

Written Comments To FERC On Behalf Of Dr. And Ms. Sabshin, Affected Landowners For
Leaching Site Residence, With Regard To EA Scoping For Dominion Transmission, Inc.'s
Proposed Storage Factory Project
FERC Docket No. PF07-12-000

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On behalf of Dr. and Ms. Sabshin, leaching site affected landowners relating to Dominion Transmission, Inc.'s (Dominion's) proposed Storage Facility Project ("Project"), we are hereby submitting comments to the scoping portion of the Environmental Assessment ("EA") being prepared by FERC (Project Docket No. PF07-12-000). The Project being proposed by Dominion is monumental in scope and potential environmental impacts and we urge that a comprehensive EIS be prepared prior to any final FERC Project determination.

Lacking the expansive resources of Dominion and the U.S. Government, our concerns must be raised in the context of common sense and our familiarity with the site, rather than expert determination. Nonetheless, we trust that Dominion and the requirements of NEPA will ensure the appropriate research and data gathering in order to be sure that the following issues are fully identified, considered and addressed:

- ❑ The subject land has substantial valuable timber resources, which is a major industry for the region. The scope of the proposed Project will not only directly destroy hundreds of acres of timber resources (much of it permanently), but may also have unanticipated impacts on adjoining timberlands from air and ground deposition of contaminants, installation of physical barriers, and alternation of natural surface/ground water flows.
- ❑ The subject land likely provides critical habitat to unique flora and fauna. The proposed Project will destroy critical habitat and may adversely impact critical species of animals and vegetation. Consideration must be given to identifying and cataloging the present flora and fauna, over the period of all seasons to ensure representative studies. Special consideration must be given to potential migratory pathways (air, land and water) and the role played by the entire proposed Project area in supporting migratory patterns of both plants and animals.

- ❑ The subject land is largely rural and agricultural. Consideration must be given to the impact this proposed Project will have on the continued encroachment on and reduction of rural and agricultural lands. The proposed Project will not only directly reduce agricultural acreage, but also will alter access routes, land-use, and growth patterns, encouraging further adverse impacts on existing communities, including family farms.
- ❑ Construction of these huge salt storage caverns a mile beneath the surface of the earth could result in unanticipated geologic impacts that must be fully modeled and understood before embarking upon this irrevocable course of action. Careful consideration must be given to pipeline construction by-ways that will present risks of contaminant migration (naturally occurring and man-caused) pathways. Hydrological impacts must also be studied and proven safe. The pumping of huge quantities of waste materials or oil into the caverns during development creates a strong likelihood of spills and contamination. The potential for catastrophic failure of the cavern and its related facilities must be evaluated.
- ❑ Studies have documented the occurrence of methane gas in the subsurface in the proposed Project area and the risk of explosion in water wells. Consideration must be given to the risk that the proposed Project will exacerbate the risk of gas infiltration and explosions. See "Natural Gases in Ground Water near Tioga Junction, Tioga County, North-Central Pennsylvania—Occurrence and Use of Isotopes to Determine Origins, 2005" By Kevin J. Breen, Kinga Révész, Fred J. Baldassare, and Steven D. McAuley, U.S. Geological Survey and Pennsylvania Department of Environmental Protection. Scientific Investigations Report Series 2007–5085, U.S. Department of the Interior, U.S. Geological Survey pubs.usgs.gov/sir/2007/5085/pdf/sir2007-5085.pdf
- ❑ Although identified by FERC in its notice, the impact from noise during the proposed Project's construction and operation must be fully considered. Importantly, since Dominion anticipates multiple stages of construction during the next 20+ years, the prolonged noise impacts, on people, birds, insects and animals must be fully understood.
- ❑ The nearby Cowanesque River and Reservoir present unique water resources, including for recreation, irrigation, species enrichment (food, sustainability, etc.), human support (drinking, industry, etc.), and flood control. Existing studies suggest that the River and Reservoir are already impacted by "sub-optimal" conditions. Consideration must be given to ensure that the impact of the proposed Project on water quality and stream/reservoir functionality is fully understood. See "FISH-COMMUNITY COMPOSITION IN COWANESQUE RIVER UPSTREAM AND DOWNSTREAM OF THE COWANESQUE DAM, TIOGA COUNTY, PENNSYLVANIA, 1998," by Robin A. Brightbill and Michael D. Bilger, U.S. Department of the Interior and U.S. Geological Survey, Open-File Report 99-208.

- ❑ The impact the proposed Project could have on groundwater base-flow and stream volume must be fully modeled and evaluated. The SRBC has opined that: "the Cowanesque water storage project epitomizes water resources management on an interstate basis. In an agreement with the Corps of Engineers in 1986, the SRBC purchased 25,000 acre-feet of water storage at the reservoir for water supply. During times of low flows or droughts, the SRBC directs the Army Corps to release the quantity of water necessary to restore river levels. The reservoir water flows into the Cowanesque River in Pennsylvania, then into New York through the Tioga River and later the Chemung River, where the increased river flow benefits New York communities, including Corning and Elmira. The Chemung River then flows into the main branch of the Susquehanna River below Sayre, Pa. From there, downstream users along the Susquehanna in Pennsylvania and Maryland benefit. In particular, this program is vitally important to the Chesapeake Bay, as it helps maintain flows to the estuary." Because of its proximity to the Cowanesque, it is imperative that all potential impacts be fully understood.
- ❑ Reliance on prior research for similar and/or nearby projects is inappropriate. The proposed Project must be evaluated anew and should not rely upon studies developed for other projects.
- ❑ The Cowanesque Reservoir's water supply is crucial to the continued proper operation of PPL's Susquehanna Steam Electric Station Nuclear Power Plant. Full consideration must be given to any impacts the proposed Project could have on the water supply and its potential for nuclear disaster.
- ❑ The brine generated from the proposed Project and transported via pipeline to extraction facilities must be evaluated for the risk it poses to priceless surface and ground water supplies.
- ❑ The multiple potentials for air pollution from the varied aspects of this proposed Project must be studied, modeled and fully accounted for in any federal and state air quality planning.
- ❑ The proposed Project will directly increase and support (fuel) other projects resulting in additional Greenhouse Gas (GHG) Emissions. Full consideration must be given to the proposed Project's GHG impacts and compatibility with likely future state and national commitments related to the prevention of global warming.
- ❑ Cultural and archeological impacts of the entire projected proposed Project area (not just this initial portion) must be carefully studied, documented and preserved. Given its location and proximity to water, it seems likely that both native and early American's inhabited and/or used the subject site lands. Careful investigation and study is appropriate to ensure no disturbance and/or destruction of any historical troves.
- ❑ Although identified in the initial documents as within the scope of any analysis, consideration must be given to the impact and risks the proposed Project's waste generation and disposal will have. Special consideration must be given to the fact that

any transportation of waste will impact existing crucial transportation arteries and that the risks are greater due to existing and projected continuing truck congestion on interstate roads.

- ❑ The environmental scoping studies should consider the existence of any historic or current underground mines in the vicinity and the potential impact to the migration and natural storage capacity of acid mine drainage.
- ❑ The proposed Project area is valuable for its recreational resources. Consideration must be given to the impacts (including economic) on the surrounding communities' recreational values.
- ❑ The proposed Project area is an invaluable visual resource. Mostly 'green space' the proposed Project area provides an invaluable foil to the concrete jungles of populated areas and roads. The collective value of the area's green spaces cannot be minimized. Unfortunately, elimination of selected green space areas, especially when coupled with the addition of noisy, obtrusive industrial structures will irrevocably eliminate a valuable resource and likely also irreparably damage the fabric of the surrounding communities.
- ❑ The scope of this proposed Project and the fact that it involves earthbound storage and pipeline transmission of an extremely flammable gas raises the need for a careful study on the potential for Homeland Security issues. The potential that the proposed Project elements could become a target or tools for terrorists, the resulting havoc (injury and damage), and security risks must be fully evaluated.
- ❑ The NEPA process requires that the proposed Project's cumulative impacts be fully understood. In this case, the initial 2-station construction phase impacting approximately 250 acres is only the first in a series of stations to be constructed over as many as 20+ years. Undertaking a proposed Project that will span a quarter of a century, by design, must presume the need for an EIS. And here, as it is not possible to predict all potential uses and risks from sub-surface salt storage on the projected proposed Project site, careful consideration and expert study is essential.
- ❑ Lastly, we believe it crucial to consider reasonable alternatives that may ameliorate the adverse impacts this proposed Project will have. Review of Dominion's Summary of Alternatives indicates that the summary is a broad-brush approach and inadequate to demonstrate appropriate consideration of alternatives. With respect to alternate proposed Project locations, Dominion contradictorily concludes both that other sites are unsuitable and that those sites are suitable for future development. Apparently, Dominion confuses its economic benefits with the public's need for a reasoned analysis of alternative potential sites. Consideration should be given to construction off-of private lands, even if that requires special angled drilling methods. Rather than drilling perpendicular to the surface, given the depth of the planned caverns, consideration should be given to locating the surface activities non-privately owned lands or more sparsely populated areas and utilizing angled drilling. In addition, while during construction some level of disturbance is inevitable, the facilities left aboveground are noisy eyesores and wholly inconsistent

with the surrounding area. Consideration should be given to locating as much of the proposed Project below ground, in vaults if necessary, and to creating new innovative designs for any minimal aboveground facilities that are compatible with the existing landscape. Also, re-routing of pipelines to avoid proximity (visual and spatial) to residences, should a priority.

We appreciate this initial opportunity for our perspectives to be considered, anticipate continued active participation in the evaluation of the proposed Project, and trust that the scoping considerations, including those identified here, will result in the preparation of a full, well researched and comprehensive NEPA EIS. Thank you.

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