

CP 15-554

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Congress of the United States

House of Representatives

Washington, DC 20515

OFFICE OF EXTERNAL AFFAIRS

June 10, 2016

2016 JUN 17 A 10:42

FEDERAL ENERGY
REGULATORY COMMISSION

Jehmal Terrence Hudson, Esq.
House Congressional Liaison
Federal Energy Regulatory Commission
888 1st Street NE
Washington, DC 20426-0002

Re: Docket No. CP15-554

Dear Mr. Hudson:

I am writing on behalf of my constituent William F. Limpert with respect to his submission dated June 1, 2016 to FERC concerning the Atlantic Coast Pipeline.

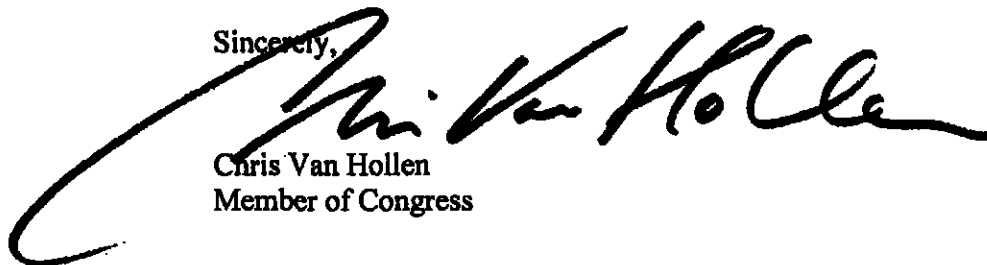
As described in the enclosed letter, Mr. Limpert and others in his community believe the pipeline will adversely affect the safety and health of their families and neighbors and the value of their property.

I would appreciate your reviewing this matter and advising me in writing of your findings. Please direct all correspondence to me at the following address:

51 Monroe Street, Suite 507
Rockville, MD 20850
FAX: (301) 424-5992

If you need additional information, please contact Brent Girard in my district office at (301) 424-3501 or by email at brent.girard@mail.house.gov. Thank you for your assistance.

Sincerely,



Chris Van Hollen
Member of Congress

2016-00105

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Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket No. CP15-554

June 1, 2016

Dear Secretary Bose:

I am hereby commenting for the fourth time regarding the proposed Atlantic Coast Pipeline. This submittal is in addition to my previous comments of March 6, 2016, March 31, 2016, and April 22, 2016. I am opposed to the pipeline at all levels for reasons stated in these and earlier comments. The pipeline, as now proposed, would come through the center of our property at 250 Fern Gully Lane, Little Valley, Warm Springs, Virginia, 24484. Our home would be within the blast zone of the pipeline, and we, as well as a number of our neighbors, would not be able to escape from the evacuation zone at the top of Little Valley should we survive the blast. This project is not in the public interest. I hereby request that you reject the Atlantic Coast Pipeline.

My comments cover issues regarding:

Safety

Lack Of Notification Of Property Owners In The Blast Zone And The Evacuation Zone

Drinking Water

Environmental Justice

Adequate Pipeline Capacity Already In Place

Cost of Pipeline Likely To Be Passed On To Consumers

Eminent Domain

Extend The Scoping Period

Taxpayers Subsidizing The Oil And Gas Industry

Loss of property value

Public Anger Over Pipelines

EPA Methane Leak Rules Insufficient

Financial Losses From Climate Change

Benefits of Forests And Old Growth Forests

ACP Invalid Rejection Of Alternative Routes and Methods For Gas Transmission

ACP Invalid Rejection of Renewable Energy Sources and Conservation

ACP Integrity

A Walk Up Miracle Ridge

Alternatives by Rank

Conclusion

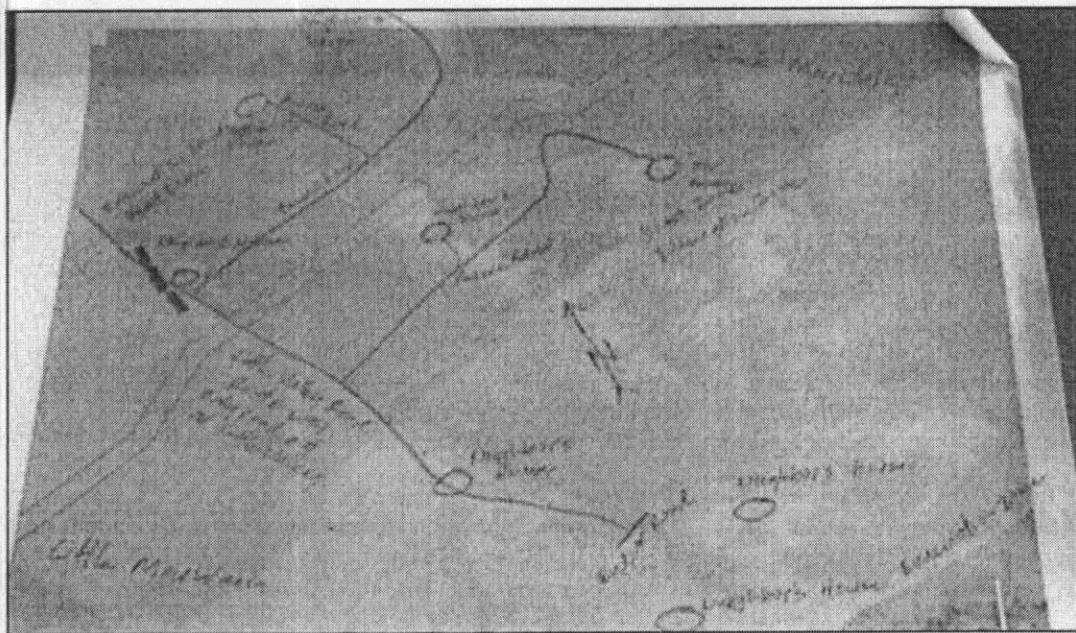
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Safety

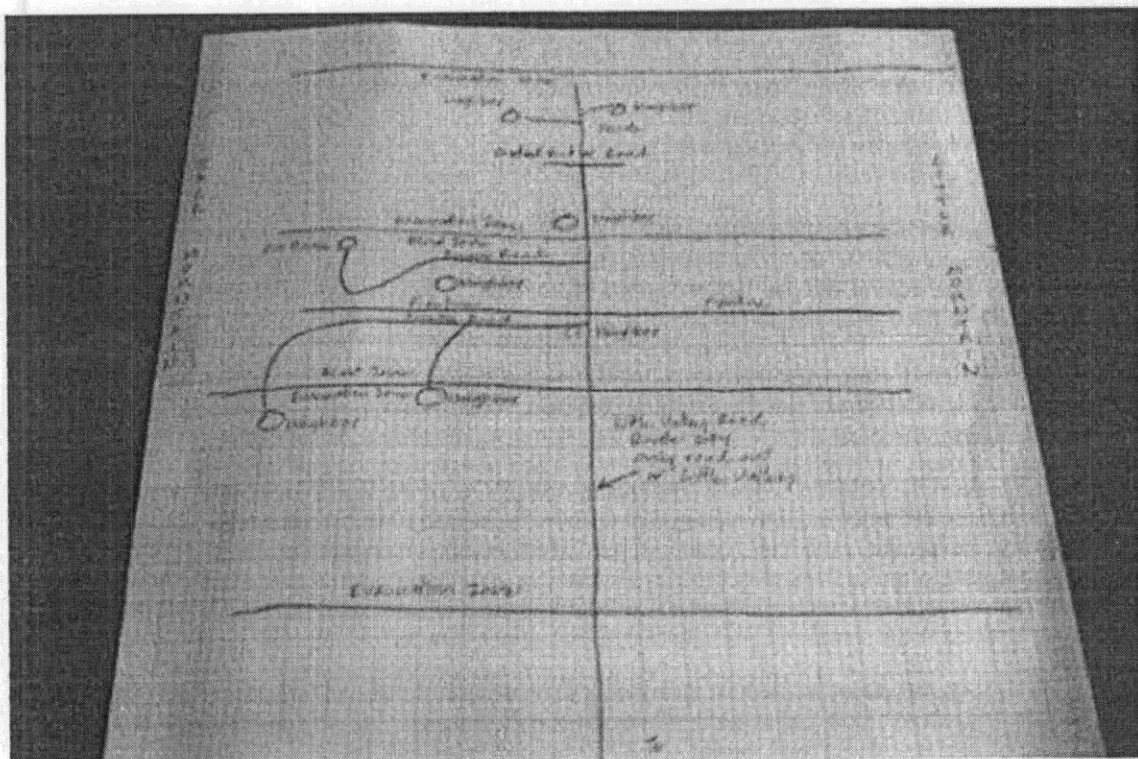
After finding new information provided by the Dominion Pipeline Monitoring Coalition my wife and I now realize that we are in even more danger than we previously thought. A map provided to us now reveals that our private access road to our home, and our only escape route out of the blast zone if the pipe explodes, comes within about 200 feet of the pipeline.

As previously mentioned our home is within 700 feet of the pipeline, well within the 2,200 foot blast zone (1,100 feet on each side of the pipe). It would run up Miracle Ridge, directly across from our home. If we somehow managed to survive the initial blast we would be unable to escape from the 1.4 mile evacuation zone (.7 mile on each side of the pipe). If the pipeline goes in as proposed my wife and I will be forced to vacate our home and property. We could not stand to see the destruction that would occur, or the ongoing fear of knowing that a dangerous volatile pipeline is so close.

According to the Pipeline Association for Public Awareness the evacuation zone in steep wooded areas as in Little Valley is likely greater than .7 mile up grade from the pipe. The determination of that .7 mile distance does not take into account wind, wooded areas, and steep slopes, all of which are significant in Little Valley. There is the extreme danger of fire rapidly advancing up the steep wooded slopes should the pipe explode. We would be trapped at the head of Little Valley where the road dead ends still well within the evacuation zone regardless if it is .7 mile or greater. A number of our neighbors would be trapped as well. I discussed this with FERC staff at the May 21, 2016 scoping meeting in Hot Springs, and showed them a diagram which graphically illustrates the danger that we and our neighbors will face if the pipeline is constructed as currently proposed. A photo of that diagram is attached.



I have asked FERC on several occasions to provide me with the number of properties directly impacted by the pipeline, within the blast zone, within the evacuation zone, and the total number of people living in or frequenting those properties. I have been advised that FERC does not have that information, and I am very surprised and concerned, given the magnitude of the adverse impact. This is information that FERC should have in order to determine adverse impact, and a decision regarding approval or disapproval of this pipeline should not be made until such time that this information is known. I strongly believe that the number of persons in the evacuation zone is in the tens of thousands.



Lack Of Notification Of Property Owners In The Blast Zone And The Evacuation Zone

My wife and I were notified that the pipeline is proposed to come through our property. Our elderly disabled neighbors were not notified. Even though their property is in the evacuation zone of the pipeline, and they would also be trapped at the head of Little Valley with no escape, they were not notified. Other neighbors in the blast zone were not notified.

Apparently, the Atlantic Coast Pipeline is required only to notify property owners who are directly in the line of the pipe, or within 300 feet of the center line of the pipe. Under those rules an elementary school, or a senior center, or a football stadium, or the nation's capitol building would not have to be notified if they were in the blast zone or the evacuation zone of the pipeline, unless they were within 300 feet of the pipe.

This is completely unacceptable. These individuals should have the formal opportunity to comment since they are so negatively impacted by the proposed pipeline, and some of them do not even know that they will be placed in harm's way if the pipeline is approved. The Atlantic Coast Pipeline must notify all those in danger, and those individuals must be given the opportunity to comment prior to FERC considering approval.

Drinking Water

As I have previously stated, our home and all of the homes in Little Valley use spring water or well water. There is no public water system. The nearest public water is 15 miles away. I attached geologist William Jones' report to my previous comments of 4/22/16, and recently made a separate submittal of that report. The report indicates that Little Valley contains significant karst features with many sinkholes and sinking

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springs, and that the water supply for residents will be at great risk if the pipeline comes through as proposed.

I should also point out that ACP's Resource Report 10 does not mention karst features in Little Valley, even though these features are apparent on the very USGS maps that ACP uses in their route determinations. In fact, Little Valley itself is not mentioned in any of ACP's reports that I have seen. This once again brings up the issue of ACP's credibility in providing needed information to FERC.

The karst features of Little Valley are well known to residents. There are sinkholes throughout the valley. There are several sinkholes in the direct proposed path of the pipeline east of Little Valley Run. A very large sinkhole is located east of Little Valley Run north of the proposed path of the pipeline. I submitted a photo of that sinkhole in my earlier comments of 4/22/16.

Geologist William Jones' report also indicates that steep slopes, up to 80%, on both sides of Little Valley have unstable soils with bedrock near the surface. Besides making construction very difficult and the pipe vulnerable to failure, these conditions could easily result in pollution to our drinking water, reduction of our drinking water supplies, or their complete cessation. Blasting required for the pipeline could collapse the underground voids in the karst soils where groundwater travels, stopping the flow of water to our springs or wells, or reducing the volume. Sediment pollution from the unstable soils, steep slopes, and massive amount of earth movement could easily enter the groundwater and contaminate our drinking water supplies. Other pollutants, such as diesel fuel, hydrostatic testing discharges, and toxic liquids accumulating in the pipe due to the extreme elevation changes could also enter our drinking water supplies.

Our drinking water supplies are expensive. Our well cost us \$8,000. A neighbor's well cost \$29,000, and had to be drilled down to 1,000 feet in depth. Loss of these water resources would be a significant financial burden, and would not be covered by the ACP since these wells are over 500 feet from the proposed pipe.

I also want to point out that the proposed pipeline will cross a waterline which we share with our neighbors. This water line carries spring water which is our backup water supply, and our neighbor's only water supply. The pipeline would also come very close or right through a concrete water reservoir that we share with our neighbors. Finally, the pipeline would come close to the spring itself, which produces that water. I have attached photos of this system in previous comments.

Please also recall that the Virginia Department of Environmental Quality has stated that they will not inspect this project, despite a total project land disturbance approaching 25 square miles, and highly erodible soils in Little Valley with slopes up to 80%. Even if state of the art sediment controls are in place, and a strong inspection and enforcement presence is in place there will be large scale sediment pollution. Add no state inspections, and it will be even worse. Any ACP inspectors will be handcuffed by a conflict of interest. I was advised at a recent scoping meeting that inspectors will be available, and they will be under FERC oversight. Even if FERC could supply inspectors, or inspector oversight, this project, especially in Little Valley, is too massive, and on slopes that are too steep, with soils that are too erodible to protect our water supply.

I should also point out that in the recent past we have learned that massive haul roads are now planned along the east side of Little Mountain, and within Little Valley. They will cross up to ten hollows along the east side of Little Mountain which will require extensive drainage structures. These haul roads will be designed for very large construction equipment. They are not logging roads. They are much larger. I have very recently learned that these roads will be 30 feet wide. As I have said, the slopes on this side of Little Mountain are extremely steep. The amount of cut and fill needed to install these massive haul roads would be tremendous.

I cannot understand how the fill area below the roadbed would be compacted and stabilized on a slope that is already up to 80%. Likewise, I don't understand how the cut portion above the roadbed would be

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stabilized on a slope previously up to 80%. If the road was built on a lesser slope of 60%, the resulting slope of the cut and fill areas would be 87.5%. The reality is that these new massive exposed areas of soil and rock would not be adequately stabilized, and the exposed soil will erode, or slide. When that soil erodes or slides it will wash down the extremely steep slopes of Little Mountain, and pollute Little Valley Run. It will also enter our groundwater through sinkholes and sinking springs, and pollute it as well.

I also recently learned that a new route for the proposed pipeline now has it following the ridge of Little Mountain for .7 of a mile. The ridge and areas near the top of the mountain are the steepest portions of Little Mountain. ACP's Resource Report 1 part 1.4.1.1 states that pipeline construction on a ridge requires that the surface may be lowered to construct a level construction right of way 125 feet wide. Notwithstanding the tremendous scarring of the view shed for my wife and I, our neighbors in Little Valley, and all of those living in and traveling in the Jackson River Valley along US Route 220, this operation would also create massive land disturbance, sediment runoff, and pollution. I will discuss the scarring of the view shed and the safety risks associated with this mountain top removal concept elsewhere in my comments.

The recent access road and route changes that I mentioned substantially increase the land disturbance that would occur in the Little Valley watershed and the likelihood of pollution resulting from that land disturbance. Prior to the very recent access road and ridge top route additions the proposed disturbance on the west side of Little Valley was already extremely large with an area 125 feet wide by 1,625 feet long, or 203,125 square feet. Adding the ridge top route change increases that land disturbance by 125 feet wide by 3,696 feet, or 462,000 square feet. Adding the approximate one mile of access roads, and assuming total width of 90 feet (including cut and fill) of land disturbance adds 90 feet by 5,280 feet, or 475,200 square feet. Total increased land disturbance from the access roads and ridge top route now adds 937,200 square feet of land disturbance. Total land disturbance now reaches 981,925 square feet, or nearly 5 times the land disturbance prior to the addition of the access roads and the ridge top route change.

So it is very likely that the total disturbance on the top and east side of Little Mountain could top 1,140,325 square feet. If you add in the disturbance from the pipeline going up the west side of Jack Mountain, that's 5,200 feet by 125 feet, or 650,000 additional square feet of land disturbance. So the total amount of land disturbance now reaches 1,808,400 square feet, or about 41.5 acres, all on highly erodible, and very steep slopes. That's about one and one half times bigger than the 27 acre Homestead Resort in Hot Springs, and about 5 times as large as the original Yankee Stadium 8 acre site.

Most of this disturbed soil will drain to Little Valley Run, or into our groundwater in the karst soils where it is very likely to pollute, reduce, or cut off the drinking water for residents of Little Valley. Ironically, part of the mountain top cut at the crest of Little Mountain will likely drain off to the west side of the ridge, and into the Jackson River, in the area where the original route of the pipeline was proposed, but has now been moved further upstream.

Keep in mind also, as I pointed out in my comments of April 22nd, that there is already a very large landslide on the east side of Little Mountain just several hundred feet north of the proposed route down the slope of the mountain. This slide is approximately 500 feet long by 35 feet wide by up to 10 feet deep near the top of the slide. This slide occurred under natural conditions, prior to any of the land disturbing activities proposed under pipeline construction. The land would be more prone to sliding following construction as soil is destabilized, and slopes are made even steeper. The amount of soil loss from a landslide far exceeds the amount of soil loss from erosion, as does the amount of pollution. I have submitted photos of this slide previously.

ACP's Resource Report 1 states that post construction maintenance will only involve cutting over the entire right of way no more than once every three years, and cutting a maximum ten foot strip more frequently to maintain herbaceous vegetation with no woody growth. There is no mention of herbicide usage. However, ACP's Invasive Species Management Plan includes herbicide use. Herbicide use in the karst terrain in Little Valley could easily result in contamination of our drinking water. So I suppose we

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have to pick our poison if the pipeline goes in. Either Little Valley gets choked with invasives, or we get poisoned with herbicides.

There is no question that invasive plants will quickly populate the areas that are denuded and exposed by construction of the pipeline. As you may recall from my earlier comments mountain top removal mining operations in nearby West Virginia resulted in 80% invasive coverage following construction. Native wildlife do not benefit from invasive species. They cannot use it as a food source. To the contrary, they suffer from it because it outcompetes our native species of vegetation that do provide food sources. These native plants and our native wildlife have adapted together in their evolutionary history. Invasive species disrupt and end that evolutionary balance. As previously stated invasive plants including Japanese Stilt grass, Barberry, Multiflora Rose, Bittersweet, Garlic Mustard, and previously unmentioned Tree of Heaven are currently in Little Valley, but they are in limited numbers at this time due to the natural conditions found here. Invasives generally do not thrive in well established natural conditions, as we have in Little Valley. Disturb those natural conditions and they take off, and take over an area in very little time. Once they are established they are difficult to eradicate.

The invasive species will also invade the previously natural areas that border the clearcut for the pipeline. These areas would now be subjected to the edge effect of clearcutting, whereby more light enters these wooded edge areas than before the clearcut, and invasives take advantage of that increased light, and spread into the forest.

In summary, residents of Little Valley will face the very real possibility of having their water supplies polluted with sediment, diesel fuel, other construction liquids, pipe hydrostatic testing pollutants, toxic liquids that collect in the pipe, and herbicides. They also face the the very real possibility of reduced drinking water supplies, or complete termination of their drinking water supplies. These adverse impacts are very likely if the pipeline is approved, and these same adverse impacts apply to all others in karst areas along the path of the pipeline.

This pipeline is not in the public interest.

Environmental Justice

In the past wastewater treatment plants, landfills, heavy industry, incinerators, and other facilities that degrade the area where they are located were consistently constructed in poorer areas. I'm not sure why that happened, but it might have been because folks in these areas didn't have the connections or the wherewithal to keep these degrading facilities out of their neighborhoods. Perhaps it was due to taxes being lower in lower income neighborhoods. Over time this tendency became recognized, and a movement for Environmental Justice took root. This concept seeks locating degrading facilities evenly throughout the socioeconomic spectrum, so that everyone shares the burden equally, and it is not all placed squarely on the shoulders of the poor.

Environmental Justice seems to once again have taken a back seat in ACP's routing of their pipeline. I believe that they have purposely routed the line through poorer areas, and for similar reasons previously used. Folks in these areas likely will not have the wherewithal to fight a multibillion dollar corporation, and they will be less likely to get fair compensation if their land is taken by eminent domain. I have seen the proposed route moved away from the Snowshoe Ski Resort, and away from other wealthy landowners. I don't see the route going through the Hot Springs area. I see it going through the Bolar area, and Little Valley. I see the compressor station in Buckingham County being placed adjacent to a poor, elderly black community, most of whom have significant illness and disabilities. These folks, and all of the other folks along the 600 mile route of this pipeline will see their property values and standard of living reduced significantly, while the corporate executives and shareholders of ACP reap an undeserved profit. For shame.

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I am not familiar with the legal ramifications, or status of Environmental Justice as the law of the land. However, I think that most of us, with the apparent exception of ACP executives, realize that Environmental Justice is a moral issue that shouldn't be squashed by corporate greed. That is in effect what is happening right here, right now, and I'm sure that is what happened in the board rooms of ACP during the planning of this route.

I know that EPA questioned Environmental Justice issues in FERC's involvement in the Freeport LNG gas facility in Texas, in 2014, so I know that this is an issue that FERC must address. I am calling on FERC to investigate the apparent lack of Environmental Justice in the routing of the ACP pipeline.

Adequate Pipeline Capacity Already in Place

There are enough pipelines currently in place to supply all of the natural gas that the ACP would carry. In fact, most of the pipelines that are currently in place are not being fully utilized. Transco can carry 3-5 times as much gas as ACP with minor modifications to the system. See additional comments below. Further, there is no public need in Virginia and North Carolina for all of the gas that the ACP could carry. Once again, I am certain that a large amount of this gas will be kept from American consumers, and sold overseas to the highest bidder.

This clearly shows that construction of the ACP is not in the public interest. It is solely in the interest of the ACP and its shareholders. It is against the interest of all those living on or near the proposed route.

Cost Of Pipeline Likely To Be Passed On To Consumers

A report published on April 27th of this year by the Institute for Energy Economics and Financial analysis indicates that the ACP is indicative of an oil and gas industry rush to overbuilding pipelines. The study indicated that pipeline companies are competing to build out the best, most well connected pipelines, and utility companies are entering the competition because a large part of the risk of over building can be passed on to ratepayers.

The report goes on to indicate that FERC reviews pipelines on a project by project basis, and does not regulate them in any regional planning process. It advises that FERC's method of determining if a pipeline is needed based on the developer entering into contracts for the majority of the pipeline's capacity is invalid if the contracts are with subsidiaries of the same companies, as is the case with the ACP. This does not indicate the independent need for the pipeline, or that it is in the public interest.

It further indicates that in ACP's application to FERC it listed the new Brunswick power plant as one use of the gas, but in its applications to the State Corporation Commission ACP asserted that the plant will be served by another gas pipeline, Transco. This once again brings up the integrity of ACP, which I will comment on later.

Based on this study and information that I have obtained from other sources I call on FERC to conduct a Programmatic Environmental Impact Statement, or a region wide study of the need for any new gas pipelines prior to making a decision on the ACP.

Eminent Domain

When I first started defending my property, my savings, my safety, and my drinking water, amongst other things, against ACP I was surprised to learn that pipeline companies have the right of eminent domain. I'm sure that most Americans are not aware that private corporations have the right of eminent domain and that right prevails over our private property rights. Several people who I have mentioned it to have

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said they thought it was un-American. I'm sure that most Americans don't agree that private corporations be granted eminent domain.

Giving our government that right is one thing. Giving a private corporation that right is quite another. Giving our government that right gives our government the power to take our land for the overall public good. Giving that right to a private corporation gives a private corporation the power to take our land for their own selfish purposes, and that's not right. Keep in mind the government works for the public interest. Private companies work for their own interest.

When government has been given the right of eminent domain citizens have open access to the public information that is involved in the project. When a private company has been given the right of eminent domain that company information and project information is not available. When I first learned that our property was going to be cut in half by the alternate route I called ACP and asked how many properties were impacted in Bath County, and asked for the names and addresses of the property owners. ACP advised that they would get back to me with that information, but of course they never did. They didn't even call me back to say they wouldn't give me that information. I can't count on ACP for any information. They won't give me much. What they may give me could very well be misinformation.

My wife and I are not selfish about our land. We have not put up any no trespassing signs. We encourage our neighbors and others to hike through our property and enjoy the ancient trees, the streams, the remote meadows, and the views. We would love for school groups or others to do the same.

However, we draw the line when it comes to an unnecessary pipeline being put through our property. We will fight to keep this pipeline off of our property, out of Little Valley, and off other's properties with everything we have. Make no mistake about that.

I'm not asking FERC to do away with eminent domain for private companies. I know that it's a bad law of the land that FERC can't change. What I am asking FERC to do is help us by providing as much information that we need in plain english, and as much time as we need so we can act appropriately to defend ourselves against all of the adverse impacts from this life changing project.

Extend The Scoping Period

I strongly believe that the scoping period for this project should be extended. The public and I are not educated in energy issues or other technical disciplines that we need to understand in order to meaningfully comment on, and address issues impacting us from this life changing project. It is a time consuming task to gather and understand this information, and then comment on it. I understand that ACP has submitted 10,000 pages of documents to FERC and those documents continue to be amended and updated, making it very difficult to stay current. I am retired, and I have spent on average 4 hours a day or more educating myself and researching issues related to this project. There remain a number of issues related to this project that I need to better understand in order to effectively comment. Most people impacted by this project do not have the luxury of time that I have. They are busy raising their families, and working at their jobs. We need to have sufficient time, and that time need will not be met if the scoping period for comments is closed on June 2nd.

Just very recently we learned that the proposed route has been again changed, and now impacts my wife and I, and our neighbors in Little Valley even more severely. We did not learn this initially from FERC. We learned it from neighbors in Little Valley who happened to look at ACP's route map. I have now received that notification from FERC. As I stated earlier this route change now shows the route following the ridge line of Little Mountain bordering the west side of Little Valley. That ridge line is an iconic part of the view shed for residents in Little Valley, and that additional work, including blasting to level the top of the mountain could further jeopardize our springs and wells which all of us use in Little Valley. Geologist William Jones discussed the vulnerability of our water supplies from blasting in our karst terrain in my comments to you on April 22nd. Are additional changes to the route pending? Will further changes be

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made after the end of the scoping period? How can we effectively comment on a constantly moving target?

I recently learned that property owners affected by haul roads and other appurtenances well off of the earlier announced pipeline route could be subject to eminent domain if the project is approved, and they cannot reach agreement regarding compensation with ACP for the taking of their land. I learned that at least some of these property owners were likely notified of the potential impacts to their properties for the first time on May 3rd. That would give them only 17 and 18 days to prepare comments for the upcoming scoping meetings, and only a month to prepare written comments. That's not enough time. What if they were out of the country, having a baby, working lots of overtime, in the hospital, a single parent, or contending with all of the many other things that needed their attention? Even if they had each day free, this would still not be enough time. The June 2nd deadline is unacceptable.

I did not receive Resource Report 1 Appendix 1A for this project from FERC. I received that document in an e-mail chain from others several days after they received it. I called FERC to complain about not receiving that document and was told that FERC was in error in not sending it to me. I was advised that I would receive all future e-mails. That did not happen. I did not receive your e-mail announcing the upcoming scoping meetings, including the deadline for the scoping period. I did receive the most recent route change information earlier today, but I remain concerned about the inconsistent FERC notifications. In fact, a neighbor who is an intervenor was unable to obtain my comments to you on April 22nd through your website. This is very troubling. My wife and I would be greatly adversely affected if the pipeline impacts our property as currently proposed. I am working as hard as I can to stay abreast of all issues regarding the pipeline so that I can research appropriate information in order to comment to FERC about the adverse impacts that this project would have on us, and our neighbors. I need these documents in a timely fashion. Please make sure that I receive all documents that I am entitled to in the future, and please send any other documents that I should have received, but did not. I plan to send you a separate letter regarding this issue.

I have asked FERC for help in understanding this project, and the procedures involved in responding to it. That help has been given, but in most cases it has been in general terms, such as referring me to very large documents that in themselves need large amounts of research, rather than answering my specific question. For instance, I was referred to the 153 page federal pipeline safety regulations which are lengthy, and difficult to read. It takes a large amount of time to understand documents like this. I had some questions about newly released Resource Report 1 Appendix 1A, and I received similar referrals to large documents as before. I am trying to learn specifications for construction and environmental controls for haul roads, valves, impoundment areas, storage yards, and other appurtenances that. A long haul road is now proposed along the very steep east side of Little Mountain, within my view shed, and steeply above our local stream, Little Valley Run. A valve is now proposed on my neighbors' property, and within about .4 mile of my home. We have also recently learned that along with the valve a microwave tower is now planned for somewhere in Little Valley, but we don't know where. Our house sits up on a ridge. Could it be up near our house? I need more time and more specific help to properly research and comment on these newly found adverse impacts.

The stated route of the ACP remains incorrect, and the public needs to be given correct information. I advised FERC of the incorrect route statement in my comments of March 6th. The current stated route from west to east has it crossing Route 220, then Back Creek Mountain, then Jack Mountain etc. That is still incorrect. It crosses Back Creek Mountain, then Route 220, then Little Mountain, then Little Valley, then Jack Mountain, etc. Can you please send out a correction?

I hereby request that you extend the scoping period for this project to September 1, 2016. I am sure that the Atlantic Coast Pipeline is pushing the Commission to move as quickly as possible in the review process. Part of this push no doubt is to keep the public from learning about and commenting on adverse impacts. However, ACP's push should in no way interfere with the public's right to fully understand and comment on this project. My wife and I, and many, many other people will be severely adversely impacted if this project is approved, and our civil rights will be taken away as well if the scoping period is not

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extended. I should advise you that I have asked the American Civil Liberties Union to look into this matter, as well as President Obama.

Taxpayers Subsidizing The Oil And Gas Industry

With all of the damage and destruction to local communities, all of the premature deaths and negative health impacts, all of the current environmental impacts, and all of the catastrophic impacts to come from climate change that I have previously mentioned you would think that the fossil fuel industry would be in jail, severely penalized, or put out of business. Quite the contrary. In fact, you and I continue to subsidize the oil and gas industry, as we have for at least the past 66 years. We are essentially paying them to find fossil fuels, bring them out of the ground, burn them, and discharge more and more pollution into our atmosphere.

The United States Treasury reports that tax subsidies to the fossil fuels industry currently amount to \$4.7 billion each year. Who has to make up for that lost revenue? We do. That's about \$20 for every man, woman, and child in our country. A 2011 study by Management Information Services showed that the industry received nearly \$600 billion in subsidies since 1950. The United States Senate recently defeated a bill two years in a row to cut \$2.4 billion in subsidies to BP, Exxon, Chevron, Shell, and Conoco Phillips, some of the world's richest corporations.

I know that FERC can't end payouts to Big Oil anymore than it can end the right of eminent domain to private companies. Then why am I bringing this up? I want to point out that these companies have been given a privileged position in our society that they don't deserve. I don't want FERC to deal with them as a privileged class, or deal with them any differently than FERC deals with me. I don't want FERC to think that FERC and Big Oil are on the same team. You are not. You work for the people, not Big Oil. FERC can fulfill its regulatory commitments to the people by denying this pipeline, and preventing the ACP from causing a path of destruction through West Virginia, Virginia, and North Carolina now, and preventing them from leaving all of us and all of those who follow us an even hotter, poorer, and more polluted earth in the future.

Loss of Property Value

This enormous adverse impact, though obviously very large, remains shrouded in mystery. The Atlantic Coast Pipeline cites an Interstate Natural Gas Association of America (INGAA) study that claims there is no loss of property value if a gas pipeline is put through private property. That study is flawed, and probably intentionally so. It's not based on true science. It compared properties in the evacuation zone of pipelines to other properties also in the evacuation zone of pipelines in urban settings. It didn't compare properties with a pipeline going through them with properties that are far away from a pipeline. It didn't take into account rural properties.

Every real estate agent I've asked has told me that a pipeline through or near your property significantly reduces the property value. These are the people who know the negative impact that the Atlantic Coast Pipeline will have on property values. They will also tell you that the possibility that the pipeline will go through a property has already depressed that property's value significantly.

Our property value has dropped at least \$200,000 and perhaps more since the pipeline has been proposed.

Most people have most of their savings in their property. They count on the value of their home and property to be there for them if times get tough. They count on the value of their home and property if they need to take a loan. They count on the value of their home and property being there for their children or other heirs when they pass on. Putting a pipeline through someone's property is no different than stealing from someone's bank account. I really don't see a difference.

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I believe that the total loss of property value for the entire 600 mile Atlantic Coast Pipeline project is tremendously high. The Atlantic Coast Pipeline knows that it is very high. They just won't admit it. We all know that loss of property value is a huge adverse impact of this project. I have not been able to get an answer to that question. I don't think that FERC knows the answer to this extreme adverse impact. How can FERC make a decision on a project as big as this with obvious huge adverse impacts from loss of property values if they don't know this information? FERC should not make a decision on this project until they know.

I once again call on FERC to complete an independent study to determine the total loss of property value for this project. I don't think that is asking too much. I personally think that FERC should be making this determination for all properties impacted by this pipeline, both directly, and all those within the evacuation zone. If our government is considering approving a project of this magnitude, and one that impacts possibly tens of thousands of people, they surely should know and act on this information.

I will estimate this loss of property value. I'll be very conservative in my calculations.

I will use the following conservative assumptions.

- 8 properties directly impacted per mile with 25% property value loss
- 8 additional properties per mile not directly impacted, but within the 2,200 foot blast zone with 15% property value loss
- 20 additional properties per mile out of the blast zone, but within the 1.4 mile evacuation zone with 10% property value loss
- Average property value \$250,000

So that comes to:

- 4,800 properties directly impacted
- 4,800 other properties in the blast zone
- 12,000 other properties in the evacuation zone

Total property value without the pipeline:

- \$1.2 billion
- \$1.2 billion
- \$3.0 billion

Total property value loss with the pipeline:

- \$300 million
- \$240 million
- \$300 million

Total property value loss = \$840 million

I realize that this is a very rough estimate. Nevertheless, it is a conservative estimate, and property value losses are likely to be higher than this. Certainly my estimate is much closer to the true property value loss than the INGAA study which calculates no property value loss. This exercise points out that property value losses from this pipeline are very, very high.

Why should the public suffer the adverse impacts of financial losses at these levels for a pipeline that is not needed? Our property and these properties will become toxic assets through no fault of our own. This is nothing less than another redistribution of wealth from the poor and middle class to the wealthy.

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Public Anger Over Pipelines

As the oil and gas industry continues to overbuild pipelines in our country to the detriment of hundreds of thousands of Americans along the lines public anger continues to rise. A populist grass roots movement is growing rapidly against the abuses perpetrated on the public from the oil and gas industry. This is a potentially dangerous situation which will only get worse unless the abuses are put to an end.

I share the anger. In all my 69 years I have never been so personally attacked, or so angry for so long. The attack that my wife and I are experiencing has changed our lives for the worse. We have never experienced so much stress for so long. We are not sleeping well. In fact, many nights I am up well before dawn worrying about the pipeline, and working to keep it away. Everything else in our lives now has taken a back seat to stopping the pipeline. Forget our planned 30th anniversary. Forget any vacation. Forget getting together with life long friends.

We are not the only ones in this situation. Tens of thousands of people in the path of this pipeline, and hundreds of thousands of others across our country are experiencing these same adverse impacts of negative emotional and health consequences. We don't deserve this. No one should have to go through this.

Our government and FERC need to take a long hard look at the procedures whereby wealthy fossil fuel companies can usurp the rights, the safety, the wealth, and the well being of ordinary Americans. These procedures need to be changed to serve the people, not the wealthy corporations.

I will fight this pipeline with every bit of energy that I have. Others will do the same. If we were being treated fairly and justly we wouldn't have to fight. We didn't pick this fight, but we will fight it. No justice, no peace.

I have been in contact with many neighbors and others in Bath County, and elsewhere along the line. I see the anger and worry in their eyes. I hear it in their voices. I see it in their correspondence. They will fight as well.

My wife and I plan to bring these unfair issues to the attention of the general public. In fact, we've already started to do this in letters to editors of newspapers all along the proposed route. However, we plan to intensify our efforts by rallying others to join us in public protests at appropriate venues. We would rather be enjoying our retirement, but that will have to wait.

EPA Methane Leak Rules Insufficient

On May 12th the EPA issued final rules intended to reduce methane emissions from the oil and gas industry. It has been recently discovered that methane emissions from these sources are much higher than previously thought. I have addressed methane issues in my previous comments. Unfortunately, after reading an EPA released summary of these rules I have found that they are woefully inadequate. The enormous amount of methane pollution that this industry is discharging into our atmosphere will continue.

The rules only apply to new, reconstructed, or modified oil and gas sources. Existing sources can continue to pollute at the high levels that they are already discharging. They are free to continue to darken our future as a society with continued build up of methane, a very potent greenhouse gas.

In the future new low production wells will be required to monitor leaks twice a year. Compressor stations will be required to monitor leaks four times per year. They will be given one year to begin the leak monitoring. The rules will set an emission limit for methane, although the EPA statement I read did not say what that limit will be, and if there will be any penalties for failing to meet those limits. It also requires owners/operators to find and repair leaks. I'm sure that the oil and gas industry will challenge these rules

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in court, further slowing down the implementation of needed changes, and allowing continued pollution and degradation of our atmosphere and our future.

With methane concentrations already 2.7 times higher than pre fossil fuel levels, and expected to increase another 25% in the next decade we cannot afford to continue to discharge these large quantities of methane in to our atmosphere. The ACP will encourage more fracking, and contribute to more methane releases during extraction, storage, transmission, and consumption. This is not acceptable, and will severely hurt our chances of having a prosperous future.

Financial Losses From Climate Change

A recent study by Thomas Sterner for the journal Nature found that if climate change proceeds on its current path world income levels will drop 23% by 2100. That is likely to be a world with 10 billion or more total population. Consider the levels of poverty that we have in the world today, and drag that down another 23% with 1/3 again as many people on the planet. That sounds like chaos, suffering, and conflict to me. Even more frightening is the fact that Mr. Sterner's study did not take into account sea level rise or increased storm intensity. I have learned that sea level rise alone will create 90 million climate refugees by 2100. Compare that to the much smaller, but still very costly and significant refugee crisis that we are currently experiencing in the Middle East and Europe. Increased storm intensity will likely cost even more, as we have seen from increased costs that we are already experiencing today. Mr. Sterner further found that income inequality throughout the world would increase with the incomes in the hotter parts of the world decreasing more than incomes in the less hot parts of the world. This is another recipe for chaos, suffering, and conflict.

In another study former World Bank chief economist Lord Stern found that actions necessary to reduce greenhouse gas emissions would cost us 2% of our gross domestic product. That sounds like a lot at first glance. But the study goes on to find that delaying actions to reduce greenhouse gas emissions would cost us 20% of our gross domestic product. That's a 10 to 1 return for the better if we act now.

Most economists will tell you the same.

We need to act now to prevent the worst impacts from climate change. We know there is a bleak future for humanity if we don't act now. We can act now by rejecting the Atlantic Coast Pipeline, which will increase carbon dioxide and methane levels in our atmosphere significantly.

Benefits of Forests and Old Growth Forests

When Europeans first came to America most of the country east of the Mississippi River was covered in virgin forest with huge trees and soils that had never been turned over. The same was true of the vast forests in the Pacific northwest, and other higher elevation areas in the west. The forest had been that way for 10,000 years, following the retreat of the glaciers at the end of the last ice age. It is true that the small numbers of native Americans that were already here had cut some trees, and turned some earth, but the amount was insignificant. The flora and fauna that lived in those forests lived in a stable environment, and their numbers and diversity reflected that stability.

When the Europeans arrived they did what they did in Europe. They cut down most of the trees. In fact, many came here as a result of poverty that resulted from cutting down the trees in Europe. Flora and fauna were thrown into a completely new environment. Some survived and actually increased in number as the forests were cut. Most declined. American forests reached their low point near the end of the 19th century. They have rebounded to a certain extent at this time, with more acreage in forest now than at that time. Unfortunately, the forests are not the same. Most are secondary growth, with younger, smaller trees, and tree proportions that are not the same as before.

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As I have previously stated a good portion of our property is in old growth forest with the average large tree being 150 years old. These trees started growing around the time of the Civil War. A number of trees are even older and larger. The proposed pipeline goes right through this old growth forest, which is just across from our home. Besides the terrible shock of seeing these trees destroyed, a forest, and particularly an old growth forest provides many benefits that would be lost if the pipeline is approved as opposed.

An old growth forest provides a high diversity habitat where diverse species can find the best place to live. This results in rich communities of plants and animals. Large standing dead trees provide great woodpecker habitat. Pits and mounds on the forest floor from large trees that have fallen provide additional diverse habitat. Various canopy layers provide diverse habitat for birds. Hollow cavities in large trees provide habitat as well for numerous species including nesting birds, squirrels, raccoons, and bear.

Forests store carbon and nitrogen, and provide a very significant amount of carbon storage. Cutting those forests releases that stored carbon into our already heavily carbon polluted atmosphere. Forests, and particularly old growth forests, improve air and water quality. If you have the opportunity, watch a small stream flowing out of a forested area in a rainstorm, and compare it to one that is flowing out of an urbanized area, or even a farm. The water flowing out of the forest is much cleaner. You don't need to test that water. You can see it. Finally, forests actually create topsoil from organic decomposition on a root stabilized forest floor. In most of our country, and around the world we are losing our valuable topsoil at alarming rates. China is losing topsoil at 50 times the natural regeneration rate. In Europe it's about 15 times the regeneration rate, and in our country it's about 10 times the regeneration rate. Topsoil loss is a major concern. Forests create topsoil.

Forests in the rest of the world continue to be cut. They say that the Amazon rain forest is the lungs of the world. Unfortunately, the Amazon is being cut down at a rate of the size of West Virginia every year. Similar large areas of forest are being cut down from southeast Asian peatland forests. According to the world Resources Institute we have only about 1/2 the forest cover worldwide than we did 300 years ago. Scientists estimate that more than 40% of the excess carbon dioxide that has accumulated in our atmosphere has come from deforestation in past centuries.

It is important that we preserve our forests, and particularly, our old growth forests. I am confident that the old growth forest on our property is the oldest forest along the entire route of the ACP, and that includes the George Washington National Forest, and the Blue Ridge Parkway.

The ACP will not preserve our forests. It will destroy them. To the best of my knowledge, and after sifting through many documents for this project, some of which have been recently amended I find that the largest land use along the proposed pipeline is upland forests. The project will cut down somewhere around 300 miles of upland forests, amounting to a forest 12.5 square miles in size being destroyed. I believe most of this forested area is in the western portion of the proposed pipeline, in our area, where the mountainous terrain previously kept man's destructive encroachment at a minimum.

They say the Amazon rain forest is the lungs of the world. The Appalachian forests are the lungs of America. The forests of Western Virginia and West Virginia are our lungs.

Cutting our forest and all of the forests down along the route would be a major adverse impact. It would release carbon into our atmosphere accelerating climate change. It would result in less filtering of the air, and reduced air quality. It would result in very heavy soil loss, and that soil would pollute our groundwater in karst areas, and our streams all along the line. It would drastically reduce the current biological diversity, and replace a rich and varied diversity of lifeforms with invasive plants. Finally, it would create a visual scar carved through our landscape and our view sheds. What was once a beautiful green canopy would become a permanent scar.

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ACP Invalid Rejection Of Alternative Routes And Methods For Gas Transmission

Much of the information submitted to FERC in ACP's Resource Report 10 regarding the benefits of this project and alternative routes is simplistic, misleading, and inaccurate.

10.0 ACP states that the pipeline project will facilitate cleaner air, increase the reliability and security of natural gas supplies, and provide a significant economic boost in West Virginia, Virginia, and North Carolina.

The pipeline project will discharge carbon dioxide and methane into our already heavily polluted atmosphere. As we have discussed, the amount of these discharges will be about the same as coal due to methane pollution losses in recovery, storage, and transmission, and during combustion. The recent EPA initiative to control these fugitive emissions does not include existing facilities, and will have a negligible effect, at best, of limiting this significant greenhouse gas pollution. Our atmosphere has been poisoned, and the ACP will facilitate feeding our atmosphere more poison.

The pipeline project will economically depress landowners and communities along the route. Please refer to my previous comments regarding the Key - Log Economic Study showing losses in four counties alone totaling more than the \$5.1 billion price of the pipeline. Please also refer to my conservative estimate of \$880 million in lost property values. Finally, keep in mind the very large costs that will be required responding to climate change, which will be exacerbated by this project, and refer to the economic forecasts by leading economists that I have discussed earlier. The only significant economic boost will be to ACP executives and their shareholders, and that will be only a short term gain. Everyone else loses. ACP executives and their shareholders will lose in the future along with the rest of us.

The security of natural gas supplies will not be increased. As I have stated, the pipeline could easily be exploded by someone with no sophisticated equipment, especially in isolated rural areas. The pipeline safety itself is very questionable given the track record of the industry and the first time ever attempt to place a pipeline of this size through steep slopes and karst terrain as we have in Little Valley and Bath County.

These simplistic and grandiose statements by ACP are blatantly untrue.

10.6.1 In this section ACP advises it cannot use the Transcontinental Gas Pipe Line Company system, the Columbia Gas Transmission System, or the East Tennessee Natural Gas System existing corridors for the ACP. They state that they would still have to build an entire pipeline, with greater environmental impacts than the current proposed route, and cite steep terrain, and developed land along the existing right of way as further reasons for rejecting this alternative to building the ACP in its currently proposed location.

The Transcontinental Gas Pipe Line Company system in particular offers a very promising alternative to building the ACP. This pipeline system could be repurposed to carry Marcellus gas to the same delivery locations as the ACP. This system has the capacity to carry 3 - 5 times as much gas as the ACP would. ACP's statement that the system is believed to be capacity constrained due to several recently proposed projects, and significant upgrades to that system would be needed are yet further unsubstantiated comments that need closer scrutiny given the ongoing misinformation campaign by the ACP.

ACP does not have to build a new pipeline. It is not needed. There is ample capacity in these existing pipelines to carry any natural gas that is needed for Virginia and North Carolina. I will discuss this issue in further detail elsewhere.

These pipelines are already in place, and even if a new pipeline was built in the same or enlarged right of way the environmental impacts would be far less than the current proposal to build the ACP in a new right of way. The new right of way for the ACP would disturb around 25 square miles, cut down approximately 12.5 square miles of forested land, lower property values by close to \$1 billion in a conservative estimate.

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Very steep slopes are present in the current proposed route, including slopes up to 80% in Little Valley. Steep slopes are present through much of the western portion of the proposed route, as are karst soils, particularly in Highland and Bath Counties. Putting the ACP through these areas would cause much more environmental damage and create serious safety issues for tens of thousands of people along the path.

There are countless developed lands along the proposed route as well. The number is not known to FERC, but it should be. There are tens of thousands of people who would be negatively impacted by the proposed route, and property values would fall dramatically, as I have previously stated. There would be much less impact on developed lands and landowners along the path if these alternative routes were used.

Once again, ACP's argument against these alternative routes is exposed as false.

10.6.2 ACP states that the proposed Carolina Pipeline, Mountain Valley Pipeline, and Appalachian Connector Pipeline would require as much construction as the ACP and do not meet the same need or purpose as the ACP.

These proposed pipelines, and the existing pipelines previously mentioned all illustrate a major flaw in our regulation of pipeline construction. It allows wasteful and disruptive overbuilding which harms many persons along the routes, and doesn't fill a public need. The maximum amount of gas that the ACP could deliver is much more than is needed, even if coal fired power plants are closed, and renewable energy is not developed. Either of these existing and proposed pipelines could be used instead of building the ACP.

10.7.1.2 Single Pipeline Option Figure 10.7.1-4 shows potential collocation routing options with the Mountain Valley Pipeline. This figure clearly points out some benefit in collocating the Atlantic Coast Pipeline and the Mountain Valley Pipeline in a route that would be substantially less than half the distance of both routes running separately, and less distance than either existing route carrying both lines

ACP Invalid Rejection of Alternative Energy Sources and Conservation

Much of the information submitted to FERC in ACP's Resource Report 10 is exaggerated, questionable, or flat out untrue. In many cases ACP exaggerates one aspect of an issue, then overstates another aspect of that issue, then leaves out important information about that issue, etc, etc, etc.

I will point out these questionable statements, and correct them.

10.3 ACP states that the No Action alternative would be unable to meet existing customers' demands for natural gas, and projected demand by other industrial, commercial, and domestic customers.

As I previously stated Virginia and North Carolina have both reduced energy consumption in the past decade. This very same ACP submittal shows a very low 0.4% per year expected increase in consumption, and an actual per capita drop in consumption into the future. The modest increase could likely be met by energy conservation alone, and most certainly by increased use of renewable energy sources. Customers are not demanding natural gas. They have a demand for energy, and that energy can be easily supplied without the ACP.

Comparisons to alternative energy sources are made using the ACP's maximum capacity running 24 hours a day, every day. It is unreasonable to state that the pipeline would be continually running at full capacity. Most of the natural gas pipelines in our country are running at less than half of their capacity, including gas pipelines nearby. Furthermore, there is no need for this amount of energy at this time, in the near future, or in the far future.

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10.4 ACP states that all of these alternative energy sources, depending on the location of the source, would require new infrastructure, including transmission facilities, to connect supply and demand areas.

Individual home renewable energy resources would require no public infrastructure, and none of the adverse impacts and disruption. These resources include solar, wind, geothermal, and even retrofit hydroelectric depending on available water sources. Public renewable energy resources would require tying into the existing grid system, with still very much less impact than building a 600 mile pipeline through thousands and thousands of properties. This is yet another invalid dismissal of superior alternatives to the pipeline.

10.4.1.1 ACP states that compared to other fossil fuels, natural gas is a relatively clean and efficient fuel.

All fossil fuels are dirty and inefficient. They all contribute large amounts of greenhouse gases to our atmosphere. They all are detrimental to human health as I have shown in my comments of April 22nd. Additionally, natural gas is as polluting as coal due to massive methane losses during recovery, storage, and transmission.

ACP states that when compared to average air emissions for coal-fired power generation, natural gas generation produces approximately half as much carbon dioxide.

Anthracite coal is 51% as efficient as natural gas. Lignite coal is 54% as efficient as natural gas. Bituminous coal is 57% as efficient as natural gas. So even when it is burned natural gas produces more than half the carbon dioxide as coal. And we have to remember the enormous losses of methane during exploration, recovery, storage, and transmission of natural gas prior to burning, making natural gas about equal to coal in greenhouse gas emissions.

ACP states that when compared to average air emissions for oil fired power generation, natural gas fired generation produces approximately two-thirds as much carbon dioxide.

Oil is 73 % as efficient as natural gas when burned.

10.4.2 ACP states that in a projection by the EIA, total U.S. electricity generation from renewable sources (excluding conventional hydropower) will increase from 12% in 2012 to 16% in 2040.

This is an unbelievably low projection, and has been highly criticized.

President Obama has pledged to cut greenhouse gas emissions between 26% and 28% by 2025 compared to 2005 levels, and 83% by 2050. Electricity generation from renewable sources will need to be much higher than the now outdated 2014 EIA projection to meet those pledges. As I have previously stated, and will discuss ahead, renewable energy is affordable, will only get less expensive with the economy of scale. It is available now, and will only improve as new technologies come on line. Remember, that once in place, and except for very minor maintenance costs renewable energy is free, inexhaustible, and does not contribute to greenhouse gas pollution.

A rigorous renewable electricity futures study published by the Union of Concerned Scientists found that renewables could account for 80% of US electricity production by 2050. A Bloomberg study found that 70% of new power generation by 2030 will be renewables. An article in Sun Day shows that the US will reach 16% renewables by 2018. The American Wind Energy Association predicts that 20% of US energy production will come from wind energy by 2030. Even last year Germany, with the best economy in Europe, and a large manufacturing sector, got 31% of its energy from renewables. FERC reports that 98.6% of new energy generating capacity in the first quarter of 2016 in the United States was from renewable energy.

Any idea that renewable energy will remain a small part of US energy production far into the future is flat out wrong.

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ACP rejects off shore wind energy with numerous compounding misleading statements. They have stated that the largest commercially available GE wind turbine is 4.1MW. That is misleading. There are at least ten other wind turbines with greater capacity than this with the highest rated at over 8 MW. ACP states that the average wind turbine needs 84 acres, so a wind farm will take up too much space. The wind farm would be 27 miles out to sea where space is not an issue. Compare that to the 25 square miles of earth disturbing construction from the pipeline.

ACP states that wind power generation does not occur at a utility scale in the United States, so it's not a viable alternative. Wind power generation is viable, and up and running around the rest of the world. Per the Global Wind Energy Council offshore wind power could meet all US energy demands 4 times over. The total world wind power generation is now 12,107MW, and has tripled since 2011. Germany has added the most wind power generation recently, and 91% of world or 11,028 MW capacity is currently in place off of northern Europe. Other governments in China, Taiwan, Japan, South Korea, Brazil, and India are expressing interest. Viet Nam is also expressing interest in wind power, and recently placed a large order for GE wind turbines under a new trade agreement. The fact is, the United States lags way behind the rest of the world in deploying wind turbines with 0 MWh capacity added in 2015. The cost for wind generated electricity is expected to drop to \$104 per MWh by 2020, with total cumulative capacity of 23.5 GW, and drop further to \$94 per MWh by 2030. So the statement that wind power generation is not a viable alternative is blatantly false.

Additional facts supporting the viability of off shore wind energy as an alternative to the Atlantic Coast Pipeline and continued use of dirty fossil fuels follow:

- In Europe 3,034 MW of new off shore wind capacity came online in 2015 with 419 new turbines installed in 14 separate projects. Europe had 268,000 total wind turbines(both on shore and off shore) at the end of 2014.

- 110,000,000 homes in China are powered by wind energy.

- 73,000,000 homes in Europe are powered by wind energy

- 59.6% of Spain's power comes from wind

- A farmer in Iowa who uses one tenth of a hectare for a wind turbine could earn \$10,000 per year, compared to \$300 per year from growing corn for ethanol.

- Wind power can save 2,000 liters of water per MWh as compared to other energy sources.

Siemens Corporation has come up with an analytical tool that more accurately compares different types of power generation than just comparing electricity prices. Siemens social cost of electricity tool takes into account transmission costs, employment impact, environmental impacts, and other factors. Using this tool Siemens has shown that the cost of offshore wind energy is about half the cost computed by just comparing electricity prices.

Denmark with the third most off shore wind energy in the world conducted a comprehensive environmental monitoring plan between 1999 and 2006 to assess the environmental impact of two very large off shore wind farms. They found that the number and diversity of species increased due to artificial reef communities. They found no linkage between fish behavior and electromagnetic impacts. They found

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the bird collision risk to be low, and impacts on porpoise and seal numbers was negligible. In all, the off shore wind turbines had virtually no impact on local wildlife.

It is abundantly clear that wind power, and in particular off shore wind power, is available now, and is the better path to prosperity and a healthy planet than the continued burning of polluting fossil fuels. ACP's assertion that wind power is not viable is blatantly false.

I would like to also point out that Dominion Power has been given a federal grant to carry out an off shore wind turbine demonstration project, and they haven't done it. That's our money that they've been given. Frankly, I don't see why a demonstration project is needed, since Europe and a good bit of the rest of the world have already demonstrated that off shore wind energy is viable, and preferable to burning dirty fossil fuels. My guess is that Dominion is dragging its feet so it can build the ACP and make windfall profits at landowners' and local communities' expense.

Wind power, and particularly off shore wind power is viable, and is a superior alternative to the ACP.

Likewise, ACP is misleading about another viable alternative fuel, and that's solar power. ACP states that there is limited solar potential in North Carolina, West Virginia, and Virginia. ACP also states that solar power takes up a large amount of land.

North Carolina is one of the leading states in recent solar installations. Virginia has also recently increased solar generation. In fact, our local utility, BARC, is currently expanding a solar array power generating station to increase the amount of clean solar energy that customers can use. I should also point out that Germany, the leading economy in Europe, and a large manufacturing nation, has substantially increased solar power into their thriving clean energy portfolio. The latitude for Germany exceeds 51 degrees, and the climate is known for cloudy weather. It's not the sunny Mediterranean climate of southern Europe, or even the temperate, and partly cloudy climate of West Virginia, Virginia, and North Carolina. Yet Germany is taking full advantage of all of the benefits of solar energy, and wind energy as I have previously stated. We can do the same.

Solar energy is generally available from photovoltaic panels, concentrated solar thermal installations, or simple passive solar construction. All three use clean, free, inexhaustible energy from the sun.

Solar panels average around 15% efficiency and new panels are being tested in the laboratory that have achieved 30% efficiency. The cost of solar panels has dropped dramatically in the recent years, and is expected to drop further with the economy of scale, as more and more units are produced. New designs for solar panels are in the works that may lower the cost even more by using materials other than glass to contain the silicon. Most individual home systems today cost around \$12,000 for a 2,400 watt system. Over the 25 year life span of that system it is expected to save over \$10,000 in electricity bills.

At present, most solar panels are manufactured in China and Taiwan, even though they were invented in our country. Some years ago a solar powered solar panel manufacturing plant opened in Frederick, Maryland, and operated for a number of years. The plant was bought out by British Petroleum, and shortly after was dismantled. I believe there has been a systematic campaign by the oil and gas industry over the years to limit the growth of the solar power industry, whom they see as rivals. Hopefully our country will increase the manufacture of United States solar panels.

Solar panels are incredibly space efficient. In most local installations they simply are placed on the roof of a home or a building. Occasionally they are placed on the ground if a roof is too shaded, but even here they take up little room. I have heard that if every parking lot in our country had solar panels installed the energy created would satisfy all of our energy needs.

Solar panels may be the ultimate local energy source, and are secure from grid interruptions due to weather, and other grid malfunctions. If more solar panels were in place during the major northeast

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blackout in 2003 the power interruption would not have been so severe, and most household functions could have continued. The same applies to the disruption from Hurricane Sandy, and to all of the future disruptions we can expect, especially with increased storm intensity from climate change. Solar panels can also be used to send unused electricity from your home or business back into the power grid where someone else can use it.

Concentrated solar thermal installations serve many customers through the grid. The Solar Reserve Crescent Dunes Power Plant in Nevada that I described in my comments of April 22nd is one example. There are many others around the world. The newer facilities have the ability to continue to produce energy many hours after sunset and solve most of the intermittency issues associated with solar power. An improved national smart grid will also help with that issue by allowing power from areas where the sun is shining to be directed to areas where it is not. Additionally, as more and more electric cars take to the road each of them will have the ability to store electricity which can then be transferred to other devices as needed, such as campers, off grid homes, or other portable electrical devices.

Passive solar power also provides tremendous energy savings. There have been cold days in the middle of the winter where just the heat of the sun coming through our windows has been enough to heat the house. I have long thought that automatic solar shades could be utilized for even greater energy savings. These would automatically open if the sun is shining on a window in the winter, and closed when it is not. Reverse that in the summer. These could be programmed for when you are away from home, and not opening and closing the shades on your own. I believe I recently saw a company that now is offering shades with this feature. It will save a lot of energy.

There is no question that the installation of solar energy generating measures requires an initial outlay of money. Nevertheless, that money is recouped and money is saved as free energy flows in year after year.

Solar power is a superior alternative to the ACP.

Geothermal energy is potentially the largest source of energy in the world today. Former United States Energy Secretary Steven Chu stated that it was "effectively unlimited". MIT, in a 2006 study, estimated that the technically extractable portion of the U. S. geothermal resource is about 2,000 times the average U.S. primary energy consumption. If properly developed it could provide more energy than all coal, oil , and gas reserves combined. Energy experts Bruce Green and Gerald Nix advise that the geothermal energy available in the U.S. to a depth of 1.86 miles is equivalent to a 30,000 year supply for all our energy needs at current U.S. consumption rates.

Geothermal energy is also constant energy, 24 hours a day, every day. A geothermal plant has a very small footprint on the surface of the earth. Geothermal energy is available virtually everywhere on our planet. The Geysers geothermal plant north of San Francisco provides 60% of the electricity used in Northern California coast area from the Golden Gate Bridge to the Oregon coast. Large geothermal plants generally are located in areas where heat is closer to the surface, and have water available, such as hot springs. The heat is extracted and is used to power turbines which make electricity.

Not all areas of the world are suitable for this type of geothermal energy production, but geothermal energy is still available in other areas as well. Just a few feet underground the temperature of the earth averages 59 degrees. This temperature can be brought into a home using simple drilling similar to drilling for a well with piping that extends from the home into the ground in a loop configuration. A heat exchanger can be used to transfer the heat into the home heating system. The heat exchangers in this process are conventional refrigerant based vapor compression units that transfer energy four times more efficiently than air to air heat pumps, and therefore do so with less electricity. This provides large energy savings. For instance in the winter it is easier to start at 59 degrees and warm the home to a comfortable temperature than starting at temperatures below freezing. In the summer that process is reversed with heat from the home transferred to the ground. Geothermal home heating can reduce heating and cooling costs by 60%. Once again, there is an initial investment in setting up the system, but after that the savings are significant.

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Geothermal power is a superior alternative to the ACP.

The ACP falsely characterizes the availability and practical application of hydropower.

ACP states that we would have to create reservoirs, and that The Union of Concerned Scientists estimates the requirement for an impoundment of 2,000 acres needed per mw in flatter areas, and .25 ac in hilly areas...this would take up a large amount of land.

We don't need to build new dams and create new impoundments to generate hydropower. Only 3% of dams in the United States currently incorporate hydropower. If those dams could be retrofit for hydropower a large amount of clean renewable energy would be made available at low cost. This is a steady, predictable carbon free source of energy. Only a tiny amount of land would be used in the retrofit. Dams near population centers in the eastern mid Atlantic that could be retrofit have the potential for 2 TWh. In the South Atlantic and Gulf area the potential power is even higher with 4TWh available. Besides retrofitting dams for new hydropower, I am sure that adding newer, more efficient turbines and other features to existing hydropower facilities would generate more clean renewable energy.

A study conducted by David T. Kao, Ting Zhong, and James R. Mahar, of the Army Corps of Engineers discusses the benefits of retrofit hydropower. They found that in Virginia alone there are only 9 dams in place with hydropower, and 52 other dams that are suitable for hydropower, but currently have none. These additional 52 dams could provide 690 MW in name plate capacity.

The Tygart Dam near Grafton, WV has great hydropotential, and is currently not being utilized for that potential. This dam was built in the 1930's with twin 15 foot diameter tunnels for possible future hydropower use. These tunnels are currently capped but could be used for hydropower. My wife and I swam in the Tygart Lake in 2003, and the lake itself is beautiful. The surrounding area, and the town of Grafton itself were not beautiful. They were seriously economically depressed. We saw several houses with no screens or even windows in place...just an opening where a window should be. We saw many yellow ribbons indicating wishes for the safety of local service men and women who had been sent to fight in Iraq. I'm sure this area remains economically depressed, particularly after the Great Recession, whose impact still remains with middle and low income Americans. This lake is not far from the start of the ACP, and this area is among those areas in West Virginia that are being heavily fracked, with all of the negative health issues that I have previously stated. The fracked gas will be put into the ACP and shipped east. It will not be available to folks in this region. Why not add retrofit hydropower to the Tygart Dam and generate inexpensive and clean electricity for people in this area?

Other large dams in West Virginia with great potential for retrofitting are the Willow Island Dam in Pleasants County, and the RC Byrd Dam in Gallipolis Ferry, both in West Virginia. These and others could increase West Virginia hydropower generation by 50%.

Retrofit hydropower offers a superior alternative to the ACP.

10.5 ACP states that energy conservation alone is not a viable alternative because it does not preclude the need for natural gas infrastructure projects like the ACP.

The U.S. Department of Energy states that energy efficiency is one of the easiest and most cost effective ways to combat climate change, clean the air we breathe, improve the competitiveness of our businesses, and reduce energy costs for consumers. The 115 million residences in America use an estimated 22.5% of our nation's energy. The USDOE further advises that a typical family spends \$2,200 a year on home utility bills, and that amount can be lowered by 25% by following their Long Term Savings Tips. So even if energy use is expected to rise by 0.4% per year as ACP states in their submittal, energy conservation can save 25% now, and 25% each and every year into the future.

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Similar energy efficiency savings apply to businesses, industry, and transportation. In fact, without past energy efficiency improvements since 1973 we would have had to use about 50% more energy than we currently do to meet our current Gross Domestic Product. Since 1973 energy use per unit of floor space has declined 11% for residential buildings and 21% for commercial buildings. President Obama announced a proposed 54.5 mpg efficiency standard for cars and light duty trucks by 2025. A McKinsey study found that the United States could cost effectively reduce energy consumption by 23% by 2020 through an array of energy efficiency measures yielding \$1.2 trillion in gross energy savings.

Energy conservation alone can save us from developing new energy resources that we don't need, and can offset all of the adverse impacts of the ACP. The ACP will supply a glut of dirty fossil fuel that isn't needed. Energy conservation is a superior alternative to the ACP.

ACP has falsely characterized these renewable fuel alternatives compared to the continued burning of expensive and polluting fossil fuels. Compare the cost of fossil fuels to renewable fuels. According to the US Department of Energy the average person in Virginia in 2012 spent \$3,341 for the year on fossil fuels. That's close to \$7,000 per couple, and substantially more if that couple has children. The cost of the renewable energy source after the infrastructure is in place, and except for minor maintenance costs, is free. That energy source is also inexhaustible. The sun will shine for another 5 billion years. The winds will always blow due to uneven heating of the earth. The interior heat of the earth will continue for the life of the planet. Water will always flow downhill. These renewable fuel alternatives will not contribute greenhouse gases to our atmosphere. Fossil fuels have heavily polluted our atmosphere, and will continue to do so if we continue to use them.

We can count on these ample, stable, unlimited renewable sources. Compare that to the fossil fuel industry with chaotically fluctuating prices, an energy source that is being depleted every day, and will end in the near future. Compare the impact on our health. Air pollution from burning fossil fuels contributes to 200,000 premature deaths per year in our country, and leaves our cities and large areas of our country covered in a petrochemical haze. Renewable energy does not emit toxic air pollutants. In fact, if we weren't burning fossil fuels air quality in our cities would be as clean as it is in Little Valley. Compare the impact on our greatest environmental issue, climate change. Fossil fuels continue to add greenhouse gases to our already heavily polluted atmosphere, leaving us in an unprecedented position of peril. Renewable fuels contribute no greenhouse gases. So there really is no question that renewable fuels are far superior to fossil fuels, and we need to use them now.

ACP rejects alternate routes along interstate highways, citing an indirect route, interchanges, highway expansion, development along interstate highways, and difficult terrain. Emmett Toms of ACP advised me that it would be difficult to obtain permits to build along interstate highways. I believe these are invalid reasons for rejecting routing along interstate highways. Where possible routes may be longer than the current proposed route environmental damage, the unwarranted use of eminent domain, disruption, potential loss of drinking water, property value loss to tens of thousands of people, and loss of local tax revenue would be all be eliminated. Construction in the wide median of most interstate highways would not interfere with interchanges since these are not at grade intersections. Highway expansion does not occur in the median, nor does development around interstate highways occur in the median. And finally, in most cases the median has already been graded flat to accommodate grades far less than even 10%. Compare those grades to the 80% grades in Little Valley currently being considered for the pipeline. The interstate highway route is a solid alternative that should not be summarily rejected by ACP.

I would like to also point out a failure by ACP to comply with a FERC directive in formulating an alternate route. In a December 4, 2015 letter from FERC to ACP, ACP was directed to evaluate and maximize a pipeline route that optimizes the use of existing rights of way as much as possible. What was ACP's response to that directive? ACP came up with a 95.7 mile route in which only 0.3 miles are adjacent to existing rights of way, and to the best of my knowledge 0.0 miles actually use an existing right of way. This in itself should be reason enough for FERC to reject alternate route GWNF-6. As a result of the failure by ACP to comply with FERC's directive in this matter, and in addition to ACP's misleading information to FERC and the public regarding alternatives I hereby call on FERC to hire an independent

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engineering firm to evaluate and maximize a pipeline route that optimizes the use of existing rights of way as much as possible, and that adverse impacts in this evaluation be compared to alternate route GWNF-6. ACP should cover the cost of this evaluation, and the independent engineering firm should remain unknown to ACP to eliminate any interference by ACP in the evaluation.

There are existing utility rights of way that travel for long distances in the direction of the currently proposed GWNF-6 route both north and south of Little Valley that could be used for the pipeline. These routes are already in place, and construction of the pipeline in these rights of way would reduce environmental damage, the unwarranted use of eminent domain, possible water supply contamination, reduction, or cessation, property value loss, loss of local tax revenue, and loss of forest. ACP states that collocating with other utilities may be difficult due to steep terrain, but again, compare the terrain along these rights of way with the extreme terrain in Little Valley.

ACP Integrity

Much of the information submitted to FERC in ACP's Resource Report 10 is exaggerated, questionable, or flat out untrue. In many cases ACP exaggerates one aspect of an issue, then overstates another aspect of that issue, then leaves out important information about that issue, etc, etc, etc.

If the number one is the truth, these statements are each less than one, and less than the truth. If you multiply these statements together or compound them, as ACP does in this report, it's multiplying something less than one by something less than one, resulting in an even lower number. If you do this repeatedly, as ACP does, the grand total is so low, and so far from the truth that the validity of the conclusion is close to zero. In this regard, I want to remind FERC of its responsibility to ferret out this questionable information, make sure that ACP gives correct information, and take legal action when it finds that statements made by the ACP are untrue, and are being made illegally. I am considering contacting the United States Department of Justice regarding these repeated falsifications. We cannot tolerate false information being given to our federal government to be used against the people.

I would like to point out another very disturbing piece of information regarding the ACP that I have recently discovered. Since the alternate route GWNF-6 was announced ACP has had a large, prominent display at the Warm Springs Public Library. The display contains copious amounts of informational material regarding the proposed pipeline and a map showing the route of the pipeline. However, the map shows the original route of the pipeline 30 miles to the north in Highland County. It does not show the alternate route GWNF-6 whatsoever. So folks in Bath County who looked at this map were given incorrect information indicating that the pipeline would come nowhere near where they live, and likely would have dismissed it as something that would not impact them. I have stated earlier that ACP would like to limit public comment on the pipeline, and this misinformation would certainly do that. Whether or not this misinformation was a deliberate public deception, or just incompetency I don't know. Either way it's very bad, and very disturbing.

ACP has repeatedly misled the public regarding this project. They previously stated that 60% of Bath County residents approve of the project. We all knew that was false, and the more than 100 persons who testified against the pipeline compared to no persons who testified for the pipeline at the May 21st Scoping Meeting in Bath County showed just how false that public statement was. I expect we will hear more of this from ACP in the future, and again, I want FERC to act aggressively on it.

I encourage FERC to use in house or independent studies to verify information pertinent to this project in order to avoid bad FERC decisions based on bad information from ACP. I once again call on FERC to take enforcement action against ACP for misinformation that meets legal standards for prosecution.

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A Walk Up Miracle Ridge

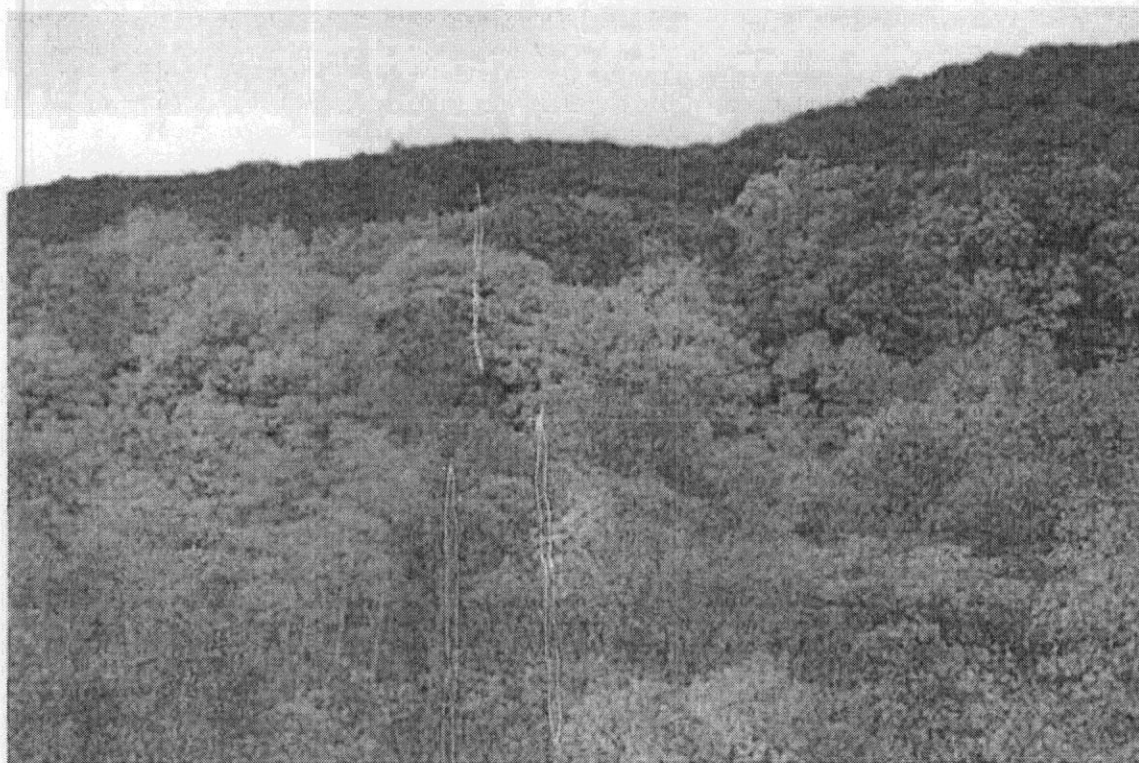
If the pipeline is constructed as proposed it would enter our property after passing through the water line and the reservoir that is our backup water supply, and the only water supply for our neighbors. It would begin to travel up a ridge that we call Miracle Ridge and follow that ridge all the way to the top of Jack Mountain, essentially bisecting our property. We named this ridge Miracle Ridge because of the old growth trees and the mostly clear ground space between the big trees due to heavy shade from the large tree canopy. This is a unique area, and we have never before seen a forest like this, despite a lifetime of hiking in the Appalachian forests. The trees along the ridge are mostly white oak, red oak, chestnut oak, shellbark hickory, shagbark hickory, sugar maple, and basswood.



Due to their great size, with long straight trunks, and healthy condition they are very valuable trees for their timber alone. They are much more valuable as a result of their age, and their contributions to the ecosystem, clean air, clean water, and habitat for diverse species. As I stated previously, they have been estimated by Virginia state forester John Wright to be between 140 and 160 years old. We are pleased that they have been spared the saw and the ax for so long. These trees were the deciding factor in our decision to buy this property for our retirement. Every time we walk through these trees we are enchanted with their beauty.

This ridge goes steeply uphill, and is narrow, with a very steep drop off on the north side, and a moderate drop off on the south side. The only way to walk down the steep north side of this ridge is to use a deer trail that traverses the slope diagonally. You do not want to attempt to walk in this area when there is an icy crust on the snow. You would likely slide down the ridge at very great peril. There is a spring fed stream at the base of the north slope with a second spring that feeds into it from the north. There is another spring in the hollow to the south, and that hollow itself has a stream coming down it that originates in another spring further up the mountain. Each of these springs could be used for our drinking water since they are not far from our home, and originate up grade from our home, which would enable a gravity fed delivery system.

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We named the hollow to the south Cathedral Hollow as it has many big trees in the same age range as on Miracle Ridge. The hollow to the north is named Dutch's Hollow, after the previous property owner. He had pointed out a meadow in this hollow, which we named Dutch's Meadow, that he thought would be a good location for a second home, or another home if the property was ever subdivided. This meadow has some fairly good southern orientation, which would make it suitable for passive solar heating. It also has a panoramic view of Little Mountain to the west. This site would be cut off from the rest of the property if the pipeline comes through as proposed, and the view of Little Mountain would be ruined forever since the top of the mountain would be flattened and denuded of trees. Dutch's Hollow has numerous Butternut, or White Walnut trees which are not endangered, but are nevertheless rare and threatened, and should be protected in this area of Virginia, where they are near the eastern extent of their range. We have measured a sugar maple at over 17 feet in circumference in this area. There are many others in excess of 15 feet in circumference.

As you proceed further up Miracle Ridge you continue through the old growth forest. Off to the north, further up Dutch's Hollow is a small pristine natural meadow on a steep slope. We have named this Hidden Meadow because it's off by itself amongst the big trees. The top of this meadow affords great views to the west, including additional views of Little Mountain. Beyond Hidden Meadow to the north is Big Spring, which I described previously as literally flowing out of sheer rock in a very steep cleft in the mountain. This is truly a spectacular location, and the entire spring area is surrounded by very large sugar maples.

We have seen where a bear has slept in this area of Miracle Ridge. There is a depression in the ground, probably left over when a big tree went down many years ago. All of the leaves in the depression are flattened and around the outside of the depression are numerous bear droppings. Bears prefer old growth forest, and there are some large bears in Little Valley. The largest dropping that we have seen, and it was fresh, was probably between one and two gallons in volume. Black bears reach a maximum size of about 500 pounds. Last summer we saw a 200 pounder in both our front yard and our back yard, and we have had bear scratchings on our wooden deck posts and a bear paw print on our rear sliding glass door. We don't think we were home when the bear put his paw on the sliding glass door. Needless to say, except in the middle of the winter, we are thinking about bear whenever we are outside, and we make a lot of noise to let any bears know that we are in the area. Black bears are generally shy, and will take off if they know you are around. Nevertheless, you don't want to get between a mama bear and her cubs, or happen upon a large bear who is feeding on a kill. We have seen a bear in the forest behind our house this year, but the leaves were on the trees, and we barely got a glimpse of it. We are wondering if it is last year's 200 pounder that may be approaching 300 pounds at this time.

About halfway between the lower portion of our property and the summit of Jack Mountain, Miracle Ridge gets much steeper, and the uphill walk gets considerably harder. The ridge itself gets much narrower, and the slope on the north side gets considerably higher as it drops off into the upper reaches of Dutch's Hollow. All of the 4 hollows on our property coming down the west side of Jack Mountain end in a very steep rock scree, that is, loose exposed rock that cannot be traversed on foot due to safety considerations. Each of the hollows has a spring emanating from the upper rock scree area, and they flow all the way down into Little Valley Run during wetter times. During dry times they continue to flow from the spring head at the top of the hollow, but may sink underground in the karst terrain, leaving a rocky, dry channel until the next rain, or until conditions in general get wetter. We have found that springs run faster in winter because evapotranspiration is not pulling groundwater up into the trees as it does in summer. After a heavy rain, regardless of season, we can hear water running in both hollows on either side of our house.

Miracle Ridge gets so steep in this area that in some instances you may want to put your hands down on the ground as you work your way uphill. This is not a good idea for about half of the year during snake season. We have seen a number of rattlesnakes, and big ones at that. During this time of the year we wear snake chaps which provide protection for our legs. Thick leather boots protect our feet. Rattlesnakes aren't the only pit viper to worry about. Perhaps even more dangerous are the copperheads, although they may be a little rarer than the timber rattlers. Copperheads don't warn you with a rattle, and they are

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aggressive. Our neighbor Gary Robinson has told us that he doesn't know anyone who has been bitten by a rattlesnake, but he knows around 10 people who have been bitten by copperheads.



This very steep upper portion of Miracle Ridge has some rock outcroppings which can be a good resting place, after checking for snakes. Trees in this upper portion of Miracle Ridge and the surrounding forest are not as big as those further down the mountain. I believe they are just as old as the trees further down, but the colder, harsher, windier conditions, and the shallower topsoil prevent them from growing as fast as the trees below. Their crowns are generally shaggier and misshapen due to stronger winds on this high exposed northwest facing ridge. I find myself looking for trees to grab onto going both uphill and downhill in this area in order to rest or stop myself from going too fast downhill and falling. Loose rocks can be very dangerous to anyone below you in areas like this. I have seen a rock bounce hundreds of feet down the mountain when I inadvertently knocked it loose from these upper, steep slopes. The steep slopes afford a great view of Little Valley and beyond from this elevation. Even with the leaves on the trees there are locations where you can see through or over the trees.

At this elevation, around 3600 feet, and as you are getting closer to the summit of Jack Mountain you pass through a large thicket of Mountain Laurel. This is tough going and requires a slow and methodical pace to avoid getting too deep into an area where you can no longer go forward due to even thicker mountain laurel. I've worried about surprising a bear in this area because visibility is so bad, so its best to make some noise. There are also some very large and beautiful Rhododendrons in this area. I'm sure that they are over 100 years old, and they are not quite as thick as the Mountain Laurel. The Rhododendrons are blooming just about now with large pink flowers that last for at least several weeks. There are some rocks where you can sit under some of these Rhododendrons.

At this point you can see that the top of the mountain is getting closer. The "horizon" to the east is lower, and more of the sky is visible as the ground begins to level off near the summit. Just before reaching our

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eastern property line there is a grove of American Chestnuts. As you may know, most of the Chestnuts died off back in the early to mid 1900's due to an invasive blight. At one point they made up a large percentage of the trees in the Appalachians, and were particularly good for wildlife with a large reliable crop of chestnuts every year. The wood was used for building and other purposes, and it did not decay nearly as fast as just about any other type of wood.

This is the largest and healthiest grove of chestnuts that I have ever seen. There are 12 to 15 of them, and they are about 30 - 35 feet tall. They all appear healthy, without the cankers that indicate the disease that has killed off almost all of their relatives. I have not seen where they have bloomed, or produced seeds, but at this size seed bearing can't be far off. These chestnuts could very well succumb to the blight as most others have done. On the other hand, due to the isolation of this area far up on the mountain, maybe they will stay with us for years to come.

At this point we have reached our upper property line, and it is only a short walk to the summit where a neighbor who we don't know has a private property sign that we obey. Other parts of our property border on the George Washington National Forest, and we can hike off into that public land without concern about treading on someone else's private paradise at the top of the mountain. In fact, we can hike south along the top of the mountain on a fire road through public land about 2 miles to Duncan Knob at 3,900 feet.

The current proposed pipeline route follows Miracle Ridge all the way to the top of Jack Mountain, and then heads east towards our neighbors over in Burnsville. All of what I have described to you will be lost if the pipeline goes through. Hundreds of years of nature's handiwork will be wiped out. Please do not let that happen.

We are not the only ones who have a spiritual bond with our land. Our neighbors do as well. Many, many people all along this proposed route share in the love of their land as we do.

Alternatives By Rank

I have previously listed alternatives to this proposed project so I won't go into detail in these comments. However, I believe these alternatives ranked from best to worst are all much more in the public interest than the project as proposed.

Do not build the pipeline. Leave the shale oil in the Marcellus shale field as part of our country's strategic energy reserves, and only to be used in an extreme emergency. Use renewable energy resources, especially local renewable energy resources, and conservation to supply energy to Virginia, North Carolina, and elsewhere.

Do not build the pipeline. Use existing pipelines to carry a small amount of shale oil from the Marcellus shale field to Virginia and North Carolina, if temporarily needed to supplement renewable energy resources and conservation. Extraction, storage, transportation, and burning of the natural gas should be done under much more stringent health and environmental regulations than current regulations to eliminate human health impacts, earthquakes, groundwater and surface water pollution, methane leaks, and greenhouse gas pollution.

Build the pipeline using interstate highway rights of way with the same strict regulations as above for natural gas, with additional strict regulations for construction and maintenance.

Build the pipeline by collocating it with other utility rights of way with the same strict regulations as above for natural gas, construction, and maintenance.

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Build the pipeline through some private property where eminent domain is not used, and the right of way through private property access is granted voluntarily by the property owner with the same strict regulations as above for natural gas, construction, and maintenance.

Conclusion

This project is not in the public interest for all of the reasons previously stated. The adverse impacts are numerous and include:

Placing tens of thousands of persons in jeopardy for their personal safety

Lowering the property values for approximately 20,000 properties, and making those properties difficult to sell

Lowering local tax revenues for local communities and counties along the route

Threatening the drinking water supplies for many people

Contributing to climate change through continued release of greenhouse gases

Contributing to dire economic consequences in the future resulting from climate change

Delaying the implementation of much needed renewable energy resources

Contributing to further hydraulic fracturing with all of its health and environmental impacts

Significant inevitable environmental damage including soil erosion, landslides, water pollution, and air pollution.

Diminution of aesthetic property values including view sheds and enjoyment of private property

Major disruption during construction

Deforestation

Loss of wildlife, plant and animal diversity

Colonization of disturbed areas with invasives

Opening areas for access by illegal hunters and four wheelers

Favoring industry over citizens in the decision making process

Extreme anger, stress, and related health issues for affected property owners, and those near the project

The use of eminent domain by a private company to take private land for their private gain at the expense of the private property owner

I want to thank FERC for accommodating citizens impacted by the alternate route GWNF-6 by holding scoping meetings in Marlinton and Bath County. I attended both meetings for a good bit of each day, and was able to talk at length with FERC staff, all of whom were pleasant, attentive, and answered most of my questions. I realize they lost an entire weekend, and I appreciate their hard work on our behalf.

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I also want to thank you for the opportunity to comment on this project. I plan to continue to assist FERC in making a decision in the public interest by bringing to light issues that are pertinent in further comments.

Sincerely,

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