



June 25, 2015

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

Dear Mr. Thompson:

I am in receipt of your letter of June 23 inviting interested parties to comment on the application of the Atlantic Coast Pipeline, LLC (ACP) to amend its special use permit GBR205003 to conduct a site survey and testing of a proposed alternative route through the Monongahela National Forest (MNF) for its proposed pipeline project.

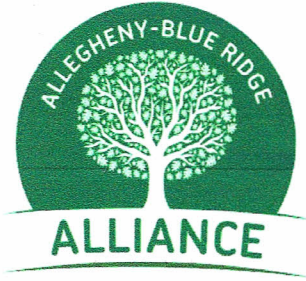
The members of the Allegheny-Blue Ridge Alliance (ABRA), a coalition of 43 member organizations that have deep concerns about the ecological and economic impacts of the ACP, appreciate the opportunity to express their views about the proposed route's effect on the MNF. However, the July 6 comment deadline you have set – less than two weeks – is unreasonable and impractical, particularly given that a major holiday weekend immediately precedes the announced deadline.

ABRA has recently adopted a policy statement on the proposed ACP that articulates the breadth of our concerns for the project, including what it would do to precious National Forest lands. A copy of our policy is attached.

I request that at least an additional two weeks be added to the public scoping period for the alternative route ACP seeks to survey in the MNF. It is in your interest to grant this request for more comment time if you wish to receive meaningful, substantive comments from the public. Thank you for your consideration.

Sincerely,

Lewis Freeman  
Chair, Allegheny-Blue Ridge Alliance



## **Policy on the Atlantic Coast Pipeline**

**June 18, 2015**

The members of the Allegheny-Blue Ridge Alliance listed below oppose all of the routes announced by Dominion Resources and its partners as under consideration for the proposed Atlantic Coast Pipeline (ACP) because they are not in the best interest of the public good for the affected communities and citizens of Virginia and West Virginia.

Specifically, the construction of a pipeline along these proposed routes would:

- Threaten the integrity and safety of the water supplies of the immediately affected communities and many other communities that are dependent upon water originating in the Allegheny-Blue Ridge region;
- Present serious safety risks because of the proven instability of the karst topography which these proposed routes would traverse;
- Endanger the structural character and seriously increase the possibility of long-term erosion in the steep mountain terrain through which the routes would pass;
- Harm the habitat of many protected species of plants and animals that are unique to the Allegheny-Blue Ridge region;
- Compromise the intended uses of public lands, particularly the Monongahela and George Washington National Forests, the Blue Ridge Parkway and the Appalachian National Scenic Trail;
- Degrade the usefulness of affected agriculture and forest resources;
- Lower the value of private property of land owners along the routes;
- Diminish the cultural and recreational attractions of the affected communities and the region as a whole; and
- Disrupt and adversely impact the economies and livelihoods of the people and communities affected by the proposed routes.

We urge the Federal Energy Regulatory Commission (FERC) to consider all of the foregoing concerns as it evaluates the application of the ACP.

Finally, we strongly believe that FERC must:

- Conduct a programmatic Environmental Impact Statement (PEIS) that assesses the full range of adverse effects of the pipeline and evaluates all reasonable, less damaging alternatives. The PEIS should examine the need for and impacts of the pipeline in the context of the numerous natural gas infrastructure projects proposed for the region and the rapidly increasing competitiveness of clean, renewable sources of energy.
- Investigate the demand for more natural gas in the markets that the ACP would reportedly serve and the need for a new pipeline to meet that demand, given that recent credible studies have concluded that the existing pipeline infrastructure may be adequate; and
- Evaluate the expected life of the Marcellus shale field since recent analyses have predicted that production from the field will soon begin to decline.

Allegheny Highlands Alliance  
Appalachian Mountain Advocates  
Augusta County Alliance  
Chesapeake Climate Action Network  
Climate Action Alliance of the Valley  
Conservation Partners  
Cooper Conservation Advisors, LLC  
Cowpasture River Preservation Association  
Dominion Pipeline Monitoring Coalition  
Eight Rivers Council  
Free Nelson  
Friends of Buckingham County, VA  
Friends of Nelson County  
Friends of Shenandoah Mountain  
Friends of Middle River  
Greenbrier River Watershed Association  
Highland County Cave Survey  
Highlanders for Responsible Development  
Jackson River Preservation Association  
Pipeline Education Group  
Rockbridge Area Conservation Council  
Shenandoah Valley Battlefields Foundation  
Shenandoah Valley Network  
Sierra Club-Virginia Chapter  
Southern Environmental Law Center  
Southern Shenandoah Valley Chapter of the Potomac Appalachian Trail Club  
Valley Conservation Council  
Virginia Native Plant Society  
Virginia Wilderness Committee  
Waterkeepers Chesapeake  
West Virginia Environmental Council  
West Virginia Highlands Conservancy  
Whitescarver Natural Resources Management  
Wild Virginia  
Yogaville Environmental Solutions