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Dear Claire Wainwright,

Please see the following public comment regarding Tennessee Department of Environment and Conservation's public scoping period for the Aquatic Resource Alteration Permit and Section 401 Water Quality Certification for the pipeline project being proposed by Tennessee Natural Gas Company, LLC.. The comment was signed by 115 people with 20 personalized comments from people living near the proposed pipeline route.

These comments and signatures are in the attached spreadsheet. Please contact me with any questions.

Thank you,

Angie Mummaw
Middle Tennessee Organizer, Appalachian Voices



Dear Claire Wainwright,

Thank you for considering our comment on the Aquatic Resource Alteration Permit and Section 401 Water Quality Certification application from Tennessee Gas Pipeline Company for its proposed Cumberland Project under FILE # NRS22.192. Because of the significant threat that this project poses to local aquatic habitat and water quality, and because viable alternatives are available, we are asking that the Tennessee Department of Environment and Conservation deny these permits.

The proposed 32-mile gas pipeline in Middle Tennessee would destroy prime aquatic and ecological habitat by using mostly open-cut methods to cross 155 streams and seven wetlands. Many of the crossings might involve blasting a deep trench into the streambed, which would irreversibly damage stream quality and aquatic habitat. Wetland crossings would also involve permanent conversion of some pristine forested wetland to emergence/shrub-scrub wetlands, yet this application was submitted without a compensatory wetland mitigation plan. Likewise, TGP's application contains no site-specific information for the vast majority of proposed stream crossings about alternative crossing methods such as trenchless techniques that may be practical and less environmentally damaging.

Pipeline construction and related dumping of materials and sediment threatens drinking sources and streams with harmful pollution, irreversible habitat degradation and possible hydro morphological impacts. We are particularly concerned that Tennessee Gas plans to use open-cut methods for crossing streams with special aquatic sites that are protected under the Clean Water Act. For instance, Bartons Creek crossing site has a riffle and pool complex. There are many other streams that will be impacted that also have these special aquatic sites.

In the Draft Environmental Impact Statement from FERC, Tennessee Gas claims to have contacted landowners to understand where natural streams and wells are located in proximity to the project. But many local landowners have yet to be contacted about this issue and are concerned about possible impacts to their drinking water, especially those whose drinking water comes from natural springs. Along the total 32-mile project route, Tennessee Gas claims that only two natural springs are within 1,000 feet of the project. This number does not likely reflect the actual number of springs within the project area, meaning some landowners may be especially susceptible to damage or loss of their primary drinking water sources.



Members of the community are also concerned about real risks of gas leaks and explosions. Some of the same community members impacted by TGP's project experienced a gas pipeline explosion in Dickson County in 1992 that burned over 400 acres before first responders could extinguish it. With only one emergency shutoff valve for TGP's full 32 miles of proposed pipeline, the threat of leaks and uncontrollable burns poses a significant risk to rural community members, wildlife, and farmland along the pipeline route. This is significant in its own right, but perhaps even more abhorrent when considering that TGP identified seven out of 11 census tracts along the pipeline corridor as environmental justice communities. Three of these block groups are considered EJ based on minority population thresholds and four were identified as EJ based on low-income thresholds.

The pipeline would permanently destroy more than 100 acres of farmland and over 290 acres of forested land, much of which is possibly prime habitat for several endangered bat species. There are other key features and habitats that are threatened by this project and not properly accounted for in application materials. For instance, in the DEIS that FERC issued for this project, Tennessee Gas claims that it "did not find suitable habitat for bald eagles during field surveys." However, bald eagles and their habitat/nesting areas have been observed by scientists and community members along the project route. As a protected species under the Bald and Golden Eagle Protection Act, injury to an eagle through the destruction or disturbance of their feeding, sheltering or nesting habits as a result of project construction is prohibited without a special permit from the U.S. Fish and Wildlife Service.

Economically, this pipeline is unlikely to provide much benefit and may in fact harm local communities. TVA's Cumberland Fossil Plant once provided hundreds of good-paying jobs to the community, but TGP's pipeline would create just one permanent job and TVA's proposed combined cycle gas plant would create just 25 to 35 permanent jobs. Even worse, 90% of the temporary construction jobs required for the pipeline project would be filled by non-local workers.

Studies have shown that renewable alternatives to TVA's gas plants and pipeline plans at Cumberland would generate 20-30 times more permanent jobs for the region. Recent research has also demonstrated that when taking advantage of benefits available through the Inflation Reduction Act, renewables are cheaper to build than 90% of gas plants. TVA's Payments in Lieu of Taxes likely would remain at similar levels as



long as TVA owns the Cumberland Reservation and produces energy there, regardless of whether that energy comes from gas, coal or renewables. Gas price volatility has already led to increased electric bills in the TVA region, which could become even more volatile and expensive if TVA moves forward with this proposed gas buildout. TGP's pipeline project would likely result in additional negative economic outcomes including decreased property values, environmental degradation, and potential property damage in the event of an explosion.

There are other reasonable and viable alternatives to this project. The Tennessee Valley Authority could select affordable and reliable energy alternatives for producing electricity that would not require the construction of a 32-mile pipeline that would inevitably have a profound and negative impact on the ecological health of the Cumberland River and Harpeth watersheds and the economic wellbeing and safety of the community. The Environmental Protection Agency found TVA's self-conducted National Environmental Policy Act analysis to be insufficient in multiple areas including in economic calculations and greenhouse gas calculations. EPA recommended that TVA modify its preferred alternative for a combined cycle gas plant and a 32-mile pipeline or select a different alternative entirely.

This project does not benefit the welfare of the people in Dickson, Houston and Stewart counties of Tennessee or people anywhere. Accordingly, TDEC should deny the application after holding its public hearing.

