



January 10, 2015

Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
Docket #PF15-6-000

Re. Atlantic Coast Pipeline project, Docket # PF15-6-000

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 you may know, the National Trails System Act was signed into law by President Lyndon Johnson on October 2, 1968. Among the many provisions of the Act is the specific designation of the AT and the Pacific Crest Trail as the first two National Scenic Trails. These trails were designated to be models for the creation and management of all other national scenic trails to come. The Act was the culmination of Benton MacKaye's 1916 idea for the creation of "*a sanctuary and a refuge from the scramble of every-day worldly commercial life*" (October 1921, The Journal of the American Institute of Architects). Today more than 2,000 thru-hikers backpack the AT's 2,180 miles from Georgia to Maine and an estimated 2 million people hike and recreate along the trail annually. These numbers are expected to continue to increase as the AT continues to be popularized in the upcoming movie "A Walk in the Woods" and other media projects.

As noble an idea as MacKaye's AT was, it has been constantly under pressure to accommodate various public and private development projects. On the ODATC section of the AT there is scarcely a mile of trail remaining on the original alignment and the relocations to accommodate the Blue Ridge Parkway and Wintergreen Ski resort have pushed the AT into the last remaining corridors along this section of trail that can offer anything like "*a sanctuary and a refuge from the scramble of every-day worldly commercial life.*" Now the ODATC section of the AT is faced with the prospect of having a new 100 foot

wide permanently maintained scar down the side of Elk Mountain and across the AT to accommodate the ACP. The ODATC respectfully requests that FERC require Dominion to evaluate all existing infrastructure crossings of the AT for the ACP project and for FERC to interpret and apply their policies regarding project location with the utmost deference to the unique purpose and character of the AT and with an appreciation of the cumulative impacts already taken on the AT for the benefit “...of every-day worldly commercial life.”

As stewards of our section of AT for the past 45 years, ODATC has considerable knowledge of the area proposed for the ACP crossing of the AT and based on that ODATC offers the following comments with the goal of assisting Dominion in fulfilling their responsibility under NEPA to Avoid and Minimize project impacts to the greatest extent practicable.

- 1) ODATC challenges the presumption that the ACP route shown on the map posted on Dominion’s ACP web page as of December 13, 2014, across the AT in the vicinity of the Mill Creek watershed on Elk Mountain is the Least Environmentally Damaging Practicable Alternative (LEDPA) as required by NEPA. ODATC notes that the currently proposed route appears to be close to the Lowe family cemetery (perhaps others) and the cultural resource area around it (as evidenced by the extensive areas of worked stone in the area). As far as ODATC is aware, the NEPA studies for the ACP are at an early and preliminary stage. ODATC requests that Dominion and its consultants coordinate with ODATC, other AT clubs and the ATC, in addition to NPS and USFS, on their NEPA study designs, the preliminary NEPA study findings and the final NEPA study results for the investigations of the project’s potential impacts to the cultural and natural resources along the AT;
- 2) ODATC notes that the AT is already crossed by several road and other infrastructure projects in the general area encompassing Nelson County. The co-location of the ACP project within one of these existing crossings needs to be examined in the Avoidance and Minimization section of Dominion’s NEPA study, a detailed case made for why each of the alternatives is not practicable for co-location of the project, and documentation provided that Dominion has made a good faith effort to petition FERC for leniency on any FERC policies that may be germane to prohibitions of project co-location;
- 3) In support of comment number 2, ODATC notes the following existing infrastructure crossings of the AT in or near Nelson County, Virginia:
 - a. The existing high-voltage transmission line and pipeline crossings through the southern portion of Shenandoah National Park;
 - b. The I-64 corridor;
 - c. The U.S. Route 250 corridor;
 - d. The old Afton Mountain Railroad Tunnel;
 - e. The existing Virginia right-of-way for the old Howardsville Turnpike;
 - f. The AT crossings of the Blue Ridge Parkway at “Dripping Rock” and Three Ridges Overlook;
 - g. The state route 684 corridor at Reid’s Gap; and
 - h. The state route 56 corridor at the Tye River Gap.

- 4) 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;
- 5) ODATC notes that a significant number of AT thru hikers and other trail users (e.g. boy scouts, day hikers, section hikers, etc.) pass through the ODATC - AT shelter at Mill Creek each year and count on the year round pereniality of Mill Creek to supply them with water. Mill Creek is the only reliable year round source of stream flow over a 40+ mile section of the AT. 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 the watershed through a "French Drain" effect. ODATC requests that Dominion detail what design measures will be taken to ensure that the pipeline trench does not become a "French Drain" and alter the hydrology that the current ecosystem and trail community depends on;
- 6) 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*", Piggging 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 Dominion detail the steps it will take to ensure the quality of the water in Mill Creek and other watersheds along the AT will not be degraded from the ACP project. These steps should include periodic water sampling, including baseline sampling during the initial survey periods, and public reporting of the sample results. ODATC also requests that Dominion's plan also contain a contingency plan outlining what Dominion will do to supply water to AT trail users if the ACP causes Mill Creek, or other water sources, to become unsafe for consumption or other uses; and
- 7) 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 all potential ACP routes and at least one-quarter mile on either side of the potential routes. 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.

In summary, ODATC does not agree that the currently proposed crossing of the AT in the vicinity of the Mill Creek watershed on Elk Mountain is the LEDPA. Through the above comments, ODATC has attempted to identify some of the main issues that need to be addressed prior to Dominion's selection of, and the regulatory community's authorization of, an alignment for the ACP project.

In closing, ODATC emphasizes that the ACP project has the potential to profoundly alter the quality of one of the nation's iconic National Scenic Trails and its ability to provide "*a sanctuary and a refuge from the scramble of every-day worldly commercial life.*" 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