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Federal Energy Regulatory Commission

July 24, 2015

Attn: Kimberly Bose, Secretary
888 First St NE, Room 1A
Washington, DC 20426

Re: Comments regarding the NEXUS Project Draft Resource Reports

Dear Ms. Bose,

After our review of the draft Resource Reports submitted by Nexus on June 15, 2015 we are dismayed at the number of errors and misinformation being reported to the Federal Energy Regulatory Commission. In view of this, we would like to take this opportunity to provide our comments and highlight areas that need to be addressed and/or corrected by NEXUS. Please note that our review pertains to only the City of Green and Summit County.

From the first day we learned about the NEXUS project, NEXUS has touted its public outreach and collaborative approach with stakeholders. As a stakeholder, this unfortunately has not been our experience. We've provided information to NEXUS employees, we've met with NEXUS employees and we've been to their public meetings. The information we provided to them was disregarded. The meetings were one sided with our concerns ignored. The public meetings offered little information. Repeated documented requests for route mapping were ignored. Throughout all of the draft Resource Reports NEXUS claims to have been collaborative. We just want FERC to recognize that NEXUS has painted a nice picture but the truth is their public outreach and collaboration is simply procedural and not authentic.

Resource Report 1 ~ Project Description

The City of Green is not against the NEXUS project. We understand that natural gas must be transported in some manner and that studies have shown pipelines to be the safest mode of transportation. We are, however, unwavering in our opposition to the preferred route that NEXUS is proposing. We feel the line was drawn on a map without an understanding of the region. Now that NEXUS has boots on the ground they are looking at minor variations to the proposed route but NEXUS still fails to understand our region and the long term implications of this project. We are concerned that NEXUS is presenting information to FERC in a manner that implies an attempt to reduce impacts, while we haven't seen any evidence of this being true.

Table 1.6-3 Temporary and Permanent Access Roads along the NEXUS Project

Temporary access road TAR-36.8 crosses over land that was recently platted for a residential development, the Sanctuary at Stoney Creek subdivision. The developer is currently grading the land and will be constructing the approved roads in the near future. The developer will then be marketing lots that could potentially have a 36" high pressure pipeline 40' from the property lines. We would anticipate the developer either having a difficult time selling these new lots and/or unhappy new home owners once the pipeline construction begins. NEXUS was made aware of this residential development in our February 23, 2015 letter outlining potential impacts throughout the City.

Temporary access road TAR-37.1 would begin from Woodacres Ave in the Stoney Creek Estates residential neighborhood. First, we discourage NEXUS from using neighborhood roads for construction traffic. Secondly, there is a reservation strip at the end of Woodacres Ave on the plat for Stoney Creek Estates. This is common practice when temporary dead-end streets are constructed in order to control access to adjoining properties. Stoney Pointe Drive on the Sanctuary at Stoney Creek plat also has a reservation strip (TAR-36.8).

Temporary access road TAR-38.7 would be on Camp Y-Noah property and appears to be going through a fenced horse pasture.

Table 1.7-3 Areas Requiring Sidehill Construction Along the NEXUS Project

This table indicates areas that would require sidehill construction methods. NEXUS lists 11.1 miles of sidehill construction for the mainline pipeline. Summit County would account for 4.3 of those 11.1 miles. That equates to 39%. The City of Green Alternative removes this issue and further demonstrates that Summit County and the City of Green is not the proper location for this pipeline. See 10.5.1.2 *City of Green Alternative* for further discussion.

Table 1.13-1 Anticipated Environmental Permit, Review and Consultation List

There are no local agencies in Ohio listed on this table. NEXUS will need to obtain Road Opening Permits and a Land Disturbance Permit from the City of Green. The issuance of a Land Disturbance Permit requires an approved Storm Water Pollution Prevention Plan (see Resource Report 2 comments for additional information). Also, the City of Green Planning Director is the Flood Plain Administrator for Green.

Figure 1.2-1

Why is the NEXUS market area only on the north side of the pipeline? With this reasoning, wouldn't moving it south for a portion of the project open up more market area?

Ohio Natural Gas Market Study

After reading the *Ohio Natural Gas Market Study* found in Appendix 1C4, FERC may want to consider why NEXUS is proposing an interstate transmission line. The Analysis Group did a terrific job in outlining

Ohio's need for natural gas now and in the future. A large portion of the report focused on the fact that a majority of Ohio's electricity is generated from coal. Strides are being made to convert existing power plants to natural gas and to open new gas-fired power plants. The report states that the NEXUS project is in close proximity to existing gas-fired power plants as well as future plants that have already received approval. **An important note to make here is that even if the City of Green Alternative route is used by NEXUS, it does not change its ability to serve these gas-fired power plants. The locations of the plants are not in the segment that the alternate route would change.** There would be little to no change in Table 6: *Estimated Gas Interconnection Costs* and NEXUS could remain competitive to the gas-fired power plant market in Ohio. While the report places much emphasis on the need of natural gas for gas-fired power plants, NEXUS has not demonstrated that they would serve this particular market.

Resource Report 2 ~ Water Use and Quality

The City of Green is an NPDES Phase 2 community. Because of this the City is required to have an NPDES Storm Water permit from the Ohio EPA in order to discharge storm water from our MS4 (Municipal Separate Storm Sewer System) into waters of the state. One aspect of this permit requires the City to regulate storm water discharges from construction activities. We have chosen to do this through our Land Disturbance Permit process that requires an approved SWPPP (Storm Water Pollution Prevention Plan). The City of Green is home to the Akron-Canton Airport and an Ohio Air National Guard Outpost. In recent years both locations have expanded and undertaken construction projects. Both entities claimed that they did not need to obtain a Land Disturbance Permit or provide a SWPPP because they were required to meet Federal regulations in regards to storm water controls. However the Ohio EPA has advised the City that regardless of meeting Federal regulations both entities would ultimately discharge into the City's MS4 and therefore the City would have jurisdiction over their storm water discharges. Given this guidance from the Ohio EPA, the City does not believe a project such as the NEXUS pipeline would be any different. Therefore, before construction in the City of Green could commence a SWPPP should be submitted to the City of Green and Summit Soil & Water Conservation District for review and approval before a Land Disturbance Permit can be issued. We would also require a pre-construction meeting and storm water inspections throughout the course of construction in our City.

Weather events in Northeast Ohio have intensified over the last several years. with storm events producing heavy rains in shorter periods of time. Storm water has become a heavily discussed topic in the City. Our streams, wetlands and ponds have become an ever increasing asset for storm water storage as the behavior of storm water changes. We want to mention this because we take our resources seriously and don't want to have them negatively impacted. FERC, as you study this particular Resource Report please pay special attention to the impact our water resources would bear in this project.

2.2.5.1 Pipeline Facilities

On page 2-6 NEXUS indicates, “The Project will offer landowners pre- and post-construction testing of water wells...for yield and turbidity parameters.” Would NEXUS land agents communicate this with property owners or would property owners just be expected to know to ask for it?

NEXUS indicates on page 2-7 that they would “avoid affecting septic systems and leach fields.” They go on to say that they would work with the property owners to relocate a system if necessary. Summit County Public Health would need to approve any septic system modification or relocation. If a septic is a discharging system any replacement will also need an Ohio EPA permit. This permit stipulates an annual inspection and renewal fee. This would be an additional burden on property owners and an on-going expense. **NEXUS needs to also be mindful of ensuring residents have a replacement area available even if their existing septic system would not be impacted by the project.** Septic lots today require more acreage to not only ensure proper area for the installation of a system but to also ensure there would be space available for a replacement system when needed. To remove up to 50ft of a property owner’s property for a permanent easement could have serious ramifications when the replacement area would be needed in the future.

It appears that the quality of the wetlands has not been measured. Will the wetlands be evaluated using the Ohio Rapid Assessment Method (ORAM) scoring? FERC may not require this wetland quality evaluation but the Army Corp of Engineers should. We would recommend that FERC use the quality scores in their project evaluation to fully understand the potential impacts. If NEXUS performs the ORAM assessments how are the scores validated?

Table 2.2-2 Wells Located within 150 Feet and Wellhead Protection Areas Crossed by the NEXUS Project

There are roughly 78 properties in Green that are served by private water wells that would be crossed by the project. We do not have data on exact water well locations but it wouldn’t be too far of a stretch to say that some of these wells would be within 150 ft of the project. Additional wells serving adjacent properties could also fall within this 150 ft area. The two wells in Green that are listed on this table are gas storage wells, not water wells, according to Ohio Department of Natural Resources records.

Table 2.3-2 Waterbodies Crossed by NEXUS Project

There are significant concerns about the number of stream crossings from MP 36.72 to MP 38.05. Between the meandering of both the stream and the pipeline, this one stream would be crossed five times in this 1.33 mile stretch. Coupled with the amount of wetland in this area we feel this project would be too great of a burden on this watershed.

Table 2.3-9 Potential Hydrostatic Testing Water Sources for Project Pipeline Segments

Comet Lake at MP 39.5 is a privately held lake owned by the Comet Lake Homeowners Association. The Comet Lake Homeowners Association owns, manages and stocks Comet Lake. They would need to agree to the use of their water.

Table 2.4-1 Wetlands Crossed by the NEXUS Project

The NEXUS pipeline would cross 12,124 ft of wetlands through Summit County. That represents 16% of the project total. Only 6% of the pipeline would traverse through Summit County, and once again the impact to Summit County would far outweigh any benefit.

Resource Report 3 ~ Fish, Wildlife and Vegetation

The City's only comment about this Resource Report is that we expect it to change should the route variation with the Singer Lake Bog be adopted. Singer Lake Bog is a globally rare wetland with several rare and endangered species of plants and wildlife. Also, we trust FERC will thoroughly study this section.

Resource Report 4 ~ Cultural Resources

A letter was filed on the FERC docket for the NEXUS project on May 11, 2015 (20150511-5056). The letter from David Mucklow indicates the presence of a Native American religious site near approximately MP 33.5. Given the background and documentation provided in his letter, this should be further explored.

Resource Report 5 ~ Socioeconomics

The City of Green is a relatively young city having incorporated in 1992. Since that time significant investment has been expended in the planning of our city, upgrading and expanding roads, maintaining our resources and encouraging proper development. The City of Green is located between the cities of Akron and Canton and bisected by Interstate 77 with three highway exits making the City a desirable location for commercial and residential development. Our schools continue to receive "Excellent" ratings from the State of Ohio. While the entire region was hit by the recent economic downturn, we continued to see new home construction, low commercial vacancy rates and our business community thrived. The Akron-Canton Airport calls Green home and is one of the fastest growing airports in the country. Carriers who utilize the Akron-Canton Airport include Southwest, Allegiant, Delta, US Airways and United. We are very proud of the strides we've made as a community and sincerely believe that this project would have a detrimental effect on our environmental resources, remaining developable land and the safety and security that our residents rely on.

Please see the following attachments for a better understanding of the City of Green:

- Attachment A ~ 2013 & 2014 City of Green Annual Reports
- Attachment B ~ Summer 2015 Our Town Newsletter
- Attachment C ~ Annual Zoning Permit Counts
- Attachment D ~ CBRE Marketview
- Attachment E ~ Akron-Canton Airport Information

5.2.3 Tourism

We feel the description for Summit County excludes several regional assets. Summit County is also home to the Soapbox Derby, Blossom Music Center, Akron Civic Theater, Akron-Canton Airport (in Green), MAPS Air Museum (in Green), Portage Lakes State Park (portion in Green), Summit County Metro Parks, the Ohio & Erie Canal Towpath Trail, the Bridgestone Invitational golf tournament and the University of Akron.

5.2.5.3 Education

The Green Local School District (GLSD) has over 500 staff members that serve over 4,200 students and is one of the top performing schools in the State of Ohio. The Portage Lakes Career Center (PLCC) serves four area schools districts. The 2014 – 2015 school year saw 475 high school students enrolled, over 100 staff members and another 100 adult students. The PLCC also hosts school and community events throughout the year that can bring over 1,000 people on campus at a time. Please see the following attachments for more information regarding GLSD:

- Attachment F ~ Green Local School District Quality Profile
- Attachment G ~ Green Local Schools Summer 2015 Update

5.3.1.1 Construction & 5.3.6 Economy and Tax Revenues

NEXUS continues to report that local communities would receive, “Significant increases in the property tax base during Project operations...”. This holds true for the handful of communities in which NEXUS would own land (i.e., property for the compressor stations). Otherwise NEXUS would only hold easement rights and not actual property. There would be no mechanism for a county to charge property taxes to a utility based on the easement holdings of the company. We take issue with this broad statement that implies every community would see an increase in the property tax base. We request that NEXUS be required to submit factual numbers in regard to economic benefits and local tax revenues.

5.2-8 Existing Housing Accommodations in the Project Area in Ohio

NEXUS reports 0 hotels & motels and 0 campgrounds for the City of Green. We in fact have 11 hotels & motels and 1 campground. **We do not believe that hotels.com should be considered a valid reporting tool.** But this is the quality of information one should expect when an out-of-state corporation is attempting to provide detailed information about a location without reaching out to the subject communities.

Revised Economic Impact Analysis

The information provided in Table 4 is incorrect and outdated for Summit County.

Resource Report 6 ~ Geological Resources

There is an abandoned mine at Ariss Park. On Table 6.4-2 NEXUS documents that the project would be 0.17 miles away from the known location of the abandoned mine. Due to the history of subsidence in the area we maintain our concern about this project and the mine on this property. The mine records are old and possibly incomplete. Reports on subsidence should also be reviewed.

Resource Report 7 ~ Soils

The City's only comment about this resource report is that the mapping for the City of Green is not included in Appendix 7-B.

Resource Report 8 ~ Land Use, Recreation and Aesthetics

8.2 Existing Land Uses in the Project Area

We would like to make a point about how land uses were classified by NEXUS. In reviewing Appendix 8B it appears that many of the areas classified as "open space" should actually be considered "residential". One example of this would be if a property owner owns a large piece land and keeps the lawn mowed and maintained, the manicured lawn should be considered "residential" and not "open space". Granted, there is some subjectivity involved in determining land uses but the land use determination affects the pipe class that would be constructed and therefore directly impacts the safety of the pipeline. Local knowledge is vital in a land use classification. **We would request that a land use analysis be completed by an impartial third party, not just for the City of Green but the entire project area.**

8.2.1 Pipeline Facilities

While describing the temporary and permanent ROW widths, NEXUS frequently uses the term "nominal". The proposed ROW widths may be nominal in the overall pipeline industry but when the impacted property owner's depth of their lot is 300', a 100' temporary ROW in their backyard certainly isn't nominal. Or when a property owner's frontage is 185' and the 100' temporary ROW is the entire depth of their land, it certainly isn't nominal. We can appreciate that the 100' temporary ROW and 50' permanent ROW seems to be the industry standard however we do not appreciate NEXUS trying to downplay the impact on property owners.

8.2.3.4 Commercial/Industrial Land

NEXUS includes 71, 76, and 77 in the "highways" list among state highways. These are, in fact, interstate highways.

8.2.3.7 Special Land Uses

It does not go unnoticed that just about half of the narrative about Special Land Uses in Ohio is about the City of Green. On one route there is the Portage Lakes Career Center and the soccer fields. On another route there is the Singer Lake Bog. Clearly the City of Green is not the right location for this pipeline.

Additionally Loyola of the Lakes (OH-SU-178.0156-SC) should be considered a special land use. From their website (www.loyolaretreathouse.com):

Mission Statement

Through our ministry of prayer, work, community and hospitality, we aspire to respond to the needs of the Catholic Church and the world. It is our Mission to help all who "Come Away to the Quiet" recognize the loving guidance of God and the redeeming love of Jesus in their lives. It is our goal that every person who visits the Retreat House will leave with a greater peace and an enlivened desire to live vibrantly in God's presence with His people.

Loyola Retreat House, Inc. offers you the rare opportunity to step back from life and be emotionally and spiritually renewed.

Come Away

For years, men and women have come to Loyola in search of peace and a deepened spiritual awareness. They have come seeking a quiet place to reflect and pray; to hear the word of God preached by an enlightened and prayerful staff; and to experience His presence along the wooded paths, or in the quiet of the chapel. Often, a little time away can give us new eyes, the ability to see life's problems and challenges from a fresh perspective. The more hectic our lives become, the more we need to get away for solitary reflection, and there is no better sanctum around than Loyola Retreat House.

To the Quiet

Sitting atop a hill overlooking farm-land and lakes, away from the noise and congestion of daily life, Loyola is a perfect spiritual hideaway for the harried city dweller seeking serenity and peace. The grounds include acres of gardens, fields and wooded trails - all open invitations to quiet walks and personal, spiritual journeys.

8.3.1 Planned Residential and Commercial Areas

We have provided information regarding various developments in close proximity to the project to NEXUS in writing and in person. However, the information is not reflected in Table 8.3-1. The planned projects and operating facilities are as follows (mile posts are approximate):

- In various planning stages:
 - Commercial
 - Brienza Park ~ MP 32.8
 - Park Place ~ MP 34
 - Residential
 - Sanctuary at Stoney Creek ~ MP 36.9
 - Public Park
 - Ariss Park Master Plan ~ MP 33.7
- Existing:
 - Commercial
 - Akron-Canton Airport Runway Protection Zone ~ MP 33.8
 - Summit County Sheriff Training Facility (includes a firing range) ~ MP 34

- Portage Lakes Career Center ~ MP 35.5
- Loyola of the Lakes Jesuit Retreat House ~ MP 38.1
- Residential
 - Wise’s Mayfair Allotment ~ MP 33.5
 - Greensburg Heights Allotment ~ MP 34.8
 - Green Meadows Estates ~ MP 35.4
 - Greensburg Woodlands ~ MP 35.7
 - High Tower Estates ~ MP 36
 - Mirror Lake Allotment ~ MP 36.2
 - Rabl Subdivision ~ MP 36.5
 - Springview Estates ~ MP 36.5
 - Stoney Creek Estates (and future phases) ~ MP 37
 - Hidden Trail Estates ~ MP 37.1
 - Lake Breeze Allotment ~ MP 37.3
 - Forest Lake Estates ~ MP 37.4
 - Comet Lake Club ~ MP 39

8.3.2 Existing Residences and Buildings

Once again Summit County would suffer the greatest impact. With 72 structures, Summit County has by far the greatest number of structures within 50 ft of construction workspace although only 59 are reported on Table 8.3.2. We used aerial photography and the June route alignment to perform an analysis of impacted structures. Admittedly this was done from the desktop and measurements do not reflect survey measurements. The analysis revealed that of the 41 “houses”, the largest percentage was single family dwellings however there were also 3 duplexes (two-family dwellings) and 4 triplexes (three-family dwellings). We believe that this distinction is important to make when considering the impact to residents. Also, it is our opinion that a 50 ft distance is entirely too small when considering impact during construction as there are many more structures just past the 50 ft magic number. Our analysis found the following errors and omissions:

Errors

Tract Number	Use
OH-SU-044.0000-SC	Reported as a shed, is actually a house
OH-SU-154.0000-SC	Reported as a shed, is actually a garage
OH-SU-178.0102-SC	Reported as a barn, is actually a house (triplex)
OH-SU-178.0138-SC	Reported as a barn, is actually a house
OH-SU-182.0000-SC	Reported as a barn, is actually a house (triplex)
OH-SU-466.0000-SC	Reported as a shed, is actually a garage

Omissions

OH-SU-050.0000-SC	Garage
OH-SU-050.0000-SC	Shed
OH-SU-067.0000-SC	House
OH-SU-087.0000-SC	Garage

OH-SU-124.0000-SC	House
OH-SU-178.0117-SC	Shed
OH-SU-178.0118-SC	Shed
OH-SU-178.0118-SC	Shed
OH-SU-178.0126-SC	House
OH-SU-178.0138-SC	Shed
OH-SU-179.0000-SC	Garage
OH-SU-179.0000-SC	Barn
OH-SU-252.0135-SC	House
OH-SU-252.0139-SC	Shed
OH-SU-252.0227-SC	House

Multi-Family Dwellings

OH-SU-019.0000-SC	Duplex
OH-SU-057.0000-SC	Duplex
OH-SU-178.0102-SC	Triplex
OH-SU-178.0163-SC	Triplex
OH-SU-178.0164-SC	Triplex
OH-SU-182.0000-SC	Triplex
OH-SU-252.0181-SC	Duplex

8.4.1 Public Conservation Land

Regarding the Portage Lakes State Park, NEXUS has incorrectly identified its location as Akron, OH. It actually lies within the City of Green, City of New Franklin and Coventry Township. Also, ODNR and Summit County Metro Parks recently came to an agreement for the Metro Parks to begin managing Nimisila Reservoir, one of the Portage Lakes. Nimisila Reservoir lies entirely in Green and the land that would be crossed by NEXUS surrounds the Reservoir. ODNR will continue to own the land while Metro Parks will manage the facilities and provide programming. Due to this new agreement we would suggest that NEXUS reach out to the Metro Parks for their input on this project.

Regarding Ariss Park, please see the comment for 8.4.3 Hazardous Waste Sites.

Regarding Camp Y-Noah, NEXUS has it incorrectly located in Green Township, it is actually in the City of Green.

8.4.2.3 Scenic Highways

The NEXUS project would also cross the Ohio & Erie Canalway Scenic Byway.

8.4.2.4 Recreational Trails

As a point of clarification, the scenic railroad trail listed is not a recreational trail for pedestrian use. The rail line, as it traverses the City of Green, is owned by Metro Regional Transit Authority and is an active rail line. The Cuyahoga Valley Scenic Railroad (out of the Cuyahoga Valley National Park) is one of the users of the rail line for its recreational train rides.

8.4.3 Hazardous Waste Sites

The Industrial Disposal Company owned the land that is now known as Ariss Park from 1946 to 1950. Reportedly the company used the site to dump rubber scrap, paper, floor sweepings and drummed chemical wastes until at least 1953 and perhaps longer.¹ When developing Ariss Park the City of Green complied with "Rule 13" (OAC 3745-27-13) due to the potential for contaminated soil. Soil samples were taken in order to demonstrate that surface soil disturbance for the park development was not in the suspected area of contamination. NEXUS would need to coordinate with the Ohio EPA to satisfy the same regulation.

Table 8.2-11 Roadways Crossed by the NEXUS Project

Honeymoon Drive and Treeview Drive are listed as "Private". At the point that the NEXUS pipeline would cross these roads, they are in fact public roads. Road Opening permits would be required for any crossings over these roads as well as all other public roads crossed in the City of Green.

Table 8.2-12 Railroads Crossed by the NEXUS Project

The rail line owned by the Metro Regional Transit Authority in Summit County is an active railroad. NEXUS defines it as being "Abandoned".

Table 8.3-3 Septic Systems Crossed by the NEXUS Project

It is unclear in this table whether NEXUS is attempting to account for septic systems that would potentially be impacted by the project or if they are listing all properties along the route with septic systems. In examining the 10 properties in Green that they have listed in this table the properties range from small lots where an impact to a septic system is clear to large tracts of land where the pipeline would be going through forested areas and no septic system would be impacted. In an effort to offer complete information, we found an additional 46 properties in Green that would be crossed by the project that have septic systems. We would suggest that FERC require NEXUS to take another look at their septic system inventory.

Figure 8.4-1 Public Lands Crossed by or within 0.25 mile of the Project

Page 5 of 26 should correctly display Camp Y-Noah. Currently only a portion of the property is displayed.

Resource Report 9 ~ Air and Noise Quality

No comments at this time.

Resource Report 10 ~ Alternatives

10.5.1.2 City of Green Alternative

¹ Phase I Environmental Site Assessment for Ariss Park prepared by Environmental Design Group in January 2005.

To begin, we would like to point out that NEXUS claims to have asked the City of Green for the electronic files of our alternative route and that they were denied. This is categorically untrue. The City of Green was never asked by NEXUS for our electronic files. Obviously, it would be in our best interest to share them with NEXUS so that they could thoroughly study the proposed alternative route. This claim is puzzling and offensive.

Our March 23, 2015 cover letter as well as the disclaimer on each map in our submittal, states that our proposed alternate route was not an absolute, defined alternate route. **Rather it was a suggested study corridor to demonstrate that the NEXUS project could move forward with far less human and environmental impact while achieving the project's purpose.** We remain steadfast in our belief that this is still true despite the analysis NEXUS released in this draft Resource Report.

NEXUS states that the Wadsworth compressor station would need to be relocated if the City of Green Alternative is adopted. While this is correct, the compressor station would not have to be located at exactly MP 59.4 as NEXUS implies. Their compressor station alternative locations offer two to three mile differences from the needed 60 mile interval. NEXUS also states that the area at 59.4 is a "congested residential area". Take a look at MP 59.4 and if that is the definition of "congested" then the City of Green far exceeds a "congested residential area". We trust FERC is fact checking NEXUS's statements.

In the "Environmental and Engineering Comparison" section NEXUS confirms that the City of Green Alternative would have its advantages. One of which is the decrease of 9.3 miles of side hill construction. In Table 1.7-3 NEXUS indicates the entire project would have 11.1 miles of side hill construction. By utilizing the City of Green Alternative the project would then have only 1.8 miles of side hill construction. The City of Green Alternative would also impact fewer structures, wetlands and require fewer road crossings. As for the engineering disadvantages, our route was not intended to be followed inch-by-inch. In order to fully consider the City of Green Alternative additional re-routes would be expected.

In their desktop engineering/construction review of the City of Green Alternative NEXUS points out several obstacles which include wetlands, shallow pipelines, railroad crossings, road crossings, residential areas and forested areas. **These are the same obstacles NEXUS would face in their preferred route, only the preferred route would have a greater impact.** For clarity, the Minerva Airfield at MP 11.3 is a 2,500ft grass landing strip that could easily be avoided. The "airport" between MP 78 and MP 80 is actually Dragway 42, a drag strip for auto racing. At this point it is critical to remind you that the preferred route under consideration in these Resource Reports would be within 700ft of the runway protection zone for the Akron-Canton Airport. One route variation under consideration would be *within* two, possibly three runway protection zones and *within* 600ft of Runway 19. See our comments for Resource Report 5 for additional information about the Akron-Canton Airport.

When the City of Green Alternative Route was created we did not have the benefit of knowing about the two market connection locations that were released by NEXUS in this draft Resource Report. We find it awfully convenient that NEXUS was able to locate two connections within the segment that the City of Green Alternative would re-route. However, we believe these points of connection to be not only

concepts with a small probability of materializing but also very capable of being served through the existing pipeline network.

A connection for Dominion East Ohio (DEO) could be made at several other points along DEO's extensive pipeline network in our region. The Coalition to Reroute Nexus covered this topic in depth in their June 26, 2015 letter. The City of Green supports the Coalition's June 26, 2015 letter. We also question the validity of the Brickyard and Rittman Industrial Parks. There are no named users for either of these industrial parks. There is considerable skepticism in this region about the ability for either of these sites to successfully move forward. We would ask that FERC examine the Brickyard and Rittman Industrial Parks. Currently they are undeveloped and the need for gas supplied from an interstate pipeline is based solely on a lead that may or may not be realized regardless of the NEXUS project. We only make these points in hopes that FERC will realize that NEXUS can put whatever they want to in writing but there isn't much substance behind what they are saying. **It is our assertion that the applicant has not proven a market exists in this particular location and is again providing misinformation.**

Speculation about the connection points aside, could the two laterals NEXUS claims are required not be one lateral? Admittedly analyzing two laterals certainly increases impact numbers and cost for the City of Green Alternative but common sense would lead to one lateral.

In Table 10-5.2 under the summary for the laterals NEXUS indicates construction ROW was based on 100ft and permanent ROW was based on 50ft. The report doesn't indicate the width of a lateral pipe but certainly it would be smaller than 36" and therefore would require less construction space and permanent ROW. This raises questions about not only the analysis but also the associated cost.

The added cost of \$28 million seems to be getting everyone's attention. It has been reported by NEXUS that the overall project is \$2 billion. \$28 million (which includes the cost of the questionable laterals) is a big number but it's only 1.4% of the total project cost. Doesn't seem so big anymore. Additionally, the *Revised Economic Impact Analysis* in Resource Report 5 indicates that the overall project costs have decreased by \$234 million from the original economic assessment produced in March 2014.

We trust that FERC will read the NEXUS analysis with a discerning eye and not wholeheartedly dismiss the City of Green Alternative as NEXUS has. Perhaps a combination of the City of Green Alternative route and NEXUS's Southern Route Alternative could result in a successful project that would clearly have fewer environmental and socioeconomic impacts.

10.6.3 Route Variations Under Evaluation

The route variation beginning at MP 30.2 has been identified because the preferred route would be "unconstructible" at Dotwood Road in Stark County. In the City of Green the variation under consideration would traverse a recently developed industrial park, the Akron-Canton Airport and the Singer Lake Bog in addition to residential areas. **If the preferred route is "unconstructible", why is there not more information included about the route variation in this draft Resource Report? Furthermore, why is an Environmental Impact Statement being prepared for an "unconstructible" route?** Several residents in the area of the route variation have called the City wanting to know about

the project because they received letters from NEXUS requesting survey permission. So we know they are on the ground and surveying this route. Will detailed information be available before this becomes the preferred route in the Certificate Application anticipated to be filed in November? Will the City be provided a fair and reasonable chance to respond to the route variation?

We are also questioning the meeting NEXUS claims to have had with the Cleveland Museum of Natural History. The report does not indicate which curator NEXUS met with. We reached out to the Curator of Botany who oversees the Singer Lake Bog and other nature preserves held by the museum. He says that he spoke with someone on the phone and requested a map which was never delivered. An in person meeting never occurred. He stands by his letter submitted to FERC on May 19, 2015. Additionally, the land owned by the Cleveland Museum of Natural History has a conservation easement and we question if this pipeline project would be in conflict with the conservation easement.

We would also like to question the "Protected Public Lands" data on Figure 10.6.3-1. The map calls out a privately owned and operated golf course as "protected public land" while it excludes three city owned public parks. It is worrisome that the data is incorrect for this small portion of the overall project.

Resource Report 11 ~ Reliability and Safety

The City understands that pipelines are the safest mode of transportation for oil and gas. Our concern with safety is that when accidents happen they can potentially be catastrophic. And those that would be potentially impacted (our residents) would not be given a choice if the certificate is granted. As we have previously stated, the proximity to residential structures in the NEXUS preferred route is far greater than the proposed City of Green Alternative.

11.2.1.2 Safety Standards

There is a contradiction in regards to pipe depth in this section. In one place it says "Minimum cover of 36-inches is required over the proposed pipeline for all pipeline Class Locations and geological conditions". Then it goes on to say, "a minimum depth of cover of 30 inches in normal soil and 18 inches in consolidated rock" for Class 1 locations. In every public meeting that we have attended we've been told 36 inches of cover. This is important, particularly in residential areas where digging may occur for landscaping or other purposes.

In the same section NEXUS indicates that as future development occurs they would evaluate potential High Consequence Areas. This will be very important to the City as we continue to be a desirable location for commercial and residential development. Please request NEXUS to expound on how this evaluation would occur and the construction process of how a pipe segment would be changed from one class to another.

11.2.1.3 High Consequence Areas

This section refers to an Integrity Management Plan. Would this be a public document? The City is hereby making a formal request for this document.

11.2.2 Pipeline Accident Data

NEXUS indicates that they would notify USDOT of any reportable incident, would local agencies receive a copy of this notification? Please request NEXUS to expand upon the notification process and agencies that are notified.

Table 11.4-1: Location of High Consequence Areas along the NEXUS Project Pipeline Facilities

The most significant finding in this Resource Report can be found in this table. NEXUS outlines total miles of HCA and states that 24.3 miles is the total mileage of HCAs for the entire project. Of that 24.3 miles, 7.9 miles of HCAs fall within Summit County. **That is one third of all HCAs within one county.** This fact alone supports our consistent claim that the City of Green is not the proper location for this pipeline. Another way to consider this impact is to recognize that 52% of the project in Summit County would be a HCA. Furthermore, looking at just the City of Green, 59% of the project would be a HCA. These are significant statistics. Understanding that pipelines currently exist in HCAs and will continue to be built in HCAs, it is disrespectful to the public to create new HCAs when an alternative is clearly available. FERC, we would ask that you require NEXUS to further study the City of Green Alternative in order to minimize HCAs across the project. Furthermore, we believe that the HCAs would increase should another land use classification take place. See our comment under *8.2 Existing Land Uses in the Project Area*.

Resource Report 12 ~ PCB Contamination

No comments at this time.

Conclusion

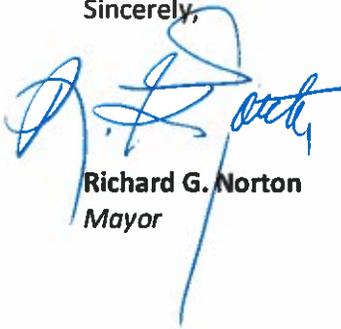
We would like to again state that we are not against the NEXUS pipeline project or the delivery of natural gas from Ohio's abundant resources. We are, however, adamantly opposed to NEXUS's preferred route that bisects the City of Green. The purpose and need of the NEXUS project can be served by selecting an alternate route south of Summit County. FERC, please review the submitted draft Resource Reports carefully with an analytical point of view and an understanding that your action will have great impact on this region. Please ensure that the information is correct and appropriate before a decision is made so that the right decision can be made.

Please take note of the amount of **misinformation** in the draft resource reports that we were able to discover. We are sure that you are aware that not every community along the preferred route will have the time or resources to provide this level of review. The City of Green, and in particular the City of Green Planning staff, do not represent ourselves as experts in the field of oil or gas pipelines. We do represent ourselves as land planning professionals with knowledge of wetland regulations, storm water and soil erosion management, land planning, transportation planning and geographic information systems. We know our community and we know the impacts that this pipeline project would cause for current and future residents, businesses and land development.

Please consider the impacts that the City of Green would shoulder as a result of this project. It would increase risk, impact our natural resources and impact our future as a community. There is an alternative location available that reduces risk and impact to natural resources. It is our hope that the comments provided in this letter clearly illustrate that there are concerns with the NEXUS project as presented and the City of Green is not the proper location for such a project.

Thank you for your time and consideration in reviewing our comments.

Sincerely,



Richard G. Norton
Mayor



Wayne L. Wiethe, AICP
Director of Planning

Chrissy Lingenfelter
GIS Planner



Attachment A ~ 2013 & 2014 City of Green Annual Reports
Attachment B ~ Summer 2015 Our Town Newsletter
Attachment C ~ Annual Zoning Permit Counts
Attachment D ~ CBRE Marketview
Attachment E ~ Akron-Canton Airport Information
Attachment F ~ Green Local School District Quality Profile
Attachment G ~ Green Local Schools Summer 2015 Update

cc: *Sherrod Brown, U.S. Senator*
Rob Portman, U.S. Senator
Jim Renacci, Congressman
John Kasich, Governor
Frank LaRose, Ohio State Senator
Anthony DeVitis, Ohio State Representative
Russ Pry, Summit County Executive
John Sheridan, Director of State Gov Affairs Spectra Energy
Brian Hicks, Hicks Partners
David Slater, Executive Vice President Gas Storage & Pipeline