end of this document)

In 1975 neighbors sold 9.3 acres to my wife and me. At the time we were in our mid-twenties and embarking on our careers. We were thrilled to adjoin the Monongahela National Forest! “What an amazing place to hike, hunt, appreciate nature, extoll the scenic beauty, and rejoice in this special place!” Although we had grown up in semi-suburban Midwestern communities, and probably could

have earned much more income in such communities, the allure of this special place in nature drew us here to build our house, raise our four wonderful sons, and altruistically serve our community as well as utilize our professional skills in teaching, social work, and administration for these past 40 years. I have a BA in Biology with an emphasis in ecology and a MA in Theology with a specialty in public policy. Currently I am president of a local advocacy group, *Eight Rivers Council*, and co-founder and coordinator for a regional faith-based environmental justice organization, *Christians For The Mountains*.

The small intermittent stream that comes off the Monongahela National Forest into our property is the northern-most head of Knapps Creek, which would be crossed by the proposed ACP route about 500 yards south of our property line. The proposed ACP route courses east through the national forest along a narrow path that I and my sons have walked, hunted, and enjoyed for four decades. I know it so intimately well, and admit to nostalgia, for the ACP would massively alter it. The path is narrow with steep slopes on each side, and then drops down into a deep narrow valley before rising again to the ridge line (and state line) of Allegheny Mountain—a place where I've recently helped conduct nesting bird studies for Cornell Lab of Ornithology. I am also personally familiar with the narrow strip of the Monongahela to the west of me and then as it abuts Seneca State Forest on very steep-sloped Michael Mountain. I have intimate knowledge of these sections where the ACP route is proposed. Our well water comes from the Michael Mountain range, according to our well-driller. Our water is low-flow but has been consistent and reliable for these 40 years.

Comments and Recommendations:

1. As I've just mentioned, the proposed ACP route lies 600 yards from our house and maintains that distance for about ¼ mile as it circles behind us in the national forest and then easterly along a favorite steep-sided trail for ½ mile before dropping off precipitously and steeply down the mountain. I know this area intimately**. DEIS p. 4-373** states that *"the removal of vegetation and trees in High SIO areas for the right-of-way, access roads, and ATWS would create visual alterations and contrasts that are visible on the landscape."* This part of the national forest is graded for scenic value as high and medium-high, per TABLE 4.8.9-14. And adjacent state and private lands are similarly scenic, including our neighborhood view shed. <u>This scenery devaluation would negatively affect our enjoyment and the reason that we moved here and financially struggled to build our modest but nice home, and which likely will negatively affect our property value.</u> **<u>If the ACP is built, we will request our county assessor to reduce our property tax.</u>**

2. According to a local real estate agent, sellers must inform prospective buyers of nearby pipelines. In highly scenic rural areas such as Pocahontas County, West Virginia, property values are highly correlated to high quality scenery. **Those of us who are impacted by scenic degradation from a pipeline should be compensated by the ACP.** The pipeline would change the aesthetic qualities of the region. Residents and visitors would see the pipeline corridor as a break in a once completely forested hillside, and the lower aesthetic quality would translate into further loss of value for properties from which the corridor is visible. In this study, that effect is captured as lost aesthetic value under the heading of ecosystem services.

I challenge the Dominion/ACP's study that determines no property value effect by a pipeline. I charge that their study was conducted in areas where scenic value is a low priority, while accessibility to workplaces, shopping, and educational institutions are higher priority and value. In my county as well as neighboring counties, high scenic value is our strongest suit. Views of mountain forested ranges marred with a wide grass pipeline strip would negatively affect property owners' quality of life and property sale value. Studies such as Key Logs, Economics, shows this fact for large pipelines. **I request that FERC provide a more intensive and objective study of property valuation in high scenery areas. And diminution of scenery-related values of property owners should be compensated by ACP. The Dominion-sponsored economic studies are NOT objective and does not consider rural areas whose economy derives significantly from its scenery.**

3. As with many of our neighbors, our home is within the pipeline **Blast Zone.** We are outside the "High Consequence" (Incineration) Zone of 1100 feet on either side. At the closest point our home is about 1700 feet from the pipeline. On the other hand, the Evacuation Zone extends 3,583 feet on either side, and is defined as an area 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. The proximity of this proposed pipeline would not only cause us unnecessary risk, but be unfavorable to our selling our property without negatively affecting the price. We would need to declare to any potential buyer that our property being in the Blast Zone.

Therefore, I request that every home dweller within the Blast Zone of the proposed Atlantic Coast Pipeline be given certified written notice of that their vulnerability.

Forest Fire potential is a serious concern that is not directly addressed in the DEIS. The region which we live in is heavily wooded with steep rugged terrain and limited access. A pipeline blowout in most of

the terrain in my Pocahontas County, for example, would pose a high likelihood of a massive uncontrollable forest fire fueled by highly-pressurized large quantities of natural gas. No nearby rescue or fire-fighting unit is capable of engaging such a conflagration. Isolated peoples might find escape impossible. Vast swaths of land would be ruined. Our economy would be seriously impacted. **I request that FERC direct a plausible forest fire fighting plan, evacuation routes, training and equipping local and regional emergency personnel, and developing an emergency protocol.**

I have heard rumors that pipe laid along a route in rural areas is thinner-walled than the pipe as it goes through urban and higher population concentrations. If this is true, rural lives are of less value and therefore the citizenry is being treated inequitably. Furthermore, much of the rural terrain proposed for the ACP is very rugged and steep-sloped with high potential of landslides (DEIS, p. 4-25). Is there a heightened possibility of gas pooling in the low spots in deep valleys between mountains and exceeding pipeline pressure limits? **I request that all pipeline throughout the ACP route be the same standard.**

4 . Into the adjacent George Washington National Forest, we drive along Rt. 84 every week to Church. According to **TABLE 4.8.9-16, mile posts 83.9 through 86.9** are graded "Moderate" for scenic value. Yet almost all this area is highly visible from Rt. 84 and is breathtakingly stunning in beauty**. It should be rated "High." A pipeline would visibly degrade this extraordinary view.** Please see for yourselves!

5. **DEIS page 4-25** points out that **73%** of the ACP route in West Virginia *"cross areas with a high incidence of and a high susceptibility to landslides"* (4-25), which ACP still has not determined how to satisfactorily construct. 82% of the 5 mile route through the Monongahela National Forest would be on ridges. 18% would be on side slopes which *"are susceptible to natural landslides, and thus, the potential for project-induced landslides (cut slope and fill slope failures) is high. Because of the steep slopes, there is potential for failure of trench backfill and the backfill in the rest of the temporary right-of-way."* (4-35). Further on we read, *"small fills on steep slopes can produce catastrophic debris flows. During a rainstorm, when a fill slope slumps or slides downhill and liquefies into debris flow, the debris flow has a "snowball effect" that increases the debris flow volume and destructive power as it gouges downslope scraping off and incorporating colluvium, weathered bedrock, trees, stream banks and bedload."* (4-36). I will point out the heavy flood rain in June and then again a few months later a record 8-inch rainfall in this section of the ACP-routed section of the Monongahela National Forest. A walk up Bird Run (USFS) near Rt. 84 visibly shows the massive debris washed out from flooding even with no recent logging or

land disturbance. The steep slopes, thin erodible soils, and high potential of rain deluge portend serious degradation of fragile lands and streams.

ACP claims that it will use "Best In Class Steep Slopes Program" to minimize landslides and sedimentation. Yet the ACP would pose an unprecedented challenge building this magnitude of a pipeline in our rugged, steep-sloped, wide elevation-differential, heavy precipitation, karst-ridden terrain (and this according to a Dominion-hired consultant I talked to). How can we be sure that the ACP can indeed meet quality standards without demonstrating proof**? Please require ACP demonstration projects that prove these steep slopes can be protectively stabilized throughout the construction process and during operations, including scenarios of severe weather, to prevent landslides and sedimentation runoff.** I understand the United States Forest Service is requesting such proof for national forest lands, which I support. In addition, all property neighbors to the proposed ACP should expect the same proof. Again, to emphasize and quote the DEIS, 73% of the ACP route in West Virginia *"cross areas with a high incidence of and a high susceptibility to landslides"* (4-25). I emphasize that any landslides connected with the construction of a FERC-approved ACP cannot be blamed on "an Act of God," but rather squarely upon FERC approving and ACP partners' constructing. This pipeline should not be built in this type of terrain!!!

6. I want to draw your attention to **Seneca State Forest**. The proposed ACP would cross 4.8 miles of the Seneca State Forest, and would entail at least twice that in access roads including heavily-traveled tourist roads along with a half-mile new construction on steep-sloped, scenic Michael Mountain that happens to be in our view shed beginning about 1000 yards from our home. Our well water comes from that mountain's watershed. **The Seneca State Forest is not going through the open FERC process but rather through private secret negotiations with ACP/ Dominion Resources.** Mr. Gary Foster, the chief negotiator for Seneca State Forest, told me that West Virginia law does not require an open process, unlike that of custodians of national public lands. The Conservation Fund has purchased 1200 acres from the Boy Scouts of America of land adjoining Seneca State Forest, paid for by $1.7 million by Dominion, in what appears would be a land swap mitigation, presumably in anticipation of the following:

> In the DEIS 4-316, the proposed ACP would significantly impinge upon the Allegheny Trail administered by the National Park Service because it was developed with Land and Water Conservation Fund (LWCF) dollars and would trigger a section 6(f)(3) conversion in accordance with 36 CFR 59.3. Section 6(f)(3) of the LWCF Act that requires that no property acquired or developed with LWCF assistance shall be converted from public outdoor recreation uses without the approval of the Secretary of the Department of the Interior; only if he/she finds it to be in

accord with an existing Statewide Comprehensive Outdoor Recreation Plans; and as necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location (36 CFR 59) (LWCF, 2008).

I am protesting the undemocratic manner of secrecy in which such negotiations of OUR state public lands are being worked out. I ask FERC request all negotiations and deals that Dominion and agents of the state of West Virginia are conducting on Seneca State Forest, and that this information be given to the public with at least a 30 day comment period to respond.

7. **Michael Mountain, which is on Seneca State Forest has karst.** Streams do not run off Michael Mountain but emerge near the base, which might indicate high percolation. The massive spring at Mountain Quest near Frost, WV comes from the southern base of Michael Mountain. Our well-driller told us that the iron content of our water points to its source as Michael Mountain. Because of the secrecy of Seneca Forest negotiations with Dominion Resources/ACP, the public has had no opportunity to ascertain whether karst is being considered. Therefore, **I request that a full assessment of Karst in Seneca State Forest and all of Michael Mountain be conducted prior to any EIS and included on any EIS, including underground water impact.**

8. **Clover Lick Mountain** is a region in my Pocahontas County that is inadequately and deficiently addressed in the DEIS. This region exemplifies many other deficient or inadequately addressed areas throughout the more rugged proposed ACP route. I make a few comments that should be addressed.

The proposed Atlantic Coast Pipeline would cross Clover Lick Mountain (4,000 feet), descend into the upper headwater area of Clover Creek, and ascend Gibson Knob (4,400 feet). Extensive access road construction on steep slopes will also be required in this area. The Clover Creek, Clover Lick Mountain, and Gibson Knob area presents extreme challenges for pipeline construction due to steep slopes, high-excavation requirements, highly erodible and slip-prone soil, and the presence of interconnected karst ground water. The same risk factors are present at many other locations along the proposed ACP route. ACP has not provided comprehensive Erosion and Sedimentation Control plans (ESC), but only partial and only recently submitted.

Storm water management, during and post-construction, is critical for prevention of long-term erosion, slope destabilization, stream channel alteration, and degradation of stream habitat. ACP apparently contends that storm water management plans are not necessary, and the issue is not addressed in the

DEIS. **I request comprehensive, plausible, provable storm water management plans for the Clover Lick area and all other similar rugged mountainous terrain throughout the proposed interstate route, including pipeline corridor, access roads, stockpile yards, and staging areas.**

West Virginia ESC requirements specify placement of slope breakers at 75-foot intervals for slopes greater than 25%, but acknowledge that installation is difficult on slopes greater than 35%.6 A substantial part of the ACP construction corridor, including in the Clover Creek area, has slopes exceeding 40% where installation of slope breakers is not practicable. **I request that ACP disclose its proposed demonstrable methods for controlling runoff on such steep slopes.**

FERC did not address issues and questions in the DEIS that were raised during the Scoping Period for sedimentation, erosion, and stream siltation related to Mauch Chunk soil. This soil is prevalent in much of the Clover Lick area, and is considered the most sediment-prone soil in the Monongahela National Forest. **I request that ACP submit a provable Best Management Practices Plan, following thorough survey of this region.**

I request independently-conducted dye tracing to establish karst interconnection in this region, and that results prioritize protecting drinking water.

My personal examination of the proposed corridor near to and crossing the Greenbrier River gives me concern. From the west end, the proposed corridor drops sharply, almost vertically down perhaps 50 feet to the Greenbrier River Trail adjacent to the river, and then more gradually to the river. **I request a provable construction plan for the proposed pipeline to drop so precipitously to the river.**

I understand that the proposed ACP corridor follows about 19 miles of ridgeline and spurs in West Virginia, and a corresponding 19 miles in Virginia. Construction of a massive pipeline corridor and pipe trench on these narrow ridgelines would require significant “mountaintop removal” excavation to flatten sufficiently to construct and maintain**. I request detailed provable and workable Best Management Plans that addresses the use of explosives, the disposal or repositioning of overburden, and storm management, final grading, and revegetating.**

9. The DEIS (4-7) lists species that potentially could be adversely affected by the ACP**. I would urge the inclusion of another species, the Timber Rattlesnake (*Crotalus horridus*).** This species is the only rattlesnake found in the national forests in West Virginia and Virginia. The West Virginia Legislature has designated this species as the state reptile. **The Timber Rattlesnake is listed as a species of concern on the Monongahela National Forest.** I know from personal observation as well as many reports of neighbors that the Timber Rattlesnake is surviving in proximity to the proposed route of the ACP. Michael Mountain in particular is noted (with notoriety by some) for its population of Timber Rattlesnakes. The top ridgeline of Michael Mountain, which is in Seneca State Forest, is rock-cropped with numerous deep crevices for denning. I have also observed Timber Rattlesnakes on the crest of Allegheny Mountain where the George Washington National Forest and Monongahela National Forest meet. This rattlesnake uses scent trails to return to its den and follows the scent trails of its prey. Habitat destruction is the greatest threat to this species. I and many other nature lovers carefully enjoy this rattlesnake. A massive pipeline construction project along with any construction of access roads could likely have a negative impact on this uncommon at-risk species. **Although I recognize that TABLE 2.3.1-1 addresses *Crotalus horridus* in its Snake Preservation Conservation Plan, I believe this area that I have mentioned, especially Michael Mountain, needs more intensive study especially in locating vulnerable denning areas that might be impacted during construction in November through March.**

10. I do not see any sources identified for the water to be used in dust suppression or pipeline testing. I draw your attention to the area in proximity to the state line of West Virginia and Virginia that is sometimes known as the Eastern Continental Divide. All water in Pocahontas County, West Virginia and in Highland County, Virginia, flow out. Water quality is high, but volume is low since streams are just birthing. Large volumes of water, especially in dry weather periods when dust suppression might be needed, might be in short supply. **Please identify in any EIS where all sources of water for the ACP would be drawn from, and demonstrate that the volume of water drawn would have no ecological impact.**

11. **I do not see specifics in reference to "imported soils"** that involve place of origin and projected volume. (2-49) This includes both topsoil and backfill. What kinds of soil are in mind? What is the plan regarding the soil and other overburden that is removed during construction of access roads and pipeline right-of-way and trench? Will it be contoured into the landscape (as the DEIS might infer) or trucked away to be deposited somewhere, or dumped over the hill?

I request that all USFS soil standards for the national forests at a minimum be applied to all private and public land throughout the ACP route. See 4.2.7.1 Forest Service Soil Standards (4-58 and following pages)

12. Invasive species traveling through the ACP corridor is addressed in the DEIS. One method of suppression involves herbicides. I raise the question to ensure that herbicides are applied according to law so that vulnerable watersheds, farms and gardens, and desirable species are not degraded. Hand culling of undesirable species should be the preferred method. I disapprove aerial spraying due to drift and ask these considerations be included in any EIS. In an additional comment, I will note that the ACP would have a negative impact upon our heavily forested terrain in that it would increase forest to edge ratios which is detrimental to numerous animal species as it increases predation.

13. The DEIS appears to give the National Forest lands stricter environmental standards and requirements, however this amount of care is not being shown on equally sensitive private property or state public lands (see my points 5, 6). National Forest standards should be used throughout the length of the ACP. Sensitive species do not stop at the National Forest boundary. All soil, water, karst, archeological, wildlife, sedimentation, landslide impacts are important whether or not they are on public lands. **Please require the entire ACP project to hold to the national forest standards at least in similar geological terrain and ecological biome. This would include all steep slopes which would be highly susceptible to landslides and sedimentation into streams.**

14. I am concerned with the relatively lack of specifics given to access road, pipe laydown yards, man camps, potential construction crew waste materials, and construction noise and dust and haze from burning logs, and traffic congestion. To restate, our house is within 600 yards of the proposed ACP. Furthermore, the geology of my local mountain terrain involves very shallow soils over hard rock. I presume this will indicate extensive trench blasting which can be harsh on the soil, disruptive to species, and bothersome to neighbors. The hours of blasting, extent of blasting, and safety precautions of blasting need to be listed with public input in every locale. I find blasting in the DEIS only with respect to waterways, not rocky mountain geology.

15. It is outrageous that my Pocahontas County, WV, will receive zero gas, zero permanent employees (4-392, Table 4.9.2-4), very little property tax that will be more than offset by devalued properties, and

yet incur long-term consequences including loss of scenic and ecological quality-of-life, less tourism business and property development, and the inconvenience of construction. This is a blatant exploitation of a low-population county (and neighboring ones, too) to be an energy sacrifice zone for the profit benefit of private investors.

I understand that existing pipelines and existing supplies of gas are already available for the areas and businesses that the ACP purports to serve**. I demand that FERC consider the total available gas infrastructure and current and projected gas availability for the target North Carolina and Virginia for domestic markets, and deny the ACP if these needs are met!!!**

IF any of this gas, or that which enables a comparable surplus due to the tied-in infrastructure, if any of this gas is liquefied and exported overseas, then eminent domain under the Bill of Rights, Article 5, is violated, and FERC should be held responsible.

Furthermore, I demand that FERC take into account economic studies on pipeline projects in our area such as that of Key-Logs Economics, which is commenting on this DEIS. I challenge the objectivity of the Dominion- commissioned two economic impact studies to assess the economic impact of construction and operation of ACP. (4-407)

16. Local roads will be negatively impacted by heavy machinery and materials yet the mitigation for this is simply to have "Atlantic coordinate with appropriate transportation authorities to assess the need for road repair". (4-401 4.9.6) In addition, the access roads in my nearby Seneca State Forest are heavily used by tourists, which will impact their use. **I insist that repairs must be done in a timely manner with full payment by ACP.**

17. I take issue with the DEIS on its dismissive language regarding cumulative impacts as "not significant." (4-487) Even though the DEIS admits permanent damage and loss, the DEIS makes a subjective claim of "not significant." Well, I'll make an objective claim that it "is significant." For my family and neighbors certainly as we would live within a half mile of the construction, permanently in a Blast Zone, and have degraded scenery and subsequent property devaluation. Sad!!!

I request FERC to provide objective criteria of what constitutes unacceptable cumulative impact, and historical precedents when FERC has insisted upon unacceptable cumulative impact.

18. Climate Change is discussed in 4-509 and following. This is the paramount reason I oppose the ACP and other gas infrastructure (and coal for that matter). This is life and death for God's creation (or the

Earth's inhabitants' stability). Leakage from the methane cycle of extraction and conveyance coupled with its combustion emissions may contribute more to climate change than even coal. (Dr. Robert Howarth and others). It is urgent that major countries shift quickly and thoroughly to energy conservation and clean energy! The ACP is projected to cost over $5 billion, so to recoup that investment the investors would use their deep pocket resources to bend political and market forces to maintain their gas-based economy rather than risk stranding the ACP asset.

In addition, the ACP would pressure further development and exploitation of shale gas through unconventional horizontal hydraulic fracturing (fracking) which is harmful both ecologically and health-wise and community-wise. God buried the gas, let it stay there. The gas won't run off. This present generation does not need to be so selfish as to grab all the world's fossil fuels.

Let me emphasize that the ACP would lock future generations further into a bleaker future. This is intergenerational theft, and theologically, it is sin.

19. **The Socioeconomics section (5-20) is overly broad.** There is no mention of impact upon our tourism here in my Pocahontas County, or the new housing construction that is related to our stunning scenery, or any of what I understand to be hundreds of comments written from the hearts and souls of people who live upon their lands. For FERC to brush off these sentiments in obvious favor of this ACP is heartless, crass, and mutinous to us citizens. We cherish the land. ACP investors see the land and its inhabitants only as an inconvenience to overcome in its greed for money. Jesus taught that to love money is to hate God (Matthew 6:24).

20. **FERC cavalierly dismisses Alternatives.** To quote the DEIS, (5-26)
"We also conclude alternative energy sources, energy conservation, and efficiency are not within the scope of this analysis because the purpose of ACP and SHP is to transport natural gas. The generation of electricity from renewable energy sources, or the gains realized from increased energy efficiency and conservation, are not transportation alternatives."

Okay, so how do we address alternative energy in lieu of a pipeline? FERC is it for thumbs up or down on the ACP! And FERC is energy-industry funded. And FERC is obviously from historical precedent complicit with that industry, and will no doubt approve the ACP. And I as a common citizen am to accept this sham?

21. I presume that most employees of the Federal Energy Regulatory Commission are upstanding, honest, community-caring individuals. I will not disparage the personal character and integrity of any of the staff or agents of FERC. However, there seems to be pressure for FERC agents to conform to a political agenda that biases toward approving pipelines. This systemic characteristic of FERC is disconcerting. Please understand the time, research, energy, through heart-aching worry that many citizens have taken to comment on this DEIS as well as the scoping meetings and myriads of community meetings. While undoubtedly FERC has received many industry-driven "post cards" in support of the ACP, please remember the people who live in the energy sacrifice zones that oppose the ACP for reasons close to their heart. If profit is the highest card in the deck, so to speak, our nation is in serious trouble. As a nation we do well to love our neighbors, care for and enjoy God's beautiful and marvelous creation, and humbly live out values that transcend commodities and money.

On February 3, 2017, outgoing FERC Commission Chairman Norman Bay issued a statement, Order Granting Abandonment and Issuing Certificates, one week after tendering his resignation to new President Donald Trump. **I quote extensively from Mr. Bay's "Separate Statement" letter, with my emphases in bold type:**

> *"I write separately to encourage the Commission to build on the progress that has been made to date and, in particular,* ***to explore two other issues****."*
>
> *"One is how the Commission establishes need in doing its certificate reviews under section 7(c) of the Natural Gas Act. The certificate policy statement, which was issued in 1999, lists a litany of factors for the Commission to consider in evaluating need.* ***Yet, in practice, the Commission has largely relied on the extent to which potential shippers have signed precedent agreements for capacity on the proposed pipeline.*** *This is a useful proxy for need, because presumably shippers would not sign up for capacity unless it was needed.* ***But focusing on precedent agreements may not take into account a variety of other considerations, including, among others: whether the capacity is needed to ensure deliverability to new or existing natural gas-fired generators, whether there is a significant reliability or resiliency benefit; whether the additional capacity promotes competitive markets; whether the precedent agreements are largely signed by affiliates; or whether there is any concern that anticipated markets may fail to materialize.*** *As an example of the latter consideration, LNG import terminals that were built*

during the early 2000 time period became stranded as shale gas increasingly substituted for LNG imports from overseas."

"There are other long-term issues that weigh in favor of examining whether other evidence, in addition to precedent agreements, can help the Commission evaluate project need. It is in the public interest to foster competition for pipeline capacity but also to ensure that the industry remains a healthy one, not subject to costly boom-and-bust cycles. ***Pipelines are capital intensive and long-lived assets. It is inefficient to build pipelines that may not be needed over the long term and that become stranded assets. Overbuilding may subject ratepayers to increased costs of shipping gas on legacy systems. If a new pipeline takes customers from a legacy system, the remaining captive customers on the system may pay higher rates. Under such circumstances, a cost-benefit analysis may not support building the pipeline.*** *Adding to the uncertainty, there is fluidity in where gas is being produced in the United States. Some of the first-producing shale plays have already seen output decline as lower-cost basins, like the Marcellus and Utica, gained prominence. Production areas are being discovered that may impact gas flows on existing and proposed pipelines. For decades, pipeline flows generally went from south to north and west to east. Production in the Marcellus and Utica led to flow reversals, with gas being transported from east to west and north to south. What happens to infrastructure developed to ship Marcellus and Utica gas west, if gas is cheaper to produce in Texas and Oklahoma? To the extent that producer-shippers are driving the development of new infrastructure, pipeline developers may now be exposed to market risk not present with shippers that are local distribution companies with a reliable rate base and predictable revenue stream. Similarly, it is important to ask what happens if basis differentials largely disappear at major gas trading hubs across the United States. A shipper would not need to transport gas from a more distant hub if it can be readily obtained for the same price from a closer one. This, too, might reduce the revenues of large interstate gas pipelines."*

"Even if not required by NEPA, in light of the heightened public interest and in the interests of good government, I believe the Commission should analyze the environmental effects of increased regional gas production from the Marcellus and Utica."

22. **For FERC to approve this ACP will create further division among our citizenry, further distrust of our money-influenced government, and increased citizen anger that will result in protests, blockades, and other (hopefully nonviolent) resistance.**

I implore you to deny the Atlantic Coast Pipeline.

<u>As I stated at the beginning, I will make objective comments and subjective emotional content. That is what makes us human beings.</u>

I will reserve further comments.

Sincerely

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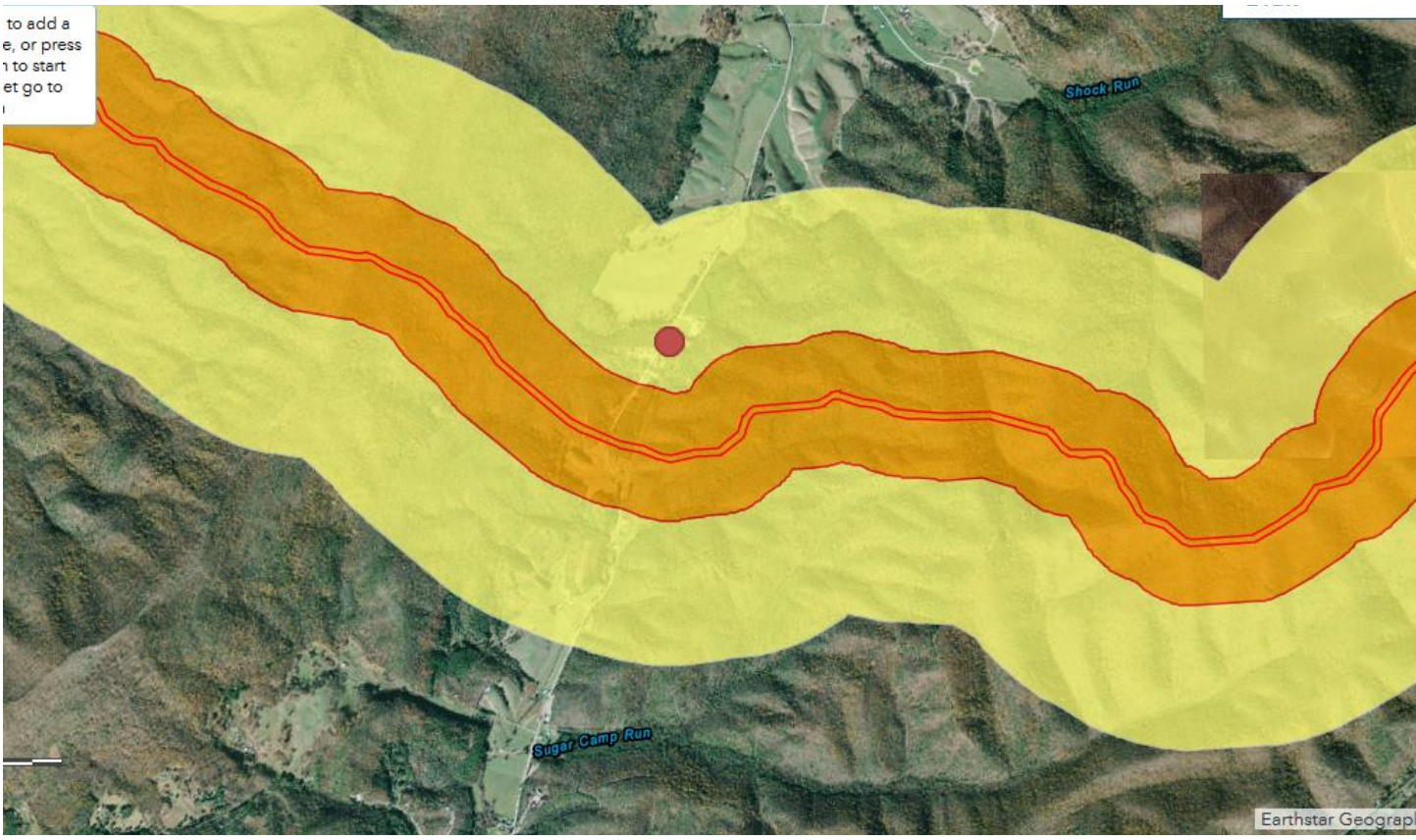
Cc.

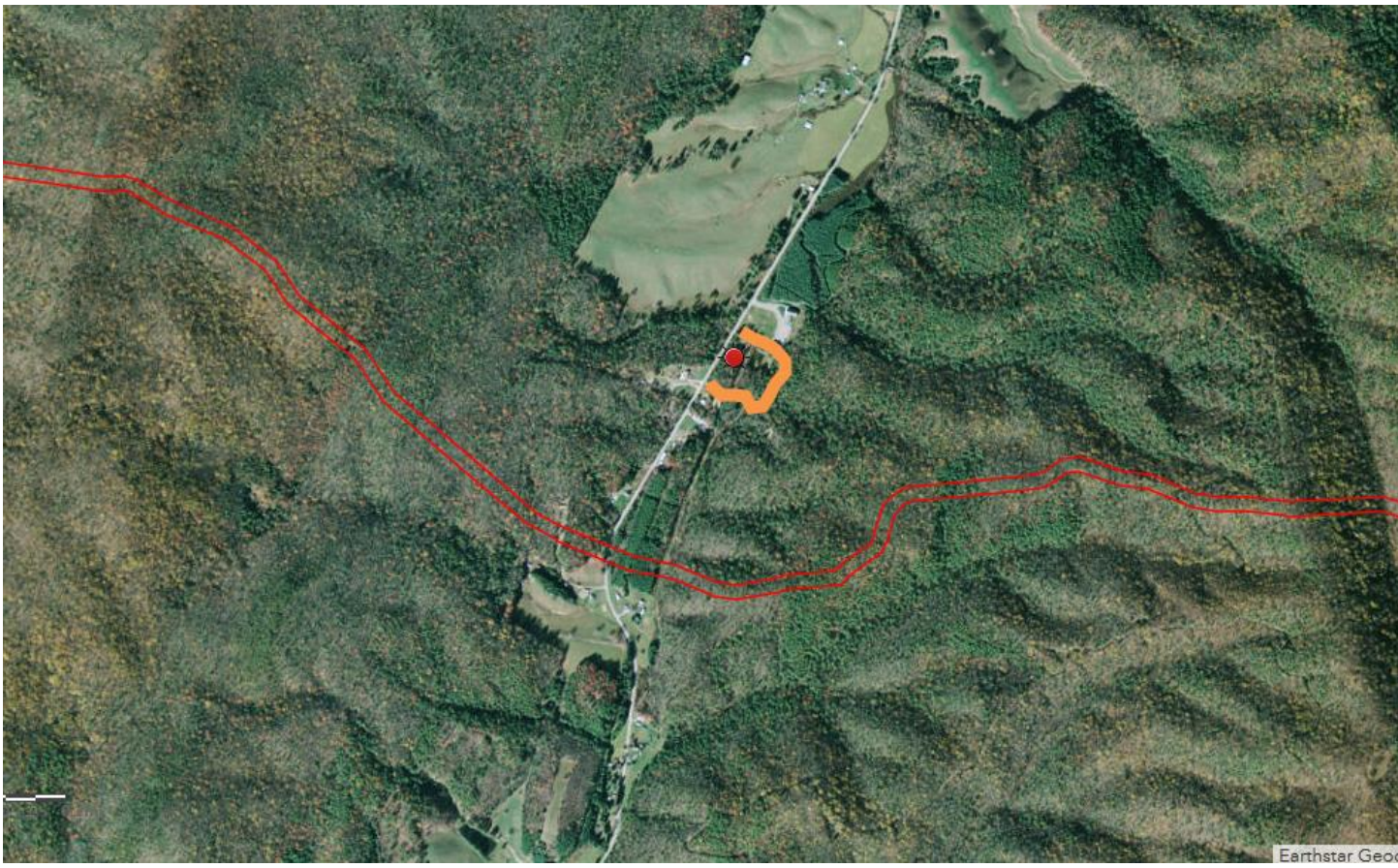
Gov. Jim Justice; US Rep. Evan Jenkins, US Senator Joe Manchin; US Senator Shelly Moore Capito; State Delegate Bill Hartman; State Delegate Phil Isner; State Senator Greg Boso; State Senator Bill Karnes; Pocahontas County Commissioners; Randolph County Commissioners.

Two Pages of Maps in following Two Pages.



The graphic above illustrates the **blast zone** for the proposed ACP in the Frost, West Virginia area on to the state line with Virginia. The orange area is the "**High Consequence Area**," 1,100 feet on either side of the pipeline, an area within which survival of an explosion would be unlikely. The yellow/green area is the "**Evacuation Zone**," 3,583 feet on either side, defined as an area 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.

The Red Dot near the top-center is our home, Allen and Debora Johnson. Our house is 600 yards from the proposed pipeline.
Just over the top of that dot is New Hope Church of the Brethren.



The red-bounded lines denote the route of the proposed Atlantic Coast Pipeline (ACP) in Pocahontas County, West Virginia. The Red Dot is our house, that is, **Allen and Debora Johnson, 12664 Frost Road, Dunmore, West Virginia 24934.** The orange is the approximate boundary of our 9.3 acres that we have owned since 1975. To the left (west) is WV Highway 92. To the north is New Hope Church of the Brethren and a sizable parking lot. To the right (east) is the boundary of the Monongahela National Forest that then goes unbroken until the Virginia State line where the land then is the George Washington National Forest (not on map). Across the highway to the west, and approximate to the boundary of the farm field on the upper part of this picture, is the boundary to the Monongahela National Forest, and after that, the Seneca State Forest. Our house is less than 600 yards from portions of the proposed ACP route.