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## Groups ask GWNF to reject pipeline survey

BY JOHN BRUCE • STAFF WRITER

ROANOKE — Highlanders for Responsible Development last week was among a chorus of organizations requesting the U.S. Forest Service to prohibit Dominion from surveying in the George Washington National Forest for its proposed natural gas pipeline.

Letters from HRD, the Dominion Pipeline Monitoring Coalition, and the Southern Environmental Law Center to GWNF supervisor H. Thomas Speaks Jr. expressed common concerns over alternate routes, threats to the ecosystem, and noncompliance with the forest management plan in the Atlantic Coast Pipeline, LLC survey application.

Dominion Pipeline Monitoring Coalition coordinator Rick Webb described the application as incomplete and raised concerns over Dominion's failure to provide route alternatives, failure to address environmental impacts, slope stability, watersheds and forest fragmentation. He wrote that Dominion did not mention the forest management plan in its application or the special protection offered to the Cow Knob salamander.

“The Laurel Fork watershed is a designated priority watershed that would be crossed by the proposed pipeline,” Webb wrote. “This watershed on the West Virginia-Virginia border is a uniquely valuable National Forest asset. The listing of priority watersheds in the GWNF Management Plan indicates that there are 19 threatened and endangered, sensitive, or locally rare species present in the watershed. This is more than twice the number indicated for any of the other 38 priority watersheds included in the list. Laurel Fork is also a native brook trout stream. It has been assigned the highest rating in the Forest Service's Watershed Condition Framework process, and it is one of the streams assigned Exceptional Water Status by the state of Virginia.

“The GWNF Management Plan describes Laurel Fork as ‘a unique area in the state of Virginia that has given rise to a forest of northern hardwoods and red spruce, unlike the Appalachian oak forest that dominates the rest of the George Washington National Forest,’” he continued.

Gregory Buppert and Kathryn Boudouriss of the Southern Environmental Law Center proposed the forest service deny Dominion's application and require the company to submit a new one identifying alternative study corridors for the ACP, including alternatives that use existing utility or natural gas transmission corridors.

They further requested an environmental assessment to examine alternatives to the proposed route and survey methodology for public comment. They called for Dominion to “establish appropriate protocols to ensure that the proposed surveys capture the necessary detail for a comprehensive evaluation of the impacts of pipeline construction and operation.

“The ACP and Mountain Valley Pipeline applications are proceeding concurrently before FERC, and Williams has taken significant steps toward initiating the approval process for its Appalachian Connector pipeline,” the attorneys continued. “All of these pipelines would cross the Appalachian Mountains on routes from West Virginia to the southeast. As natural gas ‘highways’ with similar timing and geography, these projects should be considered in a comprehensive EIS that fully captures the possible alternatives and their environmental consequences.”

HRD president Lew Freeman wrote, “The application to survey for the Atlantic Coast Pipeline is inextricably linked to a subsequent application that Dominion would make to the GWNF to build the pipeline should it receive permission to do so from the Federal Energy Regulatory Commission. The various factors that the GWNF would weigh if it were considering an application to build the ACP must also be incorporated into its consideration of the application to survey. This is true because the GWNF has only been presented with one option of a route through the forest.

“Dominion’s request to survey is seriously deficient in providing information requested by the GWNF on Standard Form 299. It offers misleading or incorrect responses to important questions. For instance, in answer to Question 13a, asking that the applicant ‘describe other reasonable alternative routes and modes considered,’ DTI states: ‘No alternative routes have been identified for these surveys.’ This response is contrary to the company’s submission in December to FERC: ‘Atlantic and DTI identified several route alternatives and variations along the proposed pipeline routes to avoid or minimize crossings of sensitive environmental features or address engineering or other concerns. These route alternatives and variations were incorporated into the proposed pipeline routes as described in detail below.’

“Further, the application’s response to the next question, 13b – ‘Why were these alternatives not selected?’ – states: ‘Not applicable.’ The instructions for Standard Form 299 clearly direct the applicant to provide ‘information on alternate routes and modes in as much detail as possible, discussing why certain routes or modes were rejected and why it is necessary to cross federal lands.’ The instructions conclude by stating: ‘If all information is not provided, the application may be rejected.’ DTI’s submission to survey for the ACP does not comply with the stated requirements of the application.

“The proposed route of the ACP through the GWNF would violate the letter and spirit of the Revised Forest Plan that was released Nov. 18,” Freeman added. “That plan states that Special Use Authorizations should be limited ‘to needs that cannot be reasonably met on non-NFS lands or that enhance programs and activities’ and that such authorizations should ‘require joint use on land when feasible.’ The DTI/ACP application, by failing to address alternatives to the route it has submitted, does not comply with the Forest Plan. This failure to address alternatives is clearly at odds with the spirit of the Forest Plan given that the construction of a pipeline the magnitude of the proposed ACP would seriously challenge the ecological and geological integrity of the GWNF.

Freeman said the ACP survey request should be considered in conjunction with other proposed pipeline projects that would cross USFS lands so the potential impact on the whole system can be assessed. “The overall integrity of the National Forest system is too vital to the nation to consider such monumental projects in a patchwork quilt fashion,” he wrote.

“For the aforementioned reasons, Highlanders for Responsible Development urges that the George Washington National Forest reject at this time Dominion Transmission Inc.’s application to survey GWNF lands for the

proposed Atlantic Coast Pipeline. More information and rationale to support the application is needed before a prudent judgment can or should be made,” Freeman concluded.

The forest service received more than 7,000 comments, most of which were form letters, but 627 contained unique comments. Two petitions were received, one with 611 signatures and the other with 74.

Forest service spokeswoman Jo Beth Brown said the majority of comments were opposed to the pipeline but the forest service was looking for unique aspects such as mentions of species or locations. She said a summary would be compiled within the next few weeks and shared with The Recorder.