

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Atlantic Coast Pipeline, LLC

Docket Nos. CP15-554-000  
CF15-554-001  
CP15-555-000

**COMMENTS IN RESPONSE TO THE ATLANTIC COAST PIPELINE DRAFT  
ENVIRONMENTAL IMPACT STATEMENT**

by

**SATCHIDANANDA ASHRAM-YOGAVILLE, INC.**

Intervenor Satchidananda Ashram-Yogaville, Inc. (the “Ashram”) submits the following comments regarding the Federal Energy Regulatory Commission’s (“FERC”) draft environmental impact statement (“DEIS”) for the proposed Atlantic Coast Pipeline project (“ACP”). The Ashram already has full party status by virtue of its motion to intervene filed previously in the ACP proceeding.<sup>1</sup> Because the DEIS is based on incorrect and incomplete information and thus fails to properly assess the adverse impacts of the ACP on the Ashram, it does not satisfy the requirements of the National Environmental Policy Act (“NEPA”). FERC must revise the DEIS to remedy those deficiencies and reissue the document for public comment.

To build the pipeline it proposes in the above Docket, Atlantic Coast Pipeline, LLC

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<sup>1</sup> See Motion to Intervene and Protest of Appalachian Mountain Advocates, Appalachian Voices, Chesapeake Climate Action Network, Doddridge County Watershed Association, Eight Rivers Council, Greenbrier River Watershed Association, Satchidananda Ashram-Yogaville, Inc., Shannon Farm Community, Sierra Club, West Virginia Rivers Coalition, and West Virginia Highlands Conservancy, Docket Nos. CP15-554-000, et al. (Oct. 23, 2015) (“Ashram Intervention Motion”). The Ashram joined the motion as an individual movant, requesting independent intervenor status.

(ACP) proposes a route that places the large hazardous natural gas pipeline dangerously close to Satchidananda Ashram-Yogaville. Using inaccurate distance data and incomplete analysis, the DEIS concludes that the Ashram would not be seriously impacted by the pipeline. In reality, the Ashram would be directly and negatively impacted by the proposed gas pipeline, compressor station and other related facilities. Both the construction and operation of the proposed pipeline and compressor station would put the Ashram's economic survival at risk, hinder its spiritual practices and ability to carry out its mission of offering these services to others, and present serious health and safety risks to the Ashram and surrounding community. Accordingly, the Commission should reject the application, as amended. In the alternative, the Commission should set the application for an evidentiary hearing to fully address contested issues.

## II. DESCRIPTION OF SATCHIDANANDA ASHRAM-YOGAVILLE, INC.

The Ashram is a spiritual community, located on 660 acres, in Buckingham, Virginia, with a Monastic Order, an Order of Integral Yoga Ministry, other spiritual aspirants, and staff. It also serves as headquarters for its world-renowned international headquarters, Integral Yoga International. Over 10,000 visitors each year come to experience a peaceful, tranquil wholesome environment while learning about the yogic teachings and lifestyle as taught through the Integral Yoga teachings of Sri Swami Satchidananda. Visitors come to restore and enhance their health, engage in spiritual and religious practices, silent retreats, and participate in the Ashram's educational programs.

## III. FERC's DEIS fails to adequately analyze the adverse impacts of the ACP Project to the Ashram

The Ashram opposes the proposed ACP gas pipeline, compressor station and other related facilities due to the substantial harm that would result from the construction and operation of the pipeline project. The adverse impacts warrant

Commission rejection of the proposal. The Commission should deny the application, as amended previously and reported on in the Draft Environmental Impact Statement (DEIS), or at a minimum, set the application for evidentiary hearing to address the contested issues, including a lack of a comprehensive justification of need for the ACP.

Like the original application, and the amended application, the DEIS fails to account for the significant adverse effects of the proposed ACP. Instead, the DEIS states the distance from the ACP to Yogaville incorrectly, with no regard to the fact that the ACP route has been moved twice closer to Yogaville property, homes, school, shrines, and the LOTUS Temple, thus increasing the likelihood on any accident, leak, fire, and explosion from the hazardous fuel transmitted in the pipeline having a devastating impact on our property, our residents, students, and staff, and on the pristine atmosphere required for our successful operation and spiritual practices.

There are two inaccurate references to Yogaville under two sections of the DEIS.

One section is **SOCIOECONOMICS - Third section, third paragraph** (pg. 4-398), where it states:

*"Regarding concerns expressed about the impact on Yogaville and its Ashram, the DEIS states: "Yogaville is located over 4 miles from ACP and, therefore, we conclude no direct or indirect impacts on tourism and visitation to Yogaville would result from construction and operation of the projects."*

The distance between the ACP and Yogaville as stated in the DEIS is grossly incorrect.

The correct information is that the Ashram's property is 1,000 ft. from the ACP, the Ashram's school and many homes are between 1600 ft. to 1900 ft. distant, and the LOTUS Temple would be 3307 ft. from the ACP. Thus the DEIS conclusion that there would be "*no direct or indirect impacts on tourism and visitation to Yogaville would result from construction and operation of the projects*" is flawed, incomplete, and based on wrong data.

Ms. Carla Y. Picard, External Affairs Manager for Dominion Energy, has confirmed this error in the DEIS in her January 3, 2017 email to Joseph Jeeva Abbate of Yogaville Environmental Solutions. In her email, Ms. Picard notes that our corrected distances (as listed above) "more closely depict the route's proximity to Yogaville" than the incorrect distances noted in the DEIS. She continues to clearly state "...this is an inaccuracy in the FERC DEIS document, and we have also flagged it as an item to correct with FERC."

The second section in this overview referencing Yogaville is under "**CULTURAL RESOURCES** (pg. 4-414)" in the third paragraph, where it states,

*"We asked Atlantic to consider effects on the Yogaville cultural site, and they responded that the pipeline route is located approximately 0.5 mile to the southwest of the proposed boundaries of the historic district and, therefore, no impacts on the proposed district as a result of construction and operation of ACP are anticipated. The Virginia Department of Historic Resources has not provided comments on potential effects of ACP on*

*Yogaville.” (Pg. 4-419)*

Again, we have a flawed conclusion that “*no impacts on the proposed district as a result of construction and operation of ACP are anticipated*” based on inaccurate distance and the lack of necessary feedback from the Virginia Department of Historic Resources.

The Ashram has detailed the ACP’s negative effects in its previously filed motion to intervene and protest submitted in Commission Docket Nos. CP15-554-000, et al. regarding the original ACP application,<sup>2</sup> and in the Ashram’s comments provided in the pre-filing proceeding in Docket Nos. PF15-6-000, et al.<sup>3</sup> The Ashram’s filings also indicate that there is no need for the ACP, which would forgo the benefits of the clean energy resources that the ACP would displace. The Ashram incorporates by reference herein each of the filings that it has submitted in the Commission proceedings concerning the proposed ACP, in Docket Nos. CP15-554-000, et al., and PF15-6-000, et al.

These comments in response to the DEIS, including the Ashram’s prior filings in the ACP proceedings, address the interests and positions of the Ashram to the extent known at this time. It reflects new developments relevant to the proceeding, which have occurred since the original ACP application, and since the follow-on Protest document submission was also filed. The Ashram notes that information regarding the proposed ACP continues to be disclosed, including Dominion’s

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<sup>2</sup> See Ashram Intervention Motion.

<sup>3</sup> See, e.g., Letter of Swami Karunananda filed on behalf of Ashram, Docket No. PF15-6-000 (May 4, 2015).

supplemental materials filed after its amended application was submitted and after the release of the DEIS.<sup>4</sup> The Ashram reserves the right to submit further evidence and arguments in this proceeding, as circumstances may warrant.

A. Proposed Gas Compressor Station and Pipeline Present Health and Safety Risks

Construction and operation of facilities related to the pipeline, including the proposed gas compressor stations, will adversely affect communities including the Ashram and other surrounding communities in Buckingham County. The compressor station that would be constructed in Buckingham County would be 5.5 miles from the Ashram, thus exposing the surrounding community and the Ashram to the pollution and associated harms it would bring. FERC's DEIS fails to account for the risk of adverse impacts on communities near the proposed compressor stations. The amended application proposes to increase the Buckingham County compressor station horsepower (HP) from 40,715 to 53,515 HP,<sup>5</sup> increasing the magnitude of the risks.

The pollution and noise emitted from compressor stations, and associated health and safety risks, are well known. 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. Air

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<sup>4</sup> Following the issuance of the Commission's March 22 Notice of the amended application, ACP partner Dominion Transmission, Inc. submitted further information in this proceeding, including site plans, archaeological and historic survey reports and agency correspondence. See Supplemental Information filed by Dominion Transmission, Inc., Docket Nos. CP15-554-000 (Mar. 24, 2016).

<sup>5</sup> Notice of Amendment at 1.

pollution comes from compressor blowdowns that release large amounts of toxic chemicals into the atmosphere. Compressor noise, both audible and low frequency, has produced reported negative health effects.

A study detailing the adverse impacts of the ACP, including the risks presented by the proposed compressor station in Buckingham, references various findings regarding the negative health effects of compressor stations. Among other findings, it cites to an environmental agency report indicating that “pollution around compressor stations is common and severe,” and noting “high rates of illnesses such as nosebleeds and respiratory difficulties among people living near the stations.”<sup>6</sup>

It is the Ashram’s understanding that the latest proposed pipeline route would bring the pipeline only 1,000 ft. from the Ashram’s property line, and within 1607 ft. from an Ashram school, within 1870 ft. of numerous homes of many Ashram community residents, and within 3307 ft. from the Light of Truth Universal Shrine (“LOTUS”), an interfaith temple that draws visitors from across the country and globe, and within 2640 ft. of our Kailash shrine. The Key-Log Economics study documents the potential impact of the ACP in stating, “Properties outside the ROW, but still near the pipeline, would also suffer a loss in value. First there is a “high consequence area”, within which one’s survival of an explosion would be unlikely. The high consequence area would be 0.4 miles wide (1,092 feet on either side) for a

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<sup>6</sup> Key-Log Economics LLC, Economic Costs of the Atlantic Coast Pipeline: Effects on Property Value, Ecosystem Services and Economic Development in Western and Central Virginia at 28-29 (Feb. 2016, as updated Mar. 2016), at [http://keylogeconomics.com/wp1/wp-content/uploads/2016/03/EconomicCostsOfTheACP\\_TechnicalReport\\_REV201603.pdf](http://keylogeconomics.com/wp1/wp-content/uploads/2016/03/EconomicCostsOfTheACP_TechnicalReport_REV201603.pdf).

pipeline of this size. There is also a 1.4-mile-wide evacuation zone (3,583 feet on either side), defined as the area an unprotected human would need to move beyond in order to avoid burn injury in the event of an explosion or a fire following a leak. Living with the 24/7/365 possibility of having to evacuate one's home or business at a moment's notice, if notice is even possible, diminishes the value of the property to its owner."

Additionally the Ashram would likely need to close its operations and lay off staff during the year or more of pipeline construction period. Dominion staff agreed publicly with Ashram management that the pipeline construction would be disturbing to the peace and quiet of our community and shrines.

**B. Proposed Gas Pipeline and Compressor Station Would Create Adverse Economic Impacts**

A recent study of the economic impact of the proposed pipeline and compressor station demonstrates the negative economic impact of the proposal in the four-county region examined, which includes Buckingham County where the Ashram is located.<sup>7</sup> Property values, economic development and ecosystem services in Western and Central Virginia would be adversely affected. According to the study's findings regarding Buckingham County, the County would incur as much as

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<sup>7</sup> Key-Log Economics LLC, Economic Costs of the Atlantic Coast Pipeline: Effects on Property Value, Ecosystem Services and Economic Development in Western and Central Virginia (Feb. 2016, as updated Mar. 2016) at [http://keylogeconomics.com/wp1/wp-content/uploads/2016/03/EconomicCostsOfTheACP\\_TechnicalReport\\_REV201603.pdf](http://keylogeconomics.com/wp1/wp-content/uploads/2016/03/EconomicCostsOfTheACP_TechnicalReport_REV201603.pdf).



\$20.8 million in one-time costs, plus annual losses of as much as \$7.1 million.<sup>8</sup>

Buckingham County, one of the poorest counties in Virginia, can ill afford such harmful economic impacts.

The study shows that the Ashram's role as an "important economic engine in western Buckingham County" would also be impacted.<sup>9</sup> Ashram revenues from visitor stays help support economic activity locally and in the region in the form of jobs, local company contracts, food purchases from farms and wholesale companies, and transportation to and from regional airports, train and bus stations. Ashram visitor surveys indicate visitors will be less likely to come to the Ashram if the pipeline is constructed. The air and noise pollution from the proposed compressor station is likely to create an environment that is no longer conducive to silent prayer and meditation and the peaceful atmosphere provided at the Ashram. The offering of a peaceful atmosphere is key to fulfilling the Ashram's mission, and draws visitors to this sacred space. The degradation of the atmosphere will impede the Ashram's ability to serve visitors consistent with its mission, and the resulting decrease in visitor stays will have a negative economic impact on the Ashram and surrounding community and region.

### C. ACP Threatens Ashram's Historic Cultural Uses and Properties

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<sup>8</sup> See Key-Log Economics LLC, Buckingham County and the Atlantic Coast Pipeline: Summary of Economic Effects at 2 (Feb. 2016), at [http://keylogeconomics.com/wp-content/uploads/2016/05/ACPCosts\\_BuckinghamCounty\\_Summary\\_REVISIED\\_20160516.pdf](http://keylogeconomics.com/wp-content/uploads/2016/05/ACPCosts_BuckinghamCounty_Summary_REVISIED_20160516.pdf) ("Buckingham Study Summary").

<sup>9</sup> Buckingham Study Summary at 4.

On January 23, 2016, the Ashram was identified by the Virginia Department of Historic Preservation (VA DHR) as eligible for nomination for National Register of Historic District status. The Historic District would be negatively impacted by the pipeline and compressor station being located so close to the property, as described above and in previous Ashram filings. The modified pipeline route is now even closer to the Ashram, as we have stated previously, and almost right up against the Ashram's property line.

The historic cultural uses of the Ashram's lands and buildings have been recognized during the Historic District consideration process and various buildings, including the interfaith LOTUS temple, also have historical value in themselves. The proposed pipeline would come perilously close to this world-renowned treasure, the first temple of its kind in the United States, which is a sanctuary and place of meditation, contemplation and prayer for people of all faiths. Similarly, the proposed pipeline would also run close to the Ashram's sacred Kailash - Lord Nataraja Shrine, gifted by the former Ambassador to the United States, Dr. Karan Singh, which is the largest outdoor Lord Nataraja shrine in the country.

In the eligibility process for National Register status, Yogaville's quiet rural setting, its vistas of several miles along the James River and more distant Blue Ridge Mountains, its system of hiking trails, and huge organic farm are as key to promoting the mission that underlies the founding of Yogaville as are its community buildings. Yogaville District encompasses beyond the borders of the Ashram to include all those properties on both sides of Rt. 604 and arterial roads in either direction where community members have built residences and businesses in order to live together

and support this mission. Every aspect of this mission and its purpose-led growth in residents, health education and yoga programs, and economic livelihoods would be negatively impacted by the pipeline and compressor station located so close to Yogaville and its community, as described above and in previous FERC filings.

V. CONCLUSION

WHEREFORE, for the reasons stated above, the Ashram notes that the DEIS provides inaccurate vital information re: the distance of the pipeline from the Ashram, its property, its school, its residents, its sacred shrine and temple, and its main campus. The DEIS conclusions re: the lack of significant impact from the ACP to the Ashram are inaccurate, unacceptable, and indicative of incomplete and faulty analysis. The Ashram respectfully requests that the Commission rescind the deficient DEIS, revise the DEIS to include accurate information on the impacts of the proposed ACP project on the Ashram, and reissue the DEIS for public comment.

Respectfully submitted,

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Dated: April 4, 2017

Document Content(s)

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