FERC DEIS comments for the Atlantic Coast Pipeline
Re: Docket No CP15-554-000

April 5, 2017

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Friends of Buckingham believes there are many reasons the ACP DEIS is very inadequate, and the many severe impacts cannot be "reduced to less than significant levels". We ask you to stop and do a more thorough impact statement.

Our major concerns:

Lack of proven need, and costs to the ratepayer
Health and safety risks
Environmental Justice
Outdated assessment tools for evaluating climate change effects.
Disregard for cultural and economic losses to communities all along the proposed routes.

Lack of proven need, and costs to the ratepayer: We send you to an industry insider, Thomas Hadwin's astute arguments. His article, "ACP in a Nutshell" is damning of the entire project and makes it very clear the sacrifices that we, the people would make, are an outrage in a democracy, or anywhere.
http://www.friendsofbuckinghamva.org/friends/the-acp-in-a-nutshell/

Physicians for Social Responsibility speaks for us here: this was penned by Lakshmi Fjord, PhD

FERC should not issue a permit for the construction of the proposed compressor station in Buckingham, Virginia.

FERC should take health effects into account in making its decision.

- According to ACP's own air permit application for the Union Hill compressor station, the facility would generate yearly emissions of 468,450 combined pounds per year of nitrous oxide, carbon dioxide, volatile organic compounds (VOCs), particulate matter, and hazardous air pollutants (HAPs). FERC's environmental impact statement estimates this compressor station's climate change contribution at 293,688 metric tons per year. These emissions would be dangerous to health and destructive of a livable climate.
- 14 gas-fired turbines would be needed to transmit the fracked gas over 200 miles. This distance is far greater than the industry standard of 40-70 miles between compressor stations. Huge transmission distances require ACP compressor stations to operate at the highest allowed levels of pressure, increasing the potential for fires and explosions.

- FERC's Draft Environmental Impact Statement (DEIS) states there will be "no health impacts" from this extremely large complex of pipelines in Union Hill. There is no explanation given for why FERC ignores the latest independent scientific studies on the potential health threats caused by living near compressor stations.

FERC should not allow this new environmental injustice to be perpetrated.

- Over 110 households in the predominantly low-income, community of color, Union Hill would be placed in close proximity to this dangerous compressor station.
- Union Hill is the site of a former slave plantation; the majority of nearby residents are the descendants of slaves who built this community after the Civil War. It is illegal under the National Environmental Policy Act (NEPA), and it is immoral, to concentrate this environmental threat on the back of a low-income community of color.
- The site also encompasses as many as 200+ unmarked slave burial sites on this former plantation land.

The risks to the climate are unacceptably high.

- Methane is 86 times more powerful than carbon dioxide as a heat-trapping gas when considered over a 20-year timeframe. That's exactly the timeframe we should consider, since that's about how long we have to get our climate emissions under control.
- Recent scientific studies summarized in PSR's recent report, *Too Dirty, Too Dangerous: Why Health Professional Reject Natural Gas*, indicate dangerous levels of methane leakage from compressor stations. For example, a study in Texas' Barnet Shale found that methane emissions from compressor stations were substantially higher than emissions from well pads. Separate field studies of processing plants and compressor stations found methane emissions to be 3.2 to 5.8 times higher than estimates that the EPA had issued based on industry self-reporting.
- Methane also leaks from the distribution pipelines that carry the gas from the utility company through our cities and towns and to our homes. In fact, the overall leakage of methane, looking across the entire supply chain, is so high that it makes fracked gas about as bad for the climate as burning coal.

Physicans for Social Responsibility has done excellent research on why we should reject natural gas all together: http://www.psr.org/resources/too-dirty-too-dangerous.html

Why health professionals reject natural gas

PSR's report, ***Too Dirty, Too Dangerous: Why Health Professionals Reject Natural Gas,*** based on summaries of recent medical and scientific studies, clearly conveys the health threats that accompany use of methane as a fuel. Here are some of the key findings it reports:

- Proximity to fracking operations are associated with congenital heart defects, increased risk of high-risk pregnancy and premature birth, worsening asthma, and increased rates of hospitalization for cardiac, neurological and cancer-related problems.

- Methane accelerates climate change. It is more potent a greenhouse gas than carbon dioxide over its first hundred years in the atmosphere—fully 86 times more potent over its first 20 years.

- Methane has been found to leak from fracking wells, equipment, and pipelines at rates that make it worse for the environment than coal. Those leakage rates, if sustained, move us closer to climate catastrophe.

The following was penned by Irene Leech, PhD, a member of FoB:

The DEIS prepared for the Atlantic Coast Pipeline and Supply Header Project that was released December 30, 2016 is riddled with vague generalizations, lacking specific detail, and summarily

dismisses issues raised by citizens without even appearing to consider the information presented. A significant portion of ACP provided information is missing and some is not expected to be available until September. The applicant submitted a large quantity of information shortly after the DEIS was released; much that appeared to have been collected well before the release. It appears that the applicant has purposefully neglected to provide key information in a timely manner. This is not fair to the affected landowners and communities.

There is structural bias against landowners and communities in the FERC process. There are close relationships among the applicant and the contractor hired by FERC to conduct much of the work that have at least the appearance of bias.

While the information provided by FERC on the process indicates that a collaborative process is used, citizens of Buckingham and other affected counties have not found this to be true. As the location of the only compressor station in Virginia, citizens requested Scoping and DEIS Response meetings in Buckingham. These were not granted and affected citizens, many of whom are elderly, had to travel to another county in the winter for both meetings. Further, the procedure used for the DEIS Response meetings kept speakers from hearing each other by relegating speakers to intimidating circumstances in private rooms. Even the two meetings held in Buckingham were not conducive to citizen participation. The original Open House was held in direct conflict with the annual meeting and fundraiser for the local historical association. The Open House for the compressor station was held at night after a significant snow event which meant schools were closed and many citizens did not feel it was safe to be out after dark. Affected citizens requested that the meeting be rescheduled but our requests were denied so many of us were unable to participate due to safety concerns. The applicant held several community meetings with selected community representatives but citizens were frustrated with the tightly controlled agenda and daytime scheduling that kept many from attending. It appeared to citizens that the applicant had more concern with selection of the paint color for the compressor station buildings than with citizen concerns about health and safety. Overall, citizens felt their concerns were brushed off and ignored. It is impossible to describe the process that occurred as collaborative.

The ACP is proposed to bisect the farm business my family has operated for over a century. It is proposed to traverse our primary pastures, hayfields and cropland, requiring us to cross the pipeline multiple times each day as we conduct our business. Almost every building on the 1,000 acre property would be within the Blast Zone, four miles after the compressor station. This includes the 1804 farmhouse that is largely unaltered, related out buildings, and the primary barns and equipment sheds used by the business. The applicant denied our request to move the pipeline to the far edge of our property where it would have the least impact on our business and our net worth. We will be forced to cross the pipeline multiple times every day and any future uses of our property will be constrained by the presence of the pipeline. The stress of living within the Blast Zone, with gas at the highest level of pressure, thin pipe walls, the closest cut off valve nearly 20 miles away, and with the infrastructure monitored hundreds of miles away using extremely undependable wireless technology is likely to make us have to abandon our heritage, culture and largest asset. With minimal oversight, the applicant will be allowed to set risk levels that provide it with the highest earnings, ignoring our concerns about health and safety.

Because this is considered an area of low concern due to the low human population, the thinnest pipe is allowed and the automatic cut-off valves will be up to 20 miles apart. While the original plans showed that the entire pipeline would be monitored with fiber broadband, the best available technology, the applicant now plans to monitor using wireless technology that is notoriously undependable and poorly supported through this rural area. Further, we are concerned that although it is widely acknowledged that high levels of methane escape pipeline infrastructure, the Trump Administration has removed the requirement that pipeline operators measure and report these emissions. Further, efforts are underway to reduce the staff of the Environmental Protection Agency by a third or more, removing critical oversight of water, air, and land. Virginia has also limited staffing in the state environmental agency and there is heavy political pressure on that agency to allow this industry to be largely deregulated and not encumbered by expensive regulation.

At the end of the Buckingham Planning Commission Public Hearing for the communications tower at the compressor station on March 27, 2017 ACP representative Emmett Toms informed those present that fiber broadband had been removed from the project in response to directions from both the federal and state (State Corporation Commission) regulators. They were responding to complaints by AT&T and other telecommunication companies. We cannot find documentation of those regulatory directions and the applicant indicated that it will not be possible to provide it prior to the end of the DEIS Comment Period.

Because PHMSA has never been funded so it could meet its mandated tasks, Congress directed it to prioritize populated areas over rural areas. The new Secretary of Transportation pointed to her commitment to reduce energy industry regulation, signaling that affected landowners and communities cannot anticipate that our health and safety concerns will be addressed. It appears that we are being sacrificed.

Since we do not desire to host this infrastructure, anticipate minimal one-time compensation that will pay the property taxes on the land used by the pipeline for the years that it is in service if we are lucky, and expose us to daily risk from infrastructure over which we have no influence, it seems that at the very least we should get the best safety available. Fiber broadband, as originally planned, must be used to monitor the pipeline. It is significantly more dependable than wireless technology. Since our property is so close to the compressor station and the odorless, colorless, and tasteless gas will be under the highest pressure when it crosses our property, the thickest pipe should be required and automatic cutoff valves should be placed every three miles. We deserve at least the same level of safety as those who live in more populated areas.

The DEIS … However, the data presented in Appendix U, Racial, ethnic, and poverty statistics for census tracts within 1 mile of the Atlantic Coast Pipeline and Supply Header Project, indicates that the path of this infrastructure has a disproportionate impact on disadvantaged communities. Ten of eighteen (55.5%). tracts have populations with income below the poverty level. Statewide percentages for population below the poverty level along the ACP are 18.1%-West Virginia, 11.5%-Virginia, and 17.6%-

North Carolina. Eleven of thirteen (84.6%) of contractor yards are in tracts with higher minority unemployment than the unemployment rate in the respective state.

Data related to the portion of the affected population that is elderly is not presented and there is no apparent consideration of the health issues faced by those living within 1 mile of the infrastructure. However, research conducted by Lakshmi Fjord (2017) in Buckingham documented the fact that affected citizens are older than the population of the state. Further, these citizens already have significant health challenges. The real estate located within the Blast Zone of the ACP is the largest asset of most of these citizens but they will not be adequately compensated for the loss of property value if they are compensated at all. Given this information, it is clear that the path of the ACP disproportionately affects disadvantaged communities.

Since the DEIS claims there is no economic justice issue, there is no proposed mitigation. However, as Fjord (2017) reports, the financial loss to these citizens is of less concern than the cultural and historical loss.

Yogaville Concerns, by Jeeva Abate

ECONOMIC IMPACT

Yogaville is a retreat and learning center that draws thousands of people annually, from all over the world, who come to take programs that focus on health and wellbeing, meditation, and stress reduction, as well as to visit our unique interfaith shrine, LOTUS.

As a residential community and the headquarters of an international organization, we established ourselves here because of the clean and peaceful environment. We are concerned that this project puts our financial survival at risk in the short term during the construction phase and in the long term if the pipeline is routed 1,000 ft. from Yogaville and the proposed compressor station is located an estimated five miles from us.

COMPRESSOR STATION

There are only three compressor stations on the proposed 600-mile pipeline and one of them is proposed to be about five miles from Yogaville, an area where hundreds of people reside and approximately 6,000 guests and students attend annually. The compressor station is sized at an est. 55,000 HP, situated on a 75-acre lot. It would run 24/7/365.

We are concerned about documented health risks consistently reported by people living near compressor sites. We refer you to the report filed with FERC by the Madison County, New York Health Department on October 15, 2014, Docket #CP14-497-000, in regards to Dominion's filing to place a compressor station in their county.

This report explains at length the potential health risks during the construction process, as well as when

the compressor is operational. It cites **harmful impact to the respiratory, cardio-vascular, and neurological systems, as well as to other systems and organs in the body.** It describes the **air pollution** that comes from blowdowns that release toxic chemicals used to process the gas and methane into the atmosphere. **Noxious fumes, increased toxic poisoning levels, radioactive materials, and large amounts of contaminants** have been reported at compressor sites, including **cancer-causing volatile organic compounds**. It cites a blowdown event in Bernville TX that emitted 61.31 tons of VOCs in forty-three minutes—an entire year's threshold of VOCs from a major source emitted in less than an hour. The online link to that report can be found here:

http://www.healthymadisoncounty.org/linkeddocs/reports/FERCcomments.pdf

We are concerned about noise, both audible and low frequency, that has been documented as causing vibro-acoustic disease, resulting in brain aneurysms, seizures, nervous system disorders, heart disease, and ruptured eardrums. People who live near compressors have also reported: headaches, fatigue, dizziness, nausea, nosebleeds, sore throats, sinus congestion, rashes, blisters, lesions, respiratory distress, hearing difficulties, ataxia, difficulty with balance, and lack of sleep. Blood tests show exposure to toxic chemicals. _____

Exclusive: Pipeline Safety Chief Says His Regulatory Process Is 'Kind of Dying'

With 'few tools to work with,' PHMSA's Jeffrey Wiese says he is creating a YouTube channel to persuade industry to voluntarily improve safety.

By Marcus Stern and Sebastian Jones

Sep 11, 2013

Jeffrey Wiese (center), PHMSA's associate administrator for pipeline safety, testifies at a hearing on pipeline safety. Credit: Rep. Gus Bilirakis

Jeffrey Wiese, the nation's top oil and gas pipeline safety official, recently strode to a dais beneath crystal chandeliers at a New Orleans hotel to let his audience in on an open secret: the regulatory process he oversees is "kind of dying."

Wiese told several hundred oil and gas pipeline compliance officers that his agency, the Pipeline and Hazardous Materials Administration [1] (PHMSA), has "very few tools to work with" in enforcing safety rules even after Congress in 2011 allowed it to impose higher fines on companies that cause major accidents.

"Do I think I can hurt a major international corporation with a $2 million civil penalty? No," he said.

Because generating a new pipeline rule can take as long as three years, Wiese said PHMSA is creating a YouTube channel to persuade the industry to voluntarily improve its safety operations. "We'll be trying to socialize these concepts long before we get to regulations."

Wiese's pessimism about the viability of the pipeline regulatory system is at odds with the Obama administration's insistence [2] that the nation's pipeline infrastructure is safe and its regulatory regime robust. In a speech last year [3], President Obama ordered regulatory agencies like PHMSA to help expedite the building of new pipelines "in a way that protects the health and safety of the American people."

Wiese's remarks also conflict with industry's view. Brian Straessle, a spokesman for the American Petroleum Institute [4], which represents much of the oil and gas industry in Washington, D.C., said the industry "is highly regulated at the state and federal level, and there are strong standards in place to govern the pipeline infrastructure that helps fuel our economy.

"Pipeline operators have every incentive to protect the environment and their financial health by preventing incidents," Straessle said.

But Wiese's remarks ring true with people who've long been concerned about pipelines near their homes.

Susan Luebbe, a Nebraska rancher who has fought for five years to keep the proposed Keystone XL pipeline from crossing her cattle ranch, reacted with bemusement when Wiese's comments were relayed to her by cell phone as she repaired a barbed-wire fence. She and other Keystone opponents have long been suspicious of assurances by TransCanada, the company building the line, that it will be safe because it will meet or exceed PHMSA regulations.

"It's kind of sad in a way, when we push for laws to be enforced and they just throw up their hands, PHMSA and all them, and say they can't deal with it," Luebbe said.

Public confidence in pipeline safety has been tested by a spate of serious accidents. In 2010, a natural gas line explosion in San Bruno, Calif., set off a 95-minute inferno that killed eight people, destroyed 38 homes and damaged scores of others. That same year, a pipeline spilled more than 1 million gallons of Canadian tar sand crude into Michigan's Kalamazoo River [5].

The ongoing clean-up of that one spill has already cost more than $1 billion. This year, a pipeline rupture deposited at least 210,000 gallons of heavy Canadian crude in the streets of Mayflower, Ark [6].

Wiese, as head of PHMSA's Office of Pipeline Safety, is the federal official most directly charged with preventing these types of accidents. But as his July 24 comments in New Orleans reflect, he is constrained by a pipeline safety budget that has remained flat at about $108 million for the past three years, despite the construction of thousands of miles of new pipeline. Most of that money comes from industry user fees and an oil spill liability trust fund. Taxpayers pay just $1 million a year toward the safety program.

The Obama administration has consistently asked for more money for pipeline safety, but those requests have fallen victim to Congress' inability to pass anything more than stopgap budgets for the past three years. The administration asked for a 60 percent increase for this year, but the continuing budget standoff and effects of sequestration instead have tightened the budget.

Two stark numbers illustrate the challenge the administration faces in ensuring pipeline safety while pressing ahead with new pipeline projects: 135 federal inspectors oversee 2.6 million miles of pipeline, which means each inspector is responsible for almost enough pipe to circle the Earth. PHMSA says it has the help of about 300 state inspectors, but not all states have inspection programs.

According to an analysis of inspection records by the nonprofit Public Employees for Environmental Responsibility [7] (PEER), only a fifth of the nation's 2.6 million miles of pipeline have been inspected by PHMSA or its state partners since 2006. PEER obtained the records through the Freedom of Information Act.

InsideClimate News tried for several weeks to arrange an interview with Wiese about his remarks. At one point PHMSA spokesman Damon Hill wrote in an email, "I'm trying to help you get what you need for your story and in no way are we saying that Mr. Wiese or anyone else in PHMSA is unavailable to provide information or clarifications."

But Hill didn't respond to subsequent emails requesting to speak with Wiese and other PHMSA staffers who attended the pipeline safety conference in New Orleans, and Wiese didn't respond to interview requests sent to his official email address.

PHMSA: A Thin Green Line Protecting the Public from Spills and Explosions

PHMSA was created in 2004 as an agency within the federal Department of Transportation. It is a thin green line intended to ensure the safety of energy pipelines that crisscross the United States. Pipelines also carry other hazardous materials, including poisonous, carcinogenic chemicals like benzene. The agency's tasks include auditing the records of almost 3,000 pipeline operators; developing, issuing and enforcing pipeline safety regulations; conducting industry training, and investigating accidents.

The challenges facing regulators are daunting. More than half of the nation's pipeline was buried prior to 1970, about the same time the nation's first pipeline safety law was enacted and the Office of Pipeline Safety created. Much of the old pipe remains a question mark in terms of its location, composition, level of corrosion and quality of welding.

Some pipelines in the East are more than 100 years old. In the West, suburbs have grown up alongside lines installed when the areas were uninhabited. Age is not necessarily a critical factor if pipe is properly installed, maintained and operated. But many pipelines have changed ownership so many times that installation and maintenance records are unavailable.

In its budget proposal for this year, PHMSA defended its record, stating that its work "often goes unnoticed due to its successful efforts in reducing and containing serious incidents." The agency included a chart showing that incidents resulting in death or serious injury declined more than 60 percent during that period even as the number of miles of pipeline increased almost 40 percent. Other PHMSA data show modest declines in the number of serious incidents, injuries and fatalities in recent years.

"PHMSA is moving in the right direction," said Ravindra Chhatre, an investigator at the National Transportation Safety Board [8] who specializes in pipeline accidents. "Sometimes people get frustrated by the pace that it's moving, but definitely it's improving."

Congress Delays Action on Shutoff Valves Even After Inferno Kills Eight

The problem, Wiese said in New Orleans, is that it takes too long to issue regulations, in part because industry negotiates for the weakest possible rules.

"Getting any change through regulation, which used to be a viable tool, is no longer viable," Wiese told the industry representatives. "I really don't see that as a way to get change. It moves so slow. I've been working on rules now for recommendations from our friends at (the National Transportation Safety Board) and U.S. Congress. I've been working very hard but with the resources we have I still can't get those rules out."

To Rep. Jackie Speier, D-Calif., whose district includes the site of one the deadliest pipeline accidents in American history, Wiese's comments were surprising only because they were delivered in public.

"To me, he was refreshingly candid," she said. "The industry has a lock on PHMSA. It has a lock on Congress. And the public's interest gets dramatically watered down."

Speier began having doubts about PHMSA after a 30-inch section of pipe ruptured in San Bruno at 6:11 p.m. on Sept. 9, 2010. The explosion generated a giant fireball that went on for 95 minutes because it took that long for gas line operator Pacific Gas & Electric to reach the manual shutoff valves.

The pipe had been installed in 1956 and was substandard and poorly welded, a National Transportation Safety Board (NTSB) investigation found later. Because it was grandfathered

under PHMSA's safety laws, it wasn't subjected to the pressure testing that newer pipes must undergo.

The NTSB's investigation also found widespread failures of PG&E's operations, maintenance, record-keeping systems and emergency response. It issued a total of 39 recommendations, including 13 to PHMSA. As the third anniversary of the explosion approaches, PHMSA has yet to finish implementing any of the recommendations, according to the NTSB.

One of those recommendations was for remote shutoff valves to be installed on energy pipelines near suburbs, dams or other areas where an explosion would have grave consequences. Safety advocates had been arguing for remote or automatic safety valves since the 1970s, but the oil and gas industry always objected, saying the cost was too high and false alarms could shut down a pipeline, disrupting the flow of oil or gas.

On the first anniversary of the tragedy that rocked her district, Speier introduced legislation designed to implement many of the NTSB recommendations, including the call for remote shutoff valves.

But the law President Obama signed several weeks later was a compromise bill—the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011. It was praised in its final form by the American Petroleum Institute, the Interstate Natural Gas Association of America and other industry groups. It was far weaker than Speier's legislation, especially when it came to the remote shutoff valves that might have reduced the death and destruction in San Bruno.

Instead of requiring operators to install the valves quickly, the act directs PHMSA to spend a year studying the mechanics and costs of such a rule and then spend another year deliberating the implications. It also stipulates that PHMSA may not proceed down the road toward regulations—a process that typically takes 18 months to three years—until it first determines that remote shutoff valves are economically feasible for the industry. Even then, the new rule could be applied only to pipelines laid in the future.

"Laughable," Speier said of the provision in a recent interview. Industry, which has argued for decades that remote shutoff valves are too costly, will no doubt continue to do so, she said.

Non-Industry Groups Find PHMSA Less Accessible

In addition to Wiese, PHMSA sent at least three officials to address the safety conference at the Royal Sonesta Hotel in New Orleans. Two former PHMSA officials who left the agency to work as industry consultants also addressed the group of 300 to 400 oil and gas pipeline operators. Throughout the week, the Louisiana Gas Association [9] operated a hospitality suite overlooking Bourbon Street, where regulators and industry representatives gathered each evening to sip libations and drop beads to passersby.

Speaking just before Wiese, Bob Kipp, president of the Common Ground Alliance [10], an industry-backed safety group, drew on Sun Tzu's classic treatise, *Art of War*, in urging the crowd

to "keep your friends close and your regulators closer." The comment drew chuckles from the audience.

Groups outside the industry have found PHMSA far less accessible.

In preparing for a recent trip to Washington, a delegation organized by the National Wildlife Federation [11] tried to set up appointments with the State Department, the Environmental Protection Agency and PHMSA to discuss pipeline safety. While the delegation was welcomed by the State Department and the EPA, a PHMSA official denied the request without explanation.

To Beth Wallace, the federation's community outreach coordinator for the Great Lakes Regional Center, it was typical of the brushoffs environmental groups get from PHMSA. "It seems that the agency always gives an ear to the industry," she said. "But when it comes to public participation, there doesn't seem to be that same level of access."

PHMSA spokesman Hill said agency officials had met with the National Wildlife Federation in May and didn't feel another meeting was necessary.

In New Orleans, Wiese said "an under-informed populace highly dependent on fossil fuels" is prone to negative perceptions of the industry. He said that penchant is exacerbated by a press corps that doesn't "have time to fully understand the story" and has instead served as a vehicle for "gang warfare" through its coverage of events like the March 29th rupture of ExxonMobil's Pegasus pipeline in Mayflower, Ark.

Congress, Wiese contended, hasn't done much to help.

"It's very political in Washington. Nobody wants to try to figure out what's the best thing to do. They're thinking about what's the most advantageous position to take," he said, later adding that he'd recently had an unpleasant meeting with a "very hot" congressional delegation about the Pegasus spill in Arkansas.

Rep. Tim Griffin, R-Ark., a member of the delegation Wiese was referring to, has criticized the operations and maintenance of the pipeline and PHMSA's lack of transparency.

"If public officials and Arkansans would have known then what we know now, changes to the operation of the pipeline may have been demanded years ago," he said.

InsideClimate News reporter David Hasemyer contributed to this report.

http://insideclimatenews.org/news/20130911/exclusive-pipeline-safety-chief-says-his-regulatory-process-kind-dying

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