



# AppalachianVoices

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April 6, 2017

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

RE: Docket Nos. CP15-554-000, CP15-554-001, CP15-555-000, CP15-556

Comments on the Atlantic Coast Pipeline and Supply Header Project DEIS

Dear Deputy Secretary Davis:

Appalachian Voices and 3,253 supporters, whose names are attached below, respectfully submit the following comments on the Draft Environmental Impact Statement for the proposed Atlantic Coast Pipeline and Supply Header Project:

The proposed Atlantic Coast Pipeline (ACP) is not in the public interest. It poses very real threats to public health and safety across West Virginia, Virginia, and North Carolina. Not only will it create permanent adverse impacts on the local environment, it will also contribute to several more decades of global climate pollution.

Studies show that existing gas infrastructure is more than sufficient to meet regional energy needs for residents and industry. Therefore, the primary beneficiaries of the pipeline will be private companies. This is deeply concerning, given that a Certificate of Public Convenience and Necessity would allow the taking of private property for this project.

The Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC) fails to provide adequate information for public comment and fully account for all of the environmental threats posed by the ACP. Among them:

**1. Forests and Habitat.** The project will adversely impact 6,800 acres of pristine forest, with 3,800 acres damaged *permanently*. It would fragment habitat for listed species and disrupt views from the Blue Ridge Parkway and Appalachian Trail. The Applicants request an amendment to the George Washington National Forest plan that would convert 104 acres to a “utility corridor.” Yet the Applicants have not provided the U.S. Forest



Service with requested surveys. The EIS process cannot move forward until consultation with the U.S. Forest Service is complete.

**2. Surface Water and Wetlands.** The ACP would cross 1,989 streams or rivers and affect 786 acres of wetlands, yet several crossing plans and mitigation plans are missing or incomplete. It is impossible to conclude that impacts will not be significant without this information.

**3. Climate Change.** The DEIS does not analyze the greenhouse gas life cycle of a project that enables 1.5 Bcf/day of a potent greenhouse gas (GHG) to be shipped and burned. While the DEIS does provide a rough calculation of GHG emissions resulting from end-use, it does not analyze upstream or fugitive emissions in a meaningful way.

**4. Air Pollution.** Operation of the ACP would produce emissions of nitrogen oxides, carbon monoxide, particulate matter, sulfur dioxide, volatile organic compounds, GHGs, and hazardous air pollutants, and each of the three new compressor stations would require a federal permit as major source emitters. Yet the DEIS refuses to take seriously system alternatives, including existing pipelines and emission-free sources of electricity generation, despite a stated purpose that roughly 80% of the gas proposed to be shipped is intended for electricity generation.

**5. Safety.** Federal data and independent studies show that natural gas pipeline leaks and explosions occur regularly, and these accidents have increased in frequency in recent years. (<http://ieefa.org/wp-content/uploads/2016/05/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-April-2016.2.pdf>) The DEIS states that the Applicants would comply with federal construction and operation standards and that emergency contact information for local fire, police, and public officials would be provided. This is cold comfort to people living near the route, especially in cases where communities are serviced by a single road.

**6. Environmental Justice.** The DEIS states that more than half of the census tracts within 1 mile of the proposed route have poverty rates above their respective statewide averages (WV, VA, NC). Therefore, its conclusion that “there is no evidence that ACP...would cause a disproportionate share of high and adverse environmental or socioeconomic impacts on any...socioeconomic group” is specious. DEIS at 4-413.

**7. Karst Terrain and Groundwater.** The pipeline would cross between 32.5 and 71.3 miles of karst terrain, characterized by sinkholes, caverns, underground streams, and springs. Sediment can contaminate groundwater due to construction on this steep and unstable terrain. If the pipeline leaks, petrochemicals associated with the pipeline (like fuels and lubricants) could enter karst systems and reemerge miles away from the point of entry. The DEIS states that surveys of private drinking wells are incomplete. Even if surveys are completed, investigative methods like dye tracing are better at risk



identification than simply monitoring wells. FERC cannot conclude that threats to groundwater would be minimized without securing and analyzing this information.

We appreciate the opportunity to provide comments on this project, which stands to have enormous impacts on the Appalachian region. For the reasons outlined above, we urge you to reject the Atlantic Coast Pipeline's application. The project is not necessary, nor is it in the public interest.

Sincerely,

A handwritten signature in black ink that reads "Tom Cormons". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Cormons, J.D.  
Executive Director



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Signatures in Support of Appalachian Voices' Comments



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Signatures in Support of Appalachian Voices' Comments

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Signatures in Support of Appalachian Voices' Comments

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