



June 1, 2016

Kimberly Bose,  
Secretary, Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Dear Secretary Bose:

We are writing on behalf of Friends of Shenandoah Mountain to express opposition to Dominion's proposed alternate Atlantic Coast Pipeline route through the Deerfield Valley, across Braley Pond Rd., and over Hankey Mountain: **FERC Docket # CP15-554**

Friends of Shenandoah Mountain is a coalition of organizations, businesses, faith groups, and individuals working toward permanent protection of the central Shenandoah Mountain area in the George Washington National Forest (GWNF). Our goal is Congressional designation of a 90,000-acre tract of Shenandoah Mountain as a National Scenic Area with embedded Wilderness (see [www.friendsofshenandoahmountain.org](http://www.friendsofshenandoahmountain.org)). Our proposal is the result of a 14-year collaborative effort that has resulted in broad support by over 250 organizations and businesses. The Shenandoah Mountain area has been identified by citizen groups for permanent protection because it is so special. Stretching 72 miles through the heart of the GWNF, Shenandoah Mountain has the largest concentration of roadless areas on national forest land east of the Mississippi. This mostly unfragmented forest, which is exceptionally rich in biodiversity, is a local, regional, and national treasure.

From our perspective Dominion's alternate route that circumvents Shenandoah Mountain is no better than the previous route across Shenandoah Mountain. (See Map of Proposed Pipeline Route over SM) One of our major concerns is that a new utility corridor of this magnitude could be sited alongside the proposed Shenandoah Mountain National Scenic Area, which the 2014 GWNF Plan recommends for Congressional designation. According to the plan,

"the purposes of the Shenandoah Mountain Scenic Area are to:

- Ensure appropriate protection and preservation of the area's scenic quality, water quality, natural characteristics, and water resources;
- Protect and manage vegetation to provide wildlife and fish habitat consistent with the previously described purpose;
- Protect habitat for the Cow Knob salamander;
- Provide areas that may develop characteristics of old-growth forests; and
- Provide a variety of recreation opportunities that are consistent with the preceding purposes.

The Shenandoah Mountain National Scenic Area is well known for its scenic overlooks from the crest of Shenandoah Mountain, particularly Reddish Knob. Some of the best views on

the North River Ranger District are possible from the crest of Shenandoah Mountain. Shenandoah Mountain has exceptional beauty and outstanding opportunities for solitude... The area provides clean drinking water; clean air; and erosion and flood control for Shenandoah Valley residents. It is a large, substantially unfragmented forest teeming with wildlife and home to neo-tropical songbirds, black bear, native trout, and a number of rare species including the Cow Knob salamander. There are abundant recreational opportunities, including camping, hiking, mountain biking, horseback riding, fishing, hunting, rockclimbing, and birding.”

Clearly, siting the ACP alongside the recommended Scenic Area is an inappropriate place for a new utility corridor. The GWNF Plan discourages new utility corridors: “When feasible, expansion of existing corridors and sites is preferable to designating new sites.” If FERC issues a permit for the pipeline along this route, the forest plan would need to be amended. If the GWNF authorizes a new Utility Corridor (GWNF Management Area 5C) across Rt. 250, Braley Pond access road, and Hankey Mountain, then future utilities will be directed there, compounding the long term impact.

The pipeline crossing near the intersection of Rt. 250 and Rt. 715 (Braley Pond Rd) is a concern primarily because Rt. 250 is a major gateway to scenic and recreational resources on Shenandoah Mountain. According to the GWNF Plan, Rt. 250 is a “Scenic Corridor” and will be managed to protect scenic values: “High quality scenery is provided in sensitive recreational and travelway settings.... The area visible during leaf-off for up to one-half mile from either side of the road typically defines the corridor... These areas are unsuitable for designation of new utility corridors, utility rights-of-way, or communication sites... The emphasis is on providing high quality scenery in sensitive recreational and travelway settings.” The ACP route does not comply with the standards set forth in the plan and should not be approved.

With regard to scenic integrity, the ACP route would be clearly visible from several popular trails in the proposed Shenandoah Mountain National Scenic Area, including the Wild Oak National Recreation Trail on Hankey Mountain and Bald Ridge Trail in Ramseys Draft Wilderness. It would also degrade the scenic quality of the Rt. 250 gateway to the following recreational resources:

- **Braley Pond Recreation Area** (fishing, picnicking, camping, biking, hiking, hunting, horseback riding, and nature study are popular in this area)
- **Dowells Draft** (popular for grouse hunting, hiking, mountain biking, horseback riding)
- **Hankey Mountain** (hiking, hunting, mountain biking, horseback riding, nature study)
- **Staunton Dam and Elkhorn Lake** (fishing, photography, canoeing, birding, hiking, mountain biking, horseback riding)
- **Upper North River** (hiking, horseback riding, camping, fishing, hunting, mountain biking, nature study)
- **Todd Lake Campground** (camping, swimming, picnicking, hiking, mountain biking)
- **North River Campground** (camping, fishing, hiking, mountain biking, horseback riding, hunting)
- **Ramseys Draft Wilderness**, one of Virginia’s most popular Wilderness areas (hiking, backpacking, fishing, hunting, camping, birding)
- **Confederate Breastworks** (hiking, learning history, viewing outstanding scenery, birding, hunting, mountain biking)

In addition to recreational and visual impacts, the new route would cut a broad swath through the GWNF, providing a pathway for non-native invasive species to take hold and spread into the proposed National Scenic Area.

We are concerned that degradation of visual qualities, recreational opportunities, and wildlife habitat could ultimately disqualify the proposed National Scenic Area from Congressional designation.

Given these concerns, Friends of Shenandoah Mountain is opposed to the ACP alternative route (GWNF-6) and the previously proposed mainline route through one of the finest and least fragmented natural areas remaining in the Eastern United States. We ask that FERC deny a permit to build the ACP in this location.

Thank you the opportunity to comment on the alternate ACP route.

Sincerely,

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Attachment:  
- Map of Proposed Pipeline Route over SM