

May 21, 2016

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

RE: CP15-554 (Proposed ACP)

The following comments were read to a representative of FERC during the Scoping Meeting held at Bath County High School, Warm Springs, VA

My name is Joseph Murray and I live approximately one-half mile from the proposed alternative ACP route and less than one-half mile from a proposed access road, both in the GWNF-6 in Bath County, Virginia.

The way in which this pipeline is being forced on to the citizens of Bath County is economically and environmentally unjust. I am not convinced Dominion's arguments will satisfy the necessary criteria when viewed in context of the other proposed pipelines in the Mid-Atlantic region and balanced against our nation's attempt at regulating greenhouse gas emissions. One look at a map of the collective pipelines in the United States and even an individual without any engineering experience can see the effect of allowing individual pipeline projects to proceed without a comprehensive plan. This chaotic array of pipelines creates, in my opinion, energy insecurity and vulnerability. We owe it to our children and future generations to take steps now to straighten out the mess we've created. I'm asking FERC to initiate a Programmatic Environmental Impact Study (PEIS). It's my understanding that Dominion is not opposed to a PEIS, indeed, I would think that they would welcome the opportunity to demonstrate that they are acting in the best interest of the region and nation.

Economically Unjust

Dominion's rosy economic outlook for their proposed pipeline in Bath County fails to meet acceptable research design criteria of an introductory Economics 101 class. Others more knowledgeable on the realistic economic impacts to Bath County property values and tourism industry have already submitted studies and reports to FERC. Dominion's same profit-driven unsubstantiated economic claims are being made with the other proposed pipelines in the Mid-Atlantic region. If we are to establish that there is indeed an economic necessity for this pipeline (and the other proposed pipelines in the region) then a more thorough and regionally comprehensive PEIS will provide that justification.

Environmentally Unjust

The presence of a natural gas right-of-way (ROW) corridor across Jack and Gum Tree mountains will impair water quality. It's not an accurate argument to compare a natural gas ROW with an electrical transmission ROW. During the installation of an electrical transmission ROW there is minimal disturbance of the soil and underlying geological features. During the construction and installation of a 42" diameter pipeline in mountainous areas of Bath County there will be significant disturbance belowground. The proposed pipeline in northern Bath County will be installed over karst topography and a network of springs and streams. The intact forest (including vegetation,

underlying soil horizons and geology) plays a critical role in water quality. Statements that there will be no impairment of water quality are not only unrealistic but demonstrate a willful ignorance of the situation.

Another significant difference in the rights-of-way for a natural gas pipeline compared to electrical transmission is the management of vegetation. No woody vegetation is allowed to grow in natural gas ROW corridors. This means a linear lawn will be maintained over Jack and Gum Tree mountains. One really needs to come visit the site to see the fallacy of this proposal. Since the ROW corridor will be oriented largely north to south, the turf corridor will receive inadequate light to develop a sufficient root system to prevent soil erosion. Any turf textbook will point out the limitations of growing turf in shade: increase in disease, decrease in health, wear, and root mass. Grass areas already have a higher runoff coefficient (a measurement relating to the amount of water runoff to the amount of precipitation received) than forest floors. The amount of runoff (including sediments) will be even greater for grass growing in the shade (and yes, this holds true for “shade tolerant” grass species as well). Given the steep topography, this means that over time there will be soil erosion and it will impact the streams, springs and other water sources in the area.

It's hard to imagine invasive plant species not moving into the ROW. Visit any electrical ROW corridor in the region and you'll find the oldest and most established invasive plants started in the ROWs and then migrated into other disturbed and sensitive areas. Regardless of the assurances ACP's contractors provide, they simply will not be able to prevent the introduction and spread of invasive species throughout this proposed ACP ROW. Sadly, this will also include the introduction of the Hemlock Woolly Adelgid to a stand of large hemlocks (just west of Gum Tree Mountain in the GWNF) that are currently free of this invasive insect pest.

If herbicides are used to manage the invasive species and unwanted woody vegetation (neither can be “controlled” with mechanical management) then those herbicides, adhering to soil particles, will also end up in the water supplies of the residents in the surrounding area. Please remember, this proposed “magical” linear lawn running over Jack and Gum Tree mountains will be there, impairing our environment over the next 50+ years.

Objective Survey?

I remain unconvinced that Dominion's survey teams will be able to perform an unbiased assessment of the GWNF. Research scientists at major universities routinely produce “scientific” results that are favorable to the corporations funding their research 80 – 90% of the time. I believe I have every reason to suspect that the proposed environmental survey will be biased in favor of the entity paying the surveyors.

According to the US Forest Service website surveys in the GWNF are to “include information on wetlands, water, soil, and **suitable habitat** for sensitive species, including federally listed threatened and endangered plants and animals.”

I'll be curious to learn if the surveyors in the GWNF recognize that directly in the path of the proposed pipeline (where it's to cross the east fork of Laurel Run) there is a large white oak with its lower trunk home to a very healthy population of the lichen “Lungwort” (*Lobaria pulmonaria*). The presence of Lungwort is “an indicator for rich, healthy ecosystems such as old growth forests” http://www.fs.fed.us/wildflowers/plant-of-the-week/lobaria_pulmonaria.shtml). I fear that the contractors hired to survey this area will simply walk past the microflora and not take notice of the

diversity of moss, lichen, bryophytes, and ferns and the role they play in this “rich, healthy ecosystem” that is our old growth forest. [I’m defining “old growth forest,” especially with respect to the presence of Lungwort, as protected forests that have been stable for over 70 years. True, this may include areas that experienced logging but loggers historically avoid harvesting trees that they perceive to be undesirable. Often these undesirable trees, and the web of life that supports them, can grow to considerable age and complexity, but not necessarily in size.]

Compared to the neighboring Jefferson National Forest, the GWNF is known for its contiguous landmass. Allowing a pipeline through the forest will further fragment and degrade one of the truly special forests of the east coast.

It appears to me that there are serious issues with the proposed Atlantic Coast Pipeline in Bath County (Virginia) that have only been superficially addressed and not sufficiently satisfied to employ eminent domain. I believe the prudent approach would be to declare the justification for this proposed pipeline to be incomplete until a more comprehensive Programmatic Environmental Impact Study can be performed. What’s the rush? Haste makes waste. Let us not burden future generations with rushed decisions that they cannot afford and the environment cannot absorb.

I wish to extend my sincere thanks to the representatives from FERC for arranging this scoping process and allowing me to express my opinions.

Respectively,

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