

Comments of Jean Howell, May 21, 2016 – ref. GWNF-6

My name is Jean Howell.

I want to talk with you about 4 areas of concern:

1. Potential damage to my property
2. Dominion's apparent lack of short and long-term accountability
3. Lack of need for the pipeline
4. Environmental concerns – Programmatic EIS

First – Potential damage to my property

I own River Bend Farm on the Cowpasture River and have protected it against further development via a conservation easement through the Virginia Outdoors Foundation. It is located in a beautiful spot in the mountains which accompanying photographs will demonstrate. GWNF-6 is located less than 2 miles from my property, and as such makes my farm perilously close to the blast and evacuation zone. The "Fort Lewis" adjustment, if actually constructed, would move it $\frac{3}{4}$ of a mile farther, hardly making me feel more comfortable.

The well on my farm is located near the line which adjoins Fort Lewis property. I'm very concerned that the pipeline and its destruction of land and various water sources will not only affect the amount of water to which I have access, but is likely to contaminate it even if there is no major event such as an explosion.

The Cowpasture River, one of the cleanest rivers in the United States and which is in the Chesapeake Bay watershed, runs through my property. The river joins the Jackson River at Iron Gate and becomes the headwaters of the James River. As it is now planned, the pipeline will be constructed under the Cowpasture just upstream from me.

Second – Dominion's apparent lack of short and long-term accountability

After my discussions with Dominion, I'm convinced that its plan to monitor construction of the pipeline under the river is deficient in several respects. Dominion claims that they will be "in and out" of the river in a maximum of 24-48 hours. Really? Remember this pipe is 42" in diameter and will be dug 5' underground. Dominion states that they will build a sort of temporary dam to protect flora and fauna of the river during construction. While I suppose there is a way to put a pipe that size under the river with some degree of safety (although it has not been done in an area such as ours – EVER) I question that Dominion can or should try to do it in 24-48 hours. And I worry about years from now, when Dominion has got all its money and has gone away, what happens when the pipe leaks into the river?

When I questioned Dominion how it will maintain the pipeline swaths near the river, they claimed that they would use approved herbicides to deal with invasive weeds. When I asked what those herbicides were, they could not say, only that they would use ones that were needed for specific species. When I asked for a list of herbicides that had been used in the past, they could not provide one, in fact were not even sure that one existed.

When I asked who would supervise this river construction, they told me that a Dominion supervisor would be there 100% of the time. That gives me no relief, because based on other things that Dominion has said and done, I'm not convinced that, under the pressure of time and money, Dominion supervisors would necessarily have the river's and our best interests as top priorities. When I asked who would supervise Dominion supervisors, they thought for a while and replied - the Army Corps of Engineers. That gave me no satisfaction either. Remember it was the Army Corps of Engineers who said the levees in New Orleans were strong enough to withstand Katrina. When I reminded them of that tragedy they thought maybe that the EPA would supervise the Corps. In other words, Dominion has NO clear idea of who would be in charge, and, demonstrated only a casual interest in the question.

3. Lack of need for the pipeline

Further, based on the professional research reported about this pipeline, I'm convinced this pipeline is not needed. And since "need" is a primary qualification for FERC to find in order to approve the pipeline, I remind you of the following;

- a. Only 54% of existing pipeline capacity is currently being used. Were there increased demand at peak times, flows that now move northward where demand has already eased, can be reversed.
- b. In this Virginia/North Carolina region, demand has definitely slowed and now has almost peaked. Further, future supply is highly uncertain.
- c. In the out years once the pipeline is no longer used at all, the unrecovered costs of the pipeline and its installation will have to be borne by the end users – that's me, and likely that's some of you.

Last – Environmental concerns – Programmatic EIS

Finally, as part of FERC's evaluation I respectfully request that you institute a Programmatic EIS. Doing so will allow FERC to consider ALL pipeline plans in the mid-Atlantic at the same time, and will permit a thorough, exhaustive environmental analysis, one that is not possible when evaluating each pipeline request individually.

So to recap:

1. Potential damage to my property
2. Dominion's apparent lack of short and long-term accountability
3. Lack of need for the pipeline
4. Environmental concerns – Programmatic EIS

Please do not permit this pipeline. Thousands of acres of beautiful, untouched countryside will be destroyed not only by the ruination of the landscape, and its fragile environment, but potentially by the possibility of explosions killing hundreds of people. This pipeline is not needed – both your research and ours show that.

Thank you.

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