

The Recorder

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But wait, there's more ...

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Need more evidence Dominion's pipeline will cause irreparable damage? Consider these points from Rick Webb, of the Dominion Pipeline Monitoring Coalition:

- There are 10.82 miles of ACP corridor proposed for Highland County. Of these miles: Dominion expects to request an open-trench variance for 99.91 percent of them — the entire route in Highland except for road crossings. (The same is true for Bath County, by the way). Virginia's Erosion and Sediment Control Regulations includes minimum standards stipulating no more than 500 linear feet of trench may be open at one time. DEQ has routinely granted variances to this standard, usually for specified distances. Dominion is essentially asking for a complete waiver of the requirement.
- Long, open trenches on steep slopes have been a problem on other projects. For example, a 2014-15 Columbia Gas pipeline project on U.S. National Forest land in Giles County obtained open trench variances of 2,000 and 3,000 feet. This resulted in significant erosion and off-site sedimentation. A Forest Service inspector reported he had never before seen as much sediment moving off of a construction site. This was reported on the Dominion Pipeline Monitoring Coalition's website (pipelineupdate.org/national-forest-pipeline-inspection-reports/).
- The open-trench limitation is particularly important in our area where long-steep mountain sides with highly erodible soils run straight down to high-quality streams, including brook trout streams, and to karst valleys, where muddy water can contaminate and disrupt water supplies.
- Over half, 5.68 miles, qualify for what Dominion has called its Best-in-Class program, which includes everywhere slopes are 30 percent or steeper for distances of 100 feet or more. The DPMC has argued that standard Best Management Practices cannot be relied upon to protect downslope water resources given large-scale pipeline construction across the type of steep mountains that are present in the path of the proposed Atlantic Coast Pipeline. The Erosion and Sediment Control and Stormwater Management Plans provided to FERC and DEQ for the ACP are low-resolution and sketchy in the extreme.
- The Darren Coffey "staff" report provided to Highland supervisors suggests we should not worry because Dominion has "committed" using its Best in Class technology. But the program is

essentially a menu of engineering options, ranging from detailed structural options to detail-free options simply identified as “sitespecific engineering.”

- With one very small but alarming exception, the public has not been apprised of what Dominion actually proposes to do with respect to these Best in Class plans. So we don’t really know, for example, how Dominion proposes to hold steep slopes in place, or how it will handle the material it excavates.
- It’s not likely the DEQ or Federal Energy Regulatory Commission has had access to this essential level of detail either. Yet the Coffey report suggests we can rely on the environmental review conducted by FERC and DEQ, and thus county officials should find the proposed ACP is consistent with the county’s comprehensive plan.
- The one small area where, thanks to the Forest Service, we have seen Best in Class plans, is a tenth of a mile section of pipeline in the Townsend Draft area. In this steep location, which drains to a tributary of a brook trout stream, the plans call for dynamiting through the stream bed and backfilling. The 60 percent slope will be held in place with heavy steel-wire mesh (like chain-link fence) fastened flat on the ground with 8- to 15-foot steel rods in the bedrock. The slope and conditions at this site are replicated at multiple other locations in Highland and the rest of the route in western Virginia. Yet the plans available for public review provide none of this detail.
- The Coffey report reads like one of Dominion’s public relations brochures. We’re not sure what this “land-use consultant” was asked to do by the county. One thing it did not do was provide sufficient information to allow the county to endorse the project. And it would have been impossible to provide an informed recommendation, given the lack of information Dominion has made available to the public, the agencies, or anyone else.