



ABRA Update #60 – December 22, 2015

Dominion Responds to FERC on Route Alternatives, Forest Service Concerns

Dominion Transmission, on behalf of the Atlantic Coast Pipeline, LLC, filed with the Federal Energy Regulatory Commission (FERC) on December 16 a response to the agency's December 4 Environmental Information Request that asked for an analysis of the ACP's conformity with U.S. Forest Service management plans and to evaluate alternative pipeline routes across the National Forests. The Dominion filing is available at https://www.dropbox.com/s/cshe7nt903tz1se/Dominion_response_to_FERC_on_NFS-concerns_12-16-15_opt.pdf?dl=0. The December 4 FERC letter to Dominion was discussed in ABRA Update #59 (http://abralliance.org/wp-content/uploads/2015/12/Update_59.pdf).

The Dominion filing noted that the company had provided FERC on December 15 “a detailed description of avoidance measures designed for the preferred route, as modified, in order for the ACP to be consistent with the Forest Service’s Long Range Management Plans.” That filing is considered privileged and therefore not available to the public.

The December 16 Dominion response provides information on “eight previously-filed route alternatives on Forest Service lands to more clearly demonstrate the relative environmental impacts of those routes, through a revised Resource Report 10. This report also contains more thorough environmental data regarding two of the filed route alternatives that would reduce the impact of the Projects on Forest Service lands to a practical minimum.” Discussed in detail are various options that Dominion says it considered and an explanation of reasons why those options were rejected. Also included in the filing were discussions of the difficulties that Dominion found in seeking to co-located with the Columbia, Mountain Valley and Appalachian Connector pipelines, the rights-of-way along U.S Interstates 79 and 64 and various electric transmission lines in the area.

Of particular interest is the following passage describing why co-location along Interstate Highway routes is not acceptable:

Topography along Interstate and Federal highways, particularly in areas with rugged terrain, can be another limiting factor. Interstate highways in mountainous areas are often built around and on the sides of mountains (i.e., in side slope terrain). As noted above, pipeline construction in rugged areas must typically cross ridges and hills perpendicular to the slope (i.e., along the natural fall of the slope). For this reason, construction adjacent to existing Interstate or highway in mountainous areas is not typically feasible. (pg. 10-41)

The challenge of crossing steep mountain terrain is elaborated upon further in a section entitled “Construction Limitations Associated with Mountainous Terrain” (pg. 10-51). This begs the question of why Dominion would try to build a pipeline in the first place through an area that it admits presents serious construction difficulties.

The Dominion filing concludes by stating that the ACP would meet an “over-riding demonstrated public need or benefit standard.” In support of that statement it cites numerous benefits of the project it has previously claimed, including replacing coal with natural gas and making a positive economic contribution through job creation (pg. 10-109). The document also

cites as justification the President Obama's 2012 Executive Order No. 13605, "Supporting Safe and Responsible Development of Unconventional Domestic Natural Gas Resources," (<https://www.gpo.gov/fdsys/pkg/FR-2012-04-17/pdf/2012-9473.pdf>) and the Virginia Energy Plan of 2014 (https://www.dmme.virginia.gov/DE/LinkDocuments/2014_VirginiaEnergyPlan/VEP2014.pdf).

New Committees Are Off and Running

ABRA's new committees, created in early November, have begun fully functioning. The Communications and Advocacy Committee, chaired by Nancy Sorrells of the Augusta County Alliance, is working on sharpening the coalition's message to public officials and the general public. Last week it prepared and issued a press release highlighting a series of Freedom of Information (FOIA) requests that are being made to the Virginia Department of Environmental Quality (DEQ). This week Jeeva Abbate of Yogaville was named Vice Chair of the committee and appointed to the ABRA Steering Committee.

The Finance Committee, chaired by Kate Wofford of Shenandoah Valley Network, has obtained two foundation grants and raised twice the targeted funds from 30 ABRA members (see article below). The Environmental Resources Committee, chaired by Rick Webb of the Dominion Pipeline Monitoring Coalition, as noted above, is pursuing FOIA requests of the DEQ. It has also launched an extensive water monitoring program of streams and rivers that would be affected by the ACP. A full committee meeting is expected in early 2016. Finally, the Legal Committee, chaired by Greg Buppert of Southern Environmental Law Center, is involved in an array of issues and expects to be very busy in 2016.

Fundraising Effort Yields Early Successes

Two foundation grants and a doubling of targeted contributions from ABRA members are among the accomplishments of the Finance Committee in its less than two months of existence. Congrats to Kate Wofford (Chair), Faye Cooper, Bruce Rinker and Larry Thomas for your efforts. And a BIG thanks to the ABRA members for their pledges and contributions to date, as well as to several member organizations who are unable to contribute funds at this time, but have pledged the strong support for our efforts.

Augusta County Alliance	Mountain Lakes Preservation Alliance,
All Pain No Gain	(Upshur County, WV)
Appalachian Mountain Advocates	Pipeline Education Group
Chesapeake Climate Action Network	Shenandoah Group Sierra Club
Climate Action Alliance of the Valley	Shenandoah Valley Battlefields Foundation
Cooper Conservation Advisors, LLC	Shenandoah Valley Network
Dominion Pipeline Monitoring Coalition	Southern Environmental Law Center
Free Nelson	Southern Shenandoah Valley Chapter,
Friends of Augusta	Potomac Appalachian Trail Club
Friends of Buckingham	Valley Conservation Council
Friends of Nelson	Virginia Native Plant Society
Friends of Shenandoah Mountain	Virginia Sierra Club
Friends of the Middle River	Virginia Wilderness Committee
Greenbrier River Watershed	Waterkeepers Chesapeake
Highland County Cave Survey	West Virginia Highlands Conservancy
Highlanders for Responsible Development	West Virginia Rivers Coalition

In the News:

Local/Atlantic Coast Pipeline

Schapiro: Va. Corporate Cops Urged To Man Up - By One Of Their Own

- Richmond Times Dispatch – 12/19/15

http://www.richmond.com/news/virginia/government-politics/jeff-schapiro/article_0642f7c1-96f2-5caf-b63b-cb556d1c0922.html

SCC member says Gen. Assembly overstepped authority by freezing Dominion's base rate until 2022

Commissioner Questions Constitutionality of Electricity Rate Freeze

- Bacon's Rebellion – 12/21/15
<http://www.baconsrebellion.com/2015/12/damnedest-thing-just-happened.html>

Projections For James River Power Line Challenged

- Richmond Times Dispatch – 12/20/15
http://www.richmond.com/news/article_4d93849f-8702-5ea4-8e96-72227bb3a0da.html
Questions remain whether Dominion's load projections for Tidewater hold up

Time To Consider A Bridge For The Power Lines

- The Virginia Gazette – 12/18/15
<http://www.vagazette.com/news/va-vg-edits-patton-1219-20151218-story.html>
Multi-benefit proposal could satisfy all parties

Regional/Mountain Valley Pipeline, other

Pipeline opposition requests Upshur County Commission's support

- The Exponent Telegram – 12/17/15
http://www.theet.com/news/local/pipeline-opposition-requests-upshur-county-commission-s-support/article_08b8268d-d9ac-5522-b4c5-92b8adccc939.html
Recruiting more counties to support a PEIS

Big Picture:

Kinder Morgan Faces FERC Deadline

- Lowell Sun – 12/19/15
http://www.lowellsun.com/news/ci_29280508/kinder-morgan-faces-ferc-deadline
FERC wants KM to reconsider an alternative route (using existing corridors) that the company had previously dismissed

Sabal Trail Pipeline's Adverse Impacts Will Be Mitigated, Agency Says

- Palm Beach Post-Blog – 12/18/15
<http://protectingyourpocket.blog.palmbeachpost.com/2015/12/18/sabal-trail-pipeline-will-have-adverse-impacts-but-those-will-be-reduced/>
The Rubber Stamp strikes again!

Study: Barnett Shale Is Richer Than Previously Thought

- Texas Tribune – 12/17/15
<http://www.texastribune.org/2015/12/17/study-barnett-shale-richer-previously-thought/>
More gas "discovered" in the birthplace of fracking

<p>The next issue of ABRA Update will be the week of January 4, 2016. Best wishes to all for the holidays!</p>
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