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Title:
Comments: Atlantic Coast Pipeline Decision Objection

August 27, 2017
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Phone: 434-263-4968
Docket #: CP15-554-000
FERC ID #: F288882

Reviewing Officer: for ACP
USDA Forest Service, Attn: Administrative Reviews
1400 Independence Ave. SW, Mailstop #1104
Washington, D.C. 20250

Dear Glen Casamassa, Associate Deputy Chief:

As per my Intervenor letter to FERC, filed on April 9, 2017 for Docket CP15-554-000, I requested that the Forest Service not authorize proposed amendments that would allow the Atlantic Coast Pipeline (ACP) to be built across the George Washington National Forest (GWNF) and the Monongahela National Forest (MNF). I now strongly object to your recent decision and am asking that you to respond to each of the following:

Why would you authorize a special use permit to the ACP for the use of National Forest Land and approve project specific amendments to the MNF and GWNF Land and Resource Management Plans when...

1) Dominion has continually submitted incomplete and late reports to the U. S. Forest Service for specific construction plans through National Forest Land? In the case of soil surveys taken by the ACP, the U.S. Forest Service's letter to FERC on November 5, 2015 (File Code: 270; 1900) concluded that the ACP "misrepresented who conducted the soil surveys," and that the Forest Service "discredits any results of any soil survey conducted to date." So I want to know what specific submissions made by the ACP and its Affiliates convince you now, that no harm to and continued care for our public lands will be possible?

2) Current energy research shows that new pipeline infrastructure is not needed to supply present and future energy needs in this country. This is not recent news. In the June 5, 2015 issue of Forbes, a U. S. Department of Energy (DOE) study was referenced that said, "our country isn't even using 46% of its pipeline capacity", and that we have "plenty of existing pipeline infrastructure to accommodate expanded gas use and to replace coal power plants."

With a FERC guaranteed rate of return on its investment of 15%, Dominion and its affiliates are hyper-motivated to see the ACP to completion, regardless of need. They claim "public necessity" for this project but the committed subscribers for the gas are, in fact, the affiliates themselves. This is written into the Environmental Impact statements, as proof of need. I want to know on what statistics or research you based your authorization for a special use permit that demonstrates public need for the ACP?

a) Were you convinced by FERC's DEIS (Now the final EIS)? Merjent was contracted by FERC to produce the ACP's DEIS. It turns out that eight of the DEIS writers for Merjent had worked for the ACP's Natural Resources Group and produced Dominion's Resource Reports. Natural Resources group reported Merjent as one of their

clients! I do not believe that such a conflict of interest can produce reliable reports. Again, on what information did you base your decision to allow a special use permit to the ACP?

b) Were you convinced by the 2017 Pipeline Poll, conducted by the Consumer Energy Alliance(CEA) and reported on in the May 25, 2017 issue of the Nelson County Times, that said the majority of Virginia citizens were in favor of the ACP? Dominion Energy and Piedmont Gas pay CEA lobbying fees. According to David Pomerantz (05-25-17), the Executive Director of the Energy Policy Institute, the "CEA has a history of fraudulently representing public support for its clients' energy projects." What the article didn't tell you was that 69% of Virginians surveyed gave stronger endorsements for renewable energy, than they did for natural gas. Amazingly, 47% of those surveyed, had never even heard of the ACP! This is just another deceptive tactic used by gas companies who are motivated purely by profit, and not what is environmentally sound and fair to the taxpayers who cherish their public lands.

c) Were you convinced that Virginia's National Forest waterways and wetlands would be protected given the DEQ's explanation of how they will assess and monitor water quality standards? The fact that they are handing off much of the work to the Army Corps of Engineers, who use lesser standards, are of great concern to me and many of my Nelson neighbors. We are also concerned of what appears to be another incidence of a conflict of interest. The Department of Environmental Quality (DEQ) hired EEE Consulting to evaluate information and develop additional standards for its assessments of Virginia water quality in relation to the ACP and MVP projects. It turns out that EEE consulting currently works for and is paid by Dominion on other projects. As a result of Freedom of Information (FOI) requests, media coverage revealed that Dominion had put pressure on the DEQ behind the scenes, to try to influence their decisions.

It's a known fact that Dominion has contributed thousands of dollars to the political campaigns of both parties in order to influence legislation. So, in light of the numerous incidences of the ACP's affiliates using their extensive monetary resources and connections to powerful people to influence other divisions and departments of government, I specifically want to know...

4. What persons, companies, or government agencies have lobbied the Forest Service in order to change your previous objections to the ACP crossing National Forest Land, given the fact that, so far as the public knows, their work has been shoddy and incomplete?
5. Has future National Forest funding been threatened in some way or form?
6. Have any Forest Service employees' jobs been threatened if permission was not granted to the ACP to cross National Forest Lands?

In Summary: I want to know how the Forest Service justifies giving the ACP a special use permit to permanently damage public land based on their consistent record of deceptive practices?

Sincerely concerned and awaiting some answers,

Marcia Gibbons

Resident of and Landowner in Nelson county, VA