

From: Rachael Hood
To: [FS-objections-chief](#)
Subject: Atlantic Coast Pipeline Decision Objection
Date: Monday, August 21, 2017 6:35:51 PM

Mr. Glen Casamassa, Associate Deputy Chief,

I am writing to you to express my concerns regarding the Atlantic Coast Pipeline crossing through National Forest Lands. Thank you for your time in considering my comments.

Though I am only nineteen, I know that the George Washington and Jefferson National Forests are one of things that will always bring me back to this state; it is one of the entities that inspires me to call Virginia my home. I love days when I get to hike out at Duncan's Knob, or visit Sherando Lake, or take advantage of the numerous other beautiful parts of our National Forests. I hope to bring my friends from out of state to these areas, and maybe someday my children.

The Atlantic Coast Pipeline will destroy and/or devalue the features of the Forest that I love. In addition, the way in which this pipeline process is being conducted is very concerning to me. It seems that corners are being cut in order to expedite construction, which is not something that I can support as a citizen, and the Forest Service should not support such a process as a federal agency.

The draft and final Environmental Impact Statements for this project fail to fully describe and analyze many environmental threats concerning this project. The Forest Service has a right and a **duty** to reject the EIS and refuse to issue a right-of-way permit until NEPA requirements are satisfied. The environmental damages that cannot be avoided or mitigated where the pipeline crosses the national lands make these crossings *unacceptable*. Forest fragmentation cannot be repaired; surface and ground waters are crucial resources that cannot be cleaned easily; and threatened and endangered species habitat should be protected. Also, mitigation for these serious impacts is to be determined **after** the project is approved; all amendments to the Forest Plan are contingent on mitigation plans that could be revised after this decision.

The project impacts on global warming and the ability of the Forest to respond to ongoing climate change are not addressed adequately in the EIS. Forests are a critical resource in fighting climate change with their ability to store carbon, and this value should be seriously considered in any National Forest proposal. In searching the Record of Decision regarding this issue, the terms "climate" and "greenhouse gas" are not even mentioned. The EPA requires that life cycle analysis from source to use be done for this project; it has not been done yet. Additionally, the cumulative impacts of both the ACP and MVP are not considered relevant to the Draft Decision, in clear violation of the National Environmental Policy Act. The impacts of both pipelines need to be analyzed together, like the volume of gas going through each pipeline, the crossings of the Appalachian Trail for both routes, and the cumulative effects to species and habitat. Moreover, the Forest Service **cannot** adopt the environmental analysis that FERC has done because it is deeply deficient. The applicants have failed to provide the necessary information and analysis regarding threats to groundwater, drinking water wells and

springs, and streams, especially in areas of karst geology. The consultation with the US Fish and Wildlife Service also has not been completed, which is required to be done before the release of the Final EIS. According to the Endangered Species Act, all agencies have to consult the USFWS if there are potential impacts to species or **habitat**.

Since large bodies of additional information regarding the pipeline were submitted to federal agencies after the public comment period for the Draft EIS had ended, the public, including people like me, did not have a chance to read over and respond to these documents. The ability to review all the information available is a right of citizens and should not be refused simply to expedite the construction of this pipeline. All of the information that is now available needed to be included in the DEIS for the public to review; since this was not done, a new or supplemental DEIS is required. Additionally, amendments that were not part of the draft ended up in the Record of Decision and thus were not available to be commented on in the scoping stage.

Finally, the purpose and need for this project and the crossings of federal lands are not adequately analyzed and do not justify the project. Neither the FEIS nor the ROD presents a clear justification for the need of the pipeline. A NEPA requirement is that federal agencies such as the Forest Service must demonstrate purpose and need for every project that goes through this process. Alternative routes for the pipeline are not sufficiently analyzed, and the standard at which National Forest lands must be held are not met. There was no analysis of alternative routes that avoid “high hazard” areas vulnerable to slides, slope instabilities, etc. It should be that the Forest Service cannot allow a pipeline to pass through these areas without proving that the area will be safe and protected and exploring all options. Additionally, while an alternative that does not cross USFS lands was mentioned in the ROD, there is no analysis of the alternatives. According to Forest Service standards, if any alternative can “reasonably accommodate” the project, then the Forest Service is supposed to reject crossing National Forest lands. Expediency and cost are not justifications for the preferred route. Since the proposal cannot meet the standard, the proposal should not be approved.

Thank you very much for your consideration of my comments. I am also requesting to meet with you about my comments, either in a group or individual setting. I hope to hear from you soon.

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