



Southern Shenandoah Valley Chapter

April 12, 2016

FERC

Re: Amendment to route for Atlantic Coast Pipeline

Dear FERC:

I am writing on behalf of the Potomac Appalachian Trail Club - Southern Shenandoah Valley Chapter (PATC-SSVC), to express concern about Dominion's new route for the Atlantic Coast Pipeline.

PATC-SSVC is primarily a trail maintenance and hiking club. We are the only formal hiking organization in the southern Shenandoah Valley. We lead hikes in the George Washington National Forest (GWNF) and Shenandoah National Park almost every weekend. We are long-time volunteers in the GWNF North River Ranger District, with several of our members having adopted trails in the Ramseys Draft and Shenandoah Mountain area. Collectively, SSVC members volunteer between 1,000 and 2,000 hours per year maintaining trails near the pipeline route. We hike, picnic, camp, swim, and hold meetings along the pipeline route. In 2014, after leading a series of hikes along the preferred pipeline route, our club took a position opposing the ACP.

SSVC is very interested in protection of natural resources on public lands that we have enjoyed since our formation in 1985. When we hike, we enjoy viewing wildflowers and native plants, birds and other wildlife, the great variety of tree species in our area, special geologic features, and clean mountain streams. We especially enjoy scenic views. We feel extremely fortunate to live where we can recreate in the heart of the George Washington National Forest.

A close look at the new pipeline route through Bath and Augusta Counties reveals that it is very problematic with regard to its passage through the GWNF. In addition to fragmenting habitat in the national forest, it would negatively affect five Special Biological Areas (SBAs), an Inventoried Roadless Area, two Concentrated Recreation Areas, a Recreational River Corridor, a Scenic Corridor, a Dispersed Recreation Area, several significant cultural resources, and a long list of trails, including both the Great Eastern Trail and the Appalachian Trail.

We would like to call to your attention the following natural, recreational and cultural resources along the route. We have indicated the GWNF management prescription for each area and have indicated how the new route does not comply with the GWNF management plan.

Natural Resources

Special Biological Areas (4D)

According to the 2014 GWNF Management Plan, Special Biological Areas are core areas for conservation of the most significant and rarer elements of biological diversity identified to date on the Forest. These areas or communities are assemblages of plants and animals that occupy a small portion of the landscape, but contribute significantly to biological diversity. The Plan states that these areas are unsuitable for designation of new utility corridors,

1. **Browns Pond SBA.** 117 acres. Montane Depression wetlands. A sinkhole pond in a dry sinkhole complex in karst topography. Browns Pond has salamanders, frogs, high bush blueberries and other plants characteristic of sinkhole ponds. Part of the Browns Pond SBA is located within the survey area.
2. **Ratcliff Hill SBA.** 31 acres. Central Appalachian Shale Barren. Located along the Cowpasture River on the east end of the 678 Bridge. Shale barrens are considered globally uncommon and host many locally rare species including the butterflies, Appalachian grizzled skipper and Olympia marble, and the federally listed plant, shale-barren rock cress. (from Virginia DCR web site)
3. **Big Cedar SBA.** 43 acres. Central Appalachian Shale Barren. Near the intersection of Scotchtown Draft and Deerfield Rd. All of it is in the survey area.
4. **Reubens Draft Shale Barren SBA** 39 acres - along Deerfield Rd. south of West Augusta. Almost all of it is in the survey area.
5. **Big Levels Macrosite SBA** 17,793 acres. Montane Depression Wetlands. A tiny corner of the SBA is in the survey area, but this is located close to some of the Maple Flats ponds. Big Levels was set aside in 1935 by FS, DGIF, and several other agencies or organizations.

Threatened and Endangered species and other species of concern along the new route. This is a selected list; there are probably many more.

- Indiana bat (based on GW plan showing habitat on both sides of new route)
- Shale barren rock cress (based on SBAs)
- James River spiny mussel (known to be in Cowpasture River)
- Bald and golden eagle habitat
- Appalachian grizzled skipper (Virginia state threatened species)
- Golden winged warbler
- Northern metalmark butterfly

Remote Backcountry (12D)

According to the GWNF plan, Remote Backcountry is managed to provide mature successional forest, large woody material on the ground and den and cavity trees. Recreation opportunities are provided in these large remote, core areas where users can obtain a degree of solitude and the environment can be maintained in a near-natural state. There is little evidence of humans or human activities other than recreation use and nonmotorized trails. No temporary or permanent road construction is allowed. Remote Backcountry should meet or exceed high scenic integrity objective.

The plan also states that Inventoried Roadless Areas will be managed to maintain their roadless character, consistent with the requirements of the 2001 Roadless Area Conservation Rule.

- **Jerkentight Roadless Area** on the south end of Shenandoah Mountain is the third largest Inventoried Roadless Area in the GW at 16,680 acres. All of it is managed as Remote Backcountry (12D) except for a Special Biological Area on South Sister with shale barrens. A big chunk of 12D along Scotchtown Draft and Deerfield Rd. is within the survey area.

Eligible Recreation River Corridor (2C3)

According to the GW Plan, rivers in this category are eligible for designation for the National Wild and Scenic River System under the recreational river designation. The primary emphasis for management of the river and river corridor is to protect and enhance the outstandingly remarkable values of that river or river segment.

- **Cowpasture River** at Ratcliff Hill/Fort Lewis
This is one of the most beautiful sections of the Cowpasture River, thought by some to be the cleanest river in Virginia, with bald eagles, river otters, a wide variety of waterfowl, and mussels. Outstanding mountain and pastoral scenery.

Recreational Resources

Scenic Corridor and Viewshed (7B)

The survey area impinges the Scenic Corridor along 250 near Hankey Mountain and West Augusta.

GWNF Plan: Forest management activities maintain the natural characteristics that make the area scenic. These areas are unsuitable for designation of new utility corridors.

Concentrated Recreation (7D)

The study area passes close by 7D as it passes Braley Pond (1 of only 10 picnic areas in the GW) and again when it passes Sherando Recreation Area.

GWNF Plan: Concentrated Recreation Zones are managed to provide the public with a variety of recreational opportunities in visually appealing and environmentally healthy settings. These areas also serve as gateways to the wide diversity of recreation opportunities on the remainder of the forest. The scenic integrity objectives are in the upper values of high to moderate. These areas are unsuitable for new linear rights-of-way.

- **Sherando Recreation Area** – most heavily used site in GWNF, camping, picnicking, swimming, hiking, mountain biking, fishing, canoeing
 - The pipeline route and survey corridor pass just east of the entrance to Sherando. Construction would disrupt public use of this popular area with traffic, noise, dust, long delays, and potential road damage. Long-term effects would include degradation of the scenic quality of Sherando, degradation of Back Creek, and a diminished recreational experience for the public.
- **Braley Pond Recreation Area** – popular for camping, hiking, fishing, picnicking, biking, horseback riding
 - The pipeline route and survey corridor cut across the access road. The edge of the study corridor is only 1,000 ft southeast of the Braley Pond Picnic Area (7D). Construction would disrupt public use of the Braley Pond area with noise, dust, long delays for access or even temporary closure of the picnic area,

campground, pond, and trails. The scenic character of the Braley Pond area would be permanently diminished by maintenance of the permanent linear clearing.

Dispersed Recreation (7E1)

This is the area around Sherando Campground and includes the lake and surrounding ridges out to Mt. Torrey Rd. Survey impinges along Mt. Torrey Rd near the entrance to Sherando Recreation Area. Mt. Torrey Furnace lies within this management area.

GWNF Plan: These areas receive moderate to high recreation use and are managed to provide a variety of dispersed recreation opportunities, improve the settings for outdoor recreation, and enhance visitor experiences in a manner that protects and restores the health, diversity, and productivity of the land.

Trails:

The pipeline route will have an impact on many trails.

- Great Eastern Trail
 - The pipeline would cross the GET in two places:
 - Just north of 678, near the Cowpasture and Ratcliff Hill.
 - On Tower Hill Mountain near Brown's Pond
- Shenandoah Mountain South Trail
 - Just north of 678, near the Cowpasture and Ratcliff Hill.
- Braley Pond trails – access could be cut off
 - Johnson Draft
 - Bald Ridge
 - Braley Branch Trail
 - Braley Pond Trail
- Dowells Draft Trail
 - Pipeline follows Dowells Draft Trail and the Dowells Draft Rd, both of which are popular for hiking, biking, and hunting.
- White Oak Draft Trail
 - The pipeline would cut across this trail approx.. 3000 ft. north of Rt. 250
- Visible from trails in Ramseys Draft Addition, Hankey Mountain, Elliott Knob, Crawford Mountain, Jerkemtight, Signal Corps Knob area,
- Appalachian Trail
 - From GW plan: Management activities such as trail construction, maintenance, and signing are designed to meet a Very High Scenic Integrity Objective.
- Mt. Torrey Ridge Trail and Mills Creek Trail
 - The trailhead for both is at Mt. Torrey Furnace, within the pipeline survey boundary
- Back Draft Trail (546)– starts off of SR 641 and goes over Walker Mountain
- Short Ridge Trail (717)– starts off west side of SR 629 and goes to FR 399 on Shenandoah Mountain
- Brushy Ridge Trail (718) – comes off east side of SR 629, just west of Walker Mountain by Fowler Spring

Viewshed impacts

The viewsheds from many of our favorite trails on Shenandoah Mountain, Elliott Knob, Crawford Mountain, Hankey Mountain, Sherando/Big Levels, Humpback Rocks, and Three Ridges will be ruined by a permanently maintained linear corridor.

GWNF Plan: Utilities should be co-located whenever possible to reduce visual impacts.

Cultural resources

GWNF Plan: Significant cultural resources are protected from loss.

Mt. Torrey Furnace

This iron furnace is situated at the foot of Torrey Ridge in the GWNF along Mt. Torrey Rd. (664). It is on National Register of Historic Places. The Mt. Torrey iron furnace complex included the iron furnace and its support facilities, as well as structures necessary to support the workers and animals who operated the furnace. The original cold-blast charcoal stack was built in 1804. The furnace structures were burned during the Civil War, but were rebuilt in 1866. The extant Mt. Torrey Furnace is a stone square trapezoid about 30 feet wide and 40 feet tall.

In addition to these special resources, we are concerned that the pipeline, if constructed, would have a negative effect on the 90,000-acre Shenandoah Mountain National Scenic Area, proposed by Friends of Shenandoah Mountain and recommended for Congressional designation by the new GWNF management plan. PATC is a strong supporter of this proposal and does not want any commercial development of this sort to degrade the scenic gateway to this special area and the surrounding national forest lands.

We continue to be concerned about public safety of hikers and other forest recreationists since the pipeline has a 1100 ft. radius of potential impact (from explosions). Safety would be a concern during construction, too.

For all these reasons we ask FERC to deny a permit for Dominion to build a pipeline along the new route. 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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