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## Pipeline's harmful impacts inescapable, Dominion says

BY JOHN BRUCE • STAFF WRITER

MONTEREY — Wildlife and habitats in Virginia could suffer unavoidable adverse impacts from construction of the proposed Atlantic Coast Pipeline, a Dominion reply to a federal regulatory directive shows.

While most of the species impacts are described as "short-term," generally up to 10 years, the project would permanently destroy nearly 2,500 acres of forest, cites the study documenting about three-dozen cases of "long-term" adverse impacts on animal habitats. Long-term is generally considered as the life of the project or longer.

In a paper posted Monday titled "Potential Impacts to Species of Greatest Conservation Need in Virginia," the pipeline company reviewed the 2015 Virginia Wildlife Action Plan to assess potential effects on Virginia Species of Greatest Conservation Need (SGCN) and their habitats.

The plan lists SGCN that have potential to occur by planning region, six of which the pipeline route would cross.

All SGCN with potential to occur in these regions are included, with the exception of federally listed species because the analysis for species undergoing consultation under the Endangered Species Act would be included in the biological assessment or the Environmental Impact Statement.

According to the company, federally listed species in the project area could include red cockaded woodpecker, Madison Cave isopod, Roanoke logperch, dwarf wedgemussel, James spinymussel, Atlantic pigtoe, Virginia big-eared bat, and Indiana bat.

For the remaining species with documented occurrences within two miles or less of the project area, potential impacts are considered more likely. Impacts from the ACP project could occur as a result of:

• Construction activities and clearing a 125-foot construction area along the pipeline centerline, which is 75 feet wide in wetlands and at waterbody crossings,

- Installing the pipeline,
- Constructing eight above-ground facilities at points along the right of way,
- Developing and improving access roads, and
- Maintaining low-growing vegetation in the 75-foot right of way.

Impact on species such as Burnsville Cove cave amphipod and Southern water shrew were yet to be determined, pending completion of a habitat assessment.

Examples of adversely impacted species potentially include numerous mountain-dwelling animals such as cave dwelling beetle species, eastern small-footed myotis bat, Appalachian cottontail, numerous birds, and subterranean and terranean amphibians.

The proposed pipeline route would cross 14 conservation sites, some of which support cave, karst, and old-growth forest habitats.

"The majority (approximately 97 to 100 percent) of impacts from pipeline installation would be of a linear nature; aside from the eight aboveground facilities, impacts would not be concentrated in a single area but rather spread out along the pipeline right of way and access roads," Dominion said in the paper.

"The total area impacted by construction of the pipeline and associated facilities would include approximately 2,428 acres of forest habitat, 822 acres of open habitat, and 252 acres of wetland habitat," Dominion said. "A portion of this area would be maintained as low-growing vegetation for the life of the pipeline, including approximately 1,466 acres of forest habitat, 502 acres of open habitat, and 174 acres of wetland habitat; therefore, forest and forested wetland would be converted to grassland, shrubland, and herbaceous or scrub-shrub wetland."

Dominion also noted the pipeline would entail about 621 waterbody crossings, which would primarily result in short-term construction impacts. In addition, roughly 271 acres of forest habitat, 144 acres of open habitat, and 37 acres of wetland would be converted to access roads.

The majority of impacts from access roads would affect forest species, Dominion said, followed by species that use open habitat and then wetland species. Access roads would result in long-term adverse impacts to habitat for at least the life of the pipeline, the company noted.

"Because access roads would essentially have the same types of potential impacts to all SGCN, if present, and regardless of their preferred habitat, access roads are not discussed further in this document," Dominion said.

Long-term adverse impacts include changes to a sensitive species' habitat in which the habitat would not return to preconstruction condition for the life of the pipeline, resulting in adverse effects to the species. This could include habitat loss such as interior forest, forested riparian areas, and forested wetlands, and habitat fragmentation resulting in fragments less that 35 acres in size, Dominion added.

The Bureau of Land Management identifies unavoidable adverse impacts as the effects on natural and human resources that would remain after mitigation measures have been applied, including:

• Soils — A small fraction of the construction right of way and ancillary facility topsoil that would be graded, stockpiled, and replaced would be mixed, buried, or lost from the right of way or site because of wind and water erosion, especially across sensitive soils.

• Native vegetation and wildlife habitats — Clearing and grading native and non-native grassland, shrubland, and forest communities would result in long-term changes in species composition and community structure (height and density). Based on reconnaissance of existing pipeline rights of way, recovery of pre-existing vegetation cover and diversity for grassland communities after disturbance generally is five years. Shrubland forest communities would begin to regenerate within 10 years.

• Land use, utility use conversion — Private land would be converted to utility uses within new permanent utility rights of way during the 30-year project life. Land uses that would not interfere with pipeline operations, such as farming, livestock grazing, etc., would continue.

• Land use, conversion to industrial land uses — Rangeland and agricultural land would be converted to pipeline products terminals, pump stations, and pressure control stations for the project life.

• Water quality — Unavoidable temporary impacts to water quality could occur during construction at river crossings. Turbidity and sedimentation could be increased, although mitigation measures would minimize extent and duration of impacts.

• Wildlife resources — Aquatic habitat could be unavoidably disturbed, either in the short term or the long term, at river crossings. Trenching activities could result in localized mortalities to fish, macroinvertebrates, and amphibians. Egg and juvenile life stages would be the most vulnerable to equipment.

• Public safety — Installing a pipeline has some degree of unavoidable potential impact with regard to public safety. Risk analysis indicates the occurrence of a pipeline accident affecting the public is unlikely. The pipeline is new and incorporates safety features and design aspects that increase safety. Early in the project, the pipeline would be visible, as vegetation reestablishes.