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Unfriendly territory

At first glance, it appears someone at Dominion merely grabbed a marker and drew a new line for the Atlantic Coast Pipeline, with little investigation.

The realigned route, as reported this week, runs through southwestern Highland County and northern Bath County, and was proposed as a means to honor the U.S. Forest Service's request to avoid the protected habitats and species on Cheat and Shenandoah mountains. By routing around those mountains altogether, that much was accomplished. As we've noted before, Dominion should not have attempted to route through those areas in the first place.

But was there any hard look at the areas where the new route would go? Yes, there was.

Dominion did, in fact, look at this area for the route before — and rejected it.

This new alignment poses just as many problems as the first one. The karst topography, the steep mountainsides, the sinkholes, the rivers — all make for unfriendly terrain. And that doesn't begin to account for the historic properties it would cross, like Seneca State Park, West Virginia's oldest in its park system. Or Valley Home Farm, which was recently designated a "Virginia Century Farm" under the Virginia Department of Agriculture and Consumer Services, Office of Farmland Preservation program. Or Fort Lewis Lodge — a historic property lovingly preserved for more than 200 years since it was founded by Col. Charles Lewis in 1750. No doubt there are other significant public and private properties affected by this new route.

Let's look at what Dominion said about this route before.

Last September, it sent a report to the Federal Energy Regulatory Commission explaining why it rejected its more southerly route alternatives.

About the disadvantages and challenges associate with those routes, the company said, "First and foremost is the difficulty of the terrain crossed by these routes, particularly in the areas west, south, and east of Snowshoe/Thorny Flats ... Of particular significance along the southern routes is the jumbled arrangement of ridge tops in the area surrounding Thorny Flats. The mountain ridges in this area generally run in a north/south

direction (the AP-1 mainline trends northwest to southeast) or have no primary orientation and consist of a jumbled mass of peaks and ridge tops.”

Further, Dominion explained, “Crossing this terrain with a 42-inch-diameter pipeline while attempting to minimize or avoid traversing steep side slopes would result in multiple, steeply graded, up-and-down approaches to ridge tops that would in many instances require heavy equipment winching on both sides of the ridge from single or multiple staging areas on the ridge top ... Because of the narrowness and remoteness of the ridge tops, most of these areas would require the construction of a graded winching platform on top of the ridge, and depending on the slope, could require construction of an access road along the ridge to access the winch platform for delivery of construction equipment and pipe sections. Access to the remote areas crossed by the three southern alternative routes would be difficult due to the lack of existing nearby roads ... which could require the construction of new roads into these areas. Slope restoration and stabilization would also be difficult to achieve in many of the steep areas crossed.”

Even as early as last year, in its 2015 filing to the Security and Exchange Commission, the company said, “The large diameter of the pipeline and difficult terrain of certain portions of the proposed pipeline route aggravate the typical construction risks with which DTI is familiar. In-service delays could lead to cost overruns and potential customer termination rights. Dominion owns a 45 percent membership interest in Atlantic Coast Pipeline. Dominion’s lack of a controlling interest means that it has limited influence over this business. If another member were unable or otherwise failed to perform its obligations to provide capital and credit support for this business, it could have an adverse effect on Dominion’s financial results.”

Just this week, Dominion told FERC the new route crosses:

- 39.8 miles of soils with near surface hard bedrock
- 22.1 miles of soils with near surface soft bedrock
- 74.5 miles of soils that are highly erodible by water, and
- 76.4 miles of soils with revegetation concerns.

“Approximately 24.3 miles of the route crosses slopes greater than 30 percent and approximately 8.6 miles of the route crosses side slopes greater than 30 percent. A total of approximately 55.5 miles of the route crosses areas characterized by the USGS as having high incidence for landslides,” Dominion said. “Data from the USGS indicates that the GWNF 6 route crosses 26.8 miles of karst topography,” including places in Highland and Bath counties.

As Dominion Pipeline Monitoring Coalition’s Rick Webb points out, the new route is roughly 95 miles long, which means, as he calculates:

- 65 percent will involve cutting into or blasting through bedrock,
- 78 percent of the route is highly erodible,
- 80 percent has revegetation concerns,
- 9 percent crosses steep side slopes,
- 58 percent has high incidence for landslides, and
- 28 percent is on karst.

“What are they thinking?” Webb asked.

We’d love to know.

Does the company now believe it can tackle that topography? Maybe Dominion felt it would be more expensive to engineer this route, but is willing now to incur that expense in order to appease the USFS.

More importantly, Dominion seems under pressure to keep the permitting process moving apace, and stick to its construction timeline. If it can satisfy the forest service, it hopes to reignite the process to secure an Environmental Impact Statement to stay on schedule.

Over the last two years, nearly every aspect of this pipeline proposal has seemed to unfold in ways that lack common sense. Notably, both the preferred primary route and all the alternatives were chosen long before any on-the-ground study took place to see what kinds of property would be affected. Dominion picked the route first, then asked questions later. Bad business. And it’s doing that again with the new route.

We understand more detail can only be had from actual surveying, but there was plenty available publicly to understand the habitats on Cheat and Shenandoah well before deciding that was the best way to go. And obviously, Dominion saw the heavy concentrations of karst topography and rough mountainsides in the area it now proposed to cross in the realignment.

Heck, there’s a 470-page book by the Butler Cave Conservation Society that contains plenty of information on the Burnsville Cove area. That big hole is pretty close to this new route line; Dominion might want to read up. Take a trip to the library to find a copy of “The Caves of Burnsville Cove: Fifty Years of Exploration and Science.”

In crossing this area, erosion and sediment control will need to be a high priority, and we already know Virginia seems poised to do little to demand site-specific plans, much less inspect the project during construction. If 58 percent of this route has a “high incidence” for landslides, and 78 percent is “highly erodible,” it makes no sense to attempt to route a 42-inch gas pipeline through that area.

As many have said repeatedly in the last two years: There’s no way to bring a pipeline through these regions of Virginia and West Virginia without considerable, irreparable harm to this mountain environment, its people, and its economy.

We applaud the move away from Cheat and Shenandoah, but really? This is only getting worse.