

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426  
Docket No. PF 15-6-000

March 12, 2015

I regret that other events previously scheduled likely will prevent me from participating in the oral presentations at regularly scheduled scoping sessions in the above-referenced docket, so I take this opportunity under the Commission's February 27, 2015, Notice to furnish the following comments in writing:

I have been a landowner in Pocahontas County, WV, for over 45 years. Milepost 80 for the proposed ACP will be about 1,000' from my front door. Nearby, U.S. 250 will be interrupted for several weeks and during that time my only alternative to get to Bartow is 9 miles down an old dirt road [Rte 3] that both County and State deny they have any responsibility to maintain. If it weren't for the ministrations of a private citizen at his own expense, it would look like the face of the moon. In addition, that dirt road will most likely have most of the other interstate traffic diverted through it during this period, including the construction vehicles. There won't be an option. This road is currently quite scenic, with vistas, and has a rich 150 year history as the original track through the mountains from Staunton to Parkersburg, an unpaved stretch of the turnpike too serpentine to be paved and subsumed by U.S. 250. "The Pike" is wide enough to allow two pickups to pass at most spots, but nothing more. Face to face meetings of construction vehicles without imaginative traffic controls will likely spark something more than imaginative language.

My favorite 3 fishing holes are downstream from streams that will be scoured. I will have to go elsewhere, as will others. Bear and wild turkey are the target species of the Monongahela National Forest, and studies show that the construction noise will cause them to go elsewhere for as long as 6 to 8 years. Many sportsmen come to the area specifically for these animals. They also will go elsewhere. What about the motels, diners, gas stations, and other local service dependent industries? They've been hanging on by their fingernails for the last 6 years. They will be toast.

Any claims of offsetting job opportunities are arrant nonsense. ALL welding positions will be filled from a union hall in Tulsa, and most heavy equipment positions are also union and will be filled from Texas. These highly skilled workers will follow the course of the pipeline throughout its construction phase. Some local truckers may be used for carrying ballast stone, but most local positions will be stringing fences and hanging signs. Not high pay nor long lasting. At the Highland County line they will be replaced by someone from Pocahontas. These are some of the negative impacts of the proposed route. Fortunately, this route is far from the only option.

Need for this pipeline can be examined in several different ways. Most ephemeral would be the number of potential new customers, a figure for which the ACP partners will never provide support – it's "proprietary". Moreover, these future customer forecasts are often hyper-inflated,

and might leave the industry with too much infrastructure in this area [see the DOE Report of February 2015 Natural Gas Infrastructure Implications of Increased Demand for the Electric Power Sector at 8,9, citing two other studies, *inter se*]. However, even if one were to assume that the future needs have been accurately forecast, need for this pipeline is also a question of whether we need the pipeline where Dominion is proposing, or also do we need Dominion to be the transporter at all? ***There is nearby an existing utility ROW across MNF, so no new bisection of the ecosystem is necessary.*** As shown by ACP Figures 10.4.1 and 10.5 1-2A of Resource Report 10, Columbia Gas Pipeline Company has a line there flowing in the general direction of a large segment of the ACP proposal. **This could be used instead of constructing a new pipeline across the MNF elsewhere.** Even if additional compression were necessary, that could be accomplished with far less disruption to the ecology than constructing an entire pipeline. Using this existing ROW across MNF means that **no new bisection of the ecosystem is necessary.** Moreover, ACP could also opt to co-locate its pipeline on this ROW, ***once again obviating any need to bisect the ecosystem one more time.*** This ROW is 18 miles north of Milepost 80. This small rerouting compared to the length of the proposed line is no dealbreaker.

Any discussion of alternatives must highlight the stunning fact that the ACP partners have not even considered the existing right-of-way across the MNF, begrudgingly offering only some alternatives south or at Milepost 80. These southern routes, including the only one highlighted by the Commission's Notice of February 27, 2015, interact with less federal forest, but cross state lands and more active farmland, matters raising their own issues. But of greater import is the fact that **ALL** of these alternatives should have been considered by ACP before designating its route, and certainly **ALL** of them should be analyzed in the Environmental Impact Statement, as well as other pipeline proposals, such as the Mountain Valley Pipeline and Spectra Pipeline, which could be seen as competing to bring the same production to the same market area. Any less would be piecemeal analysis.

Thank you for involving the public participation in this procedure and I would ask that this matter be set for **Formal Hearing.**

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