

Summary Comments on Inadequacy of Assessment of Safety Issues in DEIS

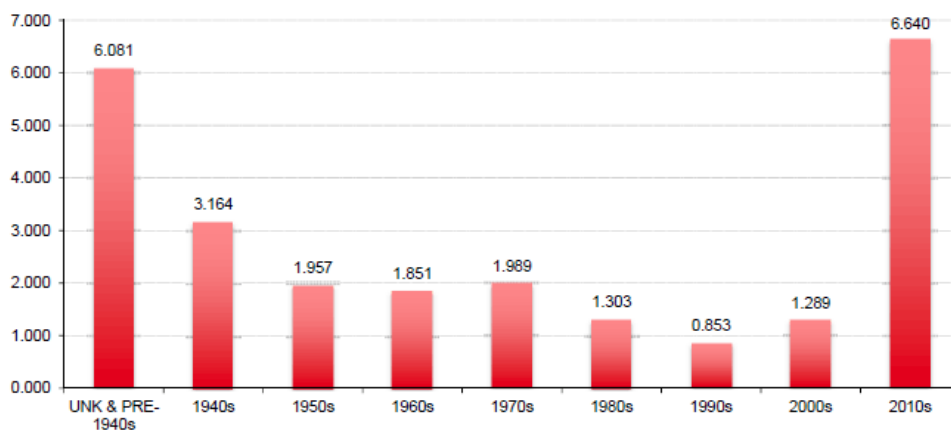
Always include your own concerns and observations about the safety implications of pipeline construction and operation near your home or business, if relevant.

Compliance with DOT Regulations is Clearly NOT Adequate

In response to a number of safety concerns expressed by public commenters during the “scoping” period, ACP simply responds that “ACP and SHP (Supply Header Project) aboveground facilities would be designed, constructed, operated, and maintained in accordance with DOT Minimum Federal Safety Standards in 49 CFR 192.” If compliance with those DOT safety standards were adequate, we would not have seen a dramatic rise in pipeline incidents per mile since 2010, the period in which a record number of pipelines have been approved and constructed. The Safety Standards themselves are inadequate or the inspection and enforcement of those standards is failing, likely due to rushed construction.

The following figure was prepared with data from the Pipeline and Hazardous Materials Safety Administration (PHMSA), and clearly documents the recent increase in pipeline incidents.

Average number of annual incidents over 2005-2013 per 10,000 miles of onshore gas transmission pipe by decade of pipe installation



As of March 2015.
Sources: U.S. Pipeline and Hazardous Materials Safety Administration, Pipeline Safety Trust

The Rush To Build

Pipeline projects are now viewed as major sources of profit for pipeline companies and electric utilities, such as Duke Energy and Dominion, due to the very high rates of return (up to 14%) being granted by the Federal Energy Regulatory Commission (FERC). FERC doesn't critically evaluate the need for gas pipelines, either locally or based on regional supply, but simply takes the project applicant's word that it has sold pipeline capacity, even when that capacity has been committed to the applicant's own subsidiaries, referred to as "self-dealing." Unlike other federal agencies, FERC's entire budget is funded by fees paid by project applicants.