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Title:

Comments: From: Lilia Fenton

To: FS-objections-chief

Subject: Atlantic Coast Pipeline Decision Objection

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Attachments: Objections.doc

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Glen Casamassa, Associate Deputy Chief, Forest Service - National Forest System objections-chief@fs.fed.us

RE: Atlantic Coast Pipeline Decision Objection

To the Forest Service:

As an interested party, intervener with FERC and because I timely submitted written comments I would like to object to the FS permit and FS plan amendments for the ACP project.

I would like to object to the FS answer to my comment about HDD drill under AT and BRP (CO53-1). See link bellow.

<https://www.ferc.gov/industries/gas/enviro/eis/2017/07-21-17-FEIS/volume-IV-part-3.pdf>

FS completely ignored the fact that ACP proposed impossible drill to the FS review in order to have approved crossing of AT and BRP. From the very beginning they were planning on contingency plan that would clear cut forested buffer on both sides of the AT/BRP and will end up in a simple under the road bore (FS owns very narrow stretch of land at Reeds Gap location and the rest of the buffer is privately owned and maintained).

The recently submitted documents regarding the analysis of the geology of the HDD crossing of the Blue Ridge Parkway and ANST are as flippant and incomplete even by the lowest standards set by Dominion in their reporting to FERC. There are many more submitted documents detailing a mired of other issues with respect to the HDD drilling through the BRP. None of these issues have been studied, examined or discussed. The only issue raised was over the first 100 feet of the HDD regarding "expected" gravel layers that might need to be cased. Dominion has not made a single test bore along any part of the HDD line. All data is purely speculation from a single test hole hundreds of yards away and downhill from the proposed tunnel exit wound. What that tells us about the drill is absolutely nothing. As to the first 100 feet, I am sure they can dig this by

hand if need be, case the entrance area, or backhoe the opening enough to start the drill below the surface material. This still leaves 4600 feet of unknown granite, metabasalt layers, magnetic layers called magnetite, as many as four fault lines, multiple springs and other as yet unexamined features ignored by this report. To evaluate a nearly mile long HDD drill by the study of the first 100 feet, is like walking out into the ocean at the beach, getting waist deep in the water and deciding that you can walk the whole way across to England.

We find the tone and unprofessional approach to this study to reflect very badly on the Forest Service. If you are so inclined to agree with the incomplete data provided by Dominion, then simply skip forward to the end, and allow them the DPI route and claim that the clearing will enhance views and help with deer migration and that the cutting of large old growth forests is important to rejuvenate the soils and biodiversity. While you are at it, change your mission statement from "Caring for the Land and Serving People" to the great quote from the former secretary of Interior James Watt, who came up with the idea of selling off the National Parks to oil and mining companies. "when you cut down the last tree, Jesus will come back." This would fit in perfectly on a plaque at the new Mark Woods scenic pipeline overlook. Given the poor stewardship in recent years of many National Parks and Forests, the land might be better cared for in private hands. At least in that case the land owner might fight to protect this valuable asset that attracts 15 million visitors a year.

These mountains we call home are some of the oldest mountains on the planet. The greenstone is over a half billion years old has seen the rise and fall of the very dinosaurs we now burn for energy. They will be here, battered and scarred, long after the age of gas pipelines and fracking. Undisturbed land is a scenic treasure, worth billions in tourism, far more than another speculative pipeline for power plants not even approved yet. Protect the land entrusted to you. Don't let a few bad years with no thoughts for the future undo the centuries of hard work that made these parks (and your positions) possible.

Question about Appalachian Trail Crossing (CO110-5) was not answered in FEIS. See the link below.
<https://www.ferc.gov/industries/gas/enviro/eis/2017/07-21-17-FEIS/volume-IV-part-7.pdf>

I would like to object to FS answer to the question about Underestimated Visual Impact Assessment for Appalachian Trail Crossing (CO 52-1). See link below.

<https://www.ferc.gov/industries/gas/enviro/eis/2017/07-21-17-FEIS/volume-IV-part-3.pdf>

FS response was : " For views oriented east of the BRP, such as Three Ridges Mountain Overlook (KOP 39) and others, the pipeline would not be located on GWNF land, and would be outside the scope of the FS scenery analysis. "

I would like to object to the above statement. The permission of Forest Service is crucial to the entire ACP project. The only reason why developers of ACP choose Reed's Gap is solely because they would not need congressional approval. Visual integrity of the woods on both sides of the BRP and AT are very important for the tourism. Right now FS owns very narrow stretch of land but local residents choose to leave their large parcels of land not developed to buffer insufficient amount of land that FS owns. Views towards AT from distance are equally

important as views from the AT. It is clear that both views from AT and view of AT would be severely damaged

because of the ACP project. Drill under BRP and AT has very high risk of failing and then Contingency plan will be implemented. This plan would cut trees all of the way to the very top of the mountain were FS own a very thin piece of land. That would make tourist experience even more miserable and views completely damaged forever. FS should take responsibility and not allow any permits or changes to the FS plan!

I want to object to the FS answer about inadequacy of DEIS (CO 52-3). See link bellow.
<https://www.ferc.gov/industries/gas/enviro/eis/2017/07-21-17-FEIS/volume-IV-part-3.pdf>

ACP developers purposefully did not submit thousands of most critical information before the release of DEIS so that public and government agencies would not have opportunity to object. Even now ACP did not submit all of the required documentation but yet they are fast tracked by FS. There is absolutely no reason for FS to use DEIS as is. Your agency can make their own research and should not rubber-stamp every piece of paper that ACP and FERC are eagerly do.

In short, I object to the issuance of Special Use Permit and to the Forest Plan Amendments because ACP location was chosen with sole purpose of not going through the Congressional Approval. AT crossing should be avoided and can be avoided, but ACP and FERC do not have any reason to choose environmentally least damaging route as far as ACP developers would pay their dues to FERC. FS on another hand has legal obligations:

1) Require to look closely for any alternative routes that would avoid taking of FS land entirely. You failed here.

2) FS should assign already spoiled by other utilities land instead of giving new and untouched property. Just 5 miles away from the proposed AT crossing is already existing crossing that ACP did not want because of time constrains. Time constrains should not be of any issue for the FS! So FS failed here as well.

3) FS spent years and large amounts of tax payers money to develop the FS plan. Thousands of hours and hundreds of professionals were working tiresomely. And now you want to throw away (you call it amend) the FS plan just to accommodate request of some small privately owned utility company in order for them to get rich quickly? If you plan to amend your plan for each and every project as FERC does, than why do citizens of the United States need YOU?

-Why do we need to waist our tax money for your salaries?

-What do you protect?

-Who do you serve?

Objections were filed on behalf of Fenton Inn by Lilia A Fenton 8/23/2017