

**Testimony by Toby Mack, President and CEO of Energy Equipment and Infrastructure Alliance
Virginia State Water Control Board Public Hearing
Regarding the Atlantic Coast Pipeline
As Delivered, December 11, 2017**

I am Toby Mack, President of the Energy Equipment and Infrastructure Alliance. EEIA represents the energy infrastructure construction supply chain. Our members provide construction, equipment, materials and services to energy infrastructure projects including pipelines. They include companies based in Virginia, and others that work on projects in Virginia, employing Virginians and otherwise contributing to Virginia's economy during construction. Within our membership are many of the firms that will be doing the physical construction of the Atlantic Coast Pipeline and supplying equipment, products and services for that construction.

I'm here to urge the Virginia Water Control Board to issue the Section 401 certification for upland areas needed to build the pipeline. The companies that will be participating in this project are best-in-class infrastructure builders that adhere rigorously to best construction industry practices for erosion and sediment control, storm-water management, riparian buffer protection and other environmentally sensitive requirements.

They are expert in horizontal directional drilling techniques that will be used in many locations to avoid impacts to major waterbodies. They will be executing this project in strict adherence to ACP's Erosion and Sediment Controls and Storm Water Pollution Prevention Plans, that incorporate best-in-class practices to prevent erosion and sedimentation in steep slope areas.

With respect to construction in karst terrain, EEIA strongly agrees with DEQ's finding that with over 2,000 miles of existing gas pipelines currently constructed within karst terrain in Virginia, Tennessee, Kentucky, and West Virginia, it has been demonstrated that pipeline construction can be safely accomplished in karst terrain. The contractors involved with this project are prominent among the builders of that network, and have the experience and expertise that will add to that success record.

EEIA also strongly concurs with DEQ's finding that the additional conditions in the proposed Section 401 Certification, including specific requirements for best work practices emphasizing hazard assessment, frequent inspection requirements, monitoring activities, preventative measures, riparian buffer protections, and comprehensive mitigation plans, will adequately protect public water supplies.

This project has had three years of review and input by various federal, state and local bodies, including more than two years of extensive review by the DEQ. The ACP route is the result of comprehensive studies and surveys to avoid and minimize impacts to sensitive areas. Over 300 reroutes have been adopted to reduce impacts to environmental, cultural and fauna resources of the region.

DEQ held over 80 meetings and work sessions with ACP to review and discuss the standards and specifications of ACP Erosion and Sediment Control and Storm Water Management plans that cover every foot of land disturbance. In addition, it has received, reviewed and considered approximately 15,000 comment submissions on the draft 401 certification received at hearings or by mail.

ACP has been given an unprecedentedly exhaustive review by the Virginia DEQ, on top of an equally rigorous environmental review by the Federal Energy Regulatory Commission. All findings confirm that the plans submitted by its developer guarantee that the Atlantic Coast Pipeline will be constructed in ways that assure minimal or no environmental impacts during and after construction.

We urge the Water Control Board to issue the Section 401 certification, and appreciate the opportunity to provide our input to the process.