



January 8, 2015

USDA Forest Service
Atlantic Coast Pipeline Survey Comments
5162 Valleypointe Parkway
Roanoke, Virginia 24019

Re. Feasibility Surveys on the GWNF for the Atlantic Coast Pipeline.

Dear Sirs,

We are writing to submit comments on the Atlantic Coast Pipeline project (ACP) on behalf of the membership of the Old Dominion Appalachian Trail Club (ODATC). The ODATC is one of 31 Appalachian Trail Conservancy (ATC) trail stewardship clubs managing the AT in cooperation with the National Park Service (NPS) and US Forest Service (USFS). Our 19.1 mile section of the AT extends from I-64 at Afton Mountain, Virginia to Reid's Gap (State Route 684), Virginia and is bordered to the east by Nelson County and to the west by Augusta County. Maps of the proposed route for the Atlantic Coast Pipeline indicate the project will cross the AT on the north end of the ODATC AT trail section. As stewards of our section of AT for the past 45 years, ODATC has considerable firsthand knowledge of the Blue Ridge Mountain area proposed for the ACP crossing.

With the above noted, ODATC respectfully provides the following comments:

- 1) As the AT clubs in the area of the ACP project have considerable knowledge of the public land resources in the vicinity of the AT, ODATC recommends that Dominion and its consultants coordinate with ODATC, other AT clubs and the ATC, along with the NPS and USFS, on the design of their surveys for cultural and natural resources in any portions of public lands that include or adjoin the AT;
- 2) ODATC notes that there are two priority natural resource areas on USDA public lands along its section of the AT, these are:
 - a. The Dripping Rock to Cedar Cliffs Natural Resource Priority Zone; and
 - b. The Hickory Spring Natural Resource Priority Zone;
- 3) ODATC notes that large disturbed areas, particularly large linear areas of land disturbance such as the ACP project, are documented pathways for the establishment of invasive species. Invasive species is a critical issue in the Blue Ridge Mountain ecosystem due to the area's unique

biodiversity. Accordingly, ODATC requests that Dominion's survey plans include the identification of natural communities that are especially susceptible to colonization by invasive species and that the survey reports include an environmental risk analysis for invasive species colonization followed by a plan that details the steps that will be taken to minimize and manage invasive species on public lands containing the ACP project on a long term basis. ODATC requests that the Dominion invasive species survey, analysis and reporting plan be submitted to the USDA for approval in consultation with the ATC prior to Dominion being authorized to survey and sample on public lands for the ACP project;

- 4) ODATC notes that hikers, other public land user groups, and natural communities rely on the intermittent and perennial streams on public lands to supply them with water. The excavation of the bedding trench for the ACP and the fill of the trench with unconsolidated bedding material create a significant risk for altering the hydrology of watersheds through a "French Drain" effect. As such, ODATC requests that Dominion's surveys make account of all surface water resources on the public lands where the ACP project may be located. As these accounts must include the numerous seasonal seeps and springs that occur, the timing of the surveys for these resources is critical. ODATC requests that the Dominion water resources survey plan be submitted to the USDA for approval in consultation with the ATC prior to Dominion being authorized to survey and sample on public lands for the ACP project;
- 5) ODATC notes that chemicals are used to promote the transport of natural gas through pipelines as well as to clean and maintain pipelines (Verleun 2003, *"Cleaning of Oil & Gas Pipelines On-Line & Off-Line"*, Pigging Products and Services Association; 2011, *"Chemical Injection Methods Pros & Cons"* Kilgore College 4.15.2011, Integrity Measurement & Control, Inc). The release of chemicals into the fractured bedrock geology and water resources of the Blue Ridge Mountains could be devastating to the natural communities and severely impede the recreational use of the AT and its surrounding public lands. Sub-surface chemical releases in these environments are virtually impossible to remediate due to the numerous contaminant migration pathways through the fractured geology. Accordingly, ODATC requests that the Dominion water resources sampling, analysis and reporting plan for both baseline and long term sampling be submitted to the USDA for approval in consultation with the ATC prior to Dominion being authorized to survey and sample on public lands for the ACP project;
- 6) ODATC notes that the potential impact radius from a rupture of the highly pressurized ACP pipeline may be as large as 1100 feet in all directions – resulting in an impact area well over one-quarter mile in width (Adams 2014, *"Concerns about pipeline strong ..."*, The Recorder). A quarter mile or more of AT restoration, as well as the restoration of the affected forested buffer area would be an insurmountable task for ODATC and its all-volunteer membership. Accordingly, ODATC requests that Dominion's proposal to cross the AT, or within one-quarter mile of the AT, contain a Corrective Action Plan (CAP) approved by the ATC for the complete restoration of the affected area of the AT and its surrounding buffer area in the event of damage by the ACP project. The CAP should be based on survey data which thoroughly documents the species composition, density and diversity of the flora along the proposed ACP route and at least

one-quarter mile on either side of the proposed route. The CAP should also contain provisions for monitoring the success of any required restoration and contingency plans for further remedial action if the success criteria are not met. ODATC requests that the Dominion flora survey, analysis and reporting plan be submitted to the USDA for approval in consultation with the ATC prior to Dominion being authorized to survey and sample on public lands for the ACP project; and

- 7) The biological diversity of the intermittent and perennial stream systems on public lands must not be overlooked. The unique biodiversity in and around the water resources of the Blue Ridge Mountains are national heritage resources and every effort should be made to protect them from further degradation. ODATC requests that the Dominion plan for surveying, analyzing and reporting on the flora and fauna on public lands be submitted to the USDA for approval in consultation with the ATC prior to Dominion being authorized to survey and sample on public lands for the ACP project.

In summary, ODATC does not agree that the currently proposed route for the ACP in the vicinity of Elk Mountain is the Least Environmentally Damaging Practicable Alternative and that there are other more practicable and less environmentally damaging routes for the ACP to cross the AT and its associated public lands. As such, Dominion's surveys should either be postponed until a suite of alternative routes is identified for the ACP, or the surveys should characterize the natural and cultural resources present on all public lands in the corridor running from I-64 at Afton Mountain south to Route 56 along the Tye River and not just those in the narrow corridor of Dominion's currently preferred alternative. As noted above the timing and thoroughness of Dominion's surveys will be critical in establishing baseline conditions from which to identify the LEDPA for the routing of the ACP as well as creating a reference for long term management of public lands affected by the project. Accordingly, the USDA should authorize Dominion to conduct surveys on public lands under its jurisdiction only after Dominion has demonstrated the need for specific surveys to complement a more extensive coordination effort with government agencies and citizen groups on all potential routes for the ACP across public lands.

In closing, ODATC emphasizes that the ACP project has the potential to profoundly alter the quality of the public lands that support many user communities including the iconic Appalachian Trail and its user community. As such the project should be evaluated using the highest level of scientific and regulatory investigation. The ACP project's impacts will last for generations if not in perpetuity and as such every effort should be made to ensure that the decisions made about the project's location, scope and operation are based on a complete evaluation of the issues and the application of not just the letter of the law but the spirit of the law as well. On behalf of the ODATC - AT community, thank you for your consideration of our comments on the ACP project.

Sincerely;

Theresa Duffey – ODATC President

David Grimes – ODATC Vice President

CC:

Ms. Laura Belleville, ATC Conservation Director

Mr. Andrew Downs, ATC Central and Southwest Virginia Regional Director

Ms. Trudy Phillips, ATC Virginia Regional Partnership Committee Chair

Mr. Mark Wenger, Tidewater Appalachian Trail Club

Mr. Richard Hostelley, Potomac Appalachian Trail Club

Mr. H. Thomas Speaks, Jr., George Washington and Jefferson National Forest

Ms. Wendy Janssen, Superintendent, Appalachian Trail National Park Office

Mr. Jonathan B. Jarvis, Director, US National Park Service

Governor Terry McAuliffe

U.S. Senator Mark Warner

U.S. Senator Tim Kaine

U.S. Representative Bob Goodlatte – 6th Congressional District

U.S. Representative Robert Hurt – 5th Congressional District

State Senator R. Creigh Deeds – District 25

State Senator Emmett W. Hanger Jr. – District 24

State Delegate Richard P. Bell – District 20

Mr. Thomas F. Farrell II, Dominion

Ms. Sarah A Francisco, Southern Environmental Law Center

Mr. Stephen A. Carter, Nelson County

Mr. Patrick J. Coffield, Augusta County