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October 20, 2023

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Public comments in response to FERC's Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Ridgeline Expansion Project, Docket No. CP23-516-000

Dear Secretary Bose:

On behalf of Appalachian Voices and the signatories in an attached PDF, please find the enclosed comment in response to FERC's Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Ridgeline Expansion Project. These materials were originally submitted on October 18th. We are submitting a copy of the signatures list with expanded cell formatting for improved legibility of the personalized messages.

As noted with our original submission, this comment was signed by **2,964 individuals**, including **289 Tennessee residents** and **268 personalized messages**. These personalized messages will be easier for reviews to read and process with this improved formatting.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Brianna Knisley".

Brianna Knisley

Director of Public Power Campaigns, Appalachian Voices



I am writing to express my opposition to the proposed East Tennessee Natural Gas (ETNG) Ridgeline Expansion Project under docket number CP23-516-000.

This pipeline is not in the public interest, nor is it necessary. Its sole purpose would be to supply gas to the site of the Tennessee Valley Authority's Kingston Fossil Plant for the purpose of producing electricity. With ample clean energy alternatives available that have far lower environmental impacts, this project goes against the interests of the public.

In addition to the impacts ETNG outlines in their resource reports, TVA states that solar and storage generation options would avoid over 1.7 million tons of annual air emissions and greatly reduce social costs [1]. Moreover, many of the conclusions that undergird TVA's preferred gas alternative have been called into question by federal agencies like the Environmental Protection Agency and National Parks Service [2, 3]. With this in mind, I urge FERC to fully consider the presence of energy generation alternatives in its Draft Environmental Impact Statement (DEIS).

Geology and soils

Impacts to the Flynn Creek Impact Crater remain a concern. This rare structure is one of the best-preserved ancient impact craters on Earth. While it was affirming to see FERC ask ETNG to "provide an alternative or alternatives that would avoid the Hawkins Impact Cave and Flynn Creek Impact Structure" in its February 1st filing [4], it was disappointing to see ETNG reject a reroute that avoids the crater after considering only one alternative [5]. ETNG should study other alternatives, beyond what was provided in Resource Report 10, and make these alternatives more accessible to members of the public and landowners who have expressed concerns.

I am also concerned about long-term impacts to soil, and particularly to agricultural land. ETNG says 26% of the project, or 656.6 acres, would impact prime farmland [6]. ETNG writes that "Landowners will be compensated for crop loss during construction," even as they acknowledge the potential for reduced future yields [7]. ETNG should provide more information about compensation and what steps they are taking to ensure landowners are aware of this commitment. FERC should also review research that demonstrates long-term impacts to soil and crop yields [8], as landowners should be compensated for this beyond the construction timeframe.

Socioeconomics and environmental justice

ETNG reports that the majority of communities impacted by the Ridgeline Expansion Project – 59%, or 23 of 39 census tract block groups – are environmental justice communities [9]. This alone is of great concern. ETNG should also work to provide more granular data and to include groups and sites left out of its report. For example, ETNG writes that it "identified areas where children or seniors may congregate within 0.25 mile of the Project" [10]. I believe this analysis should not be limited to only children or seniors, but also include workspaces and places of worship along the pipeline route.

In addition, although ETNG names that the Monterey Mennonite School is about 50 feet from the project, it made no other mention of impacts to the Amish-Mennonite community of Muddy

Pond, or relationships to technology that may affect their ability to provide input during the regulatory process. FERC should offer more in-person community meetings to accommodate for this as well as low internet connectivity along the route.

ETNG should also work to correct misleading information provided to the public. A representative of ETNG's parent company, Enbridge, is quoted in a local media outlet as saying: "Some people wrongly think it's a new pipeline." The quote continues, "It's not a new pipeline. It's a looping or expansion of our system. We'd expand our pipeline by building this new one in the same right-of-way" [11].

Even if the proposed pipeline segment connects to an existing pipeline system, this project would involve 122 miles of new pipeline – only 91 percent of which would be in or adjacent to the existing right-of-way [12]. Language like the above quote has contributed to public confusion about the proposed project, such as the belief that ETNG only seeks to modify their existing pipeline that is in the ground. Enbridge has a responsibility to address these misunderstandings.

Water resources and wetlands

ETNG says the pipeline would affect 677 waterbodies, including 408 direct crossings [13]. Some of the waterways impacted by this potential project include streams and watersheds that have gone through extensive remediation efforts. FERC should evaluate how the project would threaten waterways where significant time, effort, and/or public funds have already been spent on reclamation, such as the Crooked Fork Watershed and the Obey River [14, 15].

FERC should also specifically study risks to tourism and recreation on Tennessee's waterways, caused by direct crossings or upstream/downstream impacts. For example, the Obed River, Emory River, Clear Creek, and Daddy's Creek are all popular sites for whitewater kayaking and rafting. Fishing is also an important activity in the region. FERC should consider how access to waterways used for recreation could be limited during construction, and whether there could be short- or long-term disruption to fish populations.

Threatened and endangered species

ETNG's list of over 100 federally and state-listed species potentially occurring in the project vicinity is alarming [16]. The threatened spotfin chub, a beautiful fish also known as the turquoise shiner, has been the focus of reintroduction efforts that are ongoing [17]. ETNG also writes that "[the spotfin chub] appears to be highly sensitive to sedimentation," which is a known effect of pipeline construction that can last well after construction ends [18].

The pipeline should not be permitted to cross known critical habitat for threatened or endangered species. ETNG currently plans to cross the Emory River at a site that is federally listed as critical habitat for the spotfin chub and is proposed as critical habitat for the sickle darter [19]. This is unacceptable, and these crossings should be reconsidered.

Thank you for considering my comments.

- [1] Tennessee Valley Authority. (2023). Kingston Fossil Plant Retirement: Draft Environmental Impact Statement (pp. 361, 365).
- [2] U.S. Environmental Protection Agency. (2023). Kingston KIF DEIS Comment Letter. CEQ No: 20230067
- [3] Tennessee Valley Authority. (2023). Kingston Fossil Plant Retirement: Draft Environmental Impact Statement. (Appendix P).
- [4] Federal Energy Regulatory Commission. (2023). Comments on Draft Resource Reports 1 through 12 (p. 14). https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230201-3015
- [5] East Tennessee Natural Gas, LLC. (2023). Resource Report 10 – Alternatives (p. 11).
- [6] East Tennessee Natural Gas, LLC. (2023). Resource Report 7 – Soils (pp. 5, 6).
- [7] East Tennessee Natural Gas, LLC. (2023). Resource Report 8 – Land Use, Recreation, and Aesthetics (p. 11).
- [8] Culman, S., & Brehm, T. (2021). Does Pipeline Installation have a Lasting Effect on Crop Yields? Agronomics Crops Network, OSU Extension.
- [9] East Tennessee Natural Gas, LLC. (2023). Resource Report 5 – Socioeconomics (pp. 17, Appendix 5A).
- [10] East Tennessee Natural Gas, LLC. (2023). Resource Report 5 – Socioeconomics (p. 5).
- [11] Lawrence, D. (2023, June 14). Plant future focus of open houses. Roane County News. https://www.themountainpress.com/roane/news/plant-future-focus-of-open-houses/article_fdba0f93-ccbc-5236-8f7b-808f44ceb823.html
- [12] East Tennessee Natural Gas, LLC. (2023). Resource Report 1 – General Project Description (p. 9).
- [13] East Tennessee Natural Gas, LLC. (2023). Resource Report 2 – Water Use and Quality (p. 21).
- [14] Tennessee Valley Authority, Natural Resources Conservation District, Morgan County Soil Conservation District, & Emory River Watershed Association. (2006). Crooked Fork Watershed Restoration Plan.
- [15] Wild Side TV. (2014, September 26). Wild SideTV-The Obey River. <https://www.youtube.com/watch?v=y2gJR2rdtrE&t=65s>
- [16] East Tennessee Natural Gas, LLC. (2023). Resource Report 3 – Fish, Wildlife, and Vegetation (Appendix 3A).
- [17] Conservation Fisheries. (n.d.). Spotfin Chub | *Erimonax monachus*. Retrieved October 6, 2023, from <https://www.conservationfisheries.org/minnows/spotfin-chub?rq=spotfin>
- [18] Hansen, E., Clingerman, J., & Betcher, M. (2018). Threats to Water Quality from Mountain Valley Pipeline and Atlantic Coast Pipeline Water Crossings in Virginia. Downstream Strategies.
- [19] East Tennessee Natural Gas, LLC. (2023). Resource Report 3 – Fish, Wildlife, and Vegetation (p. 3).