



October 20, 2022

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

Re: Public comments in response to FERC's Notice of Scoping for East Tennessee Natural Gas, LLC's Ridgeline Expansion Project; docket number PF22-7-000

Dear Secretary Bose,

On behalf of Appalachian Voices and the signatories below, please find the enclosed comment in response to FERC's Notice of Scoping for East Tennessee Natural Gas, LLC's Ridgeline Expansion Project; docket number PF22-7-000.

This comment was signed by **560 individuals**, including **49 Tennessee residents** and **74 personalized messages**.

Thank you for your time and consideration.

Sincerely,

Gabi Lichtenstein
Tennessee Energy Democracy Field Coordinator
Appalachian Voices
gabi@appvoices.org

To: Kimberly D. Bose, Secretary Federal Energy Regulatory Commission; the Tennessee Valley Authority

I am writing to express my opposition to the proposed East Tennessee Natural Gas (ENTG) pipeline under docket number PF22-7-000.

It is important that FERC conduct a full Environmental Impact Statement (EIS) for this project. ENTG intends to largely build this pipeline adjacent to an existing pipeline that was constructed in the 1940s — long before the National Environmental Policy Act (NEPA) was established. This means major environmental and cultural concerns could have been overlooked in that pipeline's construction. The proposed pipeline could exacerbate those issues while creating new environmental impacts, including those described below.

Cultural resources/Geology and soils:

The pipeline would cut a new path in the Flynn Creek Impact Crater, which is a well-preserved ancient impact crater and rare geologic structure. It contains the Hawkins Impact Cave, which is the only cave known to be within the central uplift of an impact crater. NASA studied the crater in advance of the 1969 Moon Landing and it continues to be a vibrant site of geologic research. FERC should study the geologic impact of the pipeline on this historic and cultural resource.

Records also indicate the potential for Indigenous cultural resources to be impacted by the pipeline. There are well-documented Indigenous historical sites along Flynn Creek and there may be others that have not yet been identified. This warrants close study with leadership from affected Tribes.

Water resources and wetlands/threatened and endangered species:

This pipeline presents risks to drinking water, recreation and aquatic life in the region. Sedimentation or a spill during pipeline construction could affect access to clean water, including for rural residents who rely on well or spring water and cannot switch to an alternate supply in the event of contamination.

In addition, the pipeline would impact tributaries of the Obed Wild & Scenic River National Park, an important recreational area, with up to 50 stream crossings in the Clear Creek and Obed River watersheds alone. According to the National Park Service[1] this park is one of the only remaining habitats for several critically endangered freshwater mussels — including the purple bean and Alabama lamp mussel, the latter of which is found at just one other site globally. The park's waters are also home to the threatened spotfin chub.

Socioeconomics and environmental justice:

ENTG wants to put a second compressor station in Trousdale County, even though electric compressor stations release harmful emissions both through routine blowdowns and accidental leaks. They also create risk of fires and explosions. As a county where a large percentage of residents are incarcerated at the Trousdale Turner Correctional Center, this proposed compressor station presents a serious environmental justice concern.

Moreover, this pipeline would only supply gas to the Kingston Fossil Plant, where residents and cleanup workers suffered the devastating 2008 Kingston Coal Ash Spill. A gas plant would force this community to endure more water and air pollutants, while providing a fraction of the long-term jobs that clean energy alternatives could provide [2]. Also, since most of the pipeline

would be placed next to an existing ENTG pipeline, these same residents would be exposed to increased risk of leaks, explosions, and pollution. In Smith County, the existing pipeline has already exploded twice — in 1949 and 2018.

FERC should also consider how this pipeline could further increase the energy burden on low-income residents throughout the Tennessee Valley. TVA's reliance on gas has already increased electricity bills significantly this year. With readily available clean energy replacements for the Kingston Fossil Plant, a new pipeline is unnecessary.

Thank you for considering my comments.

[1] National Park Service. (2019, July 8). Inventory and Monitoring at Obed Wild and Scenic River. Appalachian Highlands Inventory & Monitoring Network. <https://www.nps.gov/im/aphn/obri.htm>

[2] Knisley, B., Luke, N., McIlmoil, R., & Barrett, J. (2022). Save Energy, Grow Jobs in the Tennessee Valley: How investments in renewable and efficient resources could bring thousands of jobs to the TVA region. Appalachian Voices. https://appvoices.org/resources/reports/TVA_Jobs_Report_07_14_22.pdf