



## ROCKBRIDGE AREA CONSERVATION COUNCIL

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June 2, 2016

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: ACP Docket Number: CP15-554-000 and the GWNF-6 alternative

Dear Secretary Bose:

The Rockbridge Area Conservation Council (RACC) thanks the Federal Energy Regulatory Commission (FERC) for the opportunity to comment on the potential environmental impact of the new alternative route for the proposed Atlantic Coast Gas Pipeline (ACP).

Although we question the continued validity of a finding of public necessity in view of recent economic, supply, and reservoir developments, if a pipeline is built, it must not only be constructed and maintained in adherence to the standards set by federal and state laws and guidelines, it must also incorporate the additional design, monitoring, and maintenance that will be necessary for safe operation in the specific geologic, hydrologic, and ecological conditions of the proposed route which are not addressed by routine best practices and guidelines.

Among these unique engineering and safety challenges are karst geology which unlike more commonly encountered granular soils and porous bedrock, presents issues of both structural instability and the infeasibility of clean-up of any spills or leaks affecting the aquifer system, which significant numbers of rural residents and farms rely on for water supplied by private wells and springs. Other conditions requiring costly, though necessary, additional measures, are the severe grades beyond those where standard sediment and erosion control measures are effective and slope stability is a concern, and the proximity of the downstream Rockbridge County and Lexington City public water supply intake and source water protection zone.

In addition to this general overall concern for the proposed Atlantic Coastal Pipeline LLC route, we have the following additional comments:

1. In the latest George Washington and Jefferson National Forest plan, the following directs the management approach to watershed resources:

*"The achievement of desired conditions for healthy watersheds is a combination of maintaining, restoring, and monitoring the soil, water, air and geologic resources on the GWNF. Much of the impacts to water resources are due to activities upstream or downstream from the areas managed by the Forest Service. Groundwater and air quality issues also cross national forest boundaries and are affected by multiple*

*region-wide impacts such as increased agricultural use, growing urban development, cumulative effects from regional emissions and discharge sources, and slow recovery from past actions. Therefore, our strategy is to focus on sustaining and improving watershed areas within national forest control while working cooperatively with other agencies and landowners to improve statewide watershed health.”*

These same principles for water quality improvement, or at least protection, should be applied to the headwaters of the Maury River and its tributaries, the source water for Lexington and portions of Rockbridge County public water supply, where we are based. The pipeline route proposed by Atlantic on February 12, 2016 crosses two USFS priority watersheds, as well as many other forest, state and private lands that contribute water to riparian lands of high water quality downstream. We believe that unavoidable water quality degradation will result from construction of the pipeline and maintaining open space for the pipeline in perpetuity will severely degrade water resources, particularly due to the steep terrain, stream crossings and carbonate flowpaths and aquifers that are of greater hazard in this route modification than in the original. Moreover, the route (in general) was rejected by ACP in Resource Report 10 largely due to the steepness of the ridges and need for many ridge-top road access points.

2. Two other aspects of proposed pipeline with potential impact on water quality, and perhaps human hazard, are soil erosion and landslide hazard on steep forested hillslopes. Erosion of bare slopes in these steep mountain slopes is not well constrained nor well-predicted by slope hazard classes. Soil erosion on exposed, steep slopes up to 40 degrees, and three types of slope failure hazards necessitate a more rigorous, geomorphological evaluation of the potential for gullying and sliding. Slope failures the 1986, 1995 and others document the landslide/debris flow damage in the watershed. Large bedrock landslides involving square kilometers of mountain slopes have occurred close to the proposed route (e.g., Sinking Creek Mountain and just south of the town of Goshen on Bratton Mountain) and are potential threats to pipeline security. Lastly, shallow slope failures are common in areas of road building and slope modification or clearing, particularly during cut-and-fill is required (or cut-and-remove in the steepest slopes where the fill would fail). These new sources of potential instability and sediment contamination in our headwaters argue for evaluation by a trained geomorphologist who can map evidence of past erosion or failure, as well as any indications of future instability due to sliding or gullying.

In closing, RACC further requests that FERC conduct a Programmatic Environmental Impact Statement for the ACP and the other pipeline projects that are pending before the agency that affect the larger region.

Thank you for the opportunity to provide comments.

Sincerely yours,



Barbara L. Walsh  
Executive Director