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## 2015-01-07 Top News

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## Feds told pipeline route options are unfeasible

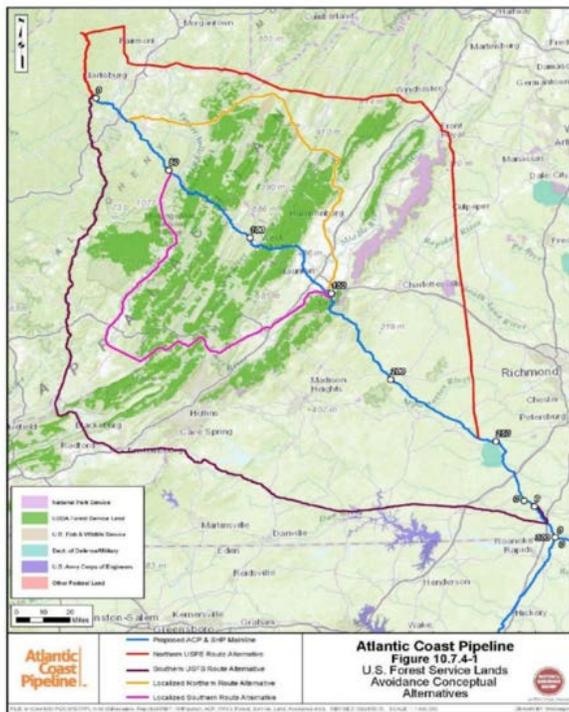
BY JOHN BRUCE • STAFF WRITER

MONTEREY — Alternative pipeline routes suggested by the U.S. Forest Service are not viable, Dominion said last month, in response to requests by federal agencies.

A company spokesman dismissed assertions the Dec. 16 filing responded to the Federal Energy Regulatory Commission's Dec. 4 directive relating to the proposed Atlantic Coast Pipeline and forest service management plans.

Resource Report 10 – Excerpts from Full Report

Alternatives



**Routes avoiding forest service land would be unfeasible or would increase environmental impact, Dominion said. (Click [here](#) for full-size image.)**

provided additional environmental information on several previously-filed route alternatives through forest service lands. This information was provided at the request of the forest service to support the agency's review of the proposed and alternative routes for the Atlantic Coast Pipeline," he said.

The Allegheny Blue Ridge Alliance's Dec. 22 newsletter and at least one citizen described a Dominion filing as a response to the agency's Dec. 4 request for alternative routes to avoid protected salamander habitats, including Shenandoah Mountain in Highland.

Thomas Epling of Cass, W. Va., told FERC he read on the ABRA website that a filing was considered privileged and therefore not available to the public. "I am having difficulty understanding why a filing with FERC should be considered privileged and therefore not available to the public," Epling said. "It seems to me that Dominion Energy and FERC should provide the public with all information about their activities when their project involves the seizure and use of public and private lands on which they intend to do their bidding. Having 'privileged' communication with FERC is not in the public's best interest."

The filing was not made in response the early December forest service concerns, nor was it wholly privileged, according to Dominion.

"This filing was not our response to FERC's Dec. 4 environmental information request," Dominion spokesman Aaron Ruby told The Recorder. "We are in the process of preparing that response now, which will be submitted to FERC in the coming weeks."

The Dec. 16 filing provided an updated version of the document that outlines and discusses details about alternative routes requested by the forest service last summer and fall, Ruby said. "The revised report

“To my knowledge, the only portion of this filing that was submitted as privileged was information showing the location of protected species or their habitats, namely the Cheat Mountain and Cow Knob salamanders. It is standard agency policy and practice to protect the location of threatened, endangered or otherwise protected species,” Ruby said.

An introductory letter to the 110-page filing states that Atlantic, the limited liability company chiefly held by Dominion, has “adopted many variations to the preferred route, along with other recommended process tools, in the months leading up to the filing of the applications. We have incorporated management plans designed to protect sensitive resources throughout the projects’ route, including the forest service lands, and we have developed best in class plans for the protection of steep slopes and to minimize emissions at the compressor stations.

“Subject to Atlantic being successful at obtaining additional requested consultation with forest service leadership, Atlantic plans to provide supplemental information relating to these measures, and to potential additional route adjustments on forest service lands that are designed to address specific resource concerns.

“Atlantic will also continue to communicate with the forest service regarding survey and routing details and our conformity determinations, in support of Atlantic’s ... application for transportation and utility systems and facilities on federal lands. We recognize that Atlantic needs to provide appropriate technical information to support the forest service’s review process, and to obtain approval to cross forest service lands.

“To that end, Atlantic hereby supplements eight previously-filed route alternatives on forest service lands to more clearly demonstrate the relative environmental impacts of those routes ... This report also contains more thorough environmental data regarding two of the filed route alternatives that would reduce the impact of the projects on forest service lands to a practical minimum,” Dominion said.

Dominion said the alternatives include:

- Columbia Gas Pipeline route colocation — “For most of the route across West Virginia and parts of west-central Virginia, the (ACP) mainline could not be constructed adjacent to the existing Columbia pipelines due to a lack of sufficient space to safely construct a new large diameter pipeline,” Dominion said.
- Single pipeline option — “Expansion of the Columbia system would not be preferable to the proposed route. For all these reasons, it would not be possible for ACP to rely on an expansion of Columbia’s existing system within the timeframe required to meet the purpose and need of the ACP. Additionally, relying on a third party to operate and maintain a portion of its system would require negotiation of terms and conditions for joint operations,” Dominion said.
- Mountain Valley Pipeline consolidation — “A single pipeline option along the MVP route would encounter the same limiting technological and hydraulic factors as the single pipeline option along the AP-1 mainline route. Therefore, a single pipeline option along the MVP route is also not considered a viable or feasible alternative to the ACP,” Dominion said.
- Appalachian Connector Pipeline consolidation — “A conceptual alternative route along a similar path as the Appalachian Connector Pipeline provides no advantage over the ACP and is not a viable or feasible alternative route.”
- Existing electric transmission lines — “Whereas electric transmission lines can be sited to span steep or difficult topographic features, such as ravines, valleys, and side slopes, pipeline construction in rugged areas must typically cross ridges and hills perpendicular to the slope (i.e., along the natural fall of the slope). For this reason, electric transmission lines can often be built in topographies where pipeline construction would be difficult or impractical,” Dominion said.
- Highways — “Topography along interstate and federal highways, particularly in areas with rugged terrain, can be another limiting factor. Interstate highways in mountainous areas are often built around and on the sides of mountains (i.e., in side slope terrain). As noted above, pipeline construction in rugged areas must typically cross ridges and hills perpendicular to the slope (i.e., along the natural fall of the slope). For this reason, construction adjacent to existing interstate or highway in mountainous areas is not typically feasible.”
- Avoiding forest service land — “The Northern USFS alternative route ... would require the crossing of about 90 miles of steep side-slope that the existing power lines have spanned. Building a pipeline along this route is infeasible due to the

amount of exposed workspace needed to create a usable and safe construction surface, as well as the corresponding amount of disrupted soils to be replaced, stabilized, and contoured to pre-existing slope conditions. This amount of excessive clearing and soil disturbance along the existing right of way would not only increase the amount of environmental impact due to increased tree clearing and soil movement, but would also substantially increase the risk of slope failure in these side slope locations,” Dominion said.

“The Southern USFS route alternative would not be able to interconnect with Transco at the required site and would not meet the customer requirements under ACP’s obligation ... This alternate route would increase the length of the ACP by approximately 75 miles and would increase the area of environmental impact for the ACP by adding 1,136 acres of temporary construction right of way and 682 acres of permanent easement.”

- Reduce crossing of forest service land — A localized northern alternative would cross the West Virginia line at Rockingham and avoid all but 1.3 miles of George Washington National Forest at the Appalachian Trail, but “weaves through a number of locations where safe pipeline construction is not possible due to extensive side slopes and construction space constraints.”

Similarly, Dominion said of a southern route passing through Alleghany County, “the constraints in these areas would not permit safe pipeline construction or stable restoration of an alternative route to avoid USFS lands.”

- Railroads — “Railroads near USFS lands in West Virginia and Virginia mostly are oriented primarily northeast to southwest, while the proposed ACP is oriented primarily northwest to the southeast. Therefore, Atlantic determined that there are no feasible alternatives adjacent to railroads in these areas,” Dominion said.

In addition to revisiting other route alternatives, the report ends by citing a presidential declaration and state energy policy plan telling utilities to replace one fossil fuel, coal, with another, natural gas, to generate electricity.