March 24, 2017

Nathaniel J. Davis, Sr., Deputy Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426  

Re: FERC Docket #CP15-554

Dear Deputy Secretary Davis:

We are writing on behalf of Friends of Shenandoah Mountain to express concern about the inadequacy of the Draft Environmental Impact Statement for the Atlantic Coast Pipeline (ACP). Our comments are focused on the Braley Pond – Hankey Mountain portion of the ACP route in western Augusta County. Our main concerns are that the Draft EIS:

1. fails to analyze impacts to scenic areas and recreational trails as is required by the Natural Gas Act
2. violates George Washington National Forest Plan standards and guidelines
3. ignores written requests from the GWNF to re-evaluate sensitive stream crossings
4. minimizes the significance of fragmentation of core forested areas on Hankey Mountain

About the Proposed Shenandoah Mountain National Scenic Area
Friends of Shenandoah Mountain is a coalition of organizations, businesses, and faith groups 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). Our proposal is the result of a 15-year collaborative effort involving diverse forest user groups that now has broad support by over 280 organizations and businesses. The Shenandoah Mountain area has been identified as a prime candidate 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.

The proposed SMNSA is an important water resource both for municipal water and to support aquatic life. It provides municipal water for Staunton and Harrisonburg and many other towns and cities downstream. It has headwaters of the James, Shenandoah and Potomac Rivers. Its coldwater streams are productive habitat for wild brook trout.
Shenandoah Mountain is also a recreational hub for hiking, mountain biking, fishing, hunting, camping, horseback riding, nature study, and scenic driving. It serves the mid-Atlantic region’s recreational needs. Outdoor recreation on Shenandoah Mountain draws visitors to the area and supports the local tourism economy, as shown in Table 1. These figures have been increasing annually.

<table>
<thead>
<tr>
<th>Table 1. Visitor Spending in 2015</th>
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<tr>
<td>Augusta County</td>
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<tr>
<td>Staunton</td>
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<td>Rockingham County</td>
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<td>Harrisonburg</td>
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<td>Highland County</td>
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Source: Virginia Tourism Corporation

Hankey Mountain: Part of Original SMNSA Proposal

Our comments on the Draft EIS are focused on the segment of the ACP that crosses the George Washington National Forest in the Braley Pond – Hankey Mountain area which was part of the original Shenandoah Mountain National Scenic Area proposal submitted to the GWNF in October 2008 during the public comment period for the forest plan revision. Since then, Friends of Shenandoah Mountain has modified our proposal boundaries to exclude the southern part of Hankey Mountain specifically to satisfy forest stakeholder concerns about the Grouse Habitat Management on Chestnut Oak Knob on the flank of Hankey Mountain. Specifically, game managers wanted to ensure that grouse management through timber sales would continue to be a priority on Chestnut Oak Knob where it has been a joint venture between Virginia Department of Game and Inland Fisheries and the Ruffed Grouse Society for several decades. While the pipeline corridor does not cross current SMNSA proposal boundaries, it does cross through the Grouse Management Habitat Area, and it would have significant negative effects on scenic qualities, recreation, forest fragmentation, and water resources of the SMNSA.

GWNF Plan Recommendation of SMNSA

The 2014 GWNF Land and Resources Management Plan recommends Congressional designation for the SMNSA: 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
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, rock climbing, 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.

Impacts of the ACP on the Proposed SMNSA
Scenic impacts
The Draft EIS fails to address scenic integrity impacts to the SMNSA. 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. Visitors form a first impression of the proposed SMNSA based on the visual experience from Rt. 250. A 125- to 175-foot wide construction corridor and 55-foot permanently-cleared corridor will significantly degrade the scenic quality of the southern end of the SMNSA.

According to the GWNF Plan, Rt. 250 is a “Scenic Corridor” (turquoise on Map 1) and GWNF land along this corridor 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.” While the ACP route skirts the Rt. 250 Scenic Corridor management prescription, it is located squarely between the Scenic Corridor and the proposed SMNSA.

The Draft EIS dismisses any visual impact, stating incorrectly that, "views of the pipeline corridor would be unlikely due to existing topography and trees." This is simply not true. 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 (green dot on right on Map 1) and Bald Ridge Trail in Ramseys Draft Wilderness (green dot on left on Map 1). 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)

**Map 1.** Scenic Integrity Impacts of the ACP and Access Roads on the SMNSA and Wild Oak National Recreation Trail

**Stream Impacts**
The Draft EIS fails to disclose all brook trout streams crossed by the ACP and access roads and fails to discuss impacts on all sensitive streams. The Shenandoah Mountain area is a regional stronghold for wild brook trout. The ACP route crosses four brook trout streams in the Braley Pond-Hankey Mountain area (shown on Map 2):

1. Braley Branch
2. Calfpasture River
3. Dowell’s Draft
4. White Oak Draft
Construction of the pipeline will harm these sensitive brook trout streams by causing siltation and turbidity.

**Map 2.** ACP Route through High Integrity Wild Brook Trout Habitat in the Braley Pond – Hankey Mountain area. Brook Trout streams are highlighted in blue.

In a Sept. 1, 2016 letter to FERC prior to the release of the DEIS, The Forest Service expressed concern about project impacts to White Oak Draft and a Dowell's Draft tributary to the Calfpasture River, both wild brook trout streams. The Forest Service specifically asked Dominion/ACP to "re-evaluate its proposed stream crossings and proposed locations of access roads, while considering Forest Plan standards and BMPs relating to soil and water." The Draft EIS ignores this official request and continues to show the ACP route and access roads crossing these sensitive streams.

**High Hazard Area**

The Forest Service has identified White Oak Draft as a "High Hazard Area" because of steep slopes (>70%) adjacent to the stream (see #4 on Map 2). Construction of the pipeline across this deep ravine would damage the stream and set the stage for landslides during heavy rains. Dominion has failed to respond to the Forest Service's request for detailed construction plans on how they could safely and responsibly construct the pipeline across White Oak Draft and what measures they would use to stabilize slopes and control soil erosion.
Recreation Impacts
The scenic Rt. 250 gateway is perhaps the most heavily used access to prime recreational resources located in or adjacent to the proposed Shenandoah Mountain National Scenic area (shown on Map 3):

- campgrounds
- lakes
- picnic areas
- 150 miles of trails
  - Wild Oak National Recreation Trail
  - Shenandoah Mountain Trail (a segment of the Great Eastern Trail)
- Ramseys Draft Wilderness
- Fort Edward Johnson (Confederate Breastworks)

The Draft EIS for the ACP project does not discuss or evaluate these potential impacts.

Map 3: Rt. 250 is a primary access to recreational sites and trails within or just outside of the SMNSA

Forest fragmentation impacts
A permanent ACP corridor across Hankey Mountain would fragment three miles of core forest causing loss of 535 acres of high quality interior forest habitat. This includes the width of the 125-foot construction corridor plus 100 meters on each side (shown on Map 4). Access roads would cause loss of an additional 124 acres of core forest. This route through core forest on Hankey Mountain is the longest continuous stretch of forest fragmentation on National Forest land for the entire ACP. The core forest on Hankey is of the highest quality category, >500 acres. The new cleared corridor and roads would create a pathway for nonnative invasives that outcompete native species and invite harmful predators to move into the forest "edge" and spread into the proposed National Scenic Area.
The Draft EIS states that forest fragmentation is one effect that cannot be mitigated. The portion of the GWNF between Rt. 250 and Rt. 33 is the largest tract of mostly unfragmented forest on National Forest land east of the Mississippi; therefore, this fragmentation would be particularly significant.

Map 4. Fragmentation and loss of core forest habitat on Hankey mountain

Map Legend
- Proposed National Scenic Area
- GWNF Recommended National Scenic Area
- ACP Corridor
- ACP Access Roads
- Core Forest Areas > 500 Acres
- Core Forest Loss
- ACP Corridor
- Access Road

Conclusion
We are concerned that the ACP would degrade visual qualities, recreational opportunities, wild brook trout streams, and interior forest habitat and could even jeopardize the viability of the proposed National Scenic Area for Congressional designation.

Given these concerns, Friends of Shenandoah Mountain does not consider the Draft EIS to provide a sufficient basis for the Forest Service to make a decision on whether to issue a Special Use Permit and waive Forest Service standards to protect water, old growth, and scenic integrity. This route passes through one of the finest and least fragmented natural areas remaining in the Eastern United States, an area that is broadly supported for
protection by the public. We ask that FERC redo the Draft EIS and conduct a thorough analysis of impacts to the proposed SMNSA in order to satisfy NEPA requirements. We also ask that the public be given a full comment period to respond to any new analyses.

Thank you the opportunity to comment on the Draft EIS.

Sincerely,

Lynn Cameron  
Co-Chair  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841  
(540)234-6273  
slynnncameron@gmail.com

Thomas Jenkins  
Co-Chair  
375 E. Wolfe St.  
Harrisonburg, VA 22802  
(540) 437-9000  
tj@shenandoahbicycle.com

Attachment:  
- Map of Proposed Pipeline Route over SM