



Southern Shenandoah Valley Chapter

April 1, 2017

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: FERC Docket #CP15-554

Dear Deputy Secretary Davis:

I am submitting comments on behalf of the Potomac Appalachian Trail Club – Southern Shenandoah Valley Chapter (PATC-SSVC) on the Draft Environmental Impact Statement (DEIS) for the Atlantic Coast Pipeline (ACP). PATC-SSVC is located in the Shenandoah Valley of Virginia in the Harrisonburg-Staunton-Waynesboro area. Our club leads hikes and maintains trails along the 16-mile route of the Atlantic Coast Pipeline through the George Washington National Forest (GWNF). In addition to hiking, PATC-SSVC typically does 1,000-2,000 hours of volunteer work on trails in the Shenandoah Mountain area of the GWNF each year.

When we hike, we enjoy scenic views, cascading mountain streams, wildflowers, birds, and geologic features, and we especially appreciate the large, unfragmented tracts of national forest on the Blue Ridge Mountains and Shenandoah Mountain. These tracts of wildlands offer supreme hiking experiences not just for our club, but for the 10 million people who live within a two-hour drive of the GWNF. The ACP route cuts through some of the premier areas of the national forest for scenic beauty, nature study, and outdoor recreation, including backpacking, birding, fishing, hunting, and mountain biking.

Our Conservation Committee has reviewed the Draft EIS for the ACP and have found it to be incomplete and very misleading. Some of the most essential information for a responsible decision is missing. Following is a list of our major concerns about the DEIS:

- **Scenic Integrity:** The DEIS fails to analyze impacts on scenic integrity in the GWNF, particularly around:
 - **Appalachian Trail and Blue Ridge Parkway** – The HDD western entrance, access road, and staging area will dominate the scenic view

from Torry Ridge Trail in the Sherando Lake Recreation Area. The pipeline route will be visible from many points along the Parkway and AT, including Three Ridges Overlook, Ravens Roost Overlook, Cedar Cliffs Overlook, Humpback Rocks, and Bee Mountain. The DEIS analysis does not include all of these.

- **Hankey and Shenandoah Mountains** – The DEIS incorrectly states that the pipeline will not be visible from the proposed Shenandoah Mountain National Scenic Area. The ACP corridor will be visible from many points on Bald Ridge Trail in Ramseys Draft Wilderness and from Wild Oak National Recreation Trail on Hankey Mountain.



The ACP Corridor would bisect the viewshed of Chestnut Oak Knob in the middle ground as seen from Wild Oak National Recreation Trail on Hankey Mountain. Photo by Malcolm Cameron

- **Trails South of Rt. 250** The ACP will mar scenic beauty seen from trails on Crawford Mountain, Elliott Knob, and southern Shenandoah Mountain, including Shenandoah Mountain Trail, a segment of the Great Eastern Trail, American's newest long distance trail. These scenic impacts are not addressed in the DEIS.
- **Proposed Shenandoah Mountain National Scenic Area (SMNSA)** PATC-SSVC is a strong advocate for Congressional designation of the the proposed SMNSA. We hike on Shenandoah Mountain and in Ramseys Draft Wilderness to enjoy the wild beauty and solitude the area offers. Our members maintain trails in Ramseys Draft Wilderness, including Bald Ridge Trail. The ACP would be clearly visible from all the best overlooks on Bald Ridge and Hankey Mountain. The ACP route would follow along and then cross Dowell's Draft Trail and White Oak Draft Trail. We concur with comments submitted by Friends of Shenandoah Mountain on March 24, 2017, regarding scenic impacts, forest and stream impacts, and recreation impacts on the proposed SMNSA. We also share their concern that the pipeline could mar the proposal and threaten its viability to be designated by Congress.
- **Recreation Resources:** The DEIS does not evaluate impacts on some of Virginia's prime recreation resources:
 - **Sherando Lake Recreation Area:** This is the most popular developed recreation site in the GWNF. The ACP would permanently degrade the scenic entrance to the recreation area, as the pipeline corridor follows Mt. Torry Rd. The DEIS omits any mention of Sherando Lake Recreation Area.

- **Braley Pond Day Use Area:** The ACP route crosses the Braley Pond access road, permanently degrading the scenic beauty that attracts so many fishermen, campers, hikers, mountain bikers, and naturalists. It would also fragment the forest around Braley Pond, providing a pathway for invasives. The DEIS does not mention impacts on Braley Pond Day Use Area.
- **Appalachian Trail Crossing:** We are very concerned about the AT crossing which would involve drilling 4,639 feet through the Blue Ridge 800 feet below the crest of the mountain using Horizontal Directional Drilling (HDD) technology. If this should fail, Dominion will use a combination of open trench and Direct Pipe Installation (DPI) 200 feet below the summit. Both the HDD and DPI methods involve substantial risk of failure and environmental damage, given workspace limitations and the topographic and geologic characteristics of the proposed drilling locations. The DEIS has not provided sufficient information to discern whether this operation could be successful. The Forest Service has placed a condition that if a Special Use Permit is issued, the HDD must be constructed successfully first before construction on other national forest land can occur. We think this is a reasonable stipulation that should be observed. This crossing is the only alternative offered. We request that other alternatives to the AT crossing at Reids Gap be considered in the DEIS. Finally, we agree with Appalachian Trail Conservancy's comments on the DEIS.



View of western HDD entry point from Torry Ridge Trail in the Sherando Area. Photo by Malcolm Cameron



View of Piney Mountain from Three Ridges Overlook on AT. Photo by Mike Waterman



SSVC hikers on AT near ACP crossing. Photo by Lynn Cameron

- Biodiversity:** The Shenandoah Mountain area of the GWNF stands out as a “Biodiversity Hotspot” identified by The Nature Conservancy. The US Fish & Wildlife Service has identified 30 federally threatened or endangered species (TES), 2 designated critical habitats, 1 proposed species, 5 proposed critical habitats, and 6 species under review for federal listing that are known to occur along the ACP route. Many of the biological surveys for special species may not be completed until September 2017; therefore, survey results are not included in the DEIS and cannot inform the Forest Service decision on whether to issue a Special Use Permit. U.S. Fish & Wildlife Service would also need survey results to inform its recommendations for the project.
- Forest Fragmentation:** According to the Virginia Department of Forestry, "Loss of forested acres and the fragmentation of the remaining acres reduces the potential of the forest to provide the economic, social and ecological benefits that we depend on." The core forested areas along the ACP route are a diminishing resource. The route cuts through 21 miles of our national forests chopping up 20 large core forest areas where biodiversity is the highest and harm to the interior forest from fragmentation and "edge effect" would be the greatest. An analysis of the ACP route through our national forests revealed that 2451.5 acres of high value core forest habitat would be lost to fragmentation from construction of the pipeline and access roads. For the entire route 14,786 acres of interior forest would be lost. Fragmentation will negatively impact many special species, such as migratory birds, pollinators, amphibians, reptiles, and mammals that need interior forest habitat. Fragmentation by 19 miles of access roads in our national forests alone compounds the problem. The DEIS acknowledges that the ACP will cause fragmentation that will have "significant impacts" on habitats. FERC states in the DEIS that forest fragmentation caused by the pipeline cannot be mitigated, yet it maintains the ACP will not result in "significant" cumulative impacts.
- Water Resources:** The ACP route crosses 26 native brook trout streams in the GWNF alone. The DEIS does not fully examine the impacts on these streams. PATC-SSVC is particularly concerned about streams in the Hankey Mountain – Braley Pond area that are not addressed in the DEIS despite the USFS calling attention to them in advance of the DEIS being released: Braley Branch, Calfpasture River, Dowells Draft, and White Oak Draft. This is a serious omission of the DEIS. These are streams where we have been leading hikes for over 30 years.
- Lack of Need:** A major weakness of the DEIS is that it so readily accepts the necessity of the project, even though this has been challenged by an independent study by Synapse Energy, *Are the Atlantic Coast Pipeline and the Mountain Valley Pipeline Necessary?* (Sept. 2016), that concludes that both the ACP and MVP are unnecessary and that existing pipelines, with modifications, can meet future demand through 2030.
- Cumulative Impact of Multiple Pipelines.** With multiple pipelines across the AT and Blue Ridge Parkway being proposed and on the horizon, it seems reasonable to consider cumulative impacts of all these pipelines, but the DEIS

does not do this. FERC is the only agency that could examine cumulative impacts.

- **Insufficient Alternatives:** Another weakness is that the DEIS does not give serious consideration to an alternative that avoids the national forests or that co-locates this new utility with existing utility corridors. The DEIS conclusion that a 21-mile route through both forests is an acceptable option is not well supported. These two national forests are strongholds for biodiversity, native brook trout, clean water, recreational resources, and scenic beauty. The DEIS gives too much credence to mitigation and dismisses cumulative impacts related to these important values that our national forests provide.
- **High Hazard Areas:** The DEIS identified over 100 possible slope instability hazard locations along the proposed ACP route. Of these it identified 46 areas that met the criteria for further evaluation as geohazards. The Forest Service asked Dominion to provide detailed plans for 10 high-hazard areas that combined steep slopes, unstable soils, and problematic bedrock types. These conditions set the stage for severe erosion and harmful stream sedimentation, particularly during severe rain events. The most significant event was Hurricane Camille in 1969, but severe rainfall events that cause landslides happen every 11 years on the average. One of the “high hazard” areas is in the White Oak Draft area of Hankey Mountain which has >80% slope. See USFS letter, Oct. 24, 2016. Dominion has not provided enough detailed analysis and site-specific mitigation plans for the 10 areas to provide adequate information for the Forest Service to make a decision on whether to issue a Special Use Permit.

As one example of misinformation, the DEIS states that the pipeline will not be visible from the proposed Shenandoah Mountain National Scenic Area. The pipeline route would bisect this viewshed from Bald Ridge Trail in Ramseys Draft Wilderness. Photo by Lynn Cameron



The ACP is putting many fragile resources in the GWNF at risk. The timetable for the project does not allow ample time for the Forest Service to work its way through the evaluation and decision-making process following all their guidelines. Information, like Biological Surveys for sensitive species, detailed plans for areas at high risk for landslides and erosion, and a more detailed engineering plan for the HDD through the Blue Ridge must be available before a decision is made with adequate time for public review. The information in the DEIS is far too incomplete to proceed with a decision on the project. We request that FERC or the Forest Service do a Supplemental DEIS for

the Atlantic Coast Pipeline. There is far too much at stake for our national forests and the public interest to rush through this process.

Thank you for the opportunity to comment.

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