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Comments: Atlantic Coast Pipeline Decision Objection

To Glen Cassamassa, the USFS, and whomever it may concern,

I am writing to object to the Forest Service's Record of Decision concerning the proposed Atlantic Coast Pipeline (ACP), specifically in its plans for crossing of the George Washington and Monongahela National Forests.
I strongly urge the Forest Service to issue an amended Record of Decision which denies permission for the Atlantic Coast Pipeline to pass through the George Washington and Monongahela National Forests. This project poses the threat of unmitigable damage to forest habitats in the GWNF and MNF, and undermines your responsibility to protect forest reserves and secure a clean water supply.
In addition, I'd like to outline the bases for my objections here:
The George Washington and Monongahela National Forests were set aside by the Forest Reserve Act of 1891 as a public domain. As a public domain these National Forests are to be protected to secure forest reserves and secure a clean water supply. Both of these National Forests are essential in keeping Virginia's headwaters clean and accessible.
The Atlantic Coast Pipeline's authorization requires a special use permit from the Forest Service in order to build the project through the Monongahela and George Washington National Forests and to modify existing standards related to water protection and soil stability. Clyde Thompson's April 4, 2017 letter by the Forest Service to FERC, claimed it performed an "independent" assessment of drilling through national forests.
What Thompson's letter did not mention is that the assessment was conducted and written by GAI Consultants, one of Dominion's main contractors on the pipeline project. GAI Consultants, a Pittsburgh-based environmental and engineering firm, has been working on the pipeline since its original proposal in late 2014. We find that this conflict of interest undermines the "independent" assessment requirements that is due to the public. By holding GAI Consultant's findings as independent you undermining the process of authorization that is required in order to keep our headwaters clean and our National Forest's protected.
The Draft Environmental Impact Statement for the ACP did not include mandatory information and was prematurely issued by FERC, diminishing my right to object. By not including that information in its Record of Decision, the Forest Service is in clear violation of its duty to comply with the National Environmental Policy Act.
The changes to amendments in the Forest Plan to accommodate for the ACP differ from earlier in the process. This is new information not included in the FEIS documents, and the public had no opportunity to comment.
Cumulative effects: There is no sufficient cumulative analysis for the ACP, rendering the Record of Decision incomplete.
The US Fish & Wildlife Service did NOT come to a conclusion on the safety and effects of the ACP, making the Record of Decision premature. This is a critical analysis for the habitats of endangered and threatened species.
The DEIS for the ACP contained no sufficient analysis of the cycle impact from source to use; the cumulative effect on climate change has not been completed. This is required of FERC by the EPA. Its absence in the ACP DEIS makes the document incomplete and prematurely issued.
In addition, Atlantic Coast Pipeline LLC did not include information in the DEIS on several route variations, information accounting for construction areas on route – these are among many pages of documentation that the public did not get to comment on, thereby making the FS Record of Decision premature.
Atlantic Coast Pipeline LLC has not answered questions from the USFS concerning “High Hazard Areas.” Permit applicant cannot prove how they will prevent landslides and in these areas with mountain slopes of over 50%. These issues will be especially dangerous in our national forests, where potentially deadly pipeline leaks or explosions could occur in extremely remote and areas with difficult terrain, difficult to reach by first responders.

Downstream from headwaters of drinking water sources in these areas, which contain extremely sensitive karst terrain. Waterways will be buried. Drinking water for residents both within and outside the National Forest lands will likely be disturbed or ruined. This is not acceptable to be permitted by the USFS by any degree. What is the purpose of having an agency exist for the protection of these areas – some of them among the most biodiverse in the country – if that agency allows industry to eradicate them?

In conclusion, it is crucial for the sake of our mountains, drinking water, and forest habitats that the USFS change its record of decision to deny permit for the Atlantic Coast Pipeline. This is a project with extreme and unaccounted-for risks, and the safety of out George Washington and Monongahela National Forests cannot – I repeat, CANNOT – be guaranteed. Atlantic Coast Pipeline LLC has not fulfilled its responsibilities as an applicant for said permit, and has not demonstrated that they can construct their pipeline safely while accounting for our protected lands.

Please consider my comments, and thank you for taking the time to document them.

Sincerely,

Tom Burkett

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"Water is a commons - No one has the right to destroy"