

**Frank Johnson, Statement on ACP GWNF-6 alternative route,
Docket Number: CP15-554-000**

My name is Frank Johnson. I live in Hot Springs, in Bath County, Virginia. I appreciate the opportunity to comment on the GWNF 6 route alternative for the Atlantic Coast Pipeline, Docket Number CP15-554-000, which is coming through northern Bath County and neighboring counties as well.

I don't live or own property along the pipeline route. But to paraphrase the poet:

No man is an island,
Entire of itself,
Every man is a piece of the county,
A part of the main.

A pipeline that threatens my neighbor's home or livelihood threatens my own as well. A pipeline that threatens the environment and the habitat of my neighbors threatens mine. So I have a moral obligation as their neighbor to stand with them when they're threatened with a disaster of this scope. It becomes my threat as well as theirs.

That's true not only morally, but **environmentally**. This project threatens not just *their* environment, but the environment of the entire region. It will be impossible to build this pipeline without causing long-term or permanent environmental damage to the county I call home.

It will require massive construction across steep, unstable slopes, flood-prone streams, caves, sinkholes, springs, and more. It will irrevocably damage the karst geology of the region that carries life-giving water to the springs and wells that people, livestock, and wildlife rely on.

And, ironically, it also threatens to pollute those water supplies. Just building the access roads for the project will send large amounts of pollution into our groundwater.

That mutual threat is also **economic**.

Farms and small businesses will lose revenue or go out of business because of this project. They're going to lose pasture land and crop fields, watering holes for their livestock, and land they use for boarding animals and hosting tourists.

Terry Jackson has 500 head of cattle whose water is going to be threatened because water travels as far as eight miles in the karst formations below their farm.

Elfrieda McDaniel won't be able to grow hay or board horses on her farm. And the springs that water her cattle will be threatened.

Her neighbors, the Dunnagans, have a sink that's just 160 yards from the pipeline route. They have a spring for watering their cattle in wet seasons, and in the summer they have to bring them water. The pipeline is going to threaten their water supply and make it more difficult to bring them water when the pipeline is being built.

There are dozens more stories like those. All of that is not only unjust to them; their losses also increase the tax burden on the rest of the citizens of Bath County.

Speaking of tourism, this county relies on tourism for a significant portion of its revenues. This pipeline threatens the environment, viewsheds, and quality of life that tourists come here to enjoy. Again, that threatens the livelihoods of people here in the tourism industry, and threatens the economic viability of the county I live in.

Programmatic Environmental Impact Statement

Before any of this gets any further, I would like to ask the FERC to conduct a Programmatic Environmental Impact Statement for this pipeline and the three other proposed pipelines currently on the table in this region of Virginia and West Virginia. A programmatic EIS for all four projects would capture the environmental impact throughout the region better than four separate ones.

In fact, the National Environmental Policy Act ***requires*** a programmatic EIS because the four pipeline projects are — and I’m quoting here — “proposals for . . . actions that will have *cumulative* or *synergistic* environmental impact upon a region [and] are pending concurrently” before the FERC. All four of these pipelines are currently pending before the FERC. They must by law be evaluated together in a programmatic EIS.

You can also validate the ***true economic necessity*** for this project with a programmatic EIS. There are so many existing natural gas pipelines in the mid-Atlantic region that the existing lines are running at 55 percent capacity. So it isn’t even clear that there’s an economic justification for this project.

Its only real beneficiaries are the subsidiaries of the ACP partners, who are the majority of the proposed customers of the gas delivered by this pipeline. Developers often use so-called customers like those to gain approval to build a new pipeline, but they aren’t indications of the true economic need for a project, and the FERC shouldn’t consider them to be.

Conclusion

The construction of this pipeline will ruin farms and pastures, ancestral homes and retirement properties. It will disrupt the lives of our residents and threaten their livelihoods and way of life. It threatens to permanently destroy a delicate environment that our people, livestock, and wildlife depend on.

All of that is terrible enough. But to wreak such destruction for a pipeline that isn’t even economically necessary approaches the definition of sinful.

So I ask the FERC to conduct a full programmatic EIS for all the pipeline projects in this region, and I ask that the FERC deny any further approvals for the planning and construction of the Atlantic Coast Pipeline.

Thank you.