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Comments to FERC  
Atlantic Coast Pipeline and Supply Header Comments to  
be considered in the EIS

Docket #PF 15-6

It is telling that last night's proceedings in Farmville were prefaced by a statement that public comments regarding purpose and need for the Atlantic Coast Pipeline are irrelevant. On the contrary, it is FERC's responsibility to assess the domestic need for this project and base that assessment not solely on whether there is someone willing to BUY the fracked gas that will flow through it, but instead what the ultimate destination for this gas will be and to what degree the applicants will profit. The fact that this pipeline will provide storage and a gateway for natural gas exports profiting only business interests and speculators does not make it in the public interest. In the words of Chairman LaFleur, "We have a situation here."

Any project that seeks to maximize the use of eminent domain across Virginia, taking away property use, property values, private property and the right to privacy to the highest number of property owners cannot be held to be in the public good or public benefit. ACPLLC has failed to consider a route that would minimize the use of eminent domain and maximize the use of existing easements and corridors. We have a situation here.

Wild Virginia has petitioned FERC for a rehearing on its approval of the permit to construct the Dominion Cove Point Export Terminal on the Maryland coast. The EIS for that project did not assess the cumulative environmental impacts that the increased capacity of the Atlantic Coast Pipeline would have on that project from increased extraction and infrastructure including the climate effects of moving unbelievably large amounts of carbon from the ground into the atmosphere. FERC has failed to hold Dominion accountable to respond to this in a timely manner and construction at Cove Point continues. We see FERC in this instance as complicit with the business interests of Dominion and negligent in assessing that these actions are in the “public interest.” We have a situation here.

In Virginia, the GWNF has approved an application for a permit to survey across ACPLLC’s preferred route despite its statement in the application that there is “no

alternative” considered. Yet we know that consideration of alternatives are required by NEPA. Without surveys of alternate routes, the public is deprived of key information to assess the impacts of the proposal. It, at this point, locks in the project to a single outcome which is, of itself, a NEPA violation. We have a situation here.

FERC has chosen to open the scoping period before many property owners had been informed that their properties are considered for the route of the pipeline. These property owners have been deprived of due process under NEPA, and in this, FERC is complicit. We have a situation here.

It is important that FERC not continue to be part of the problem. FERC must do a complete environmental analysis that documents the lifecycle effects of the fuel that it will transport, from extraction to combustion, the cumulative effects of all pipelines that the ACP will interact with in its connection from source to export, including the Mountain Valley and Western Marcellus Pipelines, and the burden that is being placed on the natural resources of every inch of land this misguided project wants to cross. The testimony that everyone here tonight gives that serve this purpose must be given due consideration. Because we all are aware to what extent we have a situation here. Thank you.