

Official Comments of  
Rebecca S. Fedewa  
Executive Director  
Flint River Watershed Coalition  
at the Federal Energy Regulatory Commission  
Environmental Impact Statement Scoping Meeting  
December 10, 2014  
Holiday Inn Gateway Center  
5353 Gateway Centre  
Flint, MI 48507

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My name is Rebecca Fedewa. I am Executive Director of the Flint River Watershed Coalition. As the leading community-based advocate for clean water resources, the Flint River Watershed Coalition (FRWC) promotes efforts to protect, preserve, and improve our area's ecosystem. The Flint River Watershed is increasingly healthy and strong, and offers countless economic, social, and environmental values for our region; our watershed is a vital resource we all need to protect and continue working to improve.

I am pleased to offer comments on the issues we believe should be addressed in the EIS. We believe there are clear indications that FERC cannot grant Rover a "Certificate of Public Convenience and Necessity" (Section 7 of the Natural Gas Act) for this project to enter the State of Michigan. Two areas where the Rover project appears to fall significantly short are:

1. Environmental Impacts, and
2. Public Necessity and Convenience.

**Environmental Impacts:**

Rover's proposed route runs through the headwater regions of the Flint River watershed affecting six sub-watersheds—Swartz Creek, Thread Creek, Kearsley Creek, Farmers Creek, Hunters Creek, and South Branch—including two nature preserves and two state parks.

Our concerns for the Flint River include, but are not limited to:

- construction and operational impacts on the fragile headwaters of a river system that provides primary or back up drinking water to over 250,000 people;
- impacts on water resources including sensitive springs, groundwater, wetlands and headwater regions;
- impacts of clearing forested areas and other vegetation along the proposed route on habitat and water quality;
- impacts on land use including agricultural lands and associated drainage systems on longstanding positive partnerships to improve water quality through conservation practices.

These subwatersheds contain wetland features that provide critical ecological services, such as floodwater storage, filtration of sediments and nutrients, and critical and sometimes rare habitat for aquatic and terrestrial wildlife. For example:

- Kearsley Creek is the only cool water stream in the region, and supports a vibrant and lucrative trout fishery supported by the Michigan DNR.
- The South Branch of the Flint River provides some of the highest quality habitat in our watershed, and water monitoring shows this area is only improving.
- On the other end of the spectrum, Farmers Creek is already a suffering ecosystem, and additional stresses to the system could prove very detrimental to our effort to protect and improve all areas of our watershed.

All phases of this pipeline project could structurally interfere with habitat connectivity, increase sedimentation and erosion, and otherwise alter natural stream processes. Examples include:

- Removal of trees and woody debris in and around water features.
- Wetland alterations.
- Placement of silt/filter fence within wildlife corridors.
- Disruption to ground surface via equipment, construction activity, and removal and replacement of soil.
- Disruption of natural soil characteristics. High infiltration capacity soils exist in many of the above headwater areas. Disrupting these soils increases the potential for erosion/sedimentation.

The project also could undo years of hard work, partnership, and financial investment to protect, preserve, and improve the Flint River Watershed. Investments include, but are not limited to:

- Two nature preserves and two state parks
- Extensive water quality monitoring in the area
- Investment by the state to stock streams with fish.
- Additional state investments in Section 319 grants, which include planning grants for the South Branch, Swartz Creek, and Kearsley Creek, as well as implementation grants in the South Branch.
- Federal investments, through the Great Lakes Restoration Initiative, in the Swartz and Kearsley Creek watersheds.
- And countless local efforts by the FRWC and our partners to encourage protection and restoration of these areas.

Environmental staff of FERC's Office of Energy Projects also will evaluate alternatives to the Project, Project components, pipeline routes, and aboveground facility locations; and make recommendations on how to avoid or minimize impacts on the various resource areas. FRWC would appreciate the opportunity to consult on alternatives. But this river basin is in recovery and the cumulative impacts from a project of this scale, even if minimized, is too much to ask.

**Public Necessity and Convenience: No and No.**

There is no public need or purpose for an additional pipeline, nor is there a public benefit for the people of the State of Michigan and the residents of the Flint River Watershed.

The Rover Project would use Michigan as a virtual "pass through" to another country, and does not serve the public good or energy needs of Michigan residents, let alone those impacted by the

pipeline project route. Rover has failed to demonstrate that the proposed new pipeline will create a level of public good that would offset the risks and environmental degradation to the Flint River Watershed, our neighboring watersheds, natural areas, lands under conservation easements, and the vital drinking water sources for the people of Michigan.

Moreover, between 2008 and 2013 the U.S. Energy Information Administration asserted that Michigan has far more underground natural gas storage capacity than any other state, representing approximately 12% of the nation's overall storage capacity. In fact, Michigan supplies natural gas to neighboring states during the high-demand winter months.<sup>1</sup> In addition, FERC has already certified that the proposed ET Rover Pipeline through SE Michigan is unnecessary given that last year both FERC and the State of Michigan allowed the sale of a different natural gas pipeline that was deemed unnecessary, and subsequently allowed modifications to that line for oil transportation.

To conclude, we envision a day when our drinking water is secure and the integrity of our Flint River is protected. We believe that all people should have access to a healthy Flint River Watershed for social and economic needs and the benefits nature provides through its natural processes to our communities. If FERC approves the Rover Project, that approval conveys with it the right of eminent domain to a for-profit entity while at the same time conferring no public benefit along with significant risks to the people and waters of the State of Michigan. On behalf of the Flint River Watershed Coalition, an organization representing individuals, businesses, community organizations, and local units of government in this seven county, 1,400 square mile drainage basin, we urge FERC to deny the Rover Project certification within the State of Michigan.

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<sup>1</sup> Underground Natural Gas Storage Capacity:  
[http://www.eia.gov/dnav/ng/ng\\_stor\\_cap\\_a\\_EPG0\\_SAC\\_Mmcf\\_a.htm](http://www.eia.gov/dnav/ng/ng_stor_cap_a_EPG0_SAC_Mmcf_a.htm)