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January 23, 2015

*Submitted via email*

H. Thomas Speaks, Jr., Forest Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, Virginia 24019

Re: Comments on the Application for a Special Use Authorization for Survey Activities for the Proposed Atlantic Coast Pipeline Corridor through the George Washington National Forest

Dear Supervisor Speaks:

The Forest Service is currently evaluating a special use application from Atlantic Coast Pipeline, LLC to conduct field routing, environmental, cultural resources, and civil surveys within the George Washington National Forest (GWNF). Waterkeepers Chesapeake respectfully submits these comments in opposition to this application for survey activities with the GWNF.

Waterkeepers Chesapeake is a regional coalition of eighteen independent Waterkeeper programs located in Virginia, West Virginia, Maryland, Pennsylvania, and the District of Columbia. These Waterkeepers are local advocates for clean and safe water for the 17 million people who live in the Chesapeake and Coastal Bays regions. The proposed Atlantic Coast Pipeline would adversely impact the James River, Shenandoah River and Potomac River watersheds. The proposed Atlantic Coast Pipeline would facilitate increased development of hydraulically fracked natural gas throughout the eastern United States. The proposed pipeline will cut through the heart of the George Washington National Forest and would have a devastating impact on some of the wildest habitat remaining in the Appalachians.

The Forest is the largest federal landholding in the Chesapeake Bay watershed and is a direct source of local drinking water to more than 329,000 people living in and around the Shenandoah Valley, and it lies in the watersheds of the James, Shenandoah, and Potomac Rivers—which ultimately provide water to over 4.5 million people downstream in cities such as Washington, D.C. and Richmond, VA. Local and regional governments and businesses have expressed widespread concern about opening up the Forest to any activities that would negatively affect local economies, particularly adjacent farms and the local recreation and tourism economy, which are the economic engines of the area.

Anacostia Riverkeeper  
Assateague Coastkeeper  
Baltimore Harbor Waterkeeper  
Chester Riverkeeper  
Choptank Riverkeeper  
Gunpowder Riverkeeper

Lower James Riverkeeper  
Lower Susquehanna Riverkeeper  
Miles-Wye Riverkeeper  
Potomac Riverkeeper  
Sassafras Riverkeeper  
Severn Riverkeeper

Shenandoah Riverkeeper  
South Riverkeeper  
Upper James Riverkeeper  
Upper Potomac Riverkeeper  
Virginia Eastern Shorekeeper  
West Rhode Riverkeeper



Waterkeepers Chesapeake requests that you deny the application for the special use permit to allow survey across the GWNF. As the Forest Service considers the application, it should note that it is deficient in many critical areas:

1. The application lacks a full assessment of the environmental impacts of the cumulative impacts in the reasonably foreseeable future of the survey, including those related to the construction and operation of the Atlantic Coast Pipeline. Cumulative impacts must be included in the analysis for the issuance of the temporary special use permit.
2. The proposed survey route passes through the most remote parts of the Forest. Due to the configuration of the proposed survey route, upon completion of the survey, Atlantic Coast Pipeline, LLC and the Forest Service would be predisposed to routing the pipeline along this route. A full range of alternatives should be considered for the survey routes, including (1) not constructing the pipeline at all (preferred option), (2) identifying and surveying routes entirely co-located along existing road and utility corridors rather than through remote parts of the Forest, and (3) locating the pipeline away from approaches to farmlands, trout streams, and other important privately-owned and public resources.
3. Proposed pipeline survey routes across all public lands should be considered together. Originally the GWNF was to have been considered the lead in directing the required procedures for all public lands in the proposed route including the Monongehela NF, the Appalachian National Scenic Trial and the Blue Ridge Parkway. This proposal for a temporary special use permit across the GWNF is now decoupled from the other three in process and in time. The public needs to assess the cumulative effects across the entire expanse of public lands and can only do so if they are analyzed concurrently.
4. Proposed survey routes of the two other proposed pipelines across the George Washington/Jefferson National Forest should be included in the analysis and considered together. The Atlantic Coast Pipeline is one of three pipelines that are currently proposed to cross the George Washington and Jefferson National Forests. Therefore, the request for the survey should be denied until such time as all three pipelines can be considered for survey *at the same time* and the cumulative effects of each and all (in the reasonably foreseeable future) analyzed.
5. The Forest Service should not rely entirely on the work of private consultants for activities that impact public lands. The Forest Service should ensure that surveyors are adequately trained and follow the highest professional standards, and that surveys are thorough and complete. There must be adequate oversight will there to ensure that surveys are thorough and that survey results are presented in an unbiased manner.

6. The pipeline could impact soils with landslide potential, erosion hazard, karst topography, and other inherent risks. Therefore, soil surveys should be very thorough and alternate routes considered.
7. Surveys should consider the safety concerns associated with accidents, rupture of pipes, and leakage, especially around sensitive areas.
8. The Forest Service should ensure that surveys for biological resources are conducted over an adequate length of time, are conducted at times of the year and times of the day when rare plants, wildlife and biological communities are most likely to be detected.

Waterkeepers Chesapeake requests that the Forest Service deny the special use permit application for a survey for the Atlantic Coast Pipeline based on the critical deficiencies as outlined above.

Sincerely,

Elizabeth Nicholas  
Executive Director, Waterkeepers Chesapeake

Pat Calvert, Upper James Riverkeeper

Jeff Kelble, President, Potomac Riverkeeper, Inc &  
Shenandoah Riverkeeper

Brent Walls, Upper Potomac Riverkeeper