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May 18, 2015

Mr. Baker,

The Tennessee Chapter Sierra Club staff has been advised that Utility Line Crossing ARAP (NR1504.007) is to be mailed to the applicant today.

We request that this issuance be suspended and reconsidered. Given the size and complexity of the proposed project and the substantial environmental impacts as documented in the site specific analysis provide to FERC by the U.S. Fish & Wildlife Service this project should require an application for an Individual permit.

The full consideration of alternatives, minimization, and mitigation required by the individual permit process and regulations is both necessary and appropriate. The existence of wetlands at the site in addition to the proposed stream crossings make use of a general permit legally inappropriate.

Public notice and comment is necessary given the controversy which has already been reported in Fox TV news and a meeting with neighbors to the project with U.S. Representative Jim Cooper.

Please suspend issuance of the permit until you can review this issue. This could avoid an unnecessary appeal to the Water Quality Board.

Note that FERC is just beginning work on a NEPA analysis of this proposed change in the pipeline. The Title V permit application for the compressor station is incomplete. Requiring an application for an Individual ARAP should not cause any delay given these other unresolved permit processes.

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