



Highlanders for Responsible Development
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February 13, 2015

Clyde N. Thompson, Forest Supervisor
Monongahela National Forest
200 Sycamore Street
Elkins, WV 26241

Re: Comments on Atlantic Coast Pipeline application for Special Use Authorization

Dear Mr. Thompson:

Highlanders for Responsible Development submits the following comments on the Special Use Authorization application submitted to the Monongahela National Forest (MNF) by Dominion Transmission, Inc. (DTI) for it to survey a route for the proposed Atlantic Coast Pipeline (ACP). Our organization is a citizens group that promotes stewardship of the unspoiled landscape, natural resources and exceptional quality of life of Highland County, VA. Highland County is immediately adjacent to the MNF and would be directly affected by the proposed ACP route, which under the most recently published map would proceed directly through our county after bisecting the MNF.

1. The application to survey for the ACP is inextricably linked to a subsequent application that DTI would make to the MNF to build the pipeline should it receive permission to do so from the Federal Energy Regulatory Commission (FERC). The various factors that the MNF would weigh if it were considering an application to build the ACP must also be incorporated into its consideration of the application to survey. This is true because the MNF has only been presented with one option of a route through the Forest.
2. DTI's request to survey is seriously deficient in providing information requested by the MNF on Standard Form 299. It offers misleading or incorrect responses to important questions. For instance, in answer to Question 13a, asking that the applicant "describe other reasonable alternative routes and modes considered," DTI states: "No alternative routes have been identified for these surveys at this time." This response is contrary to the company's submission in December to FERC:

"Atlantic and DTI identified several route alternatives and variations along the proposed pipeline routes to avoid or minimize crossings of sensitive environmental features or address engineering or other concerns. These route alternatives and variations were incorporated into the proposed pipeline routes as described in detail below." (FERC Docket No. PF15-6-000, Atlantic Coast Pipeline Resource Report 10: Alternatives, page 10-1)

Further, the application's response to the next question 13b, "Why were these alternatives not selected?" states: "Not applicable." The instructions for Standard Form 299 clearly direct the applicant to provide "information on alternate routes and modes in as much detail as possible, discussing why certain routes or modes were rejected and why it is necessary to cross Federal lands." The instructions conclude by stating: "If all information is not provided, the application may be rejected." DTI's submission to survey for the ACP does not comply with the stated requirements of the application.

Finally, in answer to question 13c, "why it is necessary to cross Federal Lands," the application states: "Given the general trajectory of the planned pipeline route between West Virginia and southern Virginia (northwest to southeast), it is not feasible to avoid a crossing of the MNF." This is counterintuitive thinking in that there are two proposed alternative pipeline projects, the Mountain Valley Pipeline and the Appalachian Connector, both of which would begin in the same general area of West Virginia and serve similar market areas as the ACP. Both would avoid the MNF entirely. While these two alternative pipelines would cross a portion of the Jefferson National Forest (JNF) in Virginia, they would disrupt far less National Forest lands than the currently proposed ACP route, which would transverse both the MNF and the George Washington National Forest (GWNF).

3. The ACP survey request should be considered in conjunction with other proposed pipeline projects that would cross National Forest lands so that the potential impact on the National Forest system can be properly assessed. As noted above, the ACP would bisect both the GWNF and the MNF. The Mountain Valley Pipeline would bisect the JNF. The proposed Appalachian Connector Pipeline, though the proposed route has not yet been announced, would also bisect the JNF based on preliminary maps that have been made available. The overall integrity of the National Forest system is too vital to the nation to consider such monumental projects in a patchwork quilt fashion.

For the aforementioned reasons, Highlanders for Responsible Development urges that the Monongahela National Forest reject at this time Dominion Transmission Inc.'s application to survey MNF lands for the proposed Atlantic Coast Pipeline. More information and rationale to support the application is needed before a prudent judgment can or should be made.

Sincerely,



Lewis Freeman
President, Highlanders for Responsible Development