

Blue Ridge Environmental Defense League

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April 4, 2017

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

RE: Draft Environmental Impact Statement Atlantic Coast Pipeline: Atlantic Coast Pipeline, LLC (Docket Nos. CP15-554-000 and PF15-6-000), Dominion Transmission, Inc. (Docket Nos. CP15-555-000 and PF15-5-000), Atlantic Coast Pipeline, LLC and Piedmont Natural Gas Company (Docket No. CP15-556-000)

Dear Secretary Bose:

On behalf of the Blue Ridge Environmental Defense League (BREDL) and its Chapters and members throughout North Carolina and Virginia, I write to address the Draft Environmental Impact Statement (DEIS) for the proposed Atlantic Coast Pipeline (ACP). These comments are in addition to the comments filed on our behalf by John Runkle, Esquire. Our Virginia Chapters potentially impacted by the ACP include: Concern for the New Generation, and Protect Our Water. Our Chapters in North Carolina potentially impacted by the ACP include: Concerned Stewards of Halifax County, Nash Stop the Pipeline, No Pipeline Wilson County, No Pipeline Johnston County, Sampson Citizens for a Safe Environment, and Cumberland County Caring Voices.

Overview

On September 18, 2015, the ACP, LLC filed an application under section 7(c) of the Natural Gas Act, requesting authorization to construct, own, and operate the ACP, including three compressor stations and at least 564 miles of pipeline across West Virginia, Virginia, and North Carolina. The ACP is a joint venture of Dominion Resources, Inc., Duke Energy Corporation, Piedmont Natural Gas Company, Inc. (a wholly owned subsidiary of Duke Energy), and AGL Resources, Inc. (collectively, "Dominion"). The purpose of the proposed ACP is to deliver up to 1.5 billion cubic feet per day of fracked natural gas to customers in Virginia and North Carolina.

On October 2, 2015, the Commission filed its Notice of Application, providing additional details about the application and outlining the review process, and opportunities for public comment.

The Commission has authority under Section 7 of the Interstate Natural Gas Pipelines and Storage Facilities (“NGA”) to issue a certificate to construct a natural gas pipeline. As described in the Commission guidance manuals, environmental documents are required to describe the purpose and commercial need for the project, the transportation rate to be charged to customers, proposed project facilities, and how the company will comply with all applicable regulatory requirements.³ The applicants must evaluate project alternatives, identify a preferred route, and complete a thorough environmental analysis - including consultation with appropriate regulatory agencies, data reviews, and field surveys. The Commission is required to analyze the information provided by Dominion and the other applicants to determine if the project is one of public convenience and necessity. The purpose of the Commission’s review is to reduce overbuilding of pipeline capacity in order to protect consumers and property owners.

As part of its review process, the Commission prepares environmental documents, and in this case, a DEIS was prepared and released on December 30, 2016. As part of the release, the Commission provided a public comment period until April 6, 2017. Subsequently, the Commission scheduled "public comment sessions" in ten locations along the ACP route to allow for public comments.

On January 10, 2017, January 17, 2017, January 23, 2017, January 27, 2017, and February 23, 2017, Dominion filed additional documents supplementing its original application.⁵ These filings contain thousands of new pages of information, voluminous appendices, and attachments on environmental issues directly relevant to the DEIS.

In response, BREDL and our member Chapters, along with other organizations, filed Joint Motion to Rescind or Supplement DEIS on January 23, 2017, and Supplement to Joint Motion to Rescind or Supplement DEIS Based on New Filings on February 15, 2017.

General Comments

Environmental Justice

Virginia

The Draft Environmental Impact Statement ignores a myriad of issues with Environmental Justice along the pipeline route. Of the 11 jurisdictions in Virginia which will be forced to host the 42” section of the proposed ACP should FERC permit it, seven (7) have above average percentages of African American populations: Buckingham, 35%; Brunswick, 55.2%; Cumberland, 32%; Dinwiddie, 32.5%, Greenville, 59.4%; Nottoway, 39.9%; and Prince Edward, 32.4%. Virginia’s African-American population percentage is 19.7%. Eight (8) of the 11 jurisdictions have higher than average poverty percentages: Buckingham 20.2%; Brunswick, 22.1%; Cumberland 19.6%; Greenville, 27.9%; Highland, 13.8%; Nelson, 13.9%; Nottoway, 23.7%, and Prince Edward, 22.3%. Virginia’s poverty percentage is 11.2%. All 11 jurisdictions have home values well below the state average of \$245,000, with the lowest found in Greenville County at \$99,800, Brunswick County at \$105,200 and Buckingham County at \$131,800. All 11

jurisdictions also have higher than average populations of senior citizens with the highest rates in Bath, 25.7%; Highland, 24.9% and Nelson at 24.6%.¹

One glaring error in the Draft Environmental Impact Statement is the complete and total disregard of the Union Hill/Union Grove community in Buckingham County, VA. We believe it imperative FERC recognize the cultural and historical significance of this community. It is a community created by freed slaves. Many descendants of those freed slaves still live today in Union Hill/Union Grove.

Many studies have shown that hazardous and solid waste facilities, power stations and industrial plants like the proposed ACP compressor station are sited disproportionately in communities of color and low-income neighborhoods. In addition to being unsightly, these plants emit toxic air pollution and noise pollution having a negative effect on the health and well-being of plant neighbors—like those living in the Union Hill/Union Grove area. We should also point out that both the Virginia and North Carolina planned compressor stations are sited in communities with high minority populations—Buckingham County, VA and Northampton County, NC. Additionally, both of Dominion’s new fracked natural gas electric generation plants are located in communities with high minority populations, Brunswick and Greensville Counties, VA.

A review of environmental justice and equity law by the American Bar Association and the Hastings College of Law revealed the following:

“Poor communities of color breathe some of the least healthy air in the nation. For example, the nation’s worst air quality is in the South Coast Air Basin in Southern California where studies have shown that Latinos are twice as likely as whites to live within one mile of an EPA Toxic Release Inventory listed facility. Latinos, African-Americans and Asian populations in the region face a 50% higher cancer risk than Anglo-Americans in the region.”

The United States General Accounting Office released findings that three-quarters of the hazardous waste landfill sites in 8 southeastern states are located in primarily poor, African-American and Latino communities.

United Church of Christ’s Commission for Racial Justice published *Toxic Wastes and Race in the United States* and determined race was the single most important factor in determining where toxic facilities were located. Dr. Robert Bullard published *Dumping in Dixie: Race, Class and Environmental Quality* in which he showed the importance of race as a factor in siting of polluting industrial facilities.²

Variety Shades, LLC, sold the residue of a plantation for the proposed compressor station for \$37,500 per acre... nearly 10 times the average price per acre in Buckingham County. Over 90% of adjoining land is owned today by African-American families. These families have lived,

¹ US Census Bureau, Quick Fact Statistics, statistical percentages used in the environmental justice section of these comments were on the US Census Bureau website March 28, 2017

² Environmental Justice for All: A Fifty State Survey of Legislation, Policies and Cases (fourth ed.), Steven Bonorris, Edior, Copyright 2010 American Bar Association and Hastings College of the Law. With citation, any portion of this document may be copied and distributed for non-commercial purposes without prior permission. All other rights are reserved. <http://www.abanet.org/environ/resources.html> or www.uchastings.edu/cs/gj

worked and raised their families in the Union Hill community. While the Variety Shades LLC stockholders rake in millions and live somewhere else, this predominantly African-American community is left to face the health and safety risks of their folly. Concern for the New Generation (CNG), a BREDL chapter will not become a sacrifice zone and insist that FERC recognize the siting of the compressor station as an environmental racism issue which must be remedied.

North Carolina

The ACP DEIS completely fails to address the environmental justice issues that directly impact North Carolina communities who have a high percentage of minorities and high levels of people who live below the poverty level in the eight counties targeted for the Atlantic Coast Pipeline. Historically, many of these communities disproportionately suffer the negative health impacts from the cumulative effects of multiple polluting industries compared to other communities. The Research Triangle Institute ³ has determined that “The counties crossed by proposed ACP route collectively have a significantly higher percentage minority population than the rest of the counties in the state (at the 99% confidence level).”⁴

FERC has a legal mandate to require the ACP to address environmental justice issues in its DEIS.

Title VI of the Civil Rights Act of 1964, legally mandates that each Federal agency shall ensure “that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin.”
[<https://www.epa.gov/environmentaljustice/title-vi-and-environmental-justice>]

In addition to this, the Presidential Executive Order 12898 (February 11, 1994) re-emphasizes the legality of Title VI of the Civil Rights Act of 1964 by stating that the United States requires all federal agencies, including the Federal Energy Regulatory Commission, to make achieving environmental justice part of their mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its actions on minority populations and low-income populations.

This is not an option, but a MUST. FERC is legally mandated to require the ACP to address environmental justice issues in the DEIS. Don't forget, people are the most important stake holders impacted in the environment, not just streams, rivers, forest, and endangered species.

³ Research Triangle Institute: “An independent nonprofit research institute dedicated to improving the human condition” <https://www.rti.org/>

⁴ Allpress, J., Hofmann, J., Wraight, S., Depro, B. (2017). *U.S. Census Socioeconomic Data, Environmental Justice, The Atlantic Coast Pipeline: A Methods Report*. Unpublished manuscript.

Recent census data compiled by the Blue Ridge Environmental Defense League shows the environmental justice demographics that the ACP will directly impact in NC.

Demographic and Income Data for the ACP Route Compared to Statewide NC

	Population	White %	Black %	Income \$ per capita	% Income below NC
Northampton	20,463	39.6	58.4	17,919	29%
Halifax	52,970	40.9	53.1	17,937	29%
Nash	94,357	57.3	39.0	22,880	10%
Wilson	81,401	57.3	39.6	20,972	17%
Johnston	181,423	80.5	15.9	22,410	11%
Sampson	64,050	67.4	27.1	19,479	23%
Cumberland	326,328	53.6	37.4	23,067	9%
Robeson*	134,760	32.4	24.7	15,343	39%
NC Statewide	9,943,964	71.7	22.0	25,284	--

[\[https://www.census.gov/quickfacts/\]](https://www.census.gov/quickfacts/)

* Additionally highest minority population in Robeson County, NC is 38.02% Native American

The per capita income levels of residents in all the counties targeted for the Atlantic Coast Pipeline are below the statewide average from 9% to 39%. In North Carolina, the official average of the population below the poverty level is 17.5%. Using this benchmark, the number of people living below the poverty line exceeds the statewide average from 30% to 81% in these eight counties. Further, seven of the counties have African American populations in greater proportion than the statewide average in addition to a large Native American population in Robeson County which has the highest poverty level along the ACP route. Is it just coincidence that the beginning and the end of the ACP route in NC starting in Northampton and ending in Robeson County are the two poorest counties along the APC route? Robeson County is the poorest county in the state and Northampton is only few percentage points behind.

Northampton Compressor Station violates environmental justice

The ACP proposes to build a 24/7 air and noise polluting compressor station in the most dense area with the highest percentage of African Americans and second highest poverty level along the ACP route in NC. If built, this will be the second compressor station in Northampton County. The Pleasant Hill Compressor Station and associated pipeline are located in the vicinity of the proposed Compressor Station #3. To ignore the air quality, sensitivities and the vulnerabilities of cumulative pollution negative health impacts of this minority community would not only be environmentally unjust, but criminal. The DEIS grossly ignores this very serious issue.

A mapping study of the impacts on public health caused by multiple pollution sources pointed to environmental justice and equity factors: It states:

“Environmental justice studies have repeatedly found associations of disproportionately high occurrences of air toxic hazards in low income and minority communities such as Toxic Release Inventory facilities, toxic waste facilities, and more recently high traffic corridors (Ringquist 1997; Anderton et al. 1994; Boer et al. 1997; Jerrett 2009). Not only are these communities more likely to be home to environmental hazards, but these communities are more vulnerable to the negative health effects of air pollution because of compromised health status resulting from lack of access to nutritional foods and medical care and lessened ability resist the placement of such facilities (O’Neill et al. 2003; Pastor et al. 2002).

Beyond the equity concern in the disproportionate siting of environmental hazards in low income and communities of color, is the potential for cumulative exposure to air pollution. Because these communities are usually home to many ambient air pollution sources, individuals are often exposed to multiple types of pollution from many sources. Exposure to multiple hazards may have cumulative effects, magnifying health risks in humans (National Research Council 2009). The extent of these health effects depends on the total exposure of chemicals (Xia and Tong 2006). Even more

concerning is there are health effects due to cumulative exposure to air pollutants

below national ambient air quality standards (Xia and Tong 2006).” - Chan A “Mapping the Cumulative Impacts of Point-Source Air Pollution in West Oakland” Spring 2012, available at http://nature.berkeley.edu/classes/es196/projects/2012final/ChanA_2012.pdf

Environmental justice law indicates that the disproportionate impacts of air pollution should be offset by greater attention to pollution sources and the reduction of air pollution wherever possible. Advocates nationwide argue that because poor people of color bear a disproportionate burden of air pollution, their communities should receive a disproportionate share of money and technology to reduce toxic emissions and that laws including the Clean Air Act should close loopholes that allow facilities to escape pollution controls. - *Environmental Justice for All: A Fifty State Survey of Legislation, Policies and Cases*, Fourth Edition,, University of California-Hastings College of the Law, February 15, 2010

The ACP's DEIS should be completely denied by FERC because it fails to address the environmental justice issues. FERC MUST require that the ACP address the environmental justice issues has mandated in Title VI of the Civil Rights Act of 1964, Presidential Executive Order 12898, and the Clean Air Act.

Safety

Discriminatory Construction Regulations

The Pipeline & Hazardous Materials Safety Administration's (PHMSA) laws and regulations for natural gas pipelines are discriminatory. Clearly, PHMSA sees the life of a citizen in a rural community as less valuable than a citizen in a suburban or urban community. The discrimination is seen in the wide differences in regulations created by “classes” along the routes of pipelines across our country. Not only does PHMSA create discriminatory regulations, it then suggests to local governments, that localities, after being forced to accept a pipeline in their community, should create ordinances to ban or deter development along the path of a pipeline. Lastly,

PHMSA has no set back requirement which allows pipeline companies, such as the ACP, to put existing homes in the blast zones of newly constructed pipelines.

CFR 49, Part 192.5 delineates “class” definitions. A class location unit is “an onshore area that extends 220 yards (660 feet) on either side of the centerline of any continuous 1-mile length of pipeline.” Within these class location units, the number of “dwelling units” designed for human occupancy are counted creating the following classifications:

Class 1: Contains 10 or less dwelling units

Class 2: Contains more than 10, but less than 46 dwelling units

Class 3: 46 and above dwelling units

Class 4: Is a class location unit where four-story above-ground dwelling units are prevalent.

Transmission Line Valve Placement

Class 1: Each point on the pipeline in a Class 1 location unit must be within ten (10) miles of a valve, which allows the valves to be 20 miles apart. Class 2 is 7 ½ miles from each point or 15 miles apart; Class 3 is 4 miles from each point, or 8 miles apart and Class 4 is 2 ½ miles from each point or 5 miles apart. This represents a 78% reduction in the number of valves required in a Class 1 location versus a Class 4 location. The increased length of time it could take to get to the valves should an accident occur in a Class 1 location versus Class 4 is dangerous! Where will staff be located and how long will it take them to drive on long, windy unpaved roads to reach valves to manually shut them in the case of an emergency?

The Construction Phase

Pipeline Wall Thickness

From these class units, the PHMSA regulations are written and enforced. For example, the minimum standards for steel pipeline wall thickness are: Class 1: 0.375”; Class 2: 0.450”; Class 3: 0.540” and Class 4: 0.675”. A natural gas pipeline constructed in a Class 4 unit is approximately 75% heavier than a Class 1 location. Does this mean PHMSA sees the lives of a rural family 75% less important, less valuable than those in a Class 4 location?

Testing Welds

For each day’s work, butt welds must be tested during the construction of a pipeline. A single sample of each welder’s work must be tested each day in all classes. In Class 1 locations, 10% of the welds completed daily must be tested; class 2, requires 15%. In Class 3 and 4 locations butt welds must be tested at crossings of major or navigable waters, railroad or public highway rights-of-way, including tunnels, bridges, overhead road crossings, 100% unless impractical, in which case 10% of the time.

Cover for the Pipeline

In Class 1 locations, if covered with normal soil, 30"; if covered with consolidated rock, 18". Classes 2, 3 and 4 require 36" of normal soil, or 24" of consolidated rock. Drainage ditches for public roads and railroad crossings require 36" of normal soil or 24" of consolidated rock. Navigable rivers, streams and harbors require from the top of the pipe to the underwater normal bottom, 48" of normal soil or 24" of consolidated rock.

After Construction

Transmission Line Security Patrols

Even after the pipeline is built, and knowing large infrastructure projects are soft targets for terrorists, PHMSA's requirements for maximum intervals between patrols for Class 1 versus Class 4 are reduced by 75%.

Class	Max Interval at Highway & Railroad Crossings the Route	All Other Places Along
1 & 2	7 ½ mos., but at least twice per calendar year	15 mos., but once a calendar year
3	4 ½ mos., but four times per calendar year	7 ½ mos., but 4 times per calendar year
4	4 ½ mos., but four times per calendar year	4 ½ mos., but 4 times per calendar year

Transmission Leakage Surveys

Class	Maximum Intervals
1 & 2	every 15 months, but once per calendar year.
3	7 ½ mos., twice per calendar year if no odorant is added.
4	4 ½ mos., 4 times per calendar year if no odorant is added.

Conclusion Discriminatory PHMSA Regulations

Not only are the PHMSA regulations discriminatory, offering less protection for the health, safety and welfare of the citizens of rural communities, they are inducements to the energy industry to build in rural communities. Weaker standards make construction and maintenance less expensive in rural America. Weaker standards also make pipelines much more dangers and offer unequal protection to rural communities.

Soil Surveys

The Blue Ridge Environmental Defense League learned through comments filed by the U.S. Forest Service (“USFS”) on November 5, 2015 that Dominion and its subcontractors blatantly misled the USFS regarding soil surveys completed on Forest Service lands in the Monongahela and George Washington National Forests. According to the documents submitted by the USFS to FERC, USFS personnel had repeatedly given Dominion’s subcontractor soil survey protocols and qualification requirements for those soil scientists who would be conducting the soil surveys on USFS lands. We believe the USFS has given ample documentation to question the qualifications of the personnel used to conduct these soil surveys, as well their ability to conduct the surveys under the protocols set out by the USFS.

It is imperative, not only on USFS lands, but on lands of private property owners, that soil surveys are conducted in a manner which protects the health, safety, and welfare of the public. Dominion’s own Resource Reports indicate in the mountainous regions of West Virginia 73 percent of the mainline route would cross areas susceptible to landslides; almost 12 miles cross slopes greater than 35 percent. In Virginia, approximately 28 percent of the mainline route would cross landslide areas; 12.5 miles cross slopes greater than 35 percent. An additional 47.9 miles have slopes with grades between 20% to 35%. The first 211.9 miles of the ACP is proposed to travel through 115.6 miles of terrain rated as high incidence with high susceptibility for landslides. An additional 46.7 miles are categorized as moderate incidence with high susceptibility for landslides.

BREDL’s expert, Jeffrey T. Walker, LPSS/AOSE, a licensed professional soil scientist, states, “Soil surveys should have been completed before the proposed Atlantic Coast Pipeline chose a preferred route. They cannot, without those surveys, know which areas along the route are susceptible to seeps, slips and slides. To have chosen the route before the surveys were completed is dangerous and shows a lack of concern for the citizens, communities, animal habitats, and the environment in general.” Walker continued, “To now know the surveys were completed on USFS lands by unlicensed ‘soil scientists’ can only be characterized as deceitful and dangerous. It calls into question not only the surveys completed on USFS lands, but all soil surveys completed along the path of the proposed ACP, especially those in areas known to be vulnerable to seeps, slips and landslides.”

As recently as March 10, 2017, Dominion has not complied with the US Forest Service requirements. An article which appeared in the Richmond Times Dispatch on March 19, 2017, clearly indicates continued disregard by Dominion of the needs of proper soil surveys occurring in our pristine national forests.

Last month, James A. Thompson, a professor of pedology (the study of soils) and land use at West Virginia University who has been contracted by the Forest Service as a third-party reviewer for the pipeline project, wrote to a Forest Service supervisor to air concerns about Dominion’s “unwillingness to respond to what I consider to be reasonable requests and, more generally, an inability to work collaboratively with the Forest Service to ensure that this review progresses in an efficient and effective manner.”

On March 9, that supervisor, Clyde Thompson, wrote Leslie Hartz, another Dominion official, faulting the company for failing to provide “requested documentation of the effectiveness of slope stabilization techniques” and other information. “Small and large soil failures can and do occur on hillsides due to human disturbances,” Thompson wrote in a letter earlier that same week. “The Forest Service is tasked with ensuring that the risks of such failures are controlled and the associated standards of forest plans are met.”⁵

BREDL’s chapter, Protect Our Water (POW), in Nelson County, Virginia has a mission to protect the waters of Nelson County. In June, 2016, BREDL submitted comments on behalf of the members of POW regarding flooding and landslides which occur regularly in the county during heavy rain from thunderstorm activity including photographic evidence of flooding in the community. POW recognizes the extreme importance of accurate and thorough review of the soils in Nelson County. In 1969, 33 inches of rain fell in an eight (8) hour period from the remnants of Hurricane Camille which created over 4,000 landslides in the county. After that disaster, a study from the Virginia Department Mines, Minerals and Energy stated pipelines should not be built in the Nelson County. This report has been submitted to FERC. Additionally, the Thomas Jefferson Soil and Water Conservation District has submitted comments to FERC stating Nelson County’s soil and steep mountainous terrain is not conducive to a project such as the proposed Atlantic Coast Pipeline.

In efforts to prove to FERC the inadequacies of the soil surveys conducted by Dominion, grassroots groups, Friends of Nelson and Friends of Wintergreen, commissioned a study by Blackburn Consulting Services, LLC, which has also been submitted to FERC. This study clearly indicates Dominion does not take the soil survey requirements seriously.

“Dominion’s filings with FERC do not appear to fully take into account the potentially dangerous conditions that the project poses to Nelson’s slopes and residents. Dominion’s findings are based on regional data sets that are inadequate to meaningfully assess the site-specific risks within Nelson County or the effect that the proposed pipeline installation has on those risks.”⁶

Nelson County, because of the historical issues with previous flooding, deserves recognition that the most stringent soil survey requirement is the only standard which should be used to determine the viability of a project of this magnitude. Nelson County, according to Dominion’s Resource Reports, ranks 3rd of all the counties with revegetation concerns because of its steep mountainous terrain.⁷ Revegetation in grass will not hold the soils in the same way as the deep tree roots which currently serve as the greatest natural protection afforded from landslides and flooding on Nelson’s steep mountainous terrain.

⁵ Richmond Times Dispatch, March 19, 2017, “*Testimony/Correspondence Show Friction between Dominion and US Forest Service*,” http://www.richmond.com/business/testimony-correspondence-show-friction-between-dominion-u-s-forest-service/article_5cc6ca1f-02eb-5384-a02a-02cb2426a764.html accessed on March 28, 2017.

⁶ Nelson County Report, Soil/Foundations, *Report Analysis and Field Verification of Soil and Geologic Concerns with the Atlantic Coast Pipeline (ACP) in Nelson County, VA* prepared by Blackburn Consulting Services, LLC, March, 2017.

⁷ Resource Report 7 (Soils), Table 7.4.1-1, “Acres of Soil Characteristics Affected by the Proposed Pipelines for the Atlantic Coast Pipeline and Supply Header Project”, originally submitted to FERC by Dominion/ACP in September 2015, and updated in Appendix I of their July 18, 2016 Supplemental Filing.

Dominion has chosen a route for the pipeline to include ridges as narrow as 12' to 16' wide. Mountaintop removal for pipeline construction cannot possibly be a viable construction technique. Lowering ridgelines by 40' to 60' to attain the 125' wide requirement for construction will require thousands of truckloads of debris which will have to be removed on access roads built into remote areas and on narrow, windy state roads not built to carry loads of this type. Where will this debris be taken? How will it be used? How will the removal of the mountaintops affect the absorption rate of rainfall by the remaining soils and altered contours of the ridgelines? How will mountaintop removal affect the route water flows into the streams and springs many of the population use as their water resources?

The health, safety and welfare of the population, as well as the protection of the water resources the community depends on, must be the paramount consideration.

Flooding

The DEIS fails to address flooding from severe storms that will likely occur in the 8 North Carolina counties of Halifax, Northampton, Nash, Wilson, Johnston, Cumberland, Sampson and Robeson. In October 2016, Hurricane Matthew devastated Eastern North Carolina, including the counties targeted by the ACP. Yet the DEIS completely ignores the impacts that the storm had on infrastructure and property. Some residents continue to be displaced.

That the FERC chooses to ignore the frequent threats to Eastern North Carolina from severe storms is stunning, and inexcusable. Hurricane Matthew was not the first storm to devastate these Eastern counties; Hurricanes Floyd, Hazel, Isabel and others have regularly pummeled the area of the proposed pipeline.⁸

News coverage:

http://www.wral.com/weather/hurricanes/asset_gallery/16112928/

Day by day flooding: <http://www.wral.com/weather/hurricanes/page/16110945/>

Hurricane Matthew Photos by Community:

http://www.wral.com/weather/hurricanes/asset_gallery/16094689/

⁸ Bennett, Abbie. "Hurricane Matthew name retired by World Meteorological Organization." *News and Observer*. 27 March 2017. http://www.newsobserver.com/news/weather/article141002948.html#eMlnl=Afternoon_Newsletter

Additional Pictures below:

Robeson County



Halifax County



Cumberland County





1Johnston County



Prime Farmland

The FERC provides no economic analysis regarding the potential impacts on prime farmland in West Virginia, Virginia or North Carolina. Almost half of the acres of prime farmland that could be disrupted are in North Carolina. North Carolina is already losing valuable farmland.⁹

In conclusion, The DEIS in its current form is an abysmally inadequate document; which ignores significant issues. The FERC must rescind the DEIS.

Respectfully Submitted,

Therese Vick

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Blue Ridge Environmental Defense League

⁹ Gergen, Christopher and Martin, Stephen. "If NC wants to feed itself- and the world- it needs to save its farms." *News and Observer*. 24 March 2017. <http://www.newsobserver.com/news/business/article140522363.html>

Document Content(s)

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