

**Alliance of Nurses for Healthy Environments \* Berks Gas Truth \* Cahaba Riverkeeper \* Center for Health, Environment & Justice \* Chesapeake Climate Action Network \* Citizen Shale \* Clean Air Council \* Croton Watershed Clean Water Coalition, Inc. \* Damascus Citizens for Sustainability \* Delaware Riverkeeper Network \* Earthjustice \* Environment Maryland \* Food and Water Watch \* Fracking Action Network \* Grassroots Environmental Education \* Great Egg Harbor Watershed Association \* Green America \* HoCo Climate Change \* Interfaith Partners for the Chesapeake \* League of Women Voters Maryland (LWVMD) \* Lehigh Valley Gas Truth \* Lower Susquehanna Riverkeeper \* Maryland Environmental Health Network \* Maryland Sierra Club \* Midshore Riverkeeper Conservancy \* Myersville Citizens for a Rural Community \* NEOGAP (Network for Oil and Gas Accountability and Protection) \* Nuclear Information and Resource Service \* Ohio Valley Environmental Coalition \* Peach Bottom Concerned Citizens Group \* Pennsylvania Council of Churches \* Patuxent Riverkeeper \* Potomac Riverkeeper \* Public Citizen \* Responsible Drilling Alliance \* Rivertown Coalition for Clean Air and Clean Water \* Savage River Watershed Association \* Severn Riverkeeper \* Shenandoah Riverkeeper \* Sierra Club, Beyond Natural Gas Campaign \* The Coalition Against the Rockaway Pipeline (CARP) \* The Green Wei \* Transition Howard County \* United for Action \* Watershed Stewards Academy \* Wicomico Environmental Trust**

October 24, 2013

The Honorable Martin O'Malley  
Governor of Maryland  
100 State Circle  
Annapolis, Maryland 21401

Dear Governor O'Malley,

We, the undersigned local, state, regional and national organizations, are writing to urge you to demand a full federal environmental impact statement (EIS) review of Dominion Resource's \$3.8 billion dollar Cove Point liquefied natural gas (LNG) export proposal. By calling on the Federal Energy Regulatory Commission (FERC) to complete a rigorous and comprehensive EIS, as required by the National Environmental Policy Act (NEPA), you will help protect the health and safety of Marylanders.

At this time, FERC has indicated that it is conducting a far less rigorous environmental assessment (EA). Given the potentially dangerous and significant impacts cited in the documents provided to federal and state agencies about this LNG export proposal to date, it is inconceivable that a full review of these impacts would not be required. Therefore, as the Governor of Maryland, we call upon you to look out for the best interests of Maryland citizens and communities, and demand that FERC provide the public with a full picture of the risks stemming from Dominion's massive Cove Point LNG export proposal.

As the lead agency for coordinating federal authorization of siting and construction of LNG export projects, FERC is charged with reviewing Dominion's Cove Point LNG export application and assessing the facility's environmental impacts under NEPA. Indeed, FERC's responsibility under NEPA is to take a "hard look" at the environmental impacts of a proposed action including social, cultural, natural, and economic resources. The cornerstone of NEPA is the environmental impact statement or EIS. Preparation of an EIS is comprehensive and requires agencies to consider direct, indirect, and cumulative impacts including past, present, and reasonably foreseeable future actions associated with development of the project.

As stated above, FERC has not indicated any intention of conducting a full EIS. In an update published on October 18, 2013, FERC outlined the environmental review process for Dominion's proposed LNG export facility, which does not even contemplate the possibility of completing an EIS. An EA is the only environmental review document associated with the Cove Point LNG export project that FERC is considering ([http://elibrary.ferc.gov/idmws/file\\_list.asp?accession\\_num=20131018-4001](http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20131018-4001)). An EA does not provide a thorough, scientific analysis of direct, indirect, or cumulative impacts of a project. Because the Dominion LNG export facility will have significant environmental impacts, it would be inappropriate for FERC to stop short of preparing a comprehensive EIS. Moreover, it is wholly improper for FERC to have concluded at this stage of its environmental review that only an EA is required.

Dominion has argued that past environmental impact statements for pier expansions and other on-site retrofit projects at the existing import facility are adequate to address impacts associated with the new export proposal. Dominion's filings with FERC and the Maryland Public Service Commission however make clear that there are significant potential environmental, safety, and economic threats associated with the LNG export facility project. The proposed export project will require a massive industrial build-out of a facility that has largely been dormant for the past 10 years. Export of LNG from Cove Point will require construction of many new industrial facilities including an on-site 130 MW power plant, storage units, and a liquefaction facility, in addition to pipelines, pier adjustments, compressor stations, and other impacts upstream of the facility. The assertion therefore that EISs done for minor modifications to the existing import facility are adequate to analyze the full scope of impacts of an LNG export facility is misguided and absurd.

Given the location and scope of this project, we are asking you to urge FERC to recognize that the project will have a significant environmental impact, and to follow up the EA with a full EIS. It is imperative that the regulatory review of this project stand up to the highest levels of scrutiny, and the past EISs for relatively minor modifications could not conceivably address the broad scope of additions and changes that will be required by turning the plant into a liquefaction and export facility.

An EIS that takes into account all of the cumulative impacts of this project is crucial to ensuring that any decision to approve or deny Dominion's application will not irreparably harm the natural environment or threaten public and economic health. The Chesapeake Bay and its tributaries support a dynamic ecosystem that is a major economic driver for the region. The full scope of this project's impacts on the Bay must be known before FERC makes a decision about whether to allow Dominion's Cove Point LNG export project to move forward. For this reason,

as far back as November of 2012, the Environmental Protection Agency (EPA) wrote to FERC to “recommend assessing the cumulative environmental effects resulting from implementation of the proposed project, when combined with other past, present and reasonably foreseeable future actions.” Only with a full EIS can the multitude of impacts be fully understood both in Southern Maryland and beyond.

Finally, Maryland state agencies are in the process of reviewing Dominion’s numerous environmental permit applications related to the on-site power plant and other liquefaction facilities, and these processes have been informed by the FERC filings to date. A thorough EIS review of the project will also aid state agencies by providing additional data and scientific analyses related to air quality, climate pollution and other environmental impacts.

Therefore, as Governor of the state of Maryland, we call upon you to urge FERC to require a full and updated EIS review for the proposed Dominion Cove Point LNG export facility. FERC is in the process of preparing only an EA, so we ask you to act on our request as soon as possible, but not later than the end of October.

Thank you for your consideration of this vital issue.

Sincerely,

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