

Blue Ridge Environmental Defense League

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November 12, 2021

Administrator Michael S. Regan
Office of the Administrator, Mail code: 1101A
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

RE: Strategic Plan 2022-2026, Docket Number EPA-HQ-OA-2021-0403

Dear Mr. Regan:

On behalf of the Blue Ridge Environmental Defense League, I write to provide comments on the Agency's draft Strategic Plan for fiscal years 2022 to 2026. First, we honor your appointment in March to lead the EPA and wish you success in a most challenging mission. Next, I present our comments on two of the goals detailed in the Draft Plan.

Introduction

Our organization was founded in 1984 and presently has members and chapters in six states: Virginia, North Carolina, South Carolina, Tennessee, Georgia and Alabama. During the last 37 years, we have collaborated with community groups and indigenous tribes in many states, with national organizations in Washington and with non-governmental organizations around the world. Despite the differences, the common threads stitching us together are values for human health, ecological stability, eliminating pollution, equitable treatment for all and the belief that by working together we can preserve the planet. In fact, we will settle for nothing less. I remember being at an environmental meeting in Rostov-on-Don (FSU) in 2000, at which a Cossack man in military regalia rose to speak, proclaiming that if we did not act to eliminate pollution, "Our children will spit on our graves!" We must not allow this to become true, via action or inaction.

Comments

Global Climate Change

The Draft Plan states:

Goal 1: Tackle the Climate Crisis

- Objective 1.1: Reduce Emissions that Cause Climate Change
- Objective 1.2: Accelerate Resilience and Adaptation to Climate Change Impacts
- Objective 1.3: Advance International and Subnational Climate Efforts

In order to fulfil these objectives, EPA must avoid false promises and blind alleys, such

as electric power from natural gas, nuclear and biomass.

Natural Gas

Natural gas is a fossil fuel. Like coal, it is found underground, it is a limited resource and not renewable. The global warming differences between coal and natural gas are a matter of degree, not of substance. Fracking, the invasive and destructive practice of extracting hitherto uneconomical pockets of natural gas, expanded greatly after 2004, when the EPA concluded incorrectly that the practice posed no threat. However, this conclusion was disputed even by EPA's experts.

Weston Wilson, a scientist and 30-year veteran of the agency, who sought whistle-blower protection, emphatically disagreed, saying that the agency's official conclusions were "unsupportable" and that five of seven members of the review panel that made the decision had conflicts of interest.¹

Nevertheless, as a result of the "Halliburton Loophole" in the 2005 energy bill, EPA is prohibited by law from regulating fracking. This fact continues to distort the Agency's analysis.

Natural gas suffers from a series of unsolvable problems. Once the gas is removed from the earth, it must be transported in trucks, compressed and delivered by pipelines where it is burned for heat and power. At each stage in this process, pollution is created. And compressor stations and electric power plants are two major pollution sources.

For example, at the Richmond County Energy Complex in Hamlet, North Carolina, Duke Energy Progress operates combustion turbines permitted to burn either fuel oil or natural gas to generate electric power. But turbines are remarkable for their lack of efficiency in converting chemical energy to mechanical energy. More than 50 percent of the turbine's power output is consumed by the turbine itself to aid combustion.² Two types of turbines are simple-cycle and combined-cycle. The simple cycle has a thermal efficiency of only 15 to 42 percent. Combined cycle units add a heat recovery steam generator to boost efficiency to between 38 and 60 percent. So, at best, 40% of the fuel burned produces no electric power; at worst, 85 % of the fuel burned produces no electric power. Of course, air pollution and global warming gases are created whether power is produced or not. Another major source of air pollution from natural gas is compressor stations. Spaced along pipelines about 50 to 100 miles apart, they keep the gas moving along the pipeline from production site to end use. Natural gas is received via upstream pipeline, compressed, and then pumped into the outlet pipeline for transmission downstream. Power for these compressors is provided by internal combustion engines which use natural gas as a fuel source. These engines release huge amounts of air pollution including sulfur dioxide, nitrogen oxides, volatile organic compounds, carbon monoxide,

¹ "How gas drilling contaminates your food," *Salon*, Barry Estabrook, May 18, 2011
http://www.salon.com/2011/05/18/fracking_food_supply/

² US EPA Air Pollution Emission Factors, AP-42, Stationary Gas Turbines, Section 3.1.2 Process Description

particulate matter, hazardous air pollutants such as benzene and formaldehyde, and huge amounts of global warming carbon dioxide. For example, a single, a medium sized compressor can emit 203 thousand tons of CO₂ annually.³

Industry representatives tout natural gas as an environmental improvement and a stepping-stone to reduced greenhouse gas emissions. It is neither.

Nuclear

To halt and reverse global warming, nuclear power is a leaky vessel for hope. Nuclear suffers the twin flaws of being too expensive and too unpredictable to rescue the planet from the looming threat of global warming.

To estimate risks, nuclear engineers use “probabilistic” techniques. For example, to determine earthquake risk they attempt to account for all potential seismic sources in the region around the plant. The standard is ground motion with an annual frequency of 1×10^{-4} /year, or ground motion that occurs every 10,000 years on average. Probabilistic assessments take into account what can go wrong, how bad and how likely based on current information. The problem is that probabilistic risk assessments do not account for unexpected failures. After the meltdown at Fukushima, a physicist writing for the *Bulletin of the Atomic Scientists* said:

The lesson from the Fukushima, Chernobyl, and Three Mile Island accidents is simply that nuclear power comes with the inevitability of catastrophic accidents. While these may not be frequent in an absolute sense, there are good reasons to believe that they will be far more frequent than quantitative tools such as probabilistic risk assessments predict. Any discussion about the future of nuclear power ought to start with that realization.⁴

When it comes to oversight, the US Nuclear Regulatory Commission is the servant of the nuclear industry, not the public. At the behest of its master, the NRC has relaxed its regulations, allowing aging reactors to remain in operation. An independent investigation found that clogged lines, cracked parts, leaky seals, rust and other deterioration resulted in 26 alerts about emerging safety problems and may have been a factor in 113 of the 226 alerts issued by the NRC between 2005 and June 2011.⁵

Embrittlement of reactor parts is caused by high levels of radiation common in a reactor vessel. Bowing to industry pressure, the NRC now employs an innovative method, the

³ Piedmont Natural Gas–Wadesboro Compressor Station, North Carolina DAQ Permit No. 10097T01 operating eight natural gas-fired reciprocating internal combustion engines each rated at 4,735 horsepower, one of the two moving gas along a 128 mile pipeline from Charlotte to Wilmington, North Carolina.

⁴ Ramana, NV, “Beyond our imagination: Fukushima and the problem of assessing risk,” *Bulletin of the Atomic Scientists*, April 19, 2011. M. V. Ramana, a physicist, is currently appointed jointly with the Nuclear Futures Laboratory and the Program on Science and Global Security at Princeton University. Ramana is a member of the Bulletin of Atomic Scientists Science and Security Board.

⁵ “U.S. nuclear regulators weaken safety rules-Regulators have been watering down standards to keep America’s aging reactors operational,” Jeff Donn, Associated Press, Jun 20, 2011

“Master Curve,” to calculate the condition of metal parts in order to keep marginal reactor vessels in service.

A 1999 NRC review of the Master Curve noted that energy deregulation had put financial pressure on nuclear plants. It went on: “So utility executives are considering new operational scenarios, some of which were unheard of as little as five years ago: extending the licensed life of the plant beyond 40 years.”⁶

Nuclear physics has not changed, but the industry’s safety margins have. Today, Master Curve technology has been incorporated into ASTM and ASME engineering codes. As a result, reactors designed for a 40-year life span are routinely being licensed by the NRC for 60 years. An accident at a nuclear power plant anywhere in the world becomes global news in an instant. The devastating consequences reduce the value of all such plants, reducing the billions of dollars invested to zero.

Rather than being too cheap to meter, nuclear energy has become too expensive to matter. The Massachusetts Institute of Technology produced a report which found that electricity from nuclear power plants, such as the Plant Vogtle Units 3 and 4 now under construction in Georgia, would cost more compared to coal and natural gas.⁷ To make the economics work, electric utilities have resorted to making its customers finance the new plants years before the first kilowatt is delivered, a method entitled “Construction Work In Progress,” or CWIP. A former regulator criticized the scheme, saying, “CWIP is a tax: the power of government is being used to take money from citizens in a way and for a purpose that a free market economy would not.”⁸

Biomass

Biomass fuel is not carbon neutral. Catch-22 ambiguities stem from the fundamental irrationality of good carbon-bad carbon. The dilemma is rightly resolved by discarding the assumption that biomass fuel is carbon neutral and admitting the premise that all carbon dioxide sources—biogenic and anthropogenic—cause global warming.

Many alternative energy advocates promote biomass as an answer to the problems of global warming and fossil fuels. Energy industry entrepreneurs assert that biomass plants do not add any additional pollutants to the environment and that the carbon dioxide released by combustion would be there anyway. Some even claim that biomass-powered electricity is “emissions free.”⁹ These claims are false.

⁶ *Id.*

⁷ *The Future of Nuclear Power, An Interdisciplinary MIT Study*, Massachusetts Institute of Technology, 2003, ISBN 0-615-12420-8, <http://web.mit.edu/nuclearpower/pdf/nuclearpower-full.pdf>

⁸ “SuperCWIP: Taxing Utility Customers to Underwrite Investments Too Risky for Wall Street,” Peter A. Bradford, Law Professor, former Nuclear Regulatory Commissioner, North Carolina, March 2011. Bradford is a former member of the U.S. Nuclear Regulatory Commission and former chair of the New York and Maine utility regulatory commissions. He has advised governments on nuclear power and is a member of the Keystone Center collaborative on nuclear power and climate change.

⁹ From Dominion Resources, Inc. annual update: “Dimensions 2008-2009: Corporate Responsibility Report,” page 20, available at www.dom.com

Biomass energy systems do release global warming gases. This is not in dispute. What are problematic are the assumptions and the justifications used to define thermal processing technologies as carbon neutral.

The natural carbon cycle is a virtual circle between living and non-living things. Plants depend on carbon dioxide in the air as humans and other animal life forms rely on oxygen. This plant-animal carbon cycle can rightly be called “natural.” However, the combustion of organic materials in industrial processes is anything but natural and should not be considered so.

The natural carbon cycle is the result of millions of years of evolution. It is a complex process which relies on the sun’s energy and photosynthesis. Green plants take up carbon dioxide and dispose of oxygen. Animals breathe in oxygen and exhale carbon dioxide. The natural carbon cycle is based on:

1. Respiration: glycolysis (breakdown) of glucose, hydrolysis of adenosine triphosphate releasing energy, synthesis of water and carbon dioxide (carbon and hydrogen from glucose plus inspired oxygen) and
2. Photosynthesis: photophosphorylation (splitting) of water and reduction of carbon dioxide to join hydrogen with carbon to make glucose and oxygen.

On the other hand, oxidation is a reaction in which oxygen combines chemically with another substance. (Chemically, the term also extends to the loss of electrons by an atom without combining with oxygen.) The burning oxidation path amounts to a short circuit of the natural carbon cycle. It lacks a corresponding short-term process akin to photosynthesis to return the carbon released to the biological loop.

Biomass proponents often rely on misleading analogies to the carbon cycle to explain how their energy facilities mimic natural processes. For example, an International Energy Agency study claims carbon emissions from biomass fuels are only 5% to 10% those of fossil fuel:

Net carbon emissions from generation of a unit of electricity from bioenergy are 10 to 20 times lower than emissions from fossil fuel-based electricity generation (Boman and Turnbull, 1997; Mann and Spath, 2000; Elsayed *et al.*, 2003).¹⁰

Following the chain of authorities in the study’s references to Elsayed *et al* regarding carbon neutrality, we learn how the 90–95% emission reduction was arrived at:

A major indicator of emissions is the carbon requirement which is the total CO₂ emissions from a biofuel technology, excluding those captured by the cultivation of the original source of biomass, divided by its specified energy output,

¹⁰ IEA Bioenergy Task 38 Greenhouse Gas Balances of Biomass and Bioenergy Systems, Matthews and Robertson, Second edition, “Answers to ten frequently asked questions about bioenergy, carbon sinks and their role in global climate change: 1. What is the difference between CO₂ emissions from bioenergy and from fossil fuels?” page 2, <http://ieabioenergy-task38.org/publications/faq/>, accessed 5 March 2010

measured in kg CO₂/MJ.¹¹ (emphasis added)

Further on in the same paper, the fundamental assumption is stated clearly:

It should be noted that comparison of total carbon dioxide outputs is possible because of the combustion of liquid biofuels is, in effect, treated as "carbon neutral" in terms of the carbon dioxide emitted and subsequently absorbed by growing biomass.¹² (emphasis added)

In other words, getting the net carbon emissions from the generation of a unit of electricity from bioenergy to be 10 to 20 times lower than emissions from fossil fuel-based electricity generation is accomplished by *not counting them*; i.e., *treating* them as carbon neutral.

A global warming researcher said that assuming from the outset that biomass combustion is carbon neutral means that a forest would have the same carbon footprint whether it is standing or cut down. Plainly, the trees are more beneficial standing for ecological reasons. Less obvious is the impact of the unjustified assumption in carbon footprint life-cycle assessments. He states:

Most guidance for carbon footprinting, and most published carbon footprints or LCAs [life-cycle assessments], presume that biomass heating fuels are carbon neutral. However, it is recognised increasingly that this is incorrect: biomass fuels are not always carbon neutral. Indeed, they can in some cases be far more carbon positive than fossil fuels.¹³

The assumption that biomass is carbon neutral tends to cut short systematic comparisons with fossil fuels by automatically excluding the impact of biomass carbon dioxide emissions on global warming. Such analyses are essential to prevent unintended consequences such as investments of capital and other resources in false solutions, disruption of agricultural economies caused by overproduction, ecological damage caused by deforestation, negative public health impacts caused by air pollution and, of course, more destructive global warming.

Environmental Justice

The Draft Plan states:

Goal 2: Take Decisive Action to Advance Environmental Justice and Civil Rights¹⁴

- Objective 2.1: Promote Environmental Justice and Civil Rights at the Federal,

¹¹ Carbon and Energy Balances for a Range of Biofuels Options, Elsayed, MA et al, Project No. B/B6/00784/REP, URN 03/836, Sheffield Hallam University Resources Research Unit, March 2003, page 19 [http://www.forestresearch.gov.uk/pdf/fr_ceb_0303.pdf/\\$FILE/fr_ceb_0303.pdf](http://www.forestresearch.gov.uk/pdf/fr_ceb_0303.pdf/$FILE/fr_ceb_0303.pdf), accessed 5 March 2010

¹² *Id.*

¹³ Johnson E, "Goodbye to carbon neutral: Getting biomass footprints right," *Environ Impact Asses Rev* (2008), doi:10.1016/j.eiar.2008.11.002

¹⁴ Draft FY 2022-2026 EPA Strategic Plan – October 1, 2021, page 6

Tribal, State, and Local Levels

- Objective 2.2: Embed Environmental Justice and Civil Rights into EPA’s Programs, Policies, and Activities
- Objective 2.3: Strengthen Civil Rights Enforcement in Communities with Environmental Justice Concerns

The Draft Plan has laudable statements which identify fundamental problems: “Centering its work on justice is especially important in an era when EPA must simultaneously break the cycle of historic environmental injustices while maximizing protection for these same communities as they are too often hit worst and first from the impacts of a changing climate.”¹⁵ To answer the need for justice and equity, the EPA must exert its authority over state programs because that is the locus of air, water and waste permitting.

Social Vulnerability Index

There is a documented correlation between pipeline density and social vulnerability which characterizes natural gas pipelines. EPA should adopt this as a basis for correcting long-standing injustice created by the placement of industrial infrastructure.

In a peer reviewed study published in May 2021 by NC State University, the authors released their nationwide investigation of natural gas gathering and transmission pipelines. It revealed a disturbing correlation between the level of pipeline development and negative social impacts.¹⁶ The NCSU study considers racial composition, age distribution and socioeconomic factors in a “social vulnerability index” (SVI), a measure of a community’s ability to cope with pollution, accidents, and other hazards.

SVI is widely accepted. The US Centers for Disease Control and Prevention uses SVI to determine a community’s resilience to respond to human and financial losses.

Social vulnerability refers to the potential negative effects on communities caused by external stresses on human health. Such stresses include natural or human-caused disasters, or disease outbreaks. Reducing social vulnerability can decrease both human suffering and economic loss.¹⁷

The study determined that SVI would be a reliable way to measure social impacts resulting from industrial projects such as pipelines. Geospatial factors were compiled to correlate with the social vulnerability index. The study developed a pipeline density factor, based on US Dept of Energy data and measured in kilometers of pipeline per 100 square kilometers of land area.

¹⁵ Draft Plan, page 20

¹⁶ Ryan E. Emanuel, Martina Angela Caretta, Louie Rivers, Pavithra Vasudevan. “Natural Gas Gathering and Transmission Pipelines and Social Vulnerability in the United States” *GeoHealth*, 2021; DOI: 10.1029/2021GH000442

¹⁷ CDC/ATSDR Social Vulnerability Index, <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>

The results of the study were 1) Communities with the most vulnerable populations are those with the highest pipeline density, 2) Pipeline density is significantly greater in communities with the highest social vulnerability, and 3) The greater the density, the greater the vulnerability. The study concludes:

The correlation between pipeline density and social vulnerability is a previously undocumented characteristic of the US natural gas gathering and transmission pipeline network. Relationships between [pipeline density] and SVI suggest that nationally, negative impacts associated with natural gas pipelines, including air and water pollution, public health and safety concerns, and other burdens, fall disproportionately on communities with already limited capacities to deal with challenges created by these impacts.

Further, the study identifies 36 fatal accidents, 164 injuries and \$2.5 billion in costs (including property damage) from *natural gas gathering and transmission pipelines* during the 20-year period between 2001 and 2020.

Pamplico Pipeline

In a specific example, Dominion Energy South Carolina has applied for permits to construct a 16-inch diameter, 14-mile natural gas pipeline near the Great Pee Dee River in Florence County, near Pamplico, South Carolina. If permitted, the proposed Riverneck-Kingsburg Pipeline would pass through twenty-seven wetlands and cross two tributaries of the Great Pee Dee River, causing both temporary and permanent impacts to sensitive and critical ecosystems.

Gas gathering and transmission pipelines are considered “midstream infrastructure,” which does not include upstream infrastructure, such as hydraulic fracturing and directional drilling, and downstream infrastructure, such as refineries and end uses. Intrastate pipelines, such as the proposed Riverneck-Kingsburg project, are midstream infrastructure.

BREDL reviewed SVI data compiled by CDC for Florence County, SC which indicate that there already are moderate to high levels of social vulnerability in the census tracts in the Pamplico area of Florence County. An existing pipeline of 8-inch diameter traces the route of the 16-inch line proposed by Dominion Energy.

| Census Tract ¹⁸ | Social Vulnerability Index ¹⁹ | Relative Level |
|----------------------------|------------------------------------------|------------------|
| 16.02 | 0.7041 | Moderate to High |
| 17 | 0.7094 | Moderate to High |
| 18 | 0.8477 | High |
| 19 | 0.8194 | High |

SVI values range from 0.0000 (least vulnerable) to 1.0000 (most vulnerable).

¹⁸ US Census Data:

https://www2.census.gov/geo/maps/DC2020/PL20/st45_sc/censustract_maps/c45041_florence/DC20CT_C45041.pdf

¹⁹ SVI Interactive Map, <https://svi.cdc.gov/map.html>

The NCSU study posits that the demonstrated inequitable distribution of pipeline infrastructure may be an “emergent property of an inherently complex system of governance.” In other words, “overt discrimination and malicious intent are not prerequisites for discriminatory outcomes” (as posed by Dr. Robert Bullard and others). Nevertheless, the legacy of past practices and the prospect of current proposals may already have caused disruption of the Pamplico community. The study recommends consideration of this environmental justice question:

Is it in the public interest to preserve or exacerbate existing patterns that disproportionately burden vulnerable populations with negative impacts from natural gas pipelines?²⁰

These concerns are not academic. Presently, pipeline company land agents are improperly trying to get landowners to sign right-of-way easements for the pipeline under eminent domain. They are unwelcome intruders in this rural, largely African American community. Attached to these comments is the petition for “Pamplico Stop the Pipeline.” So far, one hundred and eighteen people—residents and landowners—have signed the petition.

Clean Water Act Violated

Finally, the state program in charge of water permits needs oversight and correction from EPA because the pipeline project does not comply with Section 404 of the Clean Water Act. A legal analysis determined the following.

The Clean Water Act has the sweeping goals to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters,” 33 U.S.C. § 1251(a), and “to increase the quality and quantity of the Nation’s wetlands,” *Id.* § 2317(a). The Act prohibits the discharge of soil or other materials into wetlands unless authorized by a permit issued by the Corps, 33 U.S.C. § 1344(a); 33 C.F.R. § 322.3; Parts 323, 325, and provides strict substantive limits on approving projects that degrade water quality or harm aquatic uses. The Corps must deny the permit because the proposed discharge does not comply with the CWA’s Section 404(b)(1) guidelines....The applicant has not met its burden on demonstrating why this proposal meets both the Corps’ and DHEC’s guidelines to warrant approval. For the foregoing reasons, the Corps should deny Dominion Energy’s Section 404 permit application.²¹

Does the Draft Plan offer remedies in the short term or the long term for these multiple transgressions—environmental, legal, and social—which are affecting Pamplico and many other communities? We believe it should.

²⁰ *Id.*

²¹ Letter from Lauren Megill Milton, Esq. of South Carolina Environmental Law Project to South Carolina Department of Health and Environmental Control and the US Army Corps of Engineers, RE: River Neck to Kingsburg 16 Inch Gas Main Florence County, South Carolina, P/N: SAC-2019-01427, July 6, 2020

Conclusion

Fundamentally, civil rights are guarantees by the government that it will treat people equally, with a principal focus on groups of people who have been denied the same rights and opportunities as others. The Fifth Amendment to the US Constitution states, “No person shall...be deprived of life, liberty, or property, without due process of law.” The Fourteenth Amendment adds that the States may not, “deny to any person within its jurisdiction the equal protection of the laws.” Chief Justice Earl Warren stated, “discrimination may be so unjustifiable as to be violative of due process.” *Bolling v. Sharpe*, 347 U.S. 497 (1954). Pollution of the air, water and soil has historically been a burden disproportionately placed on certain groups. This is unfair, unjust and unacceptable.

In *Silent Spring*, Rachel Carson wrote, “If the Bill of Rights contains no guarantee that a citizen shall be secure against lethal poisons distributed either by private individuals or by public officials, it is surely only because our forefathers despite their considerable wisdom and foresight, could conceive of no such problem.” However, today the industrial use of poisonous substances continues almost unabated, based on regulatory risk assessments and legally sanctioned death rates. Either the fundamental principles established under the Constitution mean what they say, or Rachel Carson’s warning should become the basis for a 28th Amendment to the Constitution.

Thank you for the opportunity to comment.

Respectfully submitted,



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Founded in 1984, we have projects and chapters in Alabama, Georgia, Tennessee, South Carolina, North Carolina and Virginia

Attachment

ATTACHMENT

MAR 20 2021

To the Residents of Pamlico S.C.

As descendants of Slaves;
 the the heirs of Mr. Andrew Hyman.
 are calling upon all of you;
 to stand with us to protect the
 Community we all love.

Some of you are descendants,
 Some heirs of property, and
 Some of you are property owners.
 But all of us will be affected
 by the proposal of the River
 Neck to Kingsburg 16" Gas Main
 Line.

You probably have received some
 type of notification by now that
 Dominion Energy is planning to
 run pipelines to pump their
 gas throughout our families
 land. They are using the
 terminology "Eminent Domain"
 to secure the rights to invade
 your property, and say it is
 for the "good of the Community"
 This is not true, it is not
 for the good of the Community,..
 because most of you use
 electricity for your appliances,
 they will offer you money, (a few
 hundred dollars) to run these
 pipelines throughout the Community,

up and down your roads,
But what they won't tell you, is
how they will build access
roads, and tear up your
property while doing so. They
will also install pumping
stations, running for 7 days
a week and 24 hours a day.

Ask yourself?

- 1) How safe are these Pipelines?
- 2) What damage will be done to my property
- 3) How thick are the Pipelines and will they hold up after heavy traffic
- 4) How will these Pipelines affect my health and that of my family?

Please Sign the petition to Stop
the Pipeline