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Comments: Atlantic Coast Pipeline Decision Objection

To:

Glen Casamassa, Associate Deputy Chief

USDA Forest Service, Attn: Administrative Reviews

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Re:

Atlantic Coast Pipeline Decision Objection

I object to the draft Record of Decision (ROD) of the US Forest Service (FS) which would allow use of public lands for the proposed Atlantic Coast Pipeline (ACP) and would approve changes to the Monongahela National Forest (MNF) and George Washington National Forest (GWNF) Land and Resource Management Plans (LRMPs) to accommodate such usage.

The 2014 GWNF LRMP was the result of ten years of information gathering and public input. Thousands of comments of concerned stakeholders were submitted that were considered in the creation of the final plan. The plan contains areas that have management prescriptions consistent with the siting of natural gas infrastructure, yet Dominion has failed to consider any route that utilizes these areas. The plan was finalized only 2 years ago, and was intended to last for 15 years. What the FS now proposes is to make a shambles of this plan, so that Dominion can butcher the national forest at its whim. This is a mistake. The LRMP should not be changed for the convenience of a for-profit, investor owned energy company that chose not to engage in that planning process.

Fragmentation of the national forests is a very serious issue. Once a section is razed or carved up for whatever reason, the character of the entire forest changes irrevocably, and can never be restored to its previous condition. The FS must not condone this or allow it to happen.

Modifying the LRMP would open the door for the proposed ACP to destroy heritage landscapes and disregard public interests. The proposed ACP would damage our land and water, take private property, and destroy our public recreational lands. The FS needs to protect public forested lands as well as streams and wetlands, and honor the agreements made in creating the LRMP.

The FS should abstain from issuing any special use permit to the proposed ACP until such time as the ACP complies with the existing LRMPs.

This year, 2017, is the 18th year of the Nelson County annual North American Butterfly Association (NABA) count. NABA is a non-profit organization dedicated to increasing public enjoyment and conservation of butterflies. NABA's Butterfly Monitoring Program has amassed the largest database of butterfly occurrences and abundances in the world. These data are increasingly used by scientists to study butterfly population trends and to answer questions about butterfly biology. Citizen scientists count and report the numbers of different species sighted at the same locations each year. Count circle coordinates, once chosen, remain the same, because count data become more valuable the longer a count is run.

Reeds Gap and Grape Lawn are two of five spots within our count circle, chosen as areas that would remain

unchanged over the years. The butterflies that nectar at these places, where we count them, live in the surrounding undisturbed areas.

The proposed Atlantic Coast Pipeline (ACP) would demolish the meadow on Grape Lawn. Two species of butterflies (Least Skipper and Juniper Hairstreak) that are found in this meadow are rare elsewhere in Nelson County.

A massive construction project such as horizontal drilling for the proposed ACP at Reeds Gap would create a major disturbance of the area, destroying vegetation, creating dust, and increasing traffic over and around Reeds Gap, all of which would surely impact butterfly populations.

The proposed ACP would both harm butterflies and prevent continuous data collection in both of these currently unmodified areas. This is not something that can be "mitigated" by changing locations after 18 years of collecting data at the same locations. The data stream would be effectively terminated.

Environmental damages that cannot be avoided or mitigated make the crossing of public lands unacceptable. ACP has not examined alternatives adequately. The Forest Service should reject their application for this proposed project.

I enjoy day trips to beautiful areas in the national forests and often hike or picnic on public lands. Driving through the George Washington National Forest is a visual pleasure that enhances my appreciation of nature. When I am hiking, it seems I breathe more freely, and I always sleep better after breathing a lot of clean, fresh, mountain air. Hiking is one type of exercise that I actually enjoy, and I'm sure it is good for my health, both physically and mentally. I strongly oppose any projects that would destroy or damage our national forests. The proposed ACP is just such a project. Environmental damages that cannot be avoided or mitigated make the crossing of public lands unacceptable.

The FS must consider irreversible cumulative impacts to surface waters and groundwater and impacts to endangered and threatened species as well as forest fragmentation for both the proposed ACP and the proposed Mountain Valley Pipeline (MVP). The ROD neglects their cumulative impacts, which are required by the National Environmental Policy Act (NEPA).

Both the draft and final Environmental Impact Statements (EIS) of the ACP fail to fully describe and analyze many environmental threats. Descriptions of how to safely cross upland areas are vague and incomplete, especially regarding steep slopes, which, if disturbed, would cause major erosion and sedimentation of nearby waterways. The Forest Service has a duty to reject these documents and deny a right-of-way permit until NEPA requirements are fully satisfied.

Furthermore, neither the draft nor the final EIS of the ACP adequately describes the Purpose and Need for the proposed project. The need for crossing public lands has not been adequately analyzed. Reasonable alternatives for crossing public lands have not been seriously considered.

The Forest Service must insist on a thorough analysis with more than cursory dismissal of possible alternatives because they "do not provide a significant environmental advantage" before accepting FERC's final EIS.

Similarly, the ROD provides insufficient analysis of alternative routes. It lacks analysis of a route using existing energy corridors. It lacks analysis of a route that does not cross FS lands.

I request a resolution meeting to discuss these objections to the FS draft ROD, possible changes to the LRMP, and the FS's acceptance of the final EIS.

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