



## Southern Shenandoah Valley Chapter

Dec. 30, 2014

USDA Forest Service  
George Washington & Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Re: Special use permit to allow surveying for Atlantic Coast Pipeline

Dear GWNF:

I am writing on behalf of the Southern Shenandoah Valley Chapter of Potomac Appalachian Trail Club to register our opposition to issuing a permit to allow Dominion to survey the GWNF for the proposed Dominion Atlantic Coast Pipeline. Our chapter recently sponsored a series of six "pipeline hikes" on trails in the path of the pipeline before we considered what our position would be. At our annual meeting in December, we decided unanimously to oppose the pipeline.

Our main concern is its potential impact on Shenandoah Mountain area of the George Washington National Forest (GWNF), which has outstanding scenic, ecological and recreational values. The Shenandoah Mountain area is far too unique in terms of ecology and recreation to be a suitable location for a major interstate gas transmission pipeline. In fact we can't imagine a worse place.

The Rt. 250 corridor is a scenic gateway to Shenandoah Mountain, which lies in the heart of the national forest and has a network of almost 200 miles of trails, including a segment of the Great Eastern Trail. A 90,000-acre Shenandoah Mountain National Scenic Area, proposed by Friends of Shenandoah Mountain, has been recommended for Congressional designation by the new GWNF management plan. PATC is a strong supporter of this proposal. For the past 30 years our chapter has frequently hiked, picnicked, camped, and maintained trails in the Shenandoah Mountain area. We recently completed a 2-year project to measure all the trails on Shenandoah Mountain to supply accurate distances for a new PATC guidebook, soon to be published. We shared these wheel measurements with the North River Ranger District, and they will be used in the next edition of the National Geographic Trails Illustrated map for Staunton Shenandoah Mountain

The pipeline will have a negative impact on:

- Scenic Rt. 250 gateway to GWNF (The GWNF Plan calls for management of this area as a Scenic Corridor. Although the pipeline would be on immediately adjacent land, it would ruin the scenic quality of the corridor.)

- Hiking trails in the Georgia Camp-Shaws Fork-Ramseys Draft-Braleys Pond-Dowells Draft- Hankey Mountain Area in the GWNF;
- The Shenandoah Mountain South Trail segment of the Great Eastern Trail, one of the most accessible and heavily used sections of the GET in Virginia;
- The scenic Shenandoah Mountain area, which has the largest tract of mostly unfragmented national forest land in the Eastern US;
- Cow Knob Salamander habitat, which is documented from Rt. 250 south to Benson Run. Sightings have occurred as recent as Oct., 2014. The new GWNF management plan specifically says that Cow Knob Salamander habitat will be protected wherever they are found. We expect the GWNF to honor the Cow Knob Salamander agreement with the U.S. Fish & Wildlife Service, signed in 1994 to avoid listing as an endangered species.
- Ramseys Draft Wilderness because it slices through the adjacent forest;
- The historic value of the Rt. 250 corridor in that it was the Staunton-Parkersburg Turnpike and also has Civil War sites. There are likely additional historic sites that have not yet been discovered;
- Steep, potentially unstable slopes that can slip during rainfall events, thereby generating unacceptable levels of sediment and runoff into trout streams;
- Public safety of hikers and other forest recreationists since it has a 1100' radius of potential impact (from explosions).

The 42" pipeline will require a permanent linear clearing that will create a pathway for invasive species that will degrade the ecological integrity of the area. The Braley Pond – Ramseys Draft area is of particular interest to us because of the scenic beauty and the flora and fauna found there. It draws people from the Shenandoah Valley and the whole mid-Atlantic region.

For these reasons we ask the GWNF to deny a special use permit to allow Dominion to survey for the Atlantic Coast Pipeline. Minor adjustments to the proposed route cannot avoid all the impacts to very special resources that we have listed.

Thank you for the opportunity to comment.

Sincerely,

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