



November 13, 2014

Kimberly Bose,
Secretary Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Dear Secretary Bose:

I am writing on behalf of Friends of Shenandoah Mountain to express opposition to the Atlantic Coast Pipeline submitted for pre-filing by Dominion Resources: **FERC Docket # PF15-6**.

Friends of Shenandoah Mountain is a coalition of organizations, businesses, faith groups, and individuals 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 (see Map of Proposed Shenandoah Mountain NSA and www.friendsofshenandoahmountain.org). Our proposal is the result of a 12-year collaborative effort among diverse forest interest groups that has resulted in broad support by over 220 organizations and businesses (see SM Proposal Endorsers), and diverse GWNF stakeholders, including the Virginia Forestry Association, Ruffed Grouse Society, The Nature Conservancy, National Wild Turkey Federation, Virginia Chapter of Trout Unlimited, Virginia Chapter of Backcountry Horsemen of America, and International Mountain Bicycling Association. (See SM Proposal and the GWNF Stakeholders' Agreement)

When Dominion proposed their route for the Atlantic Coast Pipeline (shown on Dominion's August 29, 2014 Augusta and Highland County Maps), they may have been unaware of the tremendous natural and cultural resources on our public lands that the pipeline would impact, irreplaceable resources that benefit people throughout our region. The GWNF is the largest of the Eastern national forests and has the most (and largest) Inventoried Roadless Areas of any national forest in the East. It is also the closest national forest to major mid-Atlantic metropolitan areas, such as Washington, DC-Northern Virginia-Maryland, Richmond, and the Norfolk-Hampton-Chesapeake-Virginia Beach area. As such, it serves the recreational needs of about 10 million Americans who live within a 2-hour drive.

The Shenandoah Mountain area has been selected by citizen groups as a worthy 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. Shenandoah Mountain lies within a Biodiversity Hotspot identified by The Nature Conservancy (see TNC Biodiversity Hotspots Map) and constitutes an Outstanding Ecological Core identified by the Virginia Department of Conservation and Recreation (see Map of Virginia DCR Ecological Cores). Its pure mountain streams are a regional stronghold for native brook trout, a diminishing resource. With headwaters of both the Potomac and James Rivers, Shenandoah Mountain streams provide municipal drinking water to Staunton, Harrisonburg, and numerous towns in the Shenandoah Valley and downstream. Shenandoah Mountain is a popular destination for hiking, mountain biking, hunting, fishing, camping, horseback riding, and scenic driving. The Shenandoah Valley Travel Association, Scenic Virginia, and numerous tourism-related businesses in the Shenandoah Valley have endorsed the proposed Shenandoah Mountain National Scenic Area because they value its natural beauty and recreational resources that support our vibrant tourism-based economy. Rt. 250, which

would be crossed several times by the pipeline, is a scenic gateway to the national forest and one of only a few access points to the many recreational resources on Shenandoah Mountain. Rt. 250 is historically significant in that it was the Staunton-Parkersburg Turnpike.

From our perspective, the Atlantic Coast Pipeline is problematic for several important reasons:

1. It cuts a broad swath through the southeastern portion of the proposed Shenandoah Mountain National Scenic Area, creating a permanent 75' linear clearing that would destroy its natural character, and perhaps make it unsuitable for Congressional designation. (see Map of Proposed Pipeline Route over SM)
2. It would fragment one of the most undisturbed tracts of national forest land in the East, creating "edge effect" that favors less desirable predatory species and providing a pathway for nonnative invasive plant species.
3. It crosses access roads to the popular Braley Pond Recreation Area, which has a beautiful large stocked pond, a picnic area, a campground, and several heavily used trails.
4. It follows the Dowells Draft Forest Road across the flank of Hankey Mountain through the Chestnut Oak Knob Grouse Habitat Improvement Project. This project is supported by Virginia Game and Inland Fisheries and the Ruffed Grouse Society. The pipeline would not be compatible with grouse management, because maintenance of a permanent linear clearing would prevent young forests from growing. Ruffed grouse benefit from actively managed young forest habitat. Friends of Shenandoah Mountain has pledged its support for continuing management of Hankey Mountain for grouse and other species that need early successional habitat as part of the GWNF stakeholders agreement.
5. It bisects the Ramseys Draft Addition Potential Wilderness Area, inventoried by the GWNF during the forest planning process for the new plan.
6. It crosses Ramseys Draft, an exceptional Class IV native trout stream, the Calfpasture River, and the Cowpasture River, some of the cleanest native trout streams in Virginia.
7. If herbicides are used to maintain the linear clearing, the runoff will harm these streams.
8. The linear clearing and necessary maintenance vehicle access would allow invasives to move into an area that is currently relatively free of invasives. The right-of-way Dominion maintains through the south section of Shenandoah National Park for its electric transmission line is a sea of invasive ailanthus. (See Photo of Dominion Powerline ROW through SNP)
9. Ramseys Draft Wilderness, designated by Congress in 1984, is one of the most popular of Virginia's Wilderness areas, drawing hikers, backpackers, and flyfishermen from the whole region. The pipeline would permanently scar the area just downstream from the Wilderness.
10. Hankey Mountain is known to have the coal skink, a locally rare species that could be harmed by pipeline construction and maintenance.
11. Hankey Mountain is a popular recreation area for hunting, mountain biking and hiking. The pipeline would obliterate Dowells Draft Road, one of the most accessible national forest trails for hunting, mountain biking, and winter hiking.
12. The pipeline route passes about one mile from the eastern end of the Staunton Dam Tunnel through Hankey Mountain, which has supplied municipal water to Staunton since the 1920s. At that time Staunton faced a water shortage and was forced to find a pure water source 15 miles away in the GWNF. The City had to build a mile-long tunnel through Hankey Mountain using hand tools and mules. This tunnel has partially collapsed in places and could be vulnerable to blasting during pipeline construction. Pipeline explosions could endanger Staunton's water supply.
13. Because it is undeveloped, Shenandoah Mountain is one of the darkest areas in the Eastern United States, and for this reason is a popular destination for viewing stars. There are not many places in the East one can still see the Milky Way, but it is still possible from Shenandoah Mountain. Several organizations have endorsed the proposed Shenandoah Mountain National Scenic Area just for this reason.
14. The pipeline route crosses Signal Corps Knob, an area where JMU Biology researchers and GWNF biologists have documented multiple occurrences of the Cow Knob Salamander. In October 2014, Eastern Mennonite University students found and photographed Cow Knob Salamanders along the pipeline route. (see Photo of Cow Knob Salamander on Signal Corps Knob) The GWNF and U.S. Fish

and Wildlife have signed an agreement to protect Cow Knob Salamander habitat. We expect the GWNF to enforce the agreement to protect this species, which is found nowhere else on earth, and we also expect FERC's environmental review to respect and uphold this agreement.

15. The Shenandoah Mountain salamander is also a concern as it is found only on Shenandoah Mountain.
16. Shenandoah Mountain has over 180 miles of popular and scenic trails. The Great Eastern Trail (GET), which extends from New York to Alabama, follows the Shenandoah Mountain Trail through Rockingham, Augusta, and Bath Counties. The pipeline would cross the GET at Signal Corps Knob, only a mile from the Confederate Breastworks Parking Lot along Rt. 250, a popular access point for hiking, biking and hunting along the GET. The Shenandoah Mountain area is one of the most popular mountain biking destinations in the East. The Shenandoah Mountain 100 bike race, now in its 15th year, utilizes Shenandoah Mountain Trail and several other trails crossed by the pipeline. The race draws as many as 800 participants from across the country, much to the benefit of local tourism-related businesses. Trails on Shenandoah Mountain are actively maintained by the Shenandoah Valley Bicycle Coalition (SVBC) and the Potomac Appalachian Trail Club – Southern Shenandoah Valley Chapter, with volunteers collectively logging thousands of hours annually in this area. SVBC has secured \$300,000 of Recreational Trails Program grant funding in the last 5 years, most of which was used in the Shenandoah Mountain area, and is poised to spend an additional \$200,000 by the end of 2015. The PATC is preparing to publish a hiking guide for Shenandoah Mountain to promote these trails. A wide pipeline swath crisscrossing the Rt. 250 corridor would seriously degrade this popular recreation area.
17. Signal Corps Knob and the Georgia Camp area are quite significant Civil War cultural resources. The pipeline route may damage sites that have not yet been inventoried.
18. In Highland County the pipeline route appears to cut through the Shaws Fork Horse Camp, the only horse camp in the entire GWNF.
19. Our last point, and a very important one, is that the presence of a pipeline will make fracking in the GWNF more likely in the future.

Given these concerns, Friends of Shenandoah Mountain is opposed to the ACP route through one of the finest and least fragmented natural areas remaining in the Eastern United States. This area is without question one of the worst possible places to put an interstate gas transmission pipeline. We ask that FERC deny this project.

Thank you for responding to the serious concerns we have about the pipeline.

Sincerely,

Lynn Cameron
Co-Chair
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Attachments:

- Map of Proposed Shenandoah Mountain NSA
- Photo of Cow Knob Salamander on Signal Corps Knob, Oct. 11, 2014 by J Bush
- Photo of Dominion Powerline ROW through SNP, Aug. 2014 by D Bennick
- SM Proposal Endorsers as of 11/13/2014
- Map of TNC Biodiversity Hotspots
- Map of Virginia DCR Outstanding Ecological Cores
- Map of Proposed Pipeline Route over SM
- SM Proposal and the GWNF Stakeholders' Agreement, Oct. 17, 2011