



August 14, 2014

Mr. Tom Speaks, Supervisor
George Washington & Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019

Dear Supervisor Speaks:

I am writing to express concern on the part of Friends of Shenandoah Mountain about the alternate interstate gas transmission pipeline that Dominion has proposed to pass through the George Washington National Forest (GWNF) for the so-called Dominion Southeast Reliability Project.

As you know, 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 GWNF. Our goal is Congressional designation of a 90,000-acre tract of Shenandoah Mountain between Rt. 250 and Rt. 33 as a National Scenic Area with four embedded Wilderness areas. Our proposal is the result of a 12-year collaborative effort among diverse forest interest groups that has resulted in broad support. It is supported by about 80 organizations, 110 local businesses, 13 faith groups, and diverse forest stakeholders including the Virginia Forestry Association, Ruffed Grouse Society, The Nature Conservancy, Wild Turkey Federation, Virginia Chapter of Trout Unlimited, Virginia Chapter of Backcountry Horsemen of America, and International Mountain Bicycling Association.

The central section of the 72-mile Shenandoah Mountain has the largest concentration of roadless areas on national forest land east of the Mississippi. Its mostly unfragmented forest is rich in biodiversity. In fact it lies within a Biodiversity Hotspot identified by The Nature Conservancy and an Outstanding Ecological Core identified by the Virginia Department of Conservation and Recreation. Its pure mountain streams are a regional stronghold for native brook trout, a diminishing resource. Our proposal protects mountain streams that provide municipal drinking water to Staunton, Harrisonburg, and numerous towns in the Shenandoah Valley and downstream. Shenandoah Mountain is also a popular recreation area for hiking, mountain biking, hunting, fishing, camping, horseback riding, and scenic driving. The Shenandoah Valley Travel Association and numerous tourism-related businesses value the Shenandoah Mountain area for its natural beauty and recreational resources that support the vibrant tourism-based economy in the Shenandoah Valley.

From our perspective, the alternate pipeline route Dominion has proposed is problematic for several 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 fragment this special area. Fragmentation of forests creates "edge effect" that favors

less desirable predatory species, such as cowbirds, and provides a pathway for nonnative invasive species.

2. It cuts through the Braley Pond Road, the access road to the popular Braley Pond recreation area, which has a beautiful large pond stocked with fish, a picnic area, a campground, and several highly used trails that are especially popular with families because they are short, easy, and accessible.
3. It crosses Ramseys Draft, an exceptional Class IV native trout stream, and the Calfpasture River, also a native trout stream. 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.
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. During our work with forest stakeholders, we pulled back the boundary of the National Scenic Area to support continuing management for grouse and other species that need early successional habitat in this area. The pipeline would not be compatible with grouse management, because young forests would not be allowed to grow and the linear clearing would likely be maintained by herbicides, which would be harmful to grouse and other species. The runoff of herbicides would also harm both Ramseys Draft and the Calfpasture River. The linear clearing and necessary maintenance vehicle access would also allow invasives to move into an area that is relatively free of invasives at this point.
5. Hankey Mountain is known to have the coal skink, a locally rare species, which could be harmed by the pipeline construction and maintenance.
6. 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 winter hiking and easy enough for all abilities.
7. The alternate route passes within about 1 mile of the eastern end of the Staunton Dam Tunnel through Hankey Mountain, which has supplied municipal water to Staunton since the 1920s, when 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 accidents could endanger Staunton's water supply.

In addition to the concerns that directly affect the Shenandoah Mountain Proposal, I'd like to point out that the pipeline would cross Signal Corps Knob, an area where JMU Biology researchers have found multiple known occurrences of the Cow Knob Salamander. Although the Shenandoah Mountain Crest – Cow Knob Salamander Conservation Area lies north of Rt. 250, it is our understanding that if the Cow Knob Salamander is found in other areas in the GWNF, the protection afforded by the agreement with U.S. Fish and Wildlife Service would extend to these areas. We expect the GWNF to enforce the agreement to protect this species, which is found nowhere else on earth.

We also want to call attention to the Great Eastern Trail which extends from New York to Alabama. The pipeline would cross this new long trail 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 Great Eastern Trail.

One of the values of the Shenandoah Mountain Proposal is that it aims to protect cultural resources. The Signal Corps Knob area and Georgia Camp area are quite significant Civil War cultural resources. Archeology researchers from James Madison University have found

that the Georgia Camp extends beyond what was known earlier. The alternate pipeline route would bisect the camp and ruin the popular Georgia Camp Trail.

On the western side of Shenandoah Mountain in Highland County, the alternate pipeline route appears to cut through the Shaws Fork Horse Camp, the only horse camp in the GWNF. The permanent linear clearing again opens up a healthy mature forest to invasives and continuous maintenance with herbicides, which would endanger Shaws Fork and the Cowpasture River, two of Virginia's cleanest streams. The steepness of the terrain on both sides of Shenandoah Mountain would make it impossible to contain erosion and siltation during construction. The long and wide swath, the soil and rocks stockpiled on the sides, and the 10-12' deep trench increase the likelihood of significant sediment runoff.

Given all these concerns, Friends of Shenandoah Mountain is opposed to Dominion's alternate gas pipeline route through one of Virginia's finest natural areas. We ask that the GWNF deny a special use permit if Dominion should apply for one.

Thank you for your attention to our concerns.

Sincerely,

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