



**Highlanders for Responsible Development**  
P.O. Box 685 Monterey, VA 24465 [www.protecthighland.org](http://www.protecthighland.org)

January 22, 2015

H. Thomas Speaks, Jr., Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019-3050

Re: Comments on Atlantic Coast Pipeline application for Special Use Authorization

Dear Mr. Speaks:

Highlanders for Responsible Development submits the following comments on the Special Use Authorization application submitted to the George Washington National Forest (GWNF) by Dominion Transmission, Inc. (DTI) for it to survey a route for the proposed Atlantic Coast Pipeline (ACP). Our organization is a citizens group that promotes stewardship of the unspoiled landscape, natural resources and exceptional quality of life of Highland County, VA. Highland County includes part of the GWNF that would be bisected by the proposed ACP route.

1. The application to survey for the ACP is inextricably linked to a subsequent application that DTI would make to the GWNF to build the pipeline should it receive permission to do so from the Federal Energy Regulatory Commission (FERC). The various factors that the GWNF would weigh if it were considering an application to build the ACP must also be incorporated into its consideration of the application to survey. This is true because the GWNF has only been presented with one option of a route through the Forest.
2. DTI's request to survey is seriously deficient in providing information requested by the GWNF on Standard Form 299. It offers misleading or incorrect responses to important questions. For instance, in answer to Question 13a, asking that the applicant "describe other reasonable alternative routes and modes considered," DTI states: "No alternative routes have been identified for these surveys." This response is contrary to the company's submission in December to FERC:

*"Atlantic and DTI identified several route alternatives and variations along the proposed pipeline routes to avoid or minimize crossings of sensitive environmental features or address engineering or other concerns. These route alternatives and variations were incorporated into the proposed pipeline routes as described in detail below." (FERC Docket No. PF15-6-000, Atlantic Coast Pipeline Resource Report 10: Alternatives, page 10-1)*

Further, the application's response to the next question, 13b – “Why were these alternatives not selected?” – states: “Not applicable.” The instructions for Standard Form 299 clearly direct the applicant to provide “information on alternate routes and modes in as much detail as possible, discussing why certain routes or modes were rejected and why it is necessary to cross Federal lands.” The instructions conclude by stating: “If all information is not provided, the application may be rejected.” DTI's submission to survey for the ACP does not comply with the stated requirements of the application.

3. The proposed route of the ACP through the GWNF would violate the letter and spirit of the Revised Forest Plan that was released November 18. That Plan states that Special Use Authorizations should be limited “to needs that cannot be reasonably met on non-NFS lands or that enhance programs and activities” and that such authorizations should “require joint use on land when feasible.” (GW Revised Forest Plan, FW-239, page 4-23) The DTI/ACP application, by failing to address alternatives to the route it has submitted, does not comply with the Forest Plan. This failure to address alternatives is clearly at odds with the spirit of the Forest Plan given that the construction of a pipeline the magnitude of the proposed ACP would seriously challenge the ecological and geological integrity of the GWNF.
4. The ACP survey request should be considered in conjunction with other proposed pipeline projects that would transverse the George Washington, Monongahela (MON) and Jefferson (JEFF) National Forests so that the potential impact on the National Forest system can be properly assessed. The ACP would bisect both the GWNF and the MON. The Mountain Valley Pipeline would bisect the JEFF. The proposed Appalachian Connector Pipeline, though the proposed route has not yet been announced, would also bisect the JEFF based on preliminary maps that have been made available. The overall integrity of the National Forest system is too vital to the nation to consider such monumental projects in a patchwork quilt fashion.
5. For the aforementioned reasons, Highlanders for Responsible Development urges that the George Washington National Forest reject at this time Dominion Transmission Inc,'s application to survey GWNF lands for the proposed Atlantic Coast Pipeline. More information and rationale to support the application is needed before a prudent judgment can or should be made.

Sincerely,

A handwritten signature in black ink that reads "Lewis Freeman". The signature is written in a cursive, flowing style.

Lewis Freeman  
President, Highlanders for Responsible Development