CUTTING

When Diana Christopulos, the president of the Roanoke Appalachian Trail Club, first heard about the proposed Mountain Valley Pipeline project in October 2015, she wasn't particularly concerned. After all, the retired management consultant and A.T. section-hiker says there are plenty of pipelines that cross through the Trail corridor or within its viewshed. That's not surprising considering the 2,100-plus-mile-long Trail is in the backyard of the nation's largest metro corridor.

Yet the more she learned about the project that could pass near her home in southwestern Virginia the less and less she liked it. "The proposal is a total trainwreck," says Christopulos who has played a leading role in opposing the project. "We've spent decades and millions of dollars protecting the Trail. If this is approved it would make much of that work meaningless."

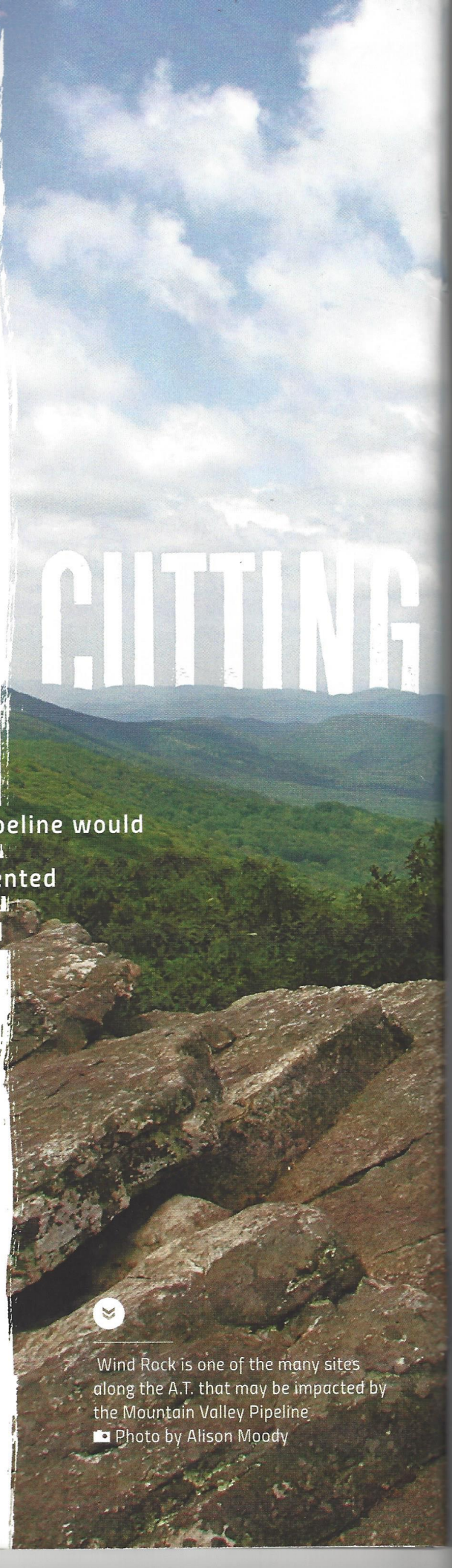
If the Federal Energy Regulatory Commission gives the project the green light, the pipeline will span 303 miles from Wetzel County, West Virginia and transport natural gas extracted from the Marcellus Shale across the Appalachian Mountains and connect with the Transco pipeline in Pittsylvania County, Virginia at a projected building cost of $3.5 billion. Currently, says Christopulos, it's one of two active pipeline proposals in Virginia, although three additional proposals are being weighed to meet the growing demand for natural gas in the U.S. and abroad.

As Christopulos and the Appalachian Trail Conservancy's (ATC) central and southern regional director Andrew Downs unearthed details of the project, they became alarmed by the large footprint of its planned route. Among their concerns is the possibility of an unusually wide utility corridor that could accommodate additional projects and would cut next to two wilderness areas while also scaling steep terrain over some of the region's highest peaks. In addition, the visual impacts were startling: in all, the ATC identified 19 scenic locations along 100 miles of the Trail where the pipeline might be visible including McAfee Knob, an iconic lookout near Roanoke.

A proposed gas pipeline would have an unprecedented impact on the Trail

While the local impact of the Mountain Valley Pipeline (MVP) is substantial, there are other more nuanced risks that national trail advocates across the country are paying close attention to. Among the ATC's primary concerns with the project is the threat of amending the Jefferson National Forest land management plan, approved in 2004, that would allow a 500-foot-wide corridor to cross through 3.4 miles of national forest. Current rules dictated by the publicly-vetted Jefferson National Forest land management plan limit the corridor to a width of 125 feet. According to Downs, amending an existing federal land management plan that currently has protective language for a national scenic trail to allow for incompatible development would be a game changer. Not just for the A.T. in southwestern Virginia, but for nationally designated trails from Florida to Alaska. "This project cuts straight to the core of what it means to be a scenic trail," explains Downs. "This is the first one that we are opposing. Not because it's the first one, but because it may be the worst. It's a thoughtful and conscious decision that we didn't take lightly, but we're confident we've chosen the right fight."

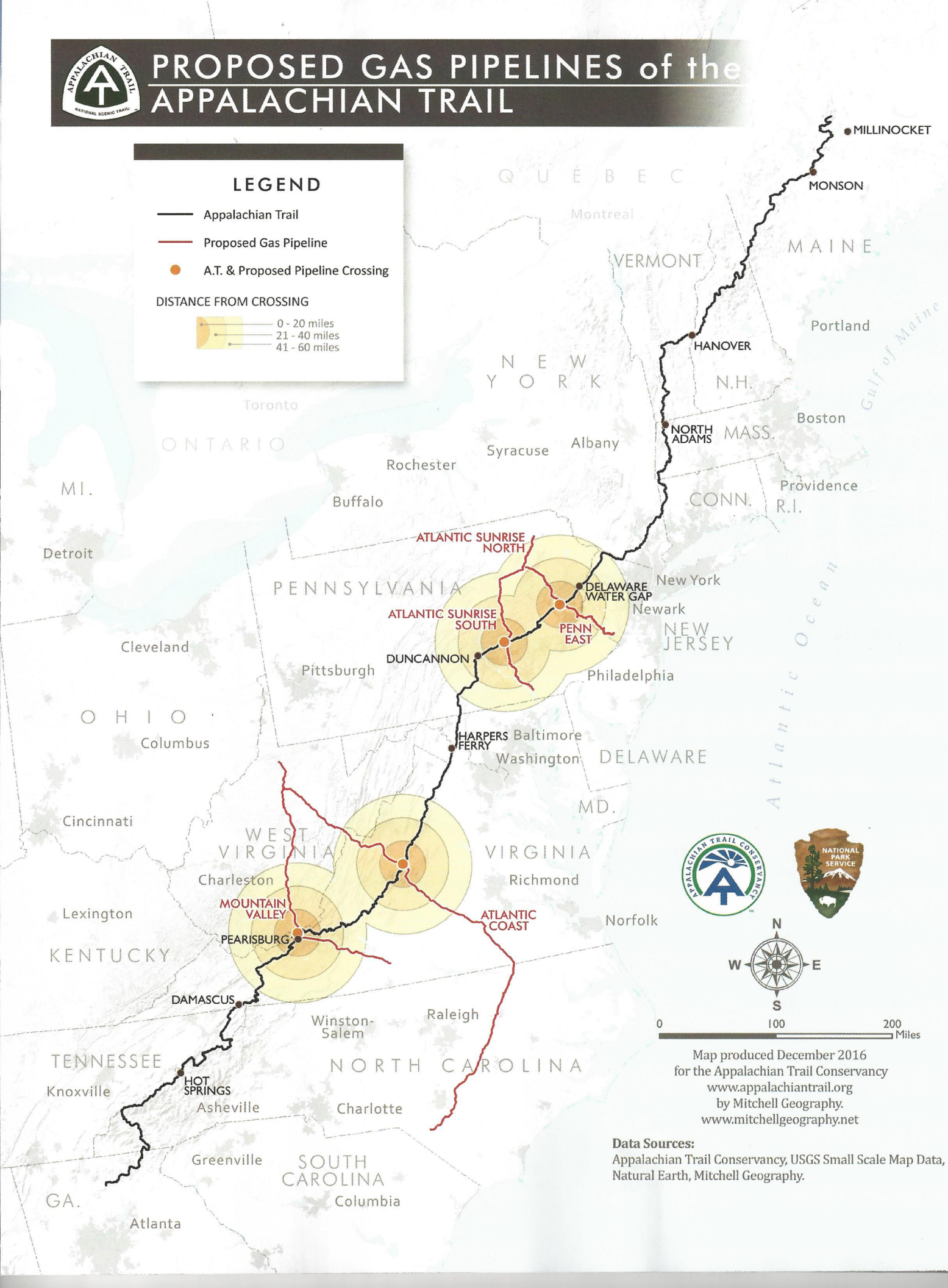
BY JACK IGELMAN



Wind Rock is one of the many sites along the A.T. that may be impacted by the Mountain Valley Pipeline
Photo by Alison Moody


TO THE CORE

PROPOSED GAS PIPELINES of the APPALACHIAN TRAIL



Map produced December 2016
for the Appalachian Trail Conservancy
www.appalachiantrail.org
by Mitchell Geography.
www.mitchellgeography.net

Data Sources:
Appalachian Trail Conservancy, USGS Small Scale Map Data, Natural Earth, Mitchell Geography.

ANALYSIS & EFFECT

To be sure, the Appalachian National Scenic Trail is bisected throughout its length by hundreds of infrastructure projects, including interstate highways, electric transmission lines, and pipelines. According to the Partnership for the National Trails System, a pipeline compatibly bisects the trail — either above or below ground — on average every 3.5 miles. "These sorts of projects are going to continue to increase in the future," says Laura Belleville, the ATC's vice president of conservation and Trail management programs. "Although we've taken a strong position against the MVP, we are not against all pipelines. What concerns us are impacts that we can't mitigate."

According to Belleville, there are 10 pipeline projects that may unfold in the near future; there are three currently under consideration and one (Atlantic Sunrise) recently permitted by the Federal Energy Regulatory Commission — the agency that regulates the interstate transmission and sale of natural gas and electricity — that would impact the A.T. "It was clear that a gas boom was in motion and proposals for more pipelines crossing the A.T. would follow fast," says Downs. "We had to get up to speed really quickly to understand the ins and out of the process: what will the corridor look like? How will they access it? How do you get water and discharge it?"

The developmental pressure is precisely why the ATC adopted a pipeline crossing policy in 2015 to address infrastructure projects. The policy includes eight standards outlining the organization's expectation for future projects, among them, that the pipeline minimize its impact through the Trail corridor and that the project must demonstrate a pressing public need.

So when the Mountain Valley Pipeline, LLC submitted its proposal, the ATC was becoming better prepared to evaluate the impacts of pipeline projects. As part of the federal regulatory process, an environmental impact statement is required to be presented to the public to analyze the potential effects of the project. To the alarm of Downs and Christopulos, there were flaws in the draft environmental impact statement (DEIS) released in September of last year. At the top of the ATC's concerns is that the analysis missed obvious impacts. For instance, the DEIS claimed there would be minimal impact on the viewshed, but analysis by the ATC demonstrates wide-reaching impact to the Trail's viewshed that were not demonstrated in the DEIS, including the pipeline's impact on the vista captured on the DEIS document's cover page. "From that exact location depicted on the cover page it's quite clear the view will be impacted. That speaks to the depth of inadequacy of the draft EIS," says Downs. "It's almost comical. The document is missing huge and important pieces of analysis."

If approved, they worried, the pipeline would have an unprecedented impact on the Trail. Yet the impact is not just visual, Christopulos says the project has potential public safety consequences since it crosses steep slopes and karst topography, a landscape that features sinkholes, caves, and underground water. The pipeline will also bisect an active seismic zone where a rupture could damage property and imperil lives. She also cites social justice concerns since 14 of the 17 counties it crosses in rural Virginia and West Virginia have lower than average incomes.

« There are four pipeline projects currently under consideration that would impact the A.T. Atlantic Sunrise was recently permitted by the Federal Energy Regulatory Commission — the agency that permits interstate natural gas pipelines

The ATC's president and CEO, Ron Tipton says that this pipeline and other future proposals are high on the organization's radar. "We understand the need for energy and natural gas as a legitimate source of clean fuel. We understand that it's going to be here for a while. It's not our policy that we oppose any of these facilities – what we are saying is they ought to be really necessary and have as small an impact as possible," explains Tipton. "We're very selective as to when we come out and say no, but this project is unacceptable." Those are pretty strong words coming from an organization that seldom draws a line in the sand; but it's not just the ATC that has opposed the MVP.

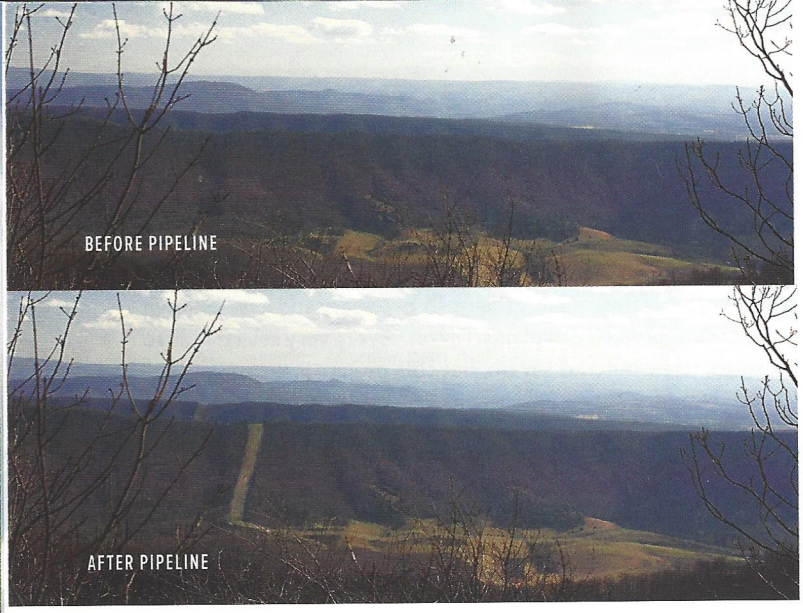
While Virginia's Governor Terry McAuliffe and the Roanoke Regional Chamber are notable supporters of the pipeline, Christopulos says that the project has broad opposition in southwestern Virginia and doesn't fall on typical party lines. Last December, when the 90-day public comment period for the DEIS came to a close, Downs estimates 1,000 letters were sent to FERC in opposition to the project. In addition, four of five Virginia county governments – Giles, Craig, Montgomery, and Roanoke – have said the document was insufficient. "This a largely driven by the need to move quickly," Downs argues. "The public investment is millions of dollars in the A.T.; we shouldn't force this through."

While Downs was concentrating on the scenic and environmental impacts of the MVP, he hadn't contemplated another suite of effects that can potentially set a negative precedent for the entire A.T. and throughout the national trails system. For decades, the ATC and other trail organizations have developed standard language and prescriptions to manage the A.T. corridor, such as rigid viewshed protocols, wildlife habitat protections, and preservation norms for cultural and historic sites. Since the Trail passes through a wide range of public management jurisdictions, from state parks to national forests, a stable order of land management practices aid in maintaining a consistent quality of experience from Maine to Georgia.

SETTING A PRECEDENT

Gary Werner, the executive director of the Partnership for the National Trails System based in Madison, Wisconsin said that the standard language of management of the A.T. throughout its corridor has set the bar for other national scenic and historic trails across the nation. "The A.T. serves as the model over and over again," he says of the first nationally designated scenic trail following the passage of the National Trails Systems Act by the U.S. Congress in 1968. So in 2013, Werner's organization convened national trail advocates to develop a pipeline and linear transmission policy that could draw on many of those best practices developed by the ATC. "We developed the policy as a result of concerns from many trail systems that there's going to be more and more pressure to build pipelines and overhead electrical transmission that crosses trails. We wanted to have a statement from the whole community that other trails could use as a reference," adds Werner.

Around the same time that a national policy was created, the U.S. National Forest was revising its planning protocols for developing national forest land management plans, known as the 2012 Planning Rule. Federal legislation requires that the public participate in the national forest planning process. Werner says that they were able to convince the Forest Service that federal forest's



The proposed pipeline would be visible from many locations on Kelly Knob (shown here). This view would likely be one of the most heavily effected
Visual impact simulations by Hill Studios

with segments of national trails should have specially designated management areas defined in their respective forest plans by drawing on the precedent established on the A.T. corridor. The 2012 Planning Rule dictates that national trails should be managed to maintain its unique special character or purpose. That's particularly meaningful to the A.T. since more than half of the Trail passes through national forest land on several national forests each managed by a unique land management plan that is required by federal law to be renewed every 10 to 15 years.

"Our argument is the fact that these national trails are Congressionally designated and established to maximize recreational opportunities and preserve the historic and cultural resources of the trails. We're asserting that their status are as important as national parks, wilderness, or wild and scenic rivers and need to be treated with a high level of care," says Werner. "To do that, the land management agencies must define a right of way. Not just a treadway, but a corridor that is not subject to the normal multiple-use land management approach that's mandated in national forests."

So what caught Werner's attention about the Mountain Valley Pipeline was the threat to amend the Jefferson National Forest plan to create a "designated utility corridor" up to 500 feet wide to allow the pipeline crossing. Although the Jefferson National Forest plan was finalized in 2004, before the 2012 planning guidelines, it included special management protections for the A.T. Among the concerns of a 500-foot corridor is not only the visual impact, but it's size would invite other utility projects to co-locate and would amend a plan that was already vetted by the public and approved by stakeholders and administrators.

"A project should not totally change the management plan. Our position is the pipeline should be the exception to the rule, it shouldn't become the rule. We see this as a potentially very damaging precedential project," says Werner. In particular, he's worried that changing the standards of protection would call into the question the ethos of the national trails system. "They have a special place in the heritage of America's public land. The A.T. remains our posterchild because of its familiarity and cache; it's like the Yellowstone of the trail system. This would lower the status of the entire system."

The ATC's Belleville, calls the prospect of the new pipeline corridors one of the Trail's most challenging present and future threats. "We'll only know the true negative effects on our lands after the lines have been installed, when it's too late." She says that the ATC's strategy to respond to the impacts of the gas boom will require a high level of coordination from a broad range of stakeholders, including Trail advocates, all levels of governments, citizens, and land managers.

That approach is consistent with the recently launched A.T. Landscape Conservation Initiative — a collaborative effort of both private and public partners and agencies to conserve ecological, cultural, historic, and economic values across a wide-ranging area surrounding the A.T. The goal, says Belleville, is to look at the A.T. landscape as an entire system, rather than a corridor segmented by boundaries. While 99 percent of the Trail itself is protected, the large landscape initiative is tasked with protecting viewsheds and monitoring local environmental impacts in order to maintain a holistic Trail experience that includes a system of iconic vistas, healthy ecosystems, and irreplaceable cultural, historic, and natural resources from Springer Mountain to Katahdin. And perhaps no project could have such a comprehensive threat to the Trail experience than the impact and precedent set by the Mountain Valley Pipeline.

In response to the fierce backlash over the controversial project, the *Roanoke Times* reported on January 31 that FERC was delaying the release of a final environmental impact statement, although a new release date has not been established. The commission, it was reported, have requested additional information from Mountain Valley, LLC. that was outlined in a 28-page document. While the delay is welcome news, Christopulos and Downs argue that the MVP project has been rushed and alternative routes weren't adequately considered in the first place. "They've been very aggressive and forced it through and selected a route that doesn't meet best practices that have been utilized for decades. If they followed the best practices they wouldn't have to amend the forest plan," says Downs. "This is largely driven by the need to move quickly. There are no reasons why we should rush this."

In addition to the grassroots backlash to the project, there are other hurdles facing approval of the pipeline, including the pending decision by the U.S. Forest Service to amend the Jefferson National Forest management plan, as well as a thumbs down from the National Park Service since the pipeline would also bisect the Blue Ridge Parkway. For now, not only is the MVP project a clear focus of concern, but the ATC's president Tipton says that future pipelines and other infrastructure projects will be a top priority of the organization. "We're going to be very public at the local and national level for these proposed routes. We're going to demand these pipelines be in the best places possible to minimize the impact on the Trail," he says. "When they talk about promoting energy infrastructure, we'll ensure that those plans are balanced with the value of nature and the potential impact on America's most popular and best known long trail."

For more information visit: **appalachiantrail.org/MountainValleyPipeline**