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## Dominion filing lacks specificity, group says

MONTEREY — Lew Freeman, president of pipeline opponent Allegheny Blue Ridge Alliance, offered some observations on Dominion's March 10 filing of its "Supplemental Information on Biological Evaluation" about the proposed Atlantic Coast Pipeline.

"In general, much of the text reads like a primer drawn from a selection of Wikipedia essays, like the 'Best of Wikipedia,' off-the-shelf information that too-often lacks specificity to the project," Freeman said. "But, this has been the rhetorical habit of many of Dominion's filings.

"It continues to be clear that Dominion has either not done its homework on the impact of access roads on geology and biology or the company is withholding such information.

"The most troublesome aspect of the filing is its lack of specificity on construction plans for building the pipeline through steep slopes and on top of mountain ridges and its failure to discuss the longer-term impacts of such construction, particularly the potential for short and long-term sediment run-off," Freeman said.

"The filing states: (Dominion) 'will develop and implement additional measures in areas where slopes exceed 30 percent to address land movement, surface erosion, backfill erosion, and general stability when backfilling the trench and restoring the right of way. The following are some of the special design and construction mitigation measures that will be implemented during construction.' A list follows of possible measures that the company might take.

But, he said, "How certain is the company that these measures will succeed? Based on other information that has come to my attention in the past week, I don't believe we should have even the most modest level of confidence in the company's ability to address the problems it cites."

Furthermore, he said, "A Feb. 24 letter to the National Forest Service from one of its consultants concerning several months of conversations with Dominion about how it would implement its so-called 'Best in Class' approach to dealing with steep terrain construction suggests the company is either incompetent or unforthcoming in describing its intended construction techniques to build the ACP through the Allegheny Highlands.

"The company has yet to describe at all how it intends to dispose of the incredible volumes of rock and soil that will result from the mountaintop removal in which it will engage in more than 20 sites that we have identified so far."

## See www.abralliance.org/2017/03/10/mountaintop-removal-will-be-a-significant....

"A report released (Tuesday) by Friends of Nelson that studies the potential for slope failure and landslides in Nelson County concludes that Dominion's filed plans have 'not adequately identified those soils and landforms that are prone to debris flows (and) landslides.' The report also states 'the potential for debris flows in the very steep mountainous portions of Nelson County is underestimated by the reports submitted to FERC by Dominion.' If this is the judgment for Nelson County, think what it would be for Pocahontas, Highland and Bath counties, where the number and severity of steep slopes are even greater," Freeman continued.

A Roanoke Times story discusses the long-term impact of sediment run-off from the Mountain Valley Pipeline as it affects the Roanoke River. "Given that sediment runoff from the Atlantic Coast Pipeline will affect an even larger system of rivers, you don't need to be a world-class soil scientist to imagine the consequences this project would have on water and dependent species," Freeman said.