

January 4, 2019

Via email to:

Virginia Air Pollution Control Board
Members of the Air Pollution Control Board

RE: Virginia Air Pollution Control Board's review of new information and additional public written comment period for Buckingham compressor station (No 21599)

I submit the following as a response to the new information and permit conditions that were submitted to the board on 11/8/18 and on 12/19/18.

Misrepresentation of Community Engagement by Dominion ACP

Lack of response to community concerns by DEQ

Comments on Dr Fjord's Community Participatory Study as a team leader

Dear Air Pollution Control Board Members:

Thank you for serving on the Air Pollution Control Board. I would like to remind you that this board exists to create a much needed separation from a governmental agency that unfortunately is being corrupted by a powerful industry that buys it's way to what it wants. It has even attempted to buy it's way into the quiet rural community of Union Hill/Woods Corner where my husband and I have lived for the past 35 years. Dominion ACP has plied us with promises of things that we would never need in the first place if they were not wanting to site their huge 54,000 plus compressor station in our neighborhood. Mitigating the harms with a 5.1 million dollar community package does not reduce the harms we would suffer in this community. We trust and fully expect that this very important trust that the public has in you will be upheld with the upmost ethical attention. The quality of our lives, specifically the air we breath, depends on it.

This board represents a moral compass and the voice of the people. You do not represent DEQ or the Governor or Dominion. The board existed beginning in 1966 long before the DEQ as an agency came along in 1993. State of Va code 1-1307 (E) provides the following mandates that you are probably well aware of, but I am compelled to remind you.

- 1) Harm to safety, health and property**
- 2) Social and economic value**
- 3) Suitability of the activity to the area in which it is located**
- 4) Scientific and economic practicality**

This provides the legal framework for the Air Board to reject a permit based on the determination of non suitability of an activity in a location, even if it is otherwise in compliance.

Background:

Friends of Buckingham was organized in the late summer of 2014 after community members were made aware of Dominion ACP's plans to locate approximately 25 miles of pipeline in Buckingham and to additionally locate the only compressor station for the state of Virginia at a then undetermined location in central Buckingham. Many residents expressed their concern and we felt it was incumbent to organize and educate ourselves about what this might mean for our safety, our health and our local and regional resources. We soon after advertised a public meeting and held one of many open public meetings to educate and invite experts in their fields to provide us with much needed information on pipelines and in particular compressor stations. Close to 200 open meetings and events were held over four and half years in Buckingham. Soon after learning that the compressor station was to be located in the Union Hill, Shelton Store Rd, James River Highway and Woods Rd area of the county we continued to hold open meetings at the Union Hill Baptist Church. These meetings were attended by members of the Union Hill community, the nearby community of Yogaville and other residents of Buckingham and Virginia.

Our mission as Friends of Buckingham is to preserve the natural resources and cultural heritage of Buckingham County and to encourage sustainable economic development.

Goals and Objectives

- Listen to and address as appropriate the concerns of the residents, especially those who would be impacted by the location of the Buckingham compressor station.

- Encourage and discuss the needs of the Union Hill and surrounding community.

- Provide education through guest experts and other informational venues

- Empower and assist members to participate in the public process and voice concerns before regulatory agencies

- Focus on activities that improve the health, safety and economic well being of residents

e.g. Base line testing of well water, air and Buckingham water ways
(See Heidi Dhivya Berthoud's comments to Air Board on 9/21/18)

Misrepresentation of Community Engagement by Dominion ACP

Dominion ACP in the Fall of 2015 announced that they were going to have a Community Advisory Group (CAG). <https://www.farmvilleherald.com/2015/09/dominion-forms-community-advisory-group/> Marie Gillespie of the Union Hill neighborhood, Pastor Paul Wilson and myself expressed that we wanted to be part of the group as did some community members from Yogaville during a meeting at the Buckingham Administration building. We were not invited to participate, in fact there was not anyone from the Union Hill neighborhood that was invited. Kenda Hanuman, the co chair of Friends of Buckingham at that time, interceded with Carla Picard, a representative of Dominion, and the invitation was then extended. It was unfortunately too late for Marie Gillespie. The venue was extremely small and the event was not well advertised so although it is stated in the summary of Dominion's Community Engagement report (CER) that it was open to the public, very few people attended other then the invitees, not one of whom was a resident of the impacted neighborhood.

There were two other CAG meetings after that (as reported in the CER). Citizen participants from Union Hill and Yogaville, the impacted areas of the county, tried to have their concerns for safety, health, property values, cultural resources and economic concerns addressed, but were continually ignored and redirected to such things as lighting of the compressor station, landscaping and color and design and fencing. Our real concerns were never addressed. (See Joseph Jeeva Abbate comments 1/4/19)
The three meetings took place in September 2015, December 2015 and January 2016.

There were no meetings in Union Hill with residents until May 2018, nearly two and a half years later when a small group of people met with Basil Gooden to discuss our concerns. A few meetings were listed on the CER that were only one on one meetings such as the one with Kenda Hanuman that is reported in the CER as 3 hours. Kenda Hanuman reports that it lasted one hour and she was not representing the Yogaville community as reported in the CER. She asked for the meeting with Union Hill members and some Yogaville representatives that later took place on May 16th. Once again we were placated and our concerns for an evacuation, safety plan and health concerns were not addressed. We were informed, redirected to the Dominion agenda and never

listened to (see [Mary Finley Brook's comments 1/4/19 on Ladders of Citizen Participation](#)).

In the Spring of 2018 the Governor's Advisory Council on Environmental Justice became interested in the possible environmental injustice in Union Hill, which was brought to their attention by our group Friends of Buckingham and other groups who had been attending some of our meetings and events. They investigated, visited on several occasions and listened to concerns from residents. They subsequently made recommendations to the Governor that identified the placement of the compressor station in the Union Hill neighborhood as an environmental justice issue and called for a halt to the pipeline (see [Mary Finley- Brooks comments on 1/4/19](#)).

It was only after the attention of the ACEJ and their recommendations that this was an environmental justice issue and public attention was directed towards this, did Dominion start to have their first meetings that supposedly would address community concerns. However the first of these meetings was held in Dillwyn with a majority of people who were not from the Union Hill neighborhood. Ruby and John Laury of the neighborhood were invited at the last minute at the request of Pastor Paul Wilson. They reported later that they did not feel their concerns were heard and that it was an attempt to promote the compressor station and was in nature one directional. ([See Ruby Laury's comments 1/3/19](#)).

Other small meetings took place with individual family groups. They were reported as only promoting what Dominion wanted and that their real concerns were not addressed in any kind of meaningful way. (see [Shelly Harper comments on 1/3/19](#))

On August 15th a meeting took place wherein Basil Gooden had encouraged Kathy Mosley, chair of Concern for the New Generation, a community based Union Hill group to organize. Only a select number of residents from the community were invited. Kathy later stated that she felt manipulated and misrepresented by Basil. She reported it was not her intent to promote Dominion's plan for the compressor station in the community. She said that Basil announced in the meeting that she had called the meeting, but it was in truth Basil Gooden as a representative of Dominion that wanted it. She had taken it in good faith that it would address the real concerns of the community, but it was once again one directional and only promoting and gathering support for the Dominion agenda of locating the compressor station in the Union Hill neighborhood.

Two other meetings took place in the Union Hill neighborhood. I was not invited to either one of them but heard from a resident when they were taking place so attended. Once again the Dominion agenda was set and there was no meaningful engagement with residents concerns. One of these meetings included the attendance of a consultation specialist for the Department of Justice to investigate charges of reported by the press including racial discrimination. By this time residents, most of whom had not been attending meetings for four plus years were beginning to drink Dominion's kool aid, were inticed by promises of improvements to the community and the community was beginning to fracture.

Subsequent meetings were by invitation only and many people who live in the community, such as my husband and myself were not invited. The most severely impacted residents of Union Hill were eliminated and especially those who did not go along with the Dominion agenda. The primary group that had been meeting in numerous open public meetings for four plus years in the community at Union Hill Baptist Church were not invited. Most took place outside of Union Hill and this is where the Community Development Corporation (CDC) was formed by members who did not actively live in the community and would not bear the impacts of the location of the compressor station. (see Irene Leech comments on 1/4/19) . It was reported in the CER that “residents expressed their displeasure with the protesting and lack of focus on community improvement” . There was not any protesting by anyone who attended the meeting. I in fact was shouted down when I tried to go along with the agenda and offer a suggestion for something I felt the community might benefit from if the compressor station was permitted and in operation (air monitors and air cleaners for residences). This was ignored. Many people who raised their hands to speak were not recognized. The proposed economic developments would not benefit the losses and harms done to the most severely impacted residents. People near compressor stations are not compensated though they bear the most in terms of safety, health impacts and economic loss due to proximity to these infrastructures. We have not had any meaningful input into what it would provide or who would organize, manage the finances or assurance that our needs would be met by this largely outside the community CDC. We have been completely left out as we were seemingly deemed to be too threatening based on our considerable knowledge of and active participation in the regulatory process for these four plus years (see Irene Leech comments on CDC 1/4/19).

These community engagements were not meaningful involvement with the most severely impacted of the community. This is manufactured community engagement by Dominion to push their agenda to reach their goal of a permitted compressor station.

Lack of response to community concerns by DEQ

During October and November of 2015 I organized with other community members a door to door survey to gather information on concerns that people might have on the proposed location of the compressor station. Many people expressed concerns for the emissions and impacts on health and other concerns. These letters, 71 in all, were then sent to the DEQ asking for a public hearing to address these concerns.(see earlier copies of letters sent to DEQ by USPS on 1/3/19). Not one of these letters was ever answered or acknowledged in any way by any representative of the DEQ. In effect we had engaged the community for them and done their work and yet none of this was addressed. I sent several emails to the DEQ in hopes that I might be able to have some acknowledgement of them. These emails were never answered. Finally in the winter of 2018(January 23 and February 26) two more emails were sent which i did not receive an answer to. I finally resorted to a FOIA request which i never received an answer to. Later due to an intervention by a member of the Advisory Council who also sent in a FOIA i was able to view documents including the 71 letters that were sent in

2015. It was shortly after this that a visit was arranged with Mike Dowd of the DEQ Air Division to visit the community of Union Hill to see first hand and hear the concerns of the residents. This came about through an indirect intervention of Mary Finly Brook who redirected Mike Dowd to us who accepted our invitation to visit and her from the residents. Later the same day an informational meeting was held at the Buckingham Administration Building. Many concerns were raised by those who attended, particularly those in the impacted community. We were often referred to web pages and online materials(bear in mind we do not have reliable or little internet service here in Union Hill and many of the residents do not even own computers). The information was not helpful and highly technical. We were discouraged from raising concerns about our cultural resources, health and safety concerns, property values or the siting of the compressor station. Mike Dowd and Patrick Corbett recommended a very narrow menu of technical aspects that most of us were not educated or prepared enough to adequately address. Our concerns were irrelevant, discouraged from commenting on in our public comments and dismissed. Dominion had been given many months to prepare an application with assistance from the DEQ. We the most impacted residents who would bear the greatest harm and risk were granted very little time in a comment period that lasted a mere few weeks.

Comments on Dr Fjord's Community Participatory Study as a team leader

I participated as a community member team leader in the community participatory demographic study conducted by Dr Lakshmi Fjord. These are my following experiences and conclusions as to why this is the best methodology for collecting community based data. I myself do community in home work through my work as a mental health worker in Buckingham and the surrounding counties so I am familiar with going into people's homes and interacting with them there:

When attempting to engage with community members within a close knit community, it was my experience that it always far more successful if the person(s) meeting with the household members are known to them or at least from the same community being faced with similar concerns. This increases the level of trust and the willingness for participants to provide information and express freely their concerns, if any. The relationship is developed based on mutual trust and concerns and there is a willingness for more information to be shared than with a stranger. A level of safety is established. Much emerges through this relationship that an unknown census taker might not be able to extract. My experience in going door to door was enriching for me as I got to know my neighbors in a much more personal and subsequently meaningful way. I think and know that there was a mutual benefit experienced at both ends of the relationship. As the relationship continues to develop more emerges and information becomes even more meaningful and enriching. I went back several times over to many of the homes I visited during my participation as a team leader in Dr Fjord's study. (see Dr Fjord's demographic study 1/4/19)

In conclusion I ask that you allow Dr. Fjord to rebutt the demographics that were introduced as the methodology used by DEQ being the ESRI maps and EJSCREEN. I feel that her methodology fills in gaps that these former methods do not accurately pick up.

Once again I thank you very much for your service on the Air Board and considering these comments.

Sincerely,
Chad Oba
Chair - Friends of Buckingham
Impacted resident