Playbook v3.0

7/3/2019

Pipeline Compliance Surveillance Initiative (CSI)

The CSI is a program of the Allegheny-Blue Ridge Alliance (ABRA) and its member groups.

CSI Volunteer Options

Citizen Observers

A volunteer position that anyone can do, Citizen Observers work independently or with ABRA member organizations to observe and report incidents of both downstream surface water impact and noncompliance with construction requirements. Whether you're a concerned landowner, neighbor, community member, or just a passer-by, keeping a watchful eye for water pollution and unlawful construction practices is something any sighted person can do and the easiest way to participate in the CSI program.

Stream Monitoring Program Volunteers

For folks interested in protecting the health of our state waters and aquatic life, participating in monitoring programs managed by local watershed groups and regional programs such as the Trout Unlimited/West Virginia Rivers Pipeline Monitoring program or the Isaak Walton

Pipeline CSI
Compliance Surveillance Initiative
Local Coordinator Playbook

Local Coordinators are integral to the success of the Pipeline Construction Surveillance Initiative (CSI.) They organize the actions of on-the-ground volunteers and coordinate with landowners to observe and record unlawful pipeline construction activity in their areas. Local Coordinators help build incident reports of non-compliant construction activity and of construction-related pollution incidents that are then submitted to both state and federal regulatory agencies. Not waiting on our government to do the right thing, the Pipeline CSI also uses that community-supplied data to build bodies of evidence for the many court cases against the permits that underly government approval of ACP. All of this starts with you and your local community of committed volunteers

League Save Our Streams program are sure ways to protect our region from harm in a community-driven way. Water monitoring volunteers can take part in trainings conducted by the above programs and follow the established protocols and reporting methods so that their reporting can be used as trusted scientific data.

CSI First Responders

First Responders are teams dispatched by CSI Central to investigate, verify, and document reported incidents of surface water impacts or noncompliance with pipeline construction requirements. First Responders are recruited based on professional or scientific background related to water resources or erosion and sediment control and stormwater management, or other relevant technical experience to collect data and investigate reported incidents following Pipeline CSI protocols.

Pipeline Air Force

Volunteer pilots and drone operators are recruited and trained to fly routine pipeline surveillance flights and incident response flights. Videos and photos from the air give us a new angle to watch for violations. Many sections of the ACP cross remote, forested mountain terrain that is *only* viewable from above, making our Pipeline Air Force volunteers indispensable to our evidence-gathering activities.

Volunteers

Volunteers are the lifeblood of the CSI. Each of the volunteer types (listed on the left-hand sidebar) has an important role in ensuring that the Atlantic Coast Pipeline construction and operation cause as little environmental degradation as is possible and that ACP and our state and federal regulators are held accountable for their egregious shortcomings. For volunteer coordinators, we're most concerned with the organization and deployment of Citizen Observers, First Responders, and Water Monitors. In the following few pages, we'll review their roles and activities and how they interface with CSI.

Volunteer Recruitment

Volunteer Recruitment is done via local organizations along the pipeline route as well as through broad outreach by the Allegheny-Blue Ridge Alliance's (ABRA) CSI-specific organizers. CSI has hosted wide ranging meetings and local events with coordinators and has a web-based sign up at http://www.abra-csi.org/volunteer. ABRA hosts local meetings for members and citizens to enlist local participants.

Training Volunteers

Like recruiting, **Volunteer Training** is a combination of local and coordinated ABRA/CSI instruction. Locally, coordinators can assess skills and determine training needs. CSI, in partnership with Trout Unlimited (TU) and the Sierra Club (SC) have a program the covers construction basics, watershed crossings, CSI programing and landowner outreach. Trainings on the use of drones and other specialized equipment are on-going and available upon request.

Deploying Volunteers

Volunteer Deployment is done at the local coordinator level. That individual will be notified of a potential incident that has been reported via one of the CSI citizen reporting options at http://www.abra-csi.org/citizen-reporting; that is, phone, email, or online form. In some cases, a coordinator may be apprised directly about an incident from one of the volunteers. When this happens, it is important for the coordinator to start an incident report in the CSI system.
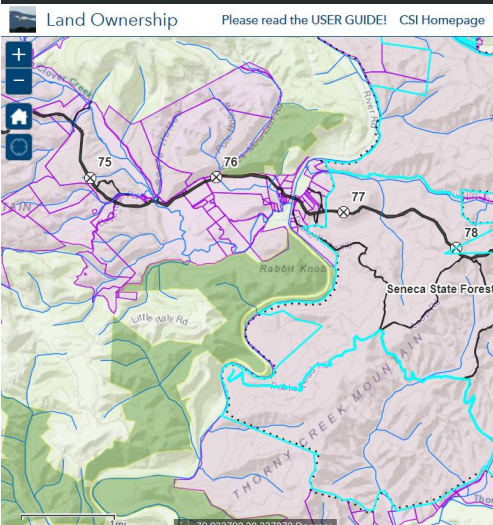
Landowners

Recruiting & Enrolling Landowners

Landowner participation is critical to the success of our monitoring efforts. We recommend taking great care when recruiting, because landowners are important 1) for access to pipeline sites on private property; 2) as eyes and ears on the construction itself, and 3) for providing the best access to neighboring landowners and property. Here are some steps to successfully recruit landowners.

1. Determine land ownership. Individual property tax parcel numbers crossed by the pipeline right of way (ROW), near the pipeline ROW and crossed by access roads are available on the CSI mapping system. Additional information for each parcel includes waterbody crossings, slope steepness, and proximity to other features such as native trout streams, karst and sinkholes. The individual parcels can be cross-referenced with county assessment data to determine ownership. Examples of these online sites include:
   a. Nelson County, VA – http://www.nelsoncounty-va.gov/government/geographic-information-systems/
   b. Augusta County, VA - https://www.co.augusta.va.us/government/circuit-court-clerk/online-access-to-land-records
   c. Buckingham County, VA - http://buckingham.interactivegis.com/
   d. Randolph County, WV https://www.acrevalue.com/plat-map/WV/Randolph/
   e. Upshur County, WV https://www.acrevalue.com/plat-map/WV/Upshur/
   f. Pocahontas County WV https://pocahontascountyassessor.com/maps/

2. Develop a plan to reach out to each landowner. Most of these meetings will be face to face. So, in advance, answer as many of these as you can: Who in their circle of friends are sympathetic? How about their neighbors? Who is the best candidate(s) to approach them? What might be the highest value for participating for this targeted landowner? Second highest? Other considerations?

3. Execute the landowner plan. Meet with each landowner and present the CSI story. They may have granted or even welcomed an easement, but reinforce that it is still their land, and the best way to ensure that it retains its value is to monitor it during construction. Pictures of some sites along the MVP or ACP where

CSI Mapping System

Use the Pipeline CSI Mapping System to find monitoring locations, property line boundaries, and links to county GIS tax records to learn land ownership!

Read the User Guide by clicking HERE!

work is being done can help drive home this point. Secure the landowner release (copy attached.), and make sure that you/we understand any unique conditions for that landowner. For example, do they want us to use a specific gate for access, limit visits to within construction periods only, not arrive after dark, call first, etc. Finally, if you know which volunteer or volunteers are going to monitor this landowner's site, arrange to introduce them. And, make sure that the landowner knows how to reach CSI.

4. If this landowner is responsive, is he or she willing to introduce us to neighbors? A referral from a neighbor can be our best means of securing the next one.

Joyce Burton, Landowner Liaison and CSI Local Coordinator for Friends of Nelson shares this tip from her experience getting to know landowners and neighbors along the route of the ACP:

"Depending on how many contacts a coordinator may already have in a particular area, it may be more efficient time-wise to identify a single landowner in a particular neighborhood and to pitch the CSI to them first, and then recruit them to help organize a "neighborhood" meeting to introduce the CSI concepts to a larger group of folks in a particular area. This "neighborhood" meeting could happen at a person's house, at a church, etc. That larger meeting should NOT be limited to impacted landowners, as other neighbors may be useful eyes and ears, as well as useful in connecting the Coordinator to other landowners who may not already be "plugged in". From there, the Coordinator can build their contact list, schedule one-on-one meetings to learn about the ins and outs of specific landowner parcels or possibly plan additional "neighborhood" meetings for trainings or further outreach in other neighborhoods.

Monitoring Construction Activity

For training on conducting pipeline visual assessments, see WV Rivers and TU's webinar recording: http://wvrivers.org/our-programs/water-monitoring/pipelinevisualassessment/

Pipeline Construction Process

The sections below describe different phases of pipeline construction activity. We list them here so you can be knowledgeable about the process and consequently make your reports and actions more effective and better informed Please review these descriptions, so you know what compliance and noncompliance look really mean.

Clearing and Grading – Cutting, removal and burning of trees, brush and debris from the pipeline right of way (ROW.) Timber may be salvaged or chipped, mulched or burned. Grubbing or stump removal and grading are included. These may involve blasting and/or heavy equipment usage.
- Key monitor actions include making sure that Erosion and Sediment Control (ESC) measures are in place and functioning correctly, and that ROW does not exceed limits of disturbance.

Stockpiling and Stringing – Transportation of pipe and equipment to designated yards and delivered to the ROW.
- Actions here include ensuring that ESC measures are not compromised.

Field Bending – also called cold bending occurs to ensure that the pipe fits the trench and ROW.
- Again, ESC measures must be in place and functioning as designed.

Ditching and Excavation – usually occur after the pipe is coated, welded and put in place. This involves excavating for the pipeline trench and is required for entry and exit in trenchless crossings.
- ESC measures must not be compromised. Trench lengths must be kept to 500 feet or variance maximum and trench breakers must be installed and maintained.

Welding – or joining the sections of pipe together is done in the ROW.
- No compromise to any of the above measures is allowed.

Coating – provides a protective barrier for the pipe sections and is done at manufacture. Additional coating is required in the field at weld areas.
- No spills or contamination is allowed.

Lowering In – refers to the preparation of the trench base and picking up and placing the pipe in the trench.
- ESC measures and trench breakers must be maintained.

Backfilling – refers to refilling the trench once the pipe is in place. Subsoil goes in first, then topsoil.

- ESC measures in place per plans.

Cathodic Protection – is used to protect the pipe from corrosion.

Hydrostatic Testing – is pressure testing to ensure pipeline will not leak during operation. Water is used as the medium.

Clean Up and Restoration – is the final cleaning and removal of all non-native materials from the ROW.

Top-Ten List of Observable Incident Types

1. **Failure to install, or delayed installation of, erosion and sediment control (ESC) measures.**

2. **Deviation from approved ESC and construction plans.**

3. **Missing, failed, damaged, or improperly installed or maintained silt fences, filter socks, or other perimeter control devices.**

4. **Missing, failed, damaged, or improperly constructed right-of-way diversions (water bars or slope breakers) and outlet structures.**

5. **Formation of earthen slips or downslope gullies within or at the perimeter of the construction right-of-way.**

6. **Sediment deposition off-site or outside of the permitted limits of disturbance.**

7. **Sediment discharge into streams and wetlands.**

8. **Failure to stabilize construction areas, bare ground, and stockpiles of spoil or topsoil after active disturbance.**

9. **Failure to construct and properly maintain construction entrances at public roads.**

10. **Failure to contain petrochemicals.**

Additional Reading –

FERC Citizen Guide for Interstate Natural Gas Pipelines
http://pstrust.org/wp-content/uploads/2014/06/FERC-Citizen-Guide.pdf

A Practical Guide For Pipeline Construction Inspectors
https://www.cepa.com/wp-content/uploads/2016/11/A-Practical-Guide-for-Pipeline-Construction-Inspectors-16Mar2016-FIN...1.pdf

Local Government Guide to Pipelines
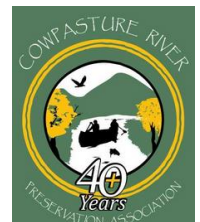http://pstrust.org/wp-content/uploads/2013/10/PST-Govt-Guide-Pipelines-2014-web.pdf

ABRA Pipeline CSI
http://www.abra-csi.org/