

LANDOWNERS COMMENTS

LO101 – Lorraine Titus

LO101-1

Lorraine J Titus, Deerfield, VA.

My husband and I are landowners in Deerfield, county of Augusta, state of Virginia. He is also a Veteran and has Alzheimer's disease, so I must speak for both of us. We've always considered ourselves as stewards of our land and want to do everything we can to protect the land, water and the environment. I don't believe that the pipeline is in our best interest as land owners and citizens.

The Atlantic coast Pipeline (ACP) is very detrimental to our way of life and all of those who are affected. The pipeline will bring much destruction and upheaval to our communities. The excavation over and under the roads and waterways will leave behind a path of potential danger to all the inhabitants and wildlife of this area. The impact will last forever along with possible future dangerous issues.

LO101-1 See the responses to comments CO46-1 and LO18-1.

Z-3154

LANDOWNERS COMMENTS

LO102 – Teresa Rhodes (cont'd)

20170321-0008 FERC PDF (Unofficial) 03/20/2017

Against the ACP FERC Docket 15-554-000

- | | |
|----------|---|
| LO102-1 | 1. Against the Atlantic Coast Pipeline: already have NC Natural Gas pipeline less than 10 miles away. Do not need another pipeline so close. |
| LO102-2 | 2. Does not need to go through timberland, farmland or rural areas that are not interested in industry. |
| LO102-3 | 3. Understand there are no taps to even hook up for industry and natural gas to be exported to foreign countries to highest bidders. Therefore will not help our economic development or bring industries to our area towns. Reported only 18 permanent jobs in N. C. Not enough to disrupt our land and families for supposed economic growth. |
| LO102-4 | 4. Farmland helps to feed this country: livestock and humans. The farming does not need to be disrupted and afterwards the farmland will never be the same or produce good crops. Will not produce good yielding crops for 15-20 years. |
| LO102-5 | 5. Will decrease property tax value if trying to sale, but property taxes will not go down as well as energy costs decrease. Taxpayers will be paying for this pipeline construction through electrical rate increases. |
| LO102-6 | 6. No jobs will be produced; all the people employed so far are from other states. Will not help the job market |
| LO102-7 | 7. Safety Issues: Asked a fire fighter their strategy for fighting natural gas fires and explosions: He said they were told to let it burn until the gas company arrives. This could take hours and impact air quality; have to evacuate homes, impact on children and their health as well as the adults. Homes will be destroyed and health of citizens will be impacted. |
| LO102-8 | 8. Cost of damages and health impact too high. Do not have enough inspectors to safely check these pipelines and the companies self-regulate and will cover their on behinds. Impact of emotional and physical health on adults, children and grandchildren too high if an explosion or leaks takes place as well as the environment. Who will pay for the damages and emotional impact. Too many explosions seen from other areas. |
| LO102-9 | 9. Homeowners insurance will probably increase due to pipeline or may not be able to get insurance . |
| LO102-10 | 10. Property value will decrease and impact on ability to get mortgage on property or even sell property in the future. Family member had planned to build a house in the future where pipeline designated to go. Who wants a house near a natural gas pipeline? |
| LO102-11 | 11. Against our rights as citizens who have worked hard for their property; some of the land has been in the family for over 4 generations for farming and wrong that the government has right to take by eminent domain. |
| LO102-12 | 12. Restricted use of property with pipeline. |
| LO102-13 | 13. Methane gas leaks into groundwater and streams and disrupts streams and riverbeds. The pipeline will go under the Neuse River which many towns get their water and this will affect |

- | | |
|---------|---|
| LO102-1 | See the response to comment CO46-1. |
| LO102-2 | Comment noted. |
| LO102-3 | See the response to comment CO80-8. |
| LO102-4 | See the response to comment CO85-7 regarding rates. |
| LO102-5 | See the response to comment LO22-5. |
| LO102-6 | The projects would be maintained and monitored throughout the life of operation. As discussed in section 4.12.1, Atlantic and DETI have affirmed that the project facilities would be designed, constructed, operated, and maintained in accordance with the DOT Minimum Federal Safety Standards in 49 CFR 192. The regulations are intended to ensure adequate protection for the public and to prevent natural gas facility accidents and failures. The staffing of DOT safety inspectors is outside the scope of this EIS. The topic of financial liability is also outside the scope of this EIS and is more properly addressed in legal forums. See also the response to comment LO22-5. |
| LO102-7 | Comment noted. |
| LO102-8 | See the response to comments CO68-12 and CO80-8. |
| LO102-9 | We do not anticipate natural gas leaks into groundwater or streams. The main potential issue with wells is that the physical structure of the well itself could be affected by the construction workspace or construction practices; or, if fluids from construction equipment were spilled in the vicinity of the well. Contamination by methane is not a primary concern. Because methane is a lighter-than-air gas, it rapidly dissipates into the atmosphere. If a pipeline leak were to occur within a stream or riverbed, there may be a small amount of methane dissolved in the water, but the majority would remain gaseous and leave the water column. This may reduce aqueous oxygen capacity slightly until repairs are completed. However, methane does not "contaminate" soils, rivers, or groundwater like fluid hydrocarbons can. |

Z-3156

LANDOWNERS COMMENTS

LO102 – Teresa Rhodes (cont'd)

20170321-0008 FERC PDF (Unofficial) 03/20/2017

- LO102-9 (cont'd) | the quality of the water. Also the pipeline will go under the county water lines. If the gas does not seep into the water, why are they asking if a well within 150 feet of the property.
- LO102-10 | 14. Going through a large area of timberland, creeks, streams and river in Johnston County, NC which is a natural habitat for many species of wildlife which will have their habitat disrupted and destroyed. The area does not want any development and we want to keep it that way for future generations. Need to keep our renewable resources intact.
- LO102-11 | 15. Will have to pay taxes on land with restricted use.
- LO102-12 | 16. Duke Progress Energy needs to find other ways (solar) to power their utility companies. They already have a bad track record for the environment. Look what they have done with coal ash. No one will benefit from the pipeline but the gas companies and utility companies.
- LO102-13 | 16. There will be destruction of miles of natural forest (cannot replant trees that are cut) and natural habitat. We need trees to produce oxygen and give us the needed rain to make our crops grow.

Teresa Rhodes of Johnston County, N.C.

LO102-10 Comment noted. Refer to sections 4.5 and 4.6 for a discussion of the potential impacts on wildlife and aquatic resources, respectively, and the mitigation measures that would be implemented to reduce these impacts.

LO102-11 Comment noted.

LO102-12 See the responses to comments CO46-1 and CO66-2. Past issues related to Dominion are outside the scope of this EIS.

LO102-13 Comment noted. Refer to section 4.4 for a discussion of impacts on forested vegetation and the mitigation measures that would be implemented to reduce these impacts.

Z-3157

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson

20170321-0066 FERC PDF (Unofficial) 03/21/2017

ORIGINAL

2012 Raccoon Run
Clayton, NC 27527
March 14, 2017

FILED
SECRETARY OF THE
COMMISSION
2017 MAR 21 A 11:31
FEDERAL ENERGY
REGULATORY COMMISSION

Mr. Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Dear Mr. Davis:

Enclosed are my comments on FERC's draft EIS for the Atlantic Coast Pipeline, Docket Number CP15-554-000 and CP15-554-001.

There are seven pages in my entire submission, including this cover letter.

Sincerely,



Francine J. Stephenson

Z-3158

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson (cont'd)

20170321-0066 FERC PDF (Unofficial) 03/21/2017

March 14, 2017
Comments of Johnston County, NC Landowner Francine J. Stephenson
2012 Raccoon Run, Clayton, NC 27527
Re: FERC's draft EIS for Docket Number CP15-554

Today's Tragedy

LO103-1

It is tragic that here in eastern NC there are plans to place a dangerous, high-pressure natural gas pipeline ruining many acres of prime farmland just when our culture is on the cusp of new technologies for renewable energy sources, and this new pipeline project is being planned at the risk of a multitude of lives and structures, merely for the excess profits of a private corporation, not for a valid public necessity.

In a few years after installation, the infrastructure for piping natural gas will be superseded by clean and safer wind, solar, and water sources. But we are left with an infertile streak of land across our plots, we have to continue to pay taxes on the land, and a private company tells us what we can and cannot do with our land, including our farming practices and our constructions, for all generations to come. In the meantime, we must live with the ever-present danger of a massive pipeline explosion, leaving few choices for planning retirement homes, rental property, or any other habitable use of the property. Our land values plummet, our water sources are subject to pollution, we are liable for suits following injuries, and our dreams of special uses for our lands are forbidden. What a lose-lose situation this is! Thirty to fifty years from now when the shale is all gone or replaced by renewables and the pipeline is abandoned, we still have someone else owning rights to our land and we will still be paying for it in taxes and many other ways.

Need for Pipeline is Unproven

LO103-2

Dominion and ACP have not sufficiently built the case for the public need of this proposed pipeline. Other sources reviewing ACP's analysis have pointed out that the predicted massive flow of gas coupled with the plans for no tap-ons and direct use to Duke Energy and Piedmont companies MUST imply that there is an intention to eventually export the valuable commodity traveling the pipeline daily.

Even if the case for dire public need had been built and if it were completely transparent, the timing is still pathetic. In my opinion, this deliberate choice to rush to get fracked shale gas "while the getting is good," rather than develop alternative energy sources, exhibits the money-grubbing stance of the energy sector and its private and government ties. It was pointed out in the draft EIS that other alternatives to this pipeline could not be achieved in such a timely fashion as what is proposed. I would like to point out that with the delays already experienced and perhaps some to come, that argument becomes more ridiculous.

LO103-1 Comment noted.

LO103-2 See the response to comment CO46-1.

Z-3159

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson (cont'd)

20170321-0066 FERC PDF (Unofficial) 03/21/2017

Fracking Bad for the Environment

LO103-3 | The Marcellous Shale resources in West Virginia is like the Klondike and the California gold rushes of years ago. Those in the energy business are “bustin’ to get to the source. But the fracking methods are very controversial and there is data to show that the methane released in this process, the chemicals shot down into the earth, and the very nature of the fracking process are causing dire environmental problems in the areas being fracked and even globally. The unwritten plan to deplete the earth of all its energy resources is deplorable. Leave some shale gas in the ground for future generations and emergencies! Turn to renewable energy sources.

Pipeline Dangers and Liabilities

LO103-4 | Pipelines, sometimes newly laid ones, are exploding frequently, as tracked by government data. In Johnston County, NC, the homes of many individuals are located within a projected 1,100-foot blast area for a pipe under the planned type and pressure. We just learned that the pipe will likely come from South Korea, and we wonder how well it is manufactured. Watching a video of any recent pipeline explosion is chilling to us all!

In addition to the catastrophic explosions, we worry about leaking methane, about pollution of our water sources, our livestock, and our land. Much of the route is planned though an area known locally as “The Mashes” (marshes) where historically individuals have sometimes needed boats to travel out of their homes. By deviating from the plan to follow the I-95 corridor and going southeast through the Bentonville area, the ACP will be gaining cheap land prone to flooding but at a risk of leaks that may pollute our water supply.

Along with the overwhelming potential devastation that can disrupt our way of life, we also worry about liability for accidents on our lands due to this intrusion of a pipeline that we do not want and are afraid of, but which may be forced upon us.

Rape of Our Lands

LO103-5 | Productivity Diminished. Regardless of what the glossy publications of pipeline procedures may tell us, we have local evidence of non-productivity of land above a pipeline for 15 and 20 years after it is installed. Seeing is believing.

LO103-6 | Land Devalued. Regardless of the lack of data to indicate yes or no for decrease of land values following a pipeline installation (as reported in the draft EIS), we fully expect to lose in any future sale of land that is split by a pipeline and which cannot be traversed in normal farming operation. A pipeline that could explode and destroy everything within 1100 feet and several stories in depth forever renders the plot of land undesirable for anything but farming, and even then routine farming procedures will be compromised.

- LO103-3 See the response to comment CO48-10.
- LO103-4 The topic of financial liability is outside the scope of this EIS and is more properly addressed in legal forums. See also the response to comment LO22-5.
- LO103-5 See the response to comment LO62-2.
- LO103-6 See the response to comment LO89-4.

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson (cont'd)

20170321-0066 FERC PDF (Unofficial) 03/21/2017

LO103-7 **Farming Practices Disrupted Forever.** ACP representatives have talked about concrete pads, land bridges, and other fixes for our routine harvesting procedures that require the use of loaded vehicles in excess of 50,000 pounds. Where in the draft EIS has anyone dealt with the environmental impact to disrupted agricultural procedures such as land bridges? If a sweet potato farmer has to restrict transportation of a tractor trailer or other large vehicle to just an area that does not cross the installed pipeline, then harvesting becomes an impossibility. It is no more satisfactory to suggest building bridges all over the field.

Almost every single plot of farmland affected by the pipeline is split right down the open field rather than made to follow property boundaries. What an insult and a waste to the landowner!

LO103-8 **Plans for Future Land Uses are Derailed.** My two daughters are set to inherit my plot that is to be taken by ACP. They had plans to build two homes next to the home place of my parents, who looked after them when their own father died. They have close ties to the land and looked forward to living near their childhood memories. What can they do with the land now? Certainly, they will not consider living in this dangerous area. They will not even consider building a rental home that would expose anyone else to the dangers. Such losses cannot be replaced! To top it off, the house where my parents and grandparents lived is now occupied and is within 200 feet of the actual pipeline.

LO103-9 **Forever Loss for Landowner**
While the ACP company has been created to exist for only a couple of decades, they are requiring a forever easement for the use of lands along the route. This is inconceivable to me. By the end of the company lifetime, we can count on the pipeline being obsolete due to development of superior renewable energy resources (and maybe to the play out of the fracking sources). Yet, the owners of the land will be stuck with the ridiculous easement forever. ACP could and should be seeking a time-limited easement. Even 50-years would be more palatable to landowners than "forever".

Use of Eminent Domain Unjust

LO103-10 What the practice of eminent domain defines as "fair market value" for an easement is far removed from the true values of emotional connection to the land and from the perceptions of danger that will forever dwell with the plot of land. Fair market value is defined between a willing buyer and a willing seller, but if the seller is not willing, then nothing about eminent domain is fair.

Because there is no substantiated overwhelming public need for this transit pipeline and because ACP is a private, for-profit company, not a public utility, the use of eminent domain appears unjust. Perhaps it is not even legal.

LO103-7 Section 4.12.1 has been revised to include discussion of potential safety impacts from heavy farm equipment and other large vehicles crossing the pipeline in open areas (i.e., not at road crossings).

LO103-8 See the response to comment CO68-12.

LO103-9 As described in section 2.7, if at some point in the future, any of the project facilities approved in this proceeding were proposed to be abandoned, Atlantic and/or DETI would have to seek specific authorization from the FERC for that action and the public would have the opportunity to comment on the applicant's abandonment proposal.

LO103-10 Comment noted.

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson (cont'd)

20170321-0066 FERC PDF (Unofficial) 03/21/2017

Circuitous Methods

LO103-11 **Broad Tactics.** From the time before landowners received any word about the planned pipeline, circuitous methods appear to have been employed by the pipeline proponents to gain support and favor from the surrounding community. Government officials and business leaders received advance information and promotion of the energy sector line -- promise of jobs, taxes, and granting of favors. Consequently, the affected landowners were at a disadvantage from the beginning. Many landowners reported receiving invitations to some of the early FERC scoping meetings weeks after business and government leaders got their invitations; landowners had insufficient time to prepare to attend. Some county government officials were convinced early by the company line and have been only tepid in their reception of landowner complaints. Landowners have had virtually no support in gaining reliable information and support about the whole process. FERC has brochures and information on line, but it is not adequate to assist an average farmer in eastern NC.

The wording of correspondence accompanying the initial easement offer was challenging for some. It was worded so that one might think refusal to sign precluded any future settlement.

My Experiences. Personally, I was promised by one of the chief engineers at an early Open House in Smithfield that if possible, the line would be re-routed to avoid the northern part of my plot altogether, but I got word, only indirectly, that someone had determined that this was not possible. No other follow-up.

Early on, I worked with a Doyle employee to investigate changes to the easement wording to make it more palatable to me. He let me know that my lists of questions about what could and could not be changed were getting tiresome and that it was perceived that I might not be serious about settling. After he left, I heard nothing for months until someone said in passing that my contact had been fired months earlier and that I would be assigned someone else.

I have been ignored for about a year by ACP personnel. Last spring, I was told that the location of the pipeline through my plot had been changed because of its proximity to a graveyard beside the road (a point I had repeatedly emphasized through written and verbal input). I was told that I would be contacted about the new location and a different easement through my land. So far, I have had no follow-up on this promise. The only calls I have had in about 10-12 months were repeats of the same information about location of wells and waterbodies on the property.

Environmental Impact Statement Comments

LO103-12 One of the points FERC stresses in the draft EIS is the importance of co-location -- using existing right-of-ways in routing the pipeline. The ACP planned route uses almost no existing right-of-ways in Johnston County, NC, although there have been repeated requests to re-examine the alternative route closer to I-95, which would use

LO103-11 Comment noted. See also the response to comment CO95-1.

LO103-12 FERC has also determined that a route along I-95 is not preferable to the proposed route. See our discussion in section 3.3.3 of the EIS.

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson (cont'd)

20170321-0066 FERC PDF (Unofficial) 03/21/2017

- LO103-12 (cont'd) | approximately 8 miles of existing Duke Energy right-of-way. The deviation away from I-95 as the pipeline travels through Johnston County is counter to original plans. ACP's initial defense for rejecting the Alternate plan closer to I-95 cited about as many positive reasons for moving it closer to I-95 as for leaving it further east. Yet, ACP rejected this alternative. That alternative is desirable by many individuals in Johnston County. It appears to me that the main reason for rejection was the higher cost of the land nearer I-95. If that is the major factor, then I resent their moving out to get my "cheap" land. I wonder why FERC has not insisted in the draft EIS that ACP look for more existing right of ways to relieve the burden on landowners, especially since FERC stressed the importance of this strategy.
- LO103-13 | In a few places in the draft EIS, FERC mentions that no environmental agency in NC has been forthcoming with a statement or views about certain aspects of the proposed pipeline. Some are saying that for a long time, North Carolina environmental agencies have asked for, but not been sent, certain information about the pipeline. What is being done about that? Was that information contained in the hundreds of pages submitted by ACP to FERC AFTER the draft EIS had already gone out?
- I am surprised that local governments as well as environmental groups, public and private, have not provided questions and feedback concerning the proposed method of crossing the Neuse River, which seems to be the only river on the ACP pipeline route that is to be crossed in this particular manner. Maybe the method is good, maybe not -- some knowledgeable group should be providing input.
- LO103-14 | Another surprising finding in the draft EIS was the acres of prime farmland to be sacrificed by landowners in Johnston County. About half of all the disrupted acres of prime farmland along the entire route of the pipeline are to be contributed by North Carolina. In my opinion, the strategy to stay away from timber land (for whatever reasons) may be too stringent. Ruination of good prime farmland has serious consequences as well.
- LO103-15 | In my opinion, reading much of the draft EIS was very, very similar to reading energy industry promotional literature. It reflects (in some cases, almost word for word) the company line. I was most disappointed in the gloss over the requirement for ACP to prove a public need for the pipeline. I think that need for the pipeline has never been adequately described, and FERC seems to say that it is not a responsibility for approval of the plan. In my opinion, it is the primary responsibility of ACP to prove that that pipeline is needed, not just proof to the energy community but to environmentalist, to those who are neutral in stance, to all interests.
- LO103-16 | I am also disappointed that FERC accepted ACP's statement of job projections without any independent analysis. By accepting the proposer's statements of public need and the proposer's statements of job creation and other benefits, the whole premises of the proposal is accepted up front without proof or justification.

- LO103-13 | Section 1.4 lists the environmental permits, authorizations, and consultations applicable to ACP and SHP.
- LO103-14 | Comment noted. The SSURGO prime farmland soil designation is land use independent, and the presence of prime farmland soils does not necessarily indicate that that soil is being actively managed for agricultural production. Agricultural land is further discussed in section 4.8.1.1.
- LO103-15 | Comment noted. See the response to comment CO46-1.
- LO103-16 | Comment noted.

Z-3163

LANDOWNERS COMMENTS

LO103 – Francine J. Stephenson (cont'd)

20170321-0066 FERC PDF (Unofficial) 03/21/2017

LO103-17 | It is my understanding that following the release of the draft EIS by FERC about 1,300 pages of additional information were submitted by ACP, information that should have been part of the environmental review process. Thus, I submit that the draft EIS is not valid.

Whose Values?

LO103-18 | In any debate or discussion, conclusions cannot properly be attained without an understanding of the values of opposing views. My set of values regarding pipeline issues (and those of many of my fellow landowners) include the following:

1. Leave the earth in good shape for at least seven generations ahead. Do not waste, avoid greed, be good stewards, plant and harvest but do not seriously disturb.
2. Value and promote agriculture and farm families and encourage their productivity.
3. "Development" is sometimes good but sometimes destructive to communities.
4. Promote jobs that are environment-friendly and community-friendly.
5. Consider the cost as well as the benefit of any proposal.

I think the big-business energy companies have some of the following values:

1. The fair and just measure of any activity is its economic benefit.
2. The earth was made for man's pleasure, enjoyment, and profit.
3. "Development" is always desirable and helps communities.
4. A major benefit to any project is the jobs it brings with it.
5. Ultimate goal is increased corporate profits.

One's stance on the pipeline depends on whether one values the earth, the environment, families, and communities to some exclusion of profits, or whether one values economic benefits and development to some exclusion of safety and environmental protection. It also depends upon whether one is motivated by community and environmental well-being or corporate well-being.

Thus, my values and those of my neighbors do not align with those of the ACP project. For me, the results of implementing these corporate values in the form of a dangerous and disruptive gas pipeline, when safer and cleaner alternatives exist, remains an unforgivable tragedy.

LO103-17 See the response to comment SA14-86.

LO103-18 Comment noted.

Z-3164

LANDOWNERS COMMENTS

LO104 – Roberta Koontz

20170327-5058 FERC PDF (Unofficial) 3/26/2017 7:59:08 AM

To: Kimberly Bose, FERC

From: Roberta K Koontz

Regarding: CP15-554-000

Date: 3/26/17

LO104-1

Subject: Abuse by Dominion of Robert & Roberta Koontz through plan to destroy the center of our homesite and farming operations with an ACP access road. Map published by Dominion circa April, 2016. Despite several meetings with our attorney to convince Dominion to move the horrific access road, Dominion did nothing. Dominion refused to move the access road for about 11 months. Now a vague, verbal comment by Gregory Park of Dominion on 3/20/17 that Dominion will move the access road could mean nothing.

Dear Ms. Bose,

Around April, 2016, Dominion published numerous maps on their website of plans for ACP access roads. We discovered that Dominion planned to build an ACP access road on top the historic entrance (circa 1740) to our farm and on top of our one-lane gravel-dirt driveway and across two bridges. We have 1.64 miles of road frontage on SR629 and more on Bright Hollow Road.

However, Dominion saw fit to destroy our numerous significant improvements, property, safety, farming operations and life in our historic home (1797). The ACP access road would cut 750 acres of our 1000 acre farm in half - right through the center separating our home from our barns among other things. The ACP access road would endanger us, our dogs, our farm help, visitors, service people and our old home with a 24x7 highway over which we have no control and no warning of usage. We would have to abandon the property and could not live here or manage farming operations until our destroyed improvements were rebuilt if that were even possible. Recovery from the ACP access road would require significant time & money for no purpose except to bully and intimidate us.

The ACP access road would complete destroy the value of the property. It would destroy the quality of our life forever. The access road would be a constant & horrific issue for the remainder of our lives. And there are many, many alternatives. What kind of people we see at Dominion inflict this horror & stress on American citizens who are trying to live a peaceful life. And who have invested significant money in preserving a beautiful, historic property. We have two conservation easements with the Virginia Outdoors Foundation (VOF). Dominion has crafted a "land swap" so that they can ILLEGALLY cross our conservation property.

LO104-1 Comment noted. Atlantic has eliminated the referenced access road from its proposed project.

Z-3165

LANDOWNERS COMMENTS

LO104 – Roberta Koontz (cont'd)

20170327-5058 FERC PDF (Unofficial) 3/26/2017 7:59:08 AM

Due to our health issues and the stress we experienced from Dominion, we decided to hire an attorney to talk with Dominion about moving the path of the ACP across our 750 acres and moving the ACP access road. He met several times with Dominion representatives and they refused to make any changes. Our attorney clearly explained all of the issues for us, especially with the access road. Dominion refused to do anything. Dominion simply burned up thousands of dollars we spent on an attorney over 11 months. They have unlimited funds and the land owners have limited resources to resist Dominion's destruction and arrogance.

I almost died from an allergic reaction to an antibiotic in June, 2016 while recovering from multiple fractures in my pelvis. I had to spend almost six weeks in the University of Virginia ICU in Charlottesville, Va. I was on a ventilator with a feeding tube. I had multiple surgeries on my throat. I now have serious nerve damage which requires multiple surgeries and intense physical therapy. Most of my hair fell out in September, 2016 which my doctor believed was due to the stress inflicted on us by Dominion. It took me several months to be able to walk. My husband was also ill and weak during this time. My right hand is essentially paralyzed so producing documents to file with FERC is extremely difficult.

The stress inflicted on us by FERC and Dominion has been significant and continuous. We expected this to be the most peaceful time in our life. We planned to live in peace on the farm until we died. We planned to sell parcels to help finance the remainder of our lives and keep maintaining our property. We wanted to preserve our historic property for future generations to enjoy. All of that is now impossible due to the ACP and Dominion and FERC. We have listed parcels for sale for over 18 months. People will not even come to look at our property due to the ACP. Yet Dominion & FERC claim that property values are not negatively impacted by the ACP. That is absurd and dishonest to say the least. The insignificant compensation we might receive from Dominion is ridiculous compared to the loss we suffer in property value, destruction of our environment and quality of life.

When Dominion published the maps for the access roads, they boasted about how they were "using existing roads for access roads" as if that were a good thing. Our driveway is NOT an existing road but a private driveway essential to our lives. This is one of many examples of the SLOPPY work by Dominion as well as their arrogance which I find unparalleled. On 3/20/17 in a meeting in our home with Dominion representatives, Gregory Park of Dominion admitted to us that the access roads were planned by people sitting in offices and looking at

Z-3166

LANDOWNERS COMMENTS

LO104 – Roberta Koontz (cont'd)

20170327-5058 FERC PDF (Unofficial) 3/26/2017 7:59:08 AM

maps. There was no attempt on the part of Dominion to understand what they were doing and the impact. That is because FERC & government at many levels has made Dominion all-powerful. And Dominion is quite high on their power.

Within about three months of publishing the maps for ACP roads, Dominion suddenly removed them from the website. Numerous people & organizations have tried to get information from Dominion about the access roads as well as other ACP-related structures. Dominion refuses to discuss anything and provides no specifics. Dominion is notorious for failing to provide any specifics. Apparently even the USFS cannot get Dominion to fulfill their request for information and specifics.

We are now being represented by litigation attorneys. While we do not wish to litigate, we have found it impossible to work with Dominion. Yet Dominion boasts about how they work with land owners and compromise. They have made concessions to some land owners. Dominion moved the route of the ACP on the property of the farm next to us. But they refuse to move the route on our property.

We want FERC and other government agencies to know how we have been abused and ignored by Dominion. Dominion planned to survey our property from 3/21 - 3/28/17. We refused to allow the unless they would meet with us to discuss our issues. We realized they could obtain a court order but that we were most willing to do this. Four Dominion representatives including Gregory Park came to our home on 3/20/17. We agreed, we allowed Dominion to proceed with the survey on 3/21/17. I will make another filing about the meeting with Dominion on 3/20/17. It did not go well.

FERC needs to force Dominion to change the way they treat property owners and how they ignore any issues. Dominion only cares about moving forward as they see fit. This kind of abuse of American citizens by a private corporation with the approval of our government is astonishing. I believe this is the kind of behavior that President Trump is committed to change. I applaud his efforts and hope that FERC is high on the list along with the IRS, FBI and more.

I will provide visual aids in a separate FERC filing to convey the horror of the ACP access road as well as the ACP on us.

Roberta K Koontz
wildernessfarm@mgwnet.com

The attachments to this letter have been reviewed by FERC staff and can be found on the FERC eLibrary site under FERC Accession Nos. 20170327-5059 and 20170327-5061.

Z-3167

LANDOWNERS COMMENTS

LO105 – Roberta Koontz

20170327-5063 FERC PDF (Unofficial) 3/26/2017 11:54:17 AM

From: wildernessfarm@mgwnet.com
Subject: Karst Issues for The Wilderness - Submitted to Dominion on 3/20/17 by Koontz
Date: March 26, 2017 at 10:59 AM
To: wildernessfarm@mgwnet.com



TO: Kimberly Bose, FERC FROM: Roberta K Koontz wildernessfarm@mgwnet.com Date: 3/26/17

Regarding: CP15-554-000 Subject: Significant Karst in Path of ACP - Preliminary karst study submitted by Koontz to Dominion on 3/20/17 - Almost totally ignored by Dominion on 3/20/17.

LO105-1

Significant karst on Koontz property (The Wilderness) has been identified by a preliminary karst study by Koontz karst expert. There are three karst springs & two sinkholes in or very near the path of ACP and near Koontz historic 1797 home. One spring has supplied sweet water to the 1797 house for 200+ years. These springs are in great jeopardy due to the ACP. The three springs form the headwaters for Mill Creek which is very important as a year round water resource through part of Bath County.

Constructing the ACP on top of this known karst area is reckless and irresponsible. The path of the ACP is so close to our home that we will be living in the blast zone in a historic house that should be protected by two Virginia Outdoors Foundation (VOF) conservation easements. VOF has been closely cooperating with Dominion and is doing nothing to enforce our conservation easements. We are working with two environmental organizations (Appalachian Mountain Advocates and the Southern Environmental Law Center of Virginia) for potential litigation against VOF.

With over 750 acres, Dominion is routing the ACP so close to our historic home that we will be living in the blast zone. I will be filing another document related to the historic value of our property to Virginia and future generations. This filing will also be related to the designation of The Wilderness as a Virginia Landmark and being placed on the National Registry in the very near future. Given this historic designation in Virginia and at a national level, the Review and Compliance Section of the Virginia Department of Historic Resources has been informed about the many issues with Dominion and the ACP. Even aside from the karst issues, the historic value of the property is justification for Dominion moving the path of the ACP to the edge of the property or NOT HAVING THE ACP on the property at all.

Dominion plans to route the ACP almost on top of two karst sinkholes and close to karst springs. Dominion has never done a study of karst on our property. Yet in the ACP EIS, Dominion claims there is "no karst" in the path of the ACP. Yet another false claim by Dominion to plow through property with the ACP regardless of issues.

It took us almost one year to find an expert to study our karst only a small portion of our 1000 acres. The result of their very preliminary work in some areas near the ACP route shows significant karst along the path of the ACP. It also shows the great possibility of a series of caves being near or under the route of the ACP.

The geological maps in use by Dominion showing karst are incorrect in our area and apparently other areas in Bath County, Va. This has been acknowledged by the Virginia State Geologist. This has been a known problem for Dominion as they acknowledge in Little Valley in Bath where they is well known karst. Yet Dominion made no attempt to determine if other maps were incorrect. They made no attempt to karst study on our 1000 acre property as part of the EIS.

We provided the attached information to Gregory Park, project manager for the ACP in a meeting at our home on 3/20/17. We strongly requested that the ACP be moved away from our known karst areas and our historic home which is in the BLAST ZONE. We also expressed our concern that the ACP is routed through the heart of the farm and over prime building sites & viewscapes on parcels we have for sale. We have significant acreage where the ACP path could be moved and have less negative impact on our lives, the historic property, environment and property values.

After walking the property for an hour or so, Mr. Park made a very, very minor adjustment to avoid running the ACP right on top of a large, steep sinkhole. However, Mr. Park refused to make any other adjustments to move the ACP away from our known karst area and precious water resources. And prime viewscapes & building sites. And historic 1797 home and carriage house.

We have significant acreage where the ACP could be moved away from the currently known karst region. This change would also provide more protection to the historic buildings, save the best home sites and viewscapes for about 500 acres of the property where the ACP runs right over the prime property. Gregory Park has refused to move the ACP away from this area and to save our property values although he has made accommodations for other property owners.

Park claims that the other area on our property makes it more difficult to build the ACP. He said accommodations by Dominion had only been made where it actually "made it easier to build the ACP". He also said regarding moving the path of the ACP: "That is not the way DOMINION does it" meaning Dominion selects the most accessible and most prime property for building the ACP. Dominion totally disregards the alternatives to reduce financial, environmental, conservation, preservation and quality of life issues for the Koontz.

LO105-1 Comment noted. We will review karst survey results when submitted by Atlantic. See also the response to comment LO70-22.

Z-3168

LANDOWNERS COMMENTS

LO105 – Roberta Koontz (cont'd)

20170527 5063 FERC PDF (Unofficial) 3/26/2017 11:54:17 AM

LO105-1
(cont'd)

Gregory Park essentially told us that we should be grateful that Dominion would not destroy our farm with an ACP access road (a related issue already filed with FERC). And so we should not expect anything else. Dominion tortured us with the plan for an ACP road for about 11 months when they were aware that we would litigate and probably prevail due to the vast number of alternatives to destroying our farm with a 24x7 access road dividing the farm into two separate parts.

Please note: Gregory Park made one of the most ludicrous and illogical remarks I have ever heard regarding a construction issue. When we protested that Dominion was destroying our prime & only building sites across 500 acres by the path of the ACP that is on karst, Mr. Park essentially said this: "If there is karst, you could not build houses anyway." What logic is that??? So we could not build houses on karst but Dominion can build a gas pipeline on it??? And of course, we could build houses on karst. Many houses in Bath County are built on karst. Building two or three houses is VERY different from running a huge gas pipeline miles across 500 acres.

Dominion started a survey of our property on 3/21/17. They sent a geologist out as part of the survey work. I doubt anything their geological tests to say will prevail over what Mr. Park and Dominion will do with the current plans for the ACP on our property. The Dominion geologist is Robert K. Denton, Jr. of GeoConcepts Engineering, Inc of Ashburn, Va.

Although it is difficult, we hope to have more karst studies done on our property near the path of the ACP. Our karst expert believes with some certainty that there is a cave near one of the karst springs that could run for miles under ridge where the path of the ACP is planned. Our expert plans to bring a crew to the property in a few months to dig out the cave, if there is one.

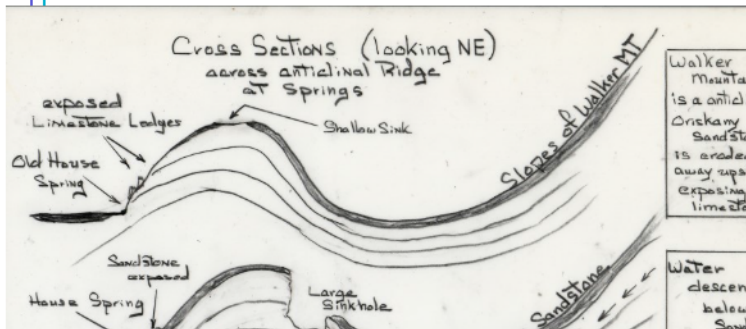
I am filing this document as evidence that we have significant karst areas on the path of the ACP. And as evidence that Dominion is aware of the karst areas but will not move the route of the ACP to avoid these karst areas. Our karst expert tells us that building the ACP in these karst areas is extremely dangerous and could result in a catastrophe that would kill us, destroy our historic property & cause great harm to our community in Bath County.

I protest the route of the ACP through known karst areas on our property. I protest the environmental harm to our precious water resources and the headwaters of Mill Creek including a critically endangered species living in Mill Creek. I protest that Dominion is reckless and irresponsible in placing the blast zone near our historic home on a known karst area. I am also protesting that this ACP path destroys the value of our property with the destruction of home sites (2 or 3) and viewscapes. I will provide additional details about these protests & issues in subsequent filings with FERC.

Please take the time to review my letter, study the attachments and understand our grave issues. It is astonishing and totally shocking to see how a PRIVATE FOR-PROFIT corporation (Dominion) can collaborate with a US government agency (FERC) to steal property and willfully harm hard-working American citizens. This is not eminent domain. The ACP does nothing to help our community in Bath County and counties in Virginia where Dominion is allowed to PLUNDER AT WILL by FERC.

Roberta K. Koontz
The Wilderness - Bath County, Va
wildernessfarm@me.com

Diagram of karst springs on The Wilderness in Bath County, Va.



Z-3169

LANDOWNERS COMMENTS

LO105 – Roberta Koontz (cont'd)

20170527 5063 PERC PDF (Unofficial) 2/26/2017 11:54:17 AM

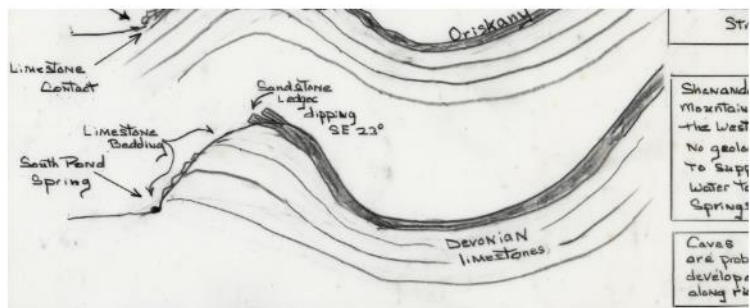


Photo showing the site of a karst spring providing water to the house for 200+ years. Historic 1797 home shown in the photo.



Z-3170

LANDOWNERS COMMENTS

LO105 – Roberta Koontz (cont'd)

20170527 5063 PERC PDF (Unofficial) 3/26/2017 11:54:17 AM



Karst area near one karst spring and potential site of a cave. The cave will be dug out in a few months by Koontz karst experts to evaluate the cave, if any.



Photo of large pond and karst spring area near Mill Creek and the old house. Next to potential site of cave.



Z-3171

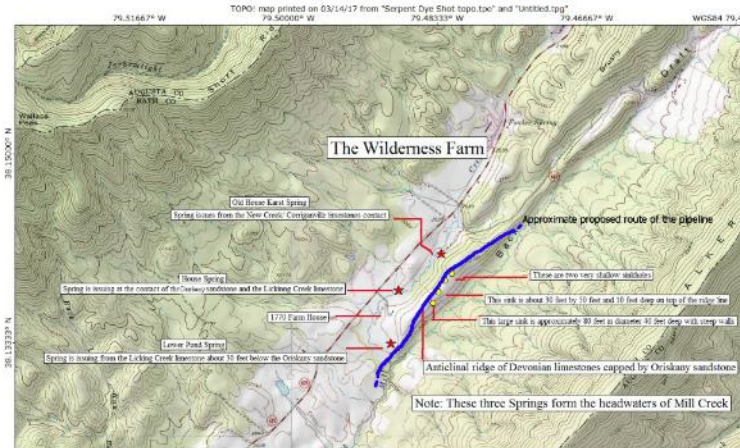
LANDOWNERS COMMENTS

LO105 – Roberta Koontz (cont'd)

20170527 5063 PERC PDF (Unofficial) 3/26/2017 11:54:17 AM



Map of the proposed route of the ACP (blue) on Koontz property in relation to karst issues found in preliminary karst study by Koontz.



Z-3172

LANDOWNERS COMMENTS

LO105 – Roberta Koontz (cont'd)

20170527 5063 PERC PDF (Unofficial) 3/26/2017 11:54:17 AM

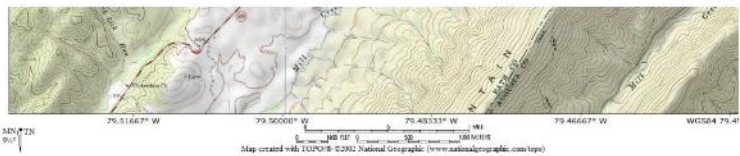


Photo of karst spring and old spring house on Koontz property near the ACP.



Z-3173

LANDOWNERS COMMENTS

LO105 – Roberta Koontz (cont'd)

20170527 5063 FERC PDF (Unofficial) 3/26/2017 11:54:17 AM

Z-3174

LANDOWNERS COMMENTS

LO106 – Roberta Koontz

20170327-5066 FERC PDF (Unofficial) 3/26/2017 2:25:56 PM

From: wildernessfarm@mgwnet.com
Subject: Fwd: 032617Merdfllinghistoricwildernessvist
Date: March 26, 2017 at 2:15 PM
To:



LO106-1

To: Kimberly Bose, FERC From: Roberta K Koontz Regarding: CP15-554-000 Date: 3/26/17

Subject: Evidence of historic importance of 1797 The Wilderness structures and property. Records of historic importance of The Wilderness from 1937 and 1990 reports by Commonwealth of Virginia. Evidence of 2017 nomination of The Wilderness for designation as a Virginia Landmark and addition to the US Department of Interior National Registry. One of the very few such properties and structures remaining in Bath County.

Dear Ms. Bose,

The Wilderness has been in continuous cultivation since 1750 starting with a large land grant conveyed in 1743. Among important farming activities were cattle raised on the property that were sent to General Braddock's troops during the French and Indian War. The property was originally owned by famous Virginians George Mathews (1739 - 1812) and his brother Sampson Mathews. They had homes in Staunton but primarily lived in Cloverdale in Bath County where they had a large farm, tavern, trading posts and homes. Both brothers were wounded on several occasions in skirmishes with Native Americans and known for their bravery. George served as a General in the Revolutionary War and was known as the "hero of Brandywine". General Mathews was captured and held prisoner by the British in New York harbor for several years. George Washington personally arranged for Mathews release by the British in a prisoner exchange. Thomas Jefferson lodged at the Mathews tavern on August 6, 1818 on his way to Warm Springs.

The Mathews brothers distinguished themselves in many important civic and military affairs. For example, following the Revolutionary War, George Mathews was member of the 1st US Congress and Governor of Georgia for two terms. He led the "Second War of 1812" by attacking the Spanish in Florida for the US to take possession of Florida. The brothers owned several important trading posts from Staunton into Greenbrier. They made many significant contributions to the early settlement of Virginia.

George Mathews' daughter Ann (1760 - 1840) married Virginia General Samuel Blackburn (1759 - 1835) and they purchased 750 acres from General Mathews, naming their property "The Wilderness". The property has been known as The Wilderness since about 1795. The Blackburns acquired another 500 acres and started a large plantation on the property. At some point (between 1797 and 1815), the Blackburns completed a Georgian brick home known as "The Mansion". The Blackburns maintained several properties in Staunton but their primary residence became The Wilderness. They built a fine brick carriage house which was the first carriage house built in Bath County. The carriage house is used today as a garage at the old house. The Blackburn's brick house is described in glowing terms in an account first published in the New York *Saturday Evening Post* in 1836.

The earliest surviving visual representation of the house and farm is a series of sketch plans made during the preliminary survey of the Warm Springs and Harrisonburg Turnpike in 1831 or 1832. The drawing is a wonderful piece of history that documents some of the property & names of places as of 1831.

General Blackburn served as a General in the Revolutionary War and was distinguished in many civic matters. He was educated as a lawyer and served in the Virginia legislature for years. He was known as a great orator. He responsible for the first anti-dueling law in Virginia. More details about the history of people who owned and lived on The Wilderness will be filed with FERC in a separate document.

Many famous Virginians owned The Wilderness following the death of General Blackburn and Ann's move back to Staunton. This includes John W. Frazier (1810 - 1853) who was a rising star among the county resort owners of spas and springs. He lived on The Wilderness while managing large (over 6000 acres) and valuable tracts of land including the Cloverdale Hotel.

One inspiring comment made by our architectural historian contact at the Virginia Department of Historic Resources during a site visit was "if General Blackburn and Ann Blackburn were to return to the property today, they would recognize this property as their home". Little has changed with the structures and the property remains unspoiled. When the house was renovated by the Koontz from 2008 - 2010, the historical integrity and footprint of the house was preserved. Farm buildings have been added to the property to support farming operations and farm maintenance. In addition to the house & carriage house, there are several contributing historical structures that support registration as a Virginia Landmark and addition to the National Registry. The remains of the old kitchen are also preserved by the Koontz.

The Commonwealth conducted an inventory of historic properties as part of the WPA circa 1932. The house & property were considered to be important historic Virginia landmarks. The Virginia Department of Historic Resources (DHR)

LO106-1 See the response to comment LO64-2.

Z-3175

LANDOWNERS COMMENTS

LO106 – Roberta Koontz (cont'd)

20170527 506F PERC PDF (Unofficial) 3/26/2017 2:25:56 PM

LO106-1
(cont'd)

published another report in 1980 about the historic significance of the property. They also conducted a physical survey of the house & surrounding property. The young DHR employee who conducted the survey in 1980 is now a manager at DHR and remembers the property very well. He returned to the property on a site visit and is very excited about The Wilderness registration as a Virginia & National landmark. The nomination should be finalized in June, 2017.

DHR architectural historians have expressed serious concerns about the impact of the ACP on our historic property. Part of their role at DHR is to help protect historic property. They hope to help protect our property from the negative impact of the ACP. They have informed the DHR Review and Compliance section about their concerns and desire to minimize the impact of the ACP by Dominion on the historic property. Our historic home may be the only such structure surviving in all of Bath County. It will be the first such property in Bath County designated as a Virginia Landmark & placed on the National Registry. Currently, the path of the ACP places the historic house & carriage house where we reside right in the blast zone. The structures and pristine environment are at great risk due to the ACP. Not only will we be killed in the event of an explosion, but the historic home will be lost forever. The open space, water resources, wildlife habitats and environment may be lost forever. Unidentified archaeological sites may be lost forever. This is unnecessary and there are many alternatives to move the route of the ACP.

Please take the time to read and understand our concerns. Please save this important and rare historic property for future generations to see and enjoy. More related information will be filed with PERC in the next few days.

Roberta K Koontz
The Wilderness
wildernessfarm@mgwncf.com

Aerial photo of The Wilderness circa 2002 when purchased by Robert and Roberta Koontz. Significant water resources can be seen in the photo and there are many more water resources not shown in the photo.



Copies of a circa 1932 WPA Historical Inventory by the Commonwealth of Virginia (the following four pages)



Z-3176

LANDOWNERS COMMENTS

LO106 - Roberta Koontz (cont'd)

20170527 505E FERC PDF (Unofficial) 3/26/2017 2:25:56 PM

78-60

3686

ARCHITECTURAL DESCRIPTION OF BUILDING CALLED FOR IN
5-A. of BULLETIN 3400

- Name of building "WILDERNESS"
- EXTERIOR
1. Building Plan "H" Collar ()
 2. No. of stories: (2) Attic classed as 1/2 story.
 3. Material: Brick () Frame () Stone () Log ()
 4. If brick, state what bond: Flemish () English () Common () Other ()
 5. Kind of roof: Hip () Gabled () Gambrel () Lean-to () Dock ()
 6. If gable, describe or draw sketch of roof on reverse side.
 7. Roof Material: Slate () Shingle () Metal () Tile ()
 8. Chimneys: Number (3) Brick () Stone () Location At each end.
 9. Weatherboarding: None. Beaded () Plain ()
 10. Cornices: Plain or Elaborate Dentils Material Wood.
 11. Windows: Number (80) Size and number of panes 396 panes each 12" x 14"
24 " " " 14" x 24"
420 " " total.
 12. Shutters: Describe: Two panel, movable at bottom.
 13. Dormers: Number, and shape of roof One gabled, fan-shaped with window,
Six panes 10" x 12".
 14. Porch: Double-deck portico.
 15. Type of Entrance: Four panelled door with square transom.
 16. Columns: Doric () Ionic () Corinthian () Square ()
- INTERIOR
17. No. of Rooms: (12) Large (4) Small: (8) Approximate ceiling height 10 feet
 18. Stairs: Open String () Closed String () Describe: Winding stairway,
bracket finish. Panelled wainscoping. One landing.
 19. Cellars: Describe: Three rooms, stone walls, dirt floor.
 20. Doors: Style and type of wood: Hand-made doors; four panels, pine.
 21. Walls: Panelled, papered or painted: Panelled and painted; pleated
and papered.
 22. Interior Cornices: None.
 23. Hardware: Locks and hinges: Common iron.
 24. Floors: Varying widths, heart pine, tongue and groove.
 25. Moulds: Hand-carved, scroll and fluted finish, of pine.
 26. Misc.: The middle room in the basement was used as a slave prison.
 27. Present condition, and state if spoiled architecturally by remodeling: Good.

Z-3177

LANDOWNERS COMMENTS

LO106 – Roberta Koontz (cont'd)

20170527 5056 FERC PDF (Unofficial) 3/26/2017 2:25:56 PM

Not remodelled.

28. Does occupant seem to appreciate old architectural features? Yes.

Your Name R. G. Wood.

BA-62

#2.

Washington and Lee University, and a soldier of the Revolution. He went first to Kentucky, and then to Georgia, to practice law, but the clamor against his father-in-law, caused him to leave the latter state in disgust. He returned to Virginia, and built the old brick mansion, on what is now called the "Wilderness" property. In 1824, he had one thousand acres under cultivation. Blackburn was an orator and a criminal lawyer of repute. While sitting in the General Assembly, he secured the passage of an anti-duelling law. In politics, he was a Federalist. He died in 1835, freeing his forty slaves by will and giving \$500.00 to the Staunton Bible Society. There were no children and the estate fell into neglect.

7. ART:

Photograph.

8. SOURCES OF INFORMATION:

Informant: Mrs. Earl Vincent, Millboro, Virginia.

Court Records, Clerk's Office,
Bath County, Warm Springs, Virginia.

Annals of Bath County by Morton, pages 163 and 166.

Z-3178

LANDOWNERS COMMENTS

LO106 – Roberta Koontz (cont'd)

20170527 5056 FERC PDF (Unofficial) 3/26/2017 2:25:56 PM

BA-6a

1. SUBJECT:

"Wilderness"

2. LOCATION:

Fourteen miles north of Millboro, Virginia, on Route #629.

3. DATE:

1915.

4. OWNERS:

Samuel Clark 1796.
Samuel Blackburn 1815.
John W. Frazier 1849.
Robert Glendy 1875.
Highland Devel Company 1916.
Lewis G. Barley and others 1923.
John Creed Nancy. 1935, present owner.

5. DESCRIPTION:

This is an old Colonial, twelve room, two-story, brick mansion. It is built on a hand-carved, stone foundation, and is the work of an expert Architect. The finished wood-work is very beautifully hand-carved. There are three huge chimneys to the house. The rooms are plastered and have a fireplace and old style mantel in each. The stairway is of beautifully hand-carved wood-work. There is a large basement, with three separate compartments. In connection with the house there are two other brick buildings. One has a large room and a very large fireplace, also a basement with a large fireplace. This building was built and used for a kitchen. The other building with quite a large room and arched door, was used for storage of coaches. In the basement of this house, one of the rooms was used as a prison for unruly slaves.

6. HISTORICAL SIGNIFICANCE:

Sampson Matthews, in the Point Pleasant Campaign, had charge of the Commissary department of the army, under Lewis. As a Colonel of Militia he saw active service in the War for

Z-3179

LANDOWNERS COMMENTS

LO106 – Roberta Koontz (cont'd)

20170527 506E PERC PDF (Unofficial) 2/26/2017 2:25:58 PM

A MEMBER OF THE REVOLUTIONARY WAR, AN HERO FOR AMERICAN INDEPENDENCE. In July, 1781, he was quelling the Tory Organization, of William Ward, in Pendleton and a little later, he was leading his Regiment, in the Yorktown Campaign. In the preceding year, he was a member of the State Senate. He favored the formation of Bath and took an active part in its organization. He died in Augusta, in 1807, at the age of seventy.
Samuel Blackburn was a graduate of Liberty Hall Academy, now

WORK PROCESS ADMINISTRATION OF VIRGINIA
PERSONAL IDENTIFICATION

GO COUNTY Bath

CLASS: None

PHOTOGRAPH ON FILE

DATE OF PHOTOGRAPH

REMARKS

This subject is a part of the Virginia W. P. A. National Historical Survey conducted by the Virginia Commission on Historical and Archaeological Resources under the direction of the Division of Historic Landmarks and Historic Sites, in which he is a part. Under authority of the Commission the subject has not been marked for removal by the agency.

Issued and made by
E. S. Wood,
Herald Hall, Virginia. February 9, 1987.

Photo of The Wilderness "Mansion" as it was called in the 18th century (from the circa 1832 WPA Historical Inventory)



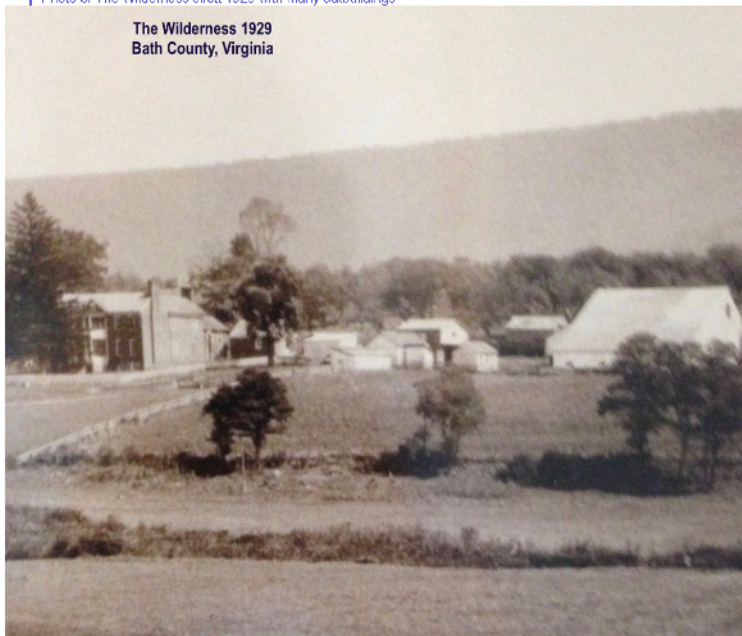
Z-3180

LANDOWNERS COMMENTS

LO106 – Roberta Koontz (cont'd)

20170327 5:06 PM PDF (Unofficial) 3/26/2017 2:25:58 PM

Photo of The Wilderness circa 1929 with many outbuildings



The Wilderness 1929
Bath County, Virginia

Z-3181

LANDOWNERS COMMENTS

LO106 – Roberta Koontz (cont'd)

20170327 5:56 PRC PDF (Unofficial) 3/26/2017 2:25:58 PM

Z-3182

LANDOWNERS COMMENTS

LO107 – Roberta Koontz

20170327-5075 FERC PDF (Unofficial) 3/26/2017 8:07:21 PM

From: wildernessfarm@mgwnet.com
Subject: 031617ercfilinghistoricvidence3
Date: March 26, 2017 at 7:12 PM
To: partofarm@mgwnet.com



To: Kimberly Bose, FERC From: Roberta K Koontz Reference: CP 15-554-000 Date: 3/26/17

Subject: Additional evidence showing close proximity of the ACP to our very historic property, The Wilderness in Bath County, Va. The Wilderness will soon be designated as a Virginia Landmark and added to the National Registry of Historic Places. As such, it should be protected for the future but is clearly seriously and knowingly endangered by Dominion and the ACP.

Dear Ms. Bose,

LO107-1

The attached Dominion map illustrates the close proximity of our historic structures & homesite to the path of the ACP. Dominion has knowingly placed our homesite and the heart of our property in the ACP blast zone. Although we have two VOF conservation easements to preserve & protect the pristine and historic property for future generations, VOF is collaborating with Dominion to negate our conservation easements with the ACP. This includes the notorious "Dominion Land Swap with VOF" which several of our litigation attorneys and several environmental organizations believe is illegal.

The map also illustrates how the path of the ACP will destroy our prime home sites and view sites for parcels that are protected by two VOF conservation easements. Dominion is destroying the best of our historic 1000 acres. These rare and historic areas should be protected and preserved according to our conservation easements as well as the DHR registration of historic properties. Dominion could be destroying many valuable archaeological sites yet unknown on the 1000-acre property which should be protected.

We have tried to sell three parcels totalling about 475 acres for the past 18+ months. No buyers will come to view any properties near the ACP. We were depending on the sale of these parcels to continue funding our modest retirement and maintain our property. I previously filed a letter from our real estate agents at Old Dominion Realty stating that the ability to sell property near the ACP is minimal and that property values are seriously negatively impacted. Dominion and FERC continue to deny that the ACP will have a negative impact on the sale of real estate and property values.

The photo of the Dominion map shows the ACP route across 750 acres of our 1000-acre farm (long red line). Large red arrow & circle shows the location of the three primary historic structures on the property. These important historic structures are where we reside with our dogs. We are in the BLAST ZONE of the ACP. Dominion refuses to move the route of the ACP across our property other than to pass a huge sinkhole and potential historic dump on the property from 200+ years.

There are many ways for Dominion to move the path of the ACP across our 750-acre property to minimize the personal harm to our historic property, to us, to our environment, water resources, our wildlife and plant habitats, etc. But Dominion refuses to move the ACP other than to avoid running across a large sinkhole in the path (causing Dominion to make a very minor adjustment).

Dominion has ignored our karst study that shows significant karst in the path of the ACP. Dominion is reckless and irresponsible to build on top of karst. We will be living on very historic property in the blast zone for a gas pipeline built on top of karst. Our karst expert has expressed his serious concerns about this but they are ignored by Dominion. This path of the ACP on karst on our property could cause a catastrophe that would destroy us & our historic property, causing great harm to our community.

Dominion has no regard for the documented historic importance of our property to Virginia and the nation. Dominion has no regard for the danger to our lives and the lives of anyone coming near the blast zone where we will be living. Dominion has no regard for property we have worked our entire lives to acquire and preserve. Dominion has no regard for the rights of American citizens and property owners. No regard for our important farming operations and maintenance of the property. No regard for the quality of our life in our remaining years on earth. No regard for our vision for the property in the future. No regard for the environment and animal habitats. No regard for property values and our inability to sell property to fund our remaining years of life.

Dominion also has obvious contempt for property owners and our issues. Dominion cares only for money and the constructing the ACP as fast as possible regardless of anything else. Unfortunately, that contempt and abuse appears to be shared by FERC and some other government agencies at many levels. It is shocking to see how a PRIVATE FOR-PROFIT corporation can steal land from American citizens and destroy the quality of our lives, cause financial ruin to property owners, slash property values, destroy goals for the future, etc.

At the VOF Board meeting on 2/9/17, my husband addressed the assembly by video because we were both too ill to attend the meeting. Following the video, a Dominion representative publicly said something like "perhaps there is something we can do to accommodate the Koontz". Obviously Dominion had no intention of following through with this

LO107-1 Comments noted.

Z-3183

LANDOWNERS COMMENTS

LO107 – Roberta Koontz (cont'd)

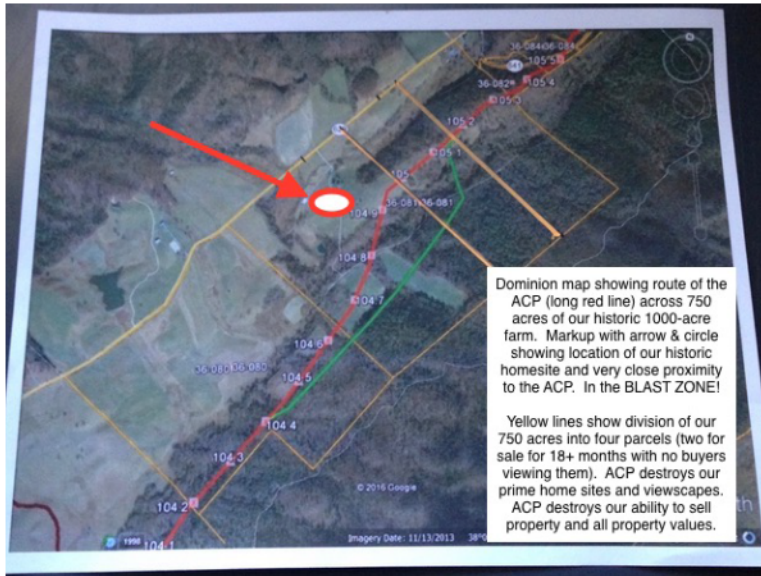
20170327 5:075 FERC PDF (Unofficial) 3/26/2017 3:07:21 PM

LO107-1
(cont'd)

"accommodation" and they have not done so. The comment was only intended to make Dominion look good in front of VOH- board members and other protesters at the meeting.

Please take the time to read and understand my several filings with FERC related to the historic importance of The Wilderness. And also try to comprehend and recognize Dominion's complete unwillingness to address any of our many concerns about the ACP. Dominion is clearly not working closely with property owners and trying to make compromises - despite Dominion's many public claims that they are working closely with property owners, making compromises, etc.

Roberta K Koontz
The Wilderness - Bath County, Va
wildernessfarm@mgwinet.com



Sign warning passers-by that they are "entering a pipeline blast zone" along our beautiful and historic property. Anti-pipeline sign showing our strong opposition to the ACP. These anti-ACP signs can be found in different forms throughout Bath County.



Z-3184

LANDOWNERS COMMENTS

LO107 – Roberta Koontz (cont'd)

00100000 0000 0000 0000 0000 0000 0000 0000 0000 0000



Z-3185

LANDOWNERS COMMENTS

LO107 – Roberta Koontz (cont'd)

SCIENCE CASE FILE NO. 2007-01112 2/20/07 2 PAGES

Z-3186

LANDOWNERS COMMENTS

LO108 – Roberta Koontz

20170327-5076 FERC PDF (Unofficial) 3/26/2017 9:26:35 PM

To: Kimberly Bose, FERC From: Roberta K Koontz Reference: CP15-554-000
Date: 3/26/17

Subject: Protest of secrecy surrounding the National Historic Preservation Act (NHPA) for the ACP. Copy of letter dated 3/2/17 from FERC to Nelson County Board of Supervisors.

Dear Ms. Bose,

LO108-1

We own and live on a very historic property known as The Wilderness since around 1770. The farm has been in continuous cultivation since the 1750s. Early owners of the property include famous Virginians distinguished in civil and military matters, Revolutionary War heroes, pioneers who facilitated the settlement of early Virginia and American patriots.

The property has been documented by the Commonwealth of Virginia as having historic importance in 1932 and 1980 reports. These two documents have already been filed with FERC by Roberta K Koontz.

The Wilderness property was approved in December 2016 by the Virginia Department of Historic Resources (DHR) for an official nomination as a Virginia Landmark and registration with the National Registry of Historic Places. This approval was based on a DHR Preliminary Information Form (PIF) compiled by Robert & Roberta Koontz. Great assistance was provided by Aubrey Von Lindern, architectural historian at DHR. Aubrey visited the property on two occasions and two other members of the DHR staff visited on one occasion. Aubrey has also been working closely with owners of historic properties in both Nelson and Bath counties with respect to the dangers posed by Dominion and the ACP.

A nomination for registration of The Wilderness was compiled by a highly regarded architectural historian consultant and submitted to DHR in early March 2017. Approval of the nomination by DHR and the US Department of the Interior is anticipated in June, 2017.

We have great concern for the potential damage of our historical property by Dominion and the ACP. Our most historic structures are in the blast zone and in close proximity to the ACP. While we have two VOF conservation easements, we believe that no protection will be provided by VOF as they are committed to provide with the easements. DHR is also concerned about the potential destruction of our historic property and has already provided information to the

LO108-1 Thank you for the information. It was reviewed and is part of the project record.

Z-3187

LANDOWNERS COMMENTS

LO108 – Roberta Koontz (cont'd)

20170327-5076 FERC PDF (Unofficial) 3/26/2017 9:26:35 PM

2

LO108-1
(cont'd)

Review and Compliance Section of DHR related to our very historic property. We hope that DHR will be able to provide some protection against Dominion and the ACP for us and other owners of historic Virginia properties.

We have no knowledge of how Dominion will protect and preserve historic properties impacted by the ACP. We have not seen any information that has been made public by Dominion or FERC. Dominion is aware of the historical significance of our property but are routing the ACP along a known area of karst in close proximity to our most historic structures. These historic structure and we will be in the ACP blast zone. We have no knowledge of what rules and regulations related to historic properties Dominion should follow.

We read the letter from FERC to the Nelson County Board of Supervisors which references the National Historic Preservation Act (NHPA) for the ACP. However this information is not being made public. It is confidential and not available to owners of historic properties such as we.

We protest that this information is not available to owners of historic property in the blast zone or near the ACP. We protest that Dominion apparently has no published rules, requirements, duties, restrictions, obligations, limitations or responsibilities related to the historic properties impacted by the ACP.

Based on our interaction with Dominion's Gregory Park and the routing of the ACP in close proximity to our historic dwelling, it is apparent that Dominion has no regard or concern for historic properties at all. Is this lack of regard for historic properties and property owners also true of FERC?

We request that FERC make all information, rules, regulations, acts, etc including the NHPA immediately available to the public. We suspect that Dominion is including a tidbit of confidential information amongst a great deal of information about historic properties that should be made available of owners of historic properties impacted by the ACP. If we signed a confidentiality agreement, the

Z-3188

LANDOWNERS COMMENTS

LO108 – Roberta Koontz (cont'd)

20170327-5076 FERC PDF (Unofficial) 3/26/2017 9:26:35 PM

3

LO108-1
(cont'd)

information would be useless to us because we could not act on it or communicate it to anyone.

Thank you for taking the time to read this filing and understand our concern about the lack of regulations & information for the ACP related to historic properties. It is yet another act against American citizens whose property is being stolen by a PRIVATE FOR PROFIT corporation with the aid of FERC and other government agencies at many levels. It is a crime against this wonderful country that important historic properties might be lost forever due to the greed of Dominion and the thoughtless construction of the ACP on historic properties. Especially when there is widespread doubt about the necessity for the ACP and other alternatives are simply ignored by Dominion and FERC.

Roberta K Koontz
The Wilderness - Bath County, Va
wildernessfarm@mgwnet.com

Attachment - Letter from FERC to Nelson County Board of Supervisors

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426
OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas 4
Atlantic Coast Pipeline, LLC
Atlantic Coast Pipeline Project
Docket No. CP15-554-000

March 2, 2017

Thomas D. Harvey, Chair

Z-3189

LANDOWNERS COMMENTS

LO108 – Roberta Koontz (cont'd)

20170327-5076 FERC PDF (Unofficial) 3/26/2017 9:26:35 PM

4

Nelson County Board of Supervisors
84 Courthouse Square
P.O. Box 336
Lovingson, VA 22949

Re: Atlantic Coast Pipeline Project – Consulting Party Status

Dear Mr. Harvey:

Thank you for your request to the Federal Energy Regulatory Commission (FERC or Commission) that the Nelson County Board of Supervisors become a consulting party under Section 106 of the National Historic Preservation Act (NHPA) for the Atlantic Coast Pipeline Project in the above-referenced docket. We accept your request, in accordance with the Advisory Council on Historic Preservation's regulations for implementing Section 106 of the NHPA at Title 36 Code of Federal Regulations (CFR) Part 800.2(c)(3).

We are requesting that Atlantic Coast Pipeline, LLC (Atlantic) provide you with the cultural resources survey reports for Nelson County, Virginia. In order to receive these cultural resources survey reports, please contact Richard Gangle from Atlantic at 804-273-2814 to obtain copies. These reports are filed with the Commission as "Privileged and Confidential" due to the sensitive information that they contain and are not normally accessible to the public. For this reason, and to comply with Section 304 of the NHPA and the FERC regulations, Atlantic may ask you to sign a confidentiality agreement in order to receive these materials.

Any comments filed with the Commission from the Nelson County Board of Supervisors containing location, character, or ownership information about cultural resources must be marked "**Contains Privileged Information – Do Not Release**" and should be filed separately from the remaining information, which should be marked "**Public.**" If you choose to file any information as *Privileged and Confidential*, please ensure that your filing meets the requirements of 18 CFR 388.112 (b)(2)(i-vi).

You may file comments either electronically or on paper; however, with either method reference the project docket number (CP15-554-000) with your submission. Electronic filings can be made through the internet by going to the FERC's web page at www.ferc.gov and using the "Documents & Filings" link. To file a paper copy, send a letter addressed to:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

Z-3190

LANDOWNERS COMMENTS

LO108 – Roberta Koontz (cont'd)

20170327-5076 FERC PDF (Unofficial) 3/26/2017 9:26:35 PM

5

888 First Street NE
Washington, DC 20426

Thank you for your continued interest and involvement in our review of the Atlantic Coast Pipeline Project.

Sincerely,

David Swearingen
Chief, Gas Branch 4

cc: Public File, Docket No. CP15-554-000

Stephen A. Carter
County Administrator
Clerk of the Board of Supervisors
P.O. Box 336
Lovington, VA 22949

Richard Gangle
Project Manager – Environmental Services
5000 Dominion Blvd
Glen Allen, VA 23060

Matthew Bley
Atlantic Coast Pipeline, LLC
701 E. Cary Street
Director, Gas Transmission Certificates
Richmond, VA 23219

Z-3191

LANDOWNERS COMMENTS

LO109 – Nancy L. Avery

20170328-0007 FERC PDF (Unofficial) 03/27/2017

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

FILED
SECRETARY OF THE
COMMISSION
ORIGINAL
2017 MAR 27 P 4:01
March 19, 2017
FEDERAL ENERGY
REGULATORY COMMISSION

In re: Dockets CP15-554-000 and CP15-554-001

Mr. Davis,

LO109-1

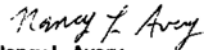
I am a property owner in Nelson County, Virginia whose property is on the current proposed route of the Atlantic Coast Pipeline. I purchased my home in 1999 shortly before my retirement, with the plan of living here the remainder of my life. I chose this as my home because of the beauty of nature that surrounds it on all sides, and the serenity I feel here.

Should the Atlantic Coast Pipeline be approved, I will lose it all:

- My land will be seized from me by the use of Eminent Domain.
- The forest behind my house will be clear-cut, and remain that way in perpetuity as a right of way for the Atlantic Coast Pipeline.
- My home will be well within the "Incineration Zone" should there be an explosion.

In looking over the FERC Draft Environmental Impact Statement for the Atlantic Coast Pipeline Project, I see no mention on the impact this pipeline will have on humans. I see this as a significant oversight and hope that you will as well. My future life and health depend on it.

Thank you for your consideration,



Nancy L. Avery
195 Flying Eagle Court
Nellysford, VA 22958

LO109-1 Sections 4.8.3, 4.9, and 4.12 include discussions of potential residential, socioeconomics, and reliability and safety impacts, respectively. See also the response to comment CO6-1.

Z-3192

LANDOWNERS COMMENTS

LO110 – Larry M. Capps

20170330-0043 FERC PDF (Unofficial) 03/30/2017

FEDERAL ENERGY REGULATORY COMMISSION ATLANTIC COAST PIPELINE AND SUPPLY HEADER PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below; or (3) electronically filed.¹

ORIGINAL

For Official Mail Filing, Send To:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

As applicable, please indicate project(s) you are commenting on:

- Atlantic Coast Pipeline: Docket No. CP15-554
- Supply Header Project: Docket No. CP15-555
- All of the above

COMMENTOR'S NAME AND MAILING ADDRESS: (Please Print)

Larry M. Capps
634 Hill Rd
Smithfield, N.C. 27577-7209

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

I Live in Johnston County North Carolina.
Atlantic Coast Pipeline wants to cross my
property which I object to strongly.
First with other types of Energy
Available we do not need gas from
West Virginia down here. They want to destroy
our property for their monetary gain. My
property has been in my family since 1910.
It is a Century Farm and I hope it is still in
my family ANOTHER ONE HUNDRED SEVENTEEN YEARS
FROM NOW. IF they get their way they will

OVER

¹ The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at <http://www.ferc.gov> under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account".

LO110-1 Comment noted. See the response to comment CO46-1.

Z-3193

LO110-1

LANDOWNERS COMMENTS

LO110 – Larry M. Capps (cont'd)

20170330-0043 FERC PDF (Unofficial) 03/30/2017

LO110-2

Pay me small amounts now and never pay anymore. Who knows what taxes on property will be in one hundred years. Why can't they be made to pay us every year at adjustable rates for how our economy is today + future years.

LO110-3

Why can't they have to pay us for the decrease in our property values. No body with common sense will ever want to live close to any gas pipeline.

LO110-4

Look at all the explosions that are happening today. Quality of construction has gone down drastically. We should be

LO110-5

compensated for our timber every twenty to thirty years instead of one time. My children and grandchildren will be punished forever with this on their property in years to come.

LO110-6

WE DON'T WANT WEST VIRGINIA'S OR ANYBODY ELSE'S GAS. WE WANT TO BE LEFT ALONE. WE CAN KEEP WARM WITH OUR OWN WOODS.
Larry M. Capps

LO110-2 Comment noted.

LO110-3 Comment noted.

LO110-4 See the response to comment CO67-15.

LO110-5 See the response to comment PM1-51.

LO110-6 Comment noted.

Z-3194

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely

Z-3195

20170331-0034 FERC PDF (Unofficial) 03/30/2017

March 27, 2017

To: Nathaniel J. Davis, Sr. Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, D.C. 20426

FILED
SECRETARY OF THE
COMMISSION
2017 MAR 30 P 4 10
ORIGINAL
FEDERAL ENERGY
REGULATORY COMMISSION

Subject: Docket Nos. CP15-554-000 & CP15-554-001: Draft Environmental Impact Statement (DEIS) for Proposed Atlantic Coast Pipeline issued December 30, 2016

Enclosure (1): January 23, 2017 letter to ACP, LLC, Richmond, Virginia, Reference: Notice of intent to Enter Property @ 10190 Deerfield Road, Millboro, Virginia 24460, Parcel ID #46-6, Owners: Wade A. & Elizabeth G. Neely, dated: December 22, 2016
Enclosure (2): February 23, 2017 FERC Scoping Meeting notes for the DEIS held @ Holiday Inn, Staunton, Virginia.

MS Secretary:

I am writing this letter to express my concerns about the inadequacy of the Draft Environmental Impact Statement (DEIS) issued by FERC on December 30, 2016. I believe the DEIS to have been improperly issued, to be incomplete and lacking as a sound and lawful basis for the conclusions reached, and endorsement of, the proposed ACP route.

LO111-1 Trying to wrap my head around this DEIS document of over 2300 pages of information is a project in itself. Uncollaborated information, both (factual) and fiction (theory) that Dominion has provided your office is a challenge to absorb. Dominion's response to a question or challenge of their information is generally, "It will have no significant impact" or we will address the issue when it comes up. There will be thousands of problems that Dominion will have to address if this project is approved. They won't address the problem now, so who believes they will address and solve all the problems in the future? What government agency has the manpower and or resources to monitor this project 24/7, 365? One of my main concerns is some of the information that Dominion provides your office is also annotated with the description that it "(Contains Privileged Information – Do Not Release)". How can that be, when your office is charged with making a complete informed decision that will affect thousands and thousands of ordinary citizens, taking private land by Eminent Domain from citizens who have put their heart and soul into their property? Waterways, streams and rivers, acres and acres of timberland, mountain springs and other water sources will be destroyed by this senseless venture and will never return for all Americans to enjoy. Dominion officials acknowledge that the proposed Atlantic Coast Pipeline faces significant environmental challenges due to construction across steep, highly-erodible and landslide prone mountain landscape. They assure us, however, that project construction

LO111-1 Section 2.5 discusses the environmental inspection and monitoring that would take place during construction of the projects. See also the responses to comments CO6-1 and LO18-1.

LO111-2 See the response to comment LO89-6.

LO111-3 Atlantic and DETI would be legally required to ensure their projects follow the construction procedures and mitigation measures described in their applications and supplements, including responses to staff data requests and as identified in the EIS, unless modified by any Order, and fulfills the intent of their various project-related plans. Failure to meet certain performance standards would result in issuance of noncompliance reports and, if the violation is repeated, could result in a stop-work order or enforcement actions by the FERC. If a company does not meet the conditions or regulations that apply to the project, FERC has authority to refer the matter to its Office of Enforcement.

Atlantic and DETI would be required to submit weekly reports documenting construction and restoration activities. Further, a third-party compliance monitor under the direction of the FERC would be onsite daily during construction documenting Atlantic's and DETI's construction and restoration through about the time the pipeline would be placed into service. FERC staff would periodically inspect the project area during construction and restoration to ensure restoration occurs and, if any issues arise, that they are addressed. The third-party monitors would also consult with FERC staff as needed during construction and restoration.

Under a MOU on Natural Gas Transportation Facilities dated January 15, 1993, between the DOT and FERC, the DOT has the exclusive authority to promulgate federal safety standards used in the transportation of natural gas. Section 157.14(a)(9)(vi) of FERC's regulations require that an applicant certify that it would design, install, inspect, test, construct, operate, replace, and maintain the facility for which a Certificate is requested in accordance with federal safety standards and plans for maintenance and inspection, or certify that it has been granted a waiver of the requirements of the safety standards by the DOT in accordance with section 3(e) of the Natural Gas Pipeline Safety Act. FERC accepts this certification and does not impose additional safety standards other than DOT standards.

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

Z-3196

LO111-3
(cont'd)

will adhere to the highest standards, and that the company will go "above and beyond" legal requirements. This part I call into question because of the ethical questions about information they have presented to all landowners in this ACP pipeline project. I can show you several springs that have running water, 24/7, 365 days a year that citizens rely on for personal use, and others haul water for their livestock to use in time of drought. This ACP will destroy several of these sources of water. Once you destroy your source of water, you have "NOTHING". You can't sustain a normal life.

LO111-4

My main concern is the water situation on my property. We have (3) ponds on our property @ 10190 Deerfield Road, Millboro, Virginia. All are spring fed and water has never been an issue in the 36 years we have owned the property. This ACP will "COMPLETELY DESTROY" this essential element of water. My property is in karst soils and that increases the potential for my ponds and especially my drinking water to be polluted with little or no liability to the ACP. There are NO public water systems available, so if my well goes bad, I would have NO drinking water. Without the ponds, there would be no water source for my cattle. Once the water stops flowing into my ponds, who is going to be held responsible and how are they going to do it? What I am looking for is a GUARANTEE that my water supply to my ponds will not be affected. Can DOMINION guarantee this? I don't think so. Water is life, without water there is no life for man, animal, or plant.

LO111-5

Second, this proposed ACP route that crosses our property will completely destroy thousands and thousands of board feet of timber which makes it a valuable asset in my property value. Standing timber looks and makes this area of Virginia "PRISTINE". There will be NO cutting of timber on our property while we own it. Trees are a valuable asset in the cleansing of the atmosphere against pollutants that will eventually destroy our planet, which brings us to the ongoing debate over global warming. It is REAL, and it is happening now.

LO111-6

As you know, or should know, property values will be devalued by at least 50% or more. Individuals can say what they want about this issue, but would you buy any property that is even close to a pipeline of this magnitude? I would not, as a friend of mine who lived in Appomattox County Virginia had a pipeline explosion in his back yard and the crater that was left in the earth was huge. Fortunately, no one was injured. In rural areas such as the Allegheny Highlands of Virginia, how are citizens supposed to evacuate an area with little or no escape routes when an explosion occurs? You and I both know that there will be some type of emergency occurring with this ACP pipeline.

LO111-7

We, the general public can't trust anything that Dominion puts out on the ACP web-site. Title 18, U.S.C. 1001 applies to both individuals and corporations, in this case Dominion. All they want to do is, try to improve their public image. What about the things that have happened in the D.C. area during the January 2016-May 2016 timeframe which involves the Potomac River? They had a diesel fuel spill in the Potomac in January 2016 and then in February 2016 they made a big issue of dumping "CLEAN COAL ASH WATER" in the Potomac River on television in Washington, D.C. They also had an oil spill in Augusta County, Staunton Virginia in June of 2015, 9000 gallons. There was a big article in the Washington Post about Dominion being fined for specific instances of wrongdoing. Money will never replace or repair the damage these events caused. Do you think Dominion has the private landowner's interests at

LO111-4 Potential impacts, and measures to reduce impacts, on groundwater are discussed in section 4.3.1.

LO111-5 Comment noted.

LO111-6 See the response to comment LO89-4. Also, section 4.12.1 has been revised with additional discussion of Atlantic's coordination with local emergency response providers and the development of its Operational Emergency Response Plans, which would address evacuation requirements in the event of an incident along the pipeline.

LO111-7 The purpose of the EIS is to analyze the potential environmental impacts of ACP and SHP. Past issues related to Dominion are outside the scope of this EIS.

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

LO111-7
(cont'd)

heart, or care who they ruin and by how much? I have made reference to activities in prior correspondence with your organization. I hope that all the material that individuals provide your office is being read and fully analyzed. Why hasn't employees, staff assigned to monitor situations of this project been on the ground, observing, taking notes, viewing situations that people have provided your office of the NEGATIVE impacts that this project will do to the landscape of the mountainous regions of West Virginia and Virginia and the coastal plain and piedmont areas of North Carolina. Dominion will do anything and everything to get this project approved by your organization.

LO111-8

Again, Ethics and Integrity of Dominion and their sub-contractor Doyle Land Services, or should I say lack thereof, constitutes another big problem for this ACP project. Enclosure (1) was written to ACP, LLC after they surveyed our property on January 9th, 2017. It details the actions that took place on that day and describes actions that are "LIES". In November of 2016 Doyle Land services trespassed on our property when a letter of NON-ENTRY was in effect. My letter dated December 9, 2016 addressed to your office, has the picture attached that proves they were on my property. All of this information is in your possession. They "LIED" to my wife about water testing. As of this date, I have received NO response from ACP, LLC addressing the issues raised in the letter. Why is that? This is the ongoing effort by Dominion of not taking their responsibility seriously of their actions. One of the most serious allegations is actions by Doyle Land Services trying to intimidate landowners (FEMALES) in particular, with their actions that this is a done deal and nothing they say or do is going to change this process. Doyle Land Services continue to harass landowners about the compensation that Dominion will pay for their property rights for invasion of their property. Who wants to sell any portion of their property? NOT ME. Dominion doesn't own this property and never will if it up to us. They indicate that there is no better deal forthcoming and to take it or leave it. Guess what, they don't own it and I can tell you one thing, Dominion does not have enough money to buy our property. This does not bode well for one's confidence in the company's competence to build a natural gas pipeline in this area or any other area of this great state of Virginia.

LO111-9

Another interesting observation is about Dominion's unwillingness to provide timely information to the Monongahela National Forest supervisor is also disturbing. According to sources, the USFS states that Dominion/ACP's lack of transparency and evasiveness in providing requested information to the Forest Service—information that is necessary to adequately assess the environmental effects of the Atlantic Coast Pipeline project is also a great concern. There have been repeated requests for information from Dominion in several teleconferences and meetings, but the company has not yet adequately responded. This is a MAJOR CONCERN, when the major project corporation, fails to respond to government agencies request for information about project direction. I see a pattern here that Dominion thinks they only have to answer questions that they want to. This is unacceptable.

Enclosure (2) is my notes from your FERC scoping meeting on February 23, 2017 @Staunton, Virginia. This document is also admissible as backup information to our objection of this senseless project.

LO111-8

Comment noted. FERC and other agencies with permitting responsibilities require that certain surveys be completed for the entire pipeline route. The data collected by Atlantic and DETI are filed with the FERC and submitted to the specific resource agencies for review. As part of the permitting/consultation process, agencies review and verify that data submitted by the applicant are accurate prior to issuing their respective permits. In addition, FERC resource specialists review the information filed by Atlantic and DETI to ensure its accuracy as part of the analysis of the proposed projects. Issues related to survey of properties are not within FERC's jurisdiction.

LO111-9

The FS is using the FERC's NEPA document to assist it in its regulatory process. The FS may continue to request additional information from Atlantic specific to its lands after the final EIS and prior to issuance of any FS permit.

Z-3197

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

LO111-10 | This project does not serve the public benefit, and therefore does not meet the guiding principle allowing eminent domain. The use of Eminent Domain in this case violates both FERC policy and the Natural Gas Act, the statute that governs the FERC's actions. Eminent domain should not be granted.

LO111-11 | Adverse Impact on Conservation Easements is also a big problem area. The proposed ACP route crosses and adversely impacts ten important land conservation easements held by the Virginia Outdoor Foundation, (VOF). These easements were given to VOF for the express purpose of preserving open space in perpetuity. There is no legitimate reason for the DEIS to recommend ACP's use of said conservation easements for the financial benefit of a for-profit corporation. Why do you think people put their land in a conservation easement in the first place? To preserve and protect their land against any or all development programs, as it stands today and the way we, the landowners, want it to be in the future. If the VOF approves a conversion process, they will lose prospective landowners willing to put their property in a conservation easement. I sure wouldn't work with any organization going back on their word of actions of this nature.

LO111-12 | View shed damage to the Allegheny Highlands would be irreparable by this ACP. The Appalachians are a series of scenic high narrow forested ridges running through large parts of Virginia, West Virginia and other states. The ACP would cut through all of those ridges. In many cases the ACP would cut a 150 foot notch through a number of these ridgetops, leaving an ugly visible cut at the ridgetop, and the same width scar running up and down the forested slopes of the mountain. However, on at least 12 of these high mountain ridges the ACP would not only cross the mountain, it would conduct mountaintop removal running along the top ridge of the mountain for great distances, denuding, flattening, and actually physically lowering the highest and most scenic ridges. What once was a beautiful rolling forested mountain ridge on the horizon would become a sterile, barren, flat eyesore. Dominion states that there will be NO visible scars that people will see. That is another untrue statement in this voluminous document. Has any of the FERC personnel driven or walked any portion of the anticipated pipeline route? If not, why not? I have a suggestion, why don't the entire staff that is charged with making a final decision on this project, take a ride or walk through the great state of West Virginia, especially the southern portion of the state and view the destruction of the once beautiful mountainous terrain into now what they call "MOUNTAIN TOP REMOVAL" for the extraction of coal from the earth? I know for a fact, that last summer when FERC held a scoping meeting in Warm Springs, Virginia, they were bused from Marlinton, West Virginia to Warm Springs, Virginia in a roundabout way through Covington so they wouldn't have to deal with the mountainous roads. Things of this nature really irritate me when personnel are charged with making a monumental decision affecting thousands and thousands of people's lives, think they know it all. When all they have accomplished is reviewing documents unknown as to fact or fiction, sitting behind a desk in Washington, D.C. judging rural area citizens who live in remote areas of the state and think that these citizens are making up this information. They are expressing their concerns for the destruction of their property and way of life which will never return.

LO111-13 | One of the most terrifying concerns of citizens in the rural areas of West Virginia, Virginia and North Carolina is the Blast Zone and Evacuation Zone associated with this pipeline project. As in the

LO111-10 | See the response to comment CO46-1. The legality of eminent domain is outside the scope of this EIS.

LO111-11 | See the response to comments SA8-252, CO3-1, and CO10-3.

LO111-12 | See the response to comment LO70-18.

LO111-13 | As discussed in section 1.3, FERC staff visited certain areas that could be affected by ACP and SHP, and met with various groups and landowners. We also inspected the remainder of the ACP and SHP area via automobile and helicopter in conjunction with open houses, public scoping meetings, and other meetings, and held meetings with various resource, permitting, and land management agencies.

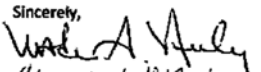
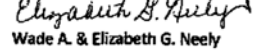
Z-3198

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

- LO111-14 | area where my property is located, Deerfield Road would be the main route to evacuate the area. About 18 miles of Deerfield Road would be in the evacuation zone, 8 miles of Route 250 from West Augusta east, and about 5 miles of Mill Gap Road in Highland County. The current proposed route of the ACP pipeline would parallel those roads. That would be a nightmare. Another concern of the citizens is
- LO111-15 | what will happen to their individual water supply, (wells) when Dominion starts blasting close to those water sources? This is a delicate issue, as I have raised the question of water supplies on numerous occasions. Has anyone acknowledged that this might be a problem? I haven't heard nor seen any mention of this issue by Dominion in their submission of voluminous amounts of propaganda information that they have forwarded to FERC in the DEIS.
- LO111-16 | In summary, I believe the DEIS to be incomplete, erroneous and not in compliance with the requirements of the National Environmental Protection Act. The DEIS fails to adequately address the environmental and economic risks to Bath County's tourism based economy. For those reasons the DEIS should be withdrawn until either a full or complete DEIS information is available, or a legitimate alternative pipeline route is offered. At that time, reset the review and comment period before publishing the final DEIS. This allows those who want to fully understand the impacts of the construction and maintenance of the ACP pipeline can do so regarding additional filings not in the original document.

Sincerely,


Wade A. & Elizabeth G. Neely
10190 Deerfield Road
Millsboro, Virginia 24460

- LO111-14 See the response to comment CO48-2.
- LO111-15 Details describing the precautionary measures to be taken during pipeline construction blasting are discussed in section 4.1.2.2 and also in Atlantic's and DETT's Blasting Plan. Potential impacts, and measures to reduce impacts, on groundwater are discussed in section 4.3.1.
- LO111-16 See the response to comment CO6-1.

Z-3199

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034_FERC_PDF (Unofficial) 03/30/2017

January 23, 2017

Atlantic Coast Pipeline, LLC
701 East Cary Street
Richmond, Virginia 23219

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Attn: Ramona J. Kanouff
Manager—Land, Lease & Right of Way
Authorized Representative

Reference: Notice of Intent to Enter Property Pursuant of VA Code 56-49.01, Atlantic Coast Pipeline, LLC: the Atlantic Coast Pipeline Project Bath County, Va. Parcel ID# 46-6, Owners: Wade A. & Elizabeth G. Neely, Dated: December 22, 2016

Attachment (1): ACP – SURVEYING INFORMATION FORM, Dated January 9, 10 and 11th, 2017, Wade A. & Elizabeth G. Neely, Owners, TERRA BELLA FARM 10190 Deerfield Road, Millsboro, Va. 24460

Ramona J. Kanouff:

Your letter was received in late December, 2016. It had dates to which we, (MY attorney and Your (ACP) attorney agreed to in consultation with the Bath County Court System, Judge John E. Wetzel, Jr. in November of 2016. We, (My wife and I), also agreed to the dates. The first dates were 01/09/2017, 01/10/2017 and 01/11/2017. Entry for those dates have been completed, verified by Richard E. Hollenkamp, Jr., right of Way Representative of Doyle Land Services on 01/09/2017. Therefore no more entry onto my property until the second date of 05/28/2017 – 06/03/2017 by the Threatened & Endangered Species crew, and 05/29/2017 – 06/04/2017 by the Cultural & Environmental crew. NO other dates of entry have been agreed to and NO personnel of the ACP or sub-contractors of the ACP are allowed on my property, it is POSTED. This is to make sure all parties are on the same page of legal entry.

There are several things that I need to bring to your attention. First, when I (Wade) and Mr. Armstrong (Wayne) a friend met the Doyle Land Services personnel, we will call crew #1, on January 9th, 2017 at the entrance to 9946 Deerfield Road, (2) parcels down from mine, everything was very professional. I asked for the person in charge and Mr. Hollenkamp, Jr. stepped forward and identified himself. He would later show me his identification card along with a picture ID. I gave him my clipboard with the "ACP SURVEYING INFORMATION" form attached and indicated that I needed some information about his crew and said to read it over and see if he would comply and fill in some information for me. I

Enclosure (1)

Z-3200

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC_PDF (Unofficial) 03/30/2017

told him that my attorney needed this for possible future use. A copy is attached for your information. I told him that if he didn't want to sign it, just initial it and give it back. He said there was NO problem with giving this information. He signed it as: Supervisor: Land Agent Rick Hollenkamp and initialed it. He handed it to his other crew members and (5) other people signed their names. On the second page of the form, there are (2) other questions that I need to be answered by your office. (1) Company will provide Wade A. & Elizabeth G. Neely a complete report of this surveying effort and Rick Hollenkamp wrote: As Available and signed his name. My question to this is, has the report been completed, if NOT, when is the estimated time of completion and when should I expect to receive it in the mail? I want a PAPER copy of the report mailed to me through the USPS delivery system. (2) Company will provide a current and up to date map of the proposed route of the ACP across my property. Rick indicated that they were going by the GPS tracking system to flag the proposed route. Has that route been altered in any way and if so, why haven't I been notified of this change? Rick Hollenkamp signed: Not Available until surveyed and signed his name. My question: Is there an UP-TO-DATE MAP of the most recent route of the anticipated ACP crossing my parcel of land? I also want a paper copy of this map sent to me in the USPS delivery system. Another question that I asked Rick was about the surveying markers on MY fence posts, inside the surveying corner marker, (pipe in ground), joining my neighbor's property? That was done while the NON-ENTRY letter was in effect. I told Rick that that is TRESPASSING. He nodded his head and he knew that I was right. That's another indication that the people employed by the ACP do not always follow the law. The Bath County Sheriff's office has a copy of the letter I wrote to FERC with the picture attached that proves this is a violation of the law. They will also receive a copy of this letter and also the one to FERC.

There were (3) other crews, environmentalist, archaeologists and construction specialists that performed duties on this January 9th, 2017 day on my property. I want ALL reports that these (3) additional teams prepared during this exercise in regard to their findings of items, their theory on the lay of the land, water sources, flow of water into (3) ponds on my property and the definite possibility of COMPLETELY DESTROYING MY WATER SUPPLY for my cattle and other animals. Natural Springs are also being destroyed by this senseless pipeline. I want a complete report on all of their findings. There were 15-20 individuals walking on my parcel of land. Copies of notes taken would be helpful also.

Another grave concern of mine also came that day, January 9th, 2017, when Rick called my wife (Elizabeth) and he told her that I had requested that my well water be tested and he could have someone at my property in 45 minutes. This is a "BLANTANT LIE" I have never asked any person or organization associated with the ACP to do anything in association with this meaningless project other than to stay off my property. Mr. Armstrong (Wayne) can verify this as factual because he spoke to Rick and my wife about this request. Antics like this make the general public question the necessity of any project proposed by DOMINION RESOURCES. As you are aware, the ACP has consistently provided shoddy, misleading, inaccurate, and self-serving information to FERC. Please provide me with a list of ALL land parcels affected by the ACP through the Allegheny Highlands, especially Bath and Highland counties and whether they are "FOR OR AGAINST" this pipeline. That would give us a complete accurate accounting (SURVEY RESULTS) for all the affected individuals in this decision making process. This is the only poll that matters. Individuals with something to lose. Dominion says that they can't provide this

Z-3201

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC_PDF (Unofficial) 03/30/2017

information because it's personal information. They would not be providing anyone's name, just the land parcel # from their maps and whether they agree to this pipeline being built or just for the survey to take place on their property which is required by LAW. Ask them that question. I think that Dominion's theory is that if people agreed to the surveying of their property, then they agree to the "PIPELINE" being built. This is not the case. This would be an excellent management tool to get an ACURATE poll of the people. It's NO wonder people are skeptical about ANY proposed project that Dominion is proposing, especially this one that will affect thousands and thousands of individuals, private property owners and destroy some of the most beautiful landscapes in this area of western Virginia. The most notable priceless piece of real estate that this ACP pipeline will completely destroy is MINE @ 10190 Deerfield Road, Millboro, Va. 24460. This is not the only region being affected. West Virginia, Virginia and North Carolina are all be directly affected by this ACP pipeline. We have several friends who live in all the affected states and they are appalled that this project is being reviewed for approval even before all the studies and preliminary work data is available for review by FERC. My guess is that FERC believes that Dominion will provide all the necessary information after the FACT. That's not the way the process is supposed to work.

Another issue is the use of "EMINENT DOMAIN" in taking innocent people's property, and they have NO recourse against this action, destroying thousands and thousands of people's lives forever. There is NO going back and doing a "DO OVER" when something catastrophic happens, and there will be some issue in the future on this UNNEEDED pipeline. Dominion is a "FOR PROFIT" company and should NOT be allowed to use this as a source of taking private land for their use. If this is such a great project, why doesn't DOMINION put it down through Richmond, Virginia, in front of your Corporate Headquarters, by the Governor's Mansion and all the other government buildings so EVERYONE can enjoy it? Don't just let the underprivileged citizens of the rural areas of all the affected states enjoy this atrocity!

Another interesting observation is in your letter dated December 22, 2016. "As previously advised, the ACP project is intended to meet the growing need for clean-burning natural gas for power generation – thus promoting cleaner air – as well as for homes and businesses throughout this currently underserved region." The ACP is a transmission line, period. NO gas will be available for Bath County. In fact, NO gas will be available for anyone from Nelson County west along this line. That includes Nelson, Augusta, Bath and Highland counties in Virginia, and all impacted counties in West Virginia. Nevertheless, in their Draft Environmental Impact Statement (DEIS), FERC says that even counties that don't receive gas will benefit, believe it or not, from other counties further east getting gas. Are you serious? How can FERC make an assertion to this affect when this document (DEIS) is supposed to be the factual guiding authority of this ACP project? Also a fact, NO permanent jobs from the pipeline for Nelson, Augusta, Bath and Highland counties, yet Dominion keeps telling the public that this ACP will create permanent jobs. Another false statement. Isn't it true that the BATH COUNTY PUMPED STORAGE STATION provides electricity for several parts of the state of Virginia and it is located in this region of western Virginia? What would happen if the water source for this facility suddenly dries up? That is why WATER is the main driving force for humans and animals for survival. That is also why MY property will be completely destroyed by this ACP.

Z-3202

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

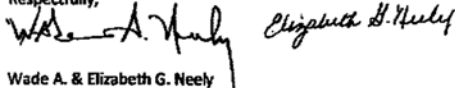
20170331-0034_FERC_PDF (Unofficial) 03/30/2017

Next is the position that Dominion takes on information that they send to FERC. They have contended that some of their information should not be distributed to the general public for dissemination. Why shouldn't the most affected property owners be able to see everything that is going to affect their property, and most notable is the DECREASE in value of their holdings? This project will lower the real estate values of all property in this region of Virginia, as well as those in West Virginia and North Carolina.

Don't we live in a Democracy in America and NOT a communist regime that tells us what to do and when to do it? In this proposal, Dominion is telling us that they are going to do it, no matter what, and nothing we say or do is going to change that. In this process, we have been directed by the court system to stand by and let the process work. We haven't agreed to anything in the past and will not agree with anything in the future, other than to do all we can to STOP this pipeline.

I will be waiting for the requested information to be forwarded as soon as possible. As for the next entry that we agreed upon stated in your letter onto my property, call me at least 24 hours prior to the anticipated date and time of entry. Contact me at (703) 323-1895.

Respectfully,


Wade A. & Elizabeth G. Neely

4517 Seaford Road

Annandale, Va. 22003

Copy to:

Kimberly D. Bose, Secretary, FERC, Washington, D.C. 20426

Atlantic Coast Pipeline Docket #CP15-554

Atlantic Coast Pipeline Docket #CP15-554-001 Revised 3/14/2016

Atlantic Coast Pipeline Docket #CP15-554-001

PF15-6-000

NOTICE OF AMENDMENT TO APPLICATION dated March 22,

2016

Atlantic Coast Pipeline Docket #CP15-554 GWFM-6 Alternative`

Sheriff of Bath County, Warm Spring Courthouse, Warm Springs, Virginia 24484

Z-3203

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

ACP—SURVEYING INFORMATION

DATE: JANUARY 9, 10, AND 11TH 2017

Wade A. & Elizabeth G. Neely, Owners

TERRA BELLA FARM 10190 DEERFIELD ROAD, MILLBORO, VA. 24460

Please provide the following information for the Record:

NAME/ADDRESS AND PHONE # OF SURVEYING ^(Rick) Richard E. Hollenkamp
COMPANY: Doyle Land Services (859) 333-9521
NAME OF CREW MEMBERS: P.O. Box 1527
Waynesboro, VA 22980

| NAME | BADGE # | ADDRESS/QUALIFICATIONS/ EDUCATION/EXPERIENCE/ TRAINING |
|------|---------|--|
|------|---------|--|

SUPERVISOR: Land Agent - Rick Hollenkamp RMLK
CREW MEMBERS: J.D. MISCHEL, Dale Ward
Land Agent - Dale Ward, PRADY RUSSELL
WARREN HANSEN

DOYLE
LAND SERVICES

in service to
Atlantic Coast Pipeline, LLC

P.O. Box 1527
Waynesboro, VA 22980
Cellular (859) 333-9521
www.doyleland.com

Richard E. Hollenkamp, Jr.
Right of Way Representative

Attachment (1)

Z-3204

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034_FERC_PDF (Unofficial) 03/30/2017

COMPANY WILL PROVIDE WADE A. & ELIZABETH G. NEELY A COMPLETE REPORT OF THIS SURVEYING EFFORT. PERSON IN CHARGE SIGN HERE.

SIGN HERE AND TITLE: As Available RML

COMPANY WILL PROVIDE A CURRENT AND UP-TO-DATE MAP OF THE PROPOSED ROUTE OF THE ACP ACROSS THIS PROPERTY.

SIGN HERE AND TITLE: BEST AVAILABLE UNTIL SURVEYED
RML

IF THE INDIVIDUAL IN CHARGE OF THIS EVENT IS UNABLE AND/OR UNWILLING TO COMPLY WITH THIS REQUEST, PLEASE SIGN BELOW AND GIVE REASON.

SIGN HERE AND TITLE: _____

Wade A. Neely

10190 Deerfield Road

Millboro, Va. 24460

Z-3205

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

February 23, 2017

FERC Scoping Meeting for the Draft Environmental Impact Statement (DEIS) @Holiday Inn on February 23, 2017 in Staunton Virginia from 5 p.m to 8 p.m. EST. Atlantic Coast Pipeline (ACP), Docket #CP15-554-000 GWFN-6 Alternative.

GOOD AFTERNOON

My Name is: Wade A. Neely My Wife's name is: Elizabeth. We own property @10190 Deerfield Road, Millboro, Va. 24460

We own property identified on the Dominion Route Map # 36-070. We own 155 acres of land, of which 127 acres are in this parcel.

The following are areas of concern:

- Z-32006
- LO111-17 (1) Water is our Number one concern. Drinking water and/or ground water will be completely DESTROYED. Springs are the sole source of water for the (3) ponds. As you are fully aware of, if you lose your source of water, you have nothing. WHO will be held responsible when the water stops running into our ponds? What am I supposed to do then? NO source of water, NO ponds.
 - LO111-18 (2) Eminent Domain-This is a disaster to all the individuals who purchased land for their personal use and now, the FERC is wanting us to sit back and let Dominion take our property and destroy all our HOPES and DREAMS that ALL AMERICANS need in their lives to survive this project.
 - LO111-19 (3) Oversight of this project? Who would have the responsibility of overseeing the day to day operations?

Enclosure (2)

- LO111-17 Potential impacts, and measures to reduce impacts, on groundwater are discussed in section 4.3.1.
- LO111-18 Comment noted.
- LO111-19 As discussed in section 2.5.3, third-party compliance monitors would be selected and managed by FERC staff and would provide daily environmental compliance monitoring services for the projects. The third-party compliance monitors are separate from the EIs that would be employed by Atlantic, as described in section 2.5.2. The FERC third-party compliance monitors would provide daily reports to the FERC staff on compliance issues and make recommendations to the FERC Project Manager on how to deal with compliance issues and construction changes, should they arise. FERC staff's periodic inspections would typically occur once per month.

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

Z-3207

- LO111-20 (4) Pristine areas of the Allegheny Highlands will be destroyed forever.
- LO111-21 (5) Property values would decrease about 50%. That is a substantial amount. Who would want to buy any land directly adjacent to a pipeline? NO ONE I KNOW.
- LO111-22 (6) Environmental concerns are many: (1) Sediment Control, (2) Hydrostatic testing, (3) Deforestation, (4) Landslides, (5) Methane Leaks, (6) Wildlife and/or endangered species.
- LO111-23 (7) Safety is important also. No gas pipeline of this size has ever been put through steep slopes and karst terrain as in this area. Dominion previously testified to Augusta County Board of Supervisors, that they did not want to build this pipeline through Bath County due to this type of terrain. Landslides, flooding, blocked escape routes from pipeline explosions, and fires in rural areas put the citizen's lives in peril.
- LO111-24 (8) Climate change will continue to worsen with the use of natural gas that is transported by this pipeline. Both carbon dioxide and methane, two nasty gases, would be discharged into the atmosphere and will continue to worsen our climate.
- LO111-25 (9) Dominion cannot be trusted. Isn't it a fact that Dominion spilled diesel fuel into the Potomac River in the Washington D.C. area in January, 2016? Isn't it a fact that Dominion dumped "CLEAN COAL ASH IN THE POTOMAC" river in February, 2016? Isn't it a fact that Dominion is now running public service announcements as TV ads in the Washington D.C. area trying to make the public think they are a caring corporation? They also had a 9000 gallon spill of toxic waste in Staunton, Virginia in June of 2016. Dominion (Sub-contractor

- LO111-20 See the response to comment LO111-12.
- LO111-21 Comment noted.
- LO111-22 Comment noted. Section 4 of the EIS includes our analysis of potential environmental impacts of the project
- LO111-23 Sections 4.1 and 4.12 discuss potential impacts related to geology and reliability and safety, respectively.
- LO111-24 Comment noted.
- LO111-25 The purpose of the EIS is to analyze the potential environmental impacts of ACP and SHP. Past issues related to Dominion are outside the scope of this EIS.

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 FERC PDF (Unofficial) 03/30/2017

LO111-25

DOYLE land Services) has lied to me and trespassed on my property when a letter on NON ENTRY was in effect. ALL FACTURAL and can be verified.

LO111-26
(cont'd)

(10) Last, but not my final thought, FERC admitted that FERC does not know how many properties are directly impacted, are in the blast zone, are in the evacuation zone, how many people live on those properties, or frequent those properties. It was indicated "we don't go into that level of detail" Are you "SERIOUS?????????" It seems to me, that we have a "BIG" problem with the level of investigative work being done on this issue.

LO111-27

My Proposal: First: Cancel the Atlantic Coast Pipeline completely.

Second: Run it down the center median of the interstates, I-64 and I-95 in Virginia, by the Corporate Headquarters of DOMINION, through the middle of Richmond, past all government buildings, the Governor's residence and south to the North Carolina boarder so "ALL" the citizens of Virginia can see the project and how great it is. I'm sorry if I have been a little sarcastic in the statement above, but I get very emotional when dealing with individuals who can't or won't use common sense in the decision making process. I guess I'm "old fashion", when I buy something and pay for it, it is mine until I want to sell it. Not when someone comes along and wants to take it from me.

In closing, I would like to request that FERC, do a complete overhaul of the current inaccurate DEIS, and start all over. There is no justification to approve this project as it currently exists. Thanks to FERC for the opportunity to present my views.

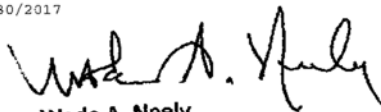
- LO111-26 Atlantic and DETI are required to provide FERC with a list of all affected landowners as defined in 18 CFR 157.6(d)(2), and the list of affected landowners was part of our environmental mailing list who received the draft EIS. Anyone who wishes can request to be added to the FERC mailing list by submitting a comment on the docket or contacting FERC directly.
- LO111-27 Comment noted.

Z-3208

LANDOWNERS COMMENTS

LO111 – Wade A. and Elizabeth G. Neely (cont'd)

20170331-0034 PERC PDF (Unofficial) 03/30/2017



Wade A. Neely

10190 Deerfield Road

Millboro, Virginia 24460

Alternate Address:

4517 Sleaford Road

Annandale, Virginia 22003

Z-3209

LANDOWNERS COMMENTS

LO112 – Multiple Landowners

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Atlantic Coast Pipeline, LLC) Docket No. CP15-554-001
And Associated Dockets

COMMENTS IN RESPONSE TO DRAFT ENVIRONMENTAL IMPACT STATEMENT
by
OWNERS OF LAND APPLICANT PROPOSES TO TAKE BY EMINENT DOMAIN

To build the pipeline it proposes in the above Docket, Atlantic Coast Pipeline, LLC (ACP) must by eminent domain take the land of many land owners who object to the taking of their land for that purpose. They are owners who value their land in its current agrarian and natural condition. Those values will irrevocably be compromised by ACP's pipeline. These Comments are filed in response to the Draft Environmental Impact Statement (DEIS) by the owners of land, the undersigned Owners (the "Owners" or "we"), which ACP proposes to take by eminent domain. Most of the Owners hold land in Bath, Highland, Augusta and Nelson Counties, Virginia, but we believe that we speak for many other such owners along ACP's proposed route.

When it chose a route for its pipeline through the rural western Virginia counties of Bath, Highland, Augusta and Nelson, ACP chose a route through some of the most beautiful and pristine geography in the eastern United States. Late in the afternoon on a summer day, one can stand at the top of any ridge and see the sun gradually set over innumerable ridges to the west, as

Z-3210

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Z-3211

the color of the sky varies in rising shades of orange, pink, purple, and deep blue. It is a picture of rugged beauty, the essence of this land.

Its natural beauty is only one reason why the land's owners value it so much. They value it because of the sense of serenity they gain from the land's rural, undisturbed character. In many cases the Owners acquired their land in the first place precisely because of its scenic and tranquil qualities. Some Owners operate businesses serving visitors for whom the terrain's scenic value forms a critical reason why those visitors patronize the businesses. Some Owners value their land because their families have held it for multiple generations. All of them value the land because it is part of who they are.

The Commission can make the undersigned Owners surrender their land to ACP for a pipeline. It can give ACP the right to take their land by eminent domain. But it can never compensate them for the loss of their land. It can never make them whole. Nor can ACP do so. Nothing ACP has to offer can compensate them for their loss.

* * * * *

LO112-1

The Owners' concerns require the Commission to consider the legal issue why a pipeline owner gets a right of eminent domain. The pipeline owner is, after all, a private company, and proposes to build its pipeline for its own, private, profit. Yet to build its pipeline, the pipeline owner must confiscate the private property of others against their will. The owners of that confiscated property presumably value it for reasons that are not reflected in its "market value." Market value does not account for the loss of property owners' natural viewsheds and family heritage in the land, nor for the disruption of their serenity caused by construction and the ever-

LO112-1 Any project that is approved by the Commission conveys the right of eminent domain, and this authority is specifically spelled out under the NGA for installation and operation of pipelines. See also the responses to comments CO6-1 and CO46-1.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

LO112-1
(cont'd)

present danger of a subsequent explosion, and the possible loss of their sources of clean water.

Those things matter to them, but not to the “market.”

So what gives the pipeline owner the right to take this land? There is a tendency to think of the words “public convenience and necessity” as a sort of cliché that applies to any pipeline that a pipeline company wants to build. But those words have meaning. Only in the presence of a supervening public convenience and necessity may the Commission, under the Natural Gas Act, grant a pipeline company the right to take the people’s property. The Act specifies here that ACP may not construct its pipeline “unless” it first receives “a certificate of public convenience and necessity issued by the Commission.” The Commission may grant that certificate only if it finds that the proposed pipeline “is or will be required by the present or future public convenience and necessity.” “Otherwise,” the statute continues, the “application shall be denied.” 15 U.S.C. §§ 717f(c)(1) and (c). The pipeline must both serve the public convenience and meet a public necessity.

The Commission has considered in some detail the question how it will determine whether a public convenience and necessity outweighs the rights of private land owners whose land will be taken involuntarily. Statement of Policy, Docket No. PL99-3-000, Sept. 15, 1999 (the Policy Statement). The Commission recognized that “landowners whose land would be condemned for the new pipeline right-of-way, under eminent domain rights conveyed by the Commission,” hold legitimate interests in seeking “to avoid unnecessary construction.” Policy Statement, 24.

To resolve this conflict, the Commission determined, it will conduct a balancing analysis. The degree of a pipeline’s prospective public benefit will be weighed against the extent to which the pipeline will require the use of eminent domain. “A showing of *significant* public benefit

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

LO112-1
(cont'd)

would outweigh the *modest* use of federal eminent domain authority.” But the calculus will be more demanding when a greater use of eminent domain will be required. “The strength of the benefit showing will need to be proportional to the applicant’s proposed exercise of eminent domain procedures.” “[T]he Commission will approve an application for a certificate,” in the end, “only if the public benefits from the project outweigh any adverse effects.” Policy Statement, 27, 28, emphasis added.

* * * * *

ACP proposes to use eminent domain to a truly extraordinary extent. The critical numbers in miles of pipeline can be seen in columnar form:

| | |
|---|-------|
| ACP Main Pipeline Total Length: | 604 |
| Length Transiting Privately Owned Land: | 576 |
| Co-located with Existing Rights-of-Way: | - 48 |
| Length Transiting Private, non-ROW, land: | 528 |
| | ÷ 604 |
| Percentage of Pipeline on Private, non-ROW, Land: | 87.4 |

ACP proposes, that is, to use private, non-co-located, land for fully 528 of its pipeline’s 604 miles, or 87.4 % of that total distance. It proposes, in other words, to use privately owned forests, pastures, farmlands, and family yards for 87.4% of its proposed pipeline.¹

The Commission has not in recent memory, we believe, before approved a proposed pipeline that involved so extensive a use of private, non-co-located, land. ACP must, it reports, acquire no fewer than 2,241 parcels of non-co-located land for its pipeline.² We do not know how many of these parcels ACP intends to take involuntarily by eminent domain. Although the

¹ Figures in column derived from the DEIS, Table 4.8.2-1

² Figure derived from ACP response to the Commission’s Question No. 2, filed December 8, 2016.

Z-3213

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

LO112-1
(cont'd)

Commission asked ACP for that information in a public request, ACP chose to file its response as a privileged document.³ But we believe that ACP's reluctance to release this information reflects its general lack of success by it in acquiring rights by consent. In western Virginia, where the undersigned Owners' land lies, opposition to this pipeline is fierce. People in general, and people in particular on whose land the pipeline would be built, do not want to see their slice of heaven sliced by a pipeline.

* * * * *

In contrast to the extraordinary extent to which ACP proposes to confiscate private land, the public benefits of its proposed pipeline are thinner than tissue. Indeed, ACP provides the Commission with essentially no concrete, reliable demonstration of a public need for its pipeline. ACP and its owners offer the Commission vague platitudes about "growing energy needs," and "growing gas generation needs."⁴ Platitudes do not, however, buy gas. And ACP provides the Commission with precisely no study—none whatever—showing that there is a demand for its pipeline that could not be met using existing infrastructure. ACP's arrogance in this regard flies in the face of the Commission's carefully articulated policy. When, as here, a new pipeline will serve markets already reached by existing infrastructure, "the evidence necessary to establish the need for the project will usually include a market study." Policy Statement, 25. As for what ACP does offer, the Commission states, "Vague assertions of public benefits will not be sufficient." *Id.*

Undeterred by its inability to show an actual need for its pipeline, ACP offers the Commission instead an artificial construct. Not to worry about the absence of actual demand for

³ See *id.*

⁴ DEIS, p. 1-2, Joint Supplemental Comments of Duke Energy Carolinas, et al., p. 2, filed February 17, 2017.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Z-3215

LO112-1
(cont'd)

its pipeline, it seems to say. The gas it transports will be purchased under contract by certain utilities. Who are those utilities? Fully 93% of the contracted gas consists of gas that is contracted for by subsidiaries of ACP's *own owners*. Subsidiaries of Dominion Resources and Duke Energy, including Piedmont Natural Gas, account for 82% of the contracted gas, and Virginia Natural Gas, a subsidiary of another owner, Southern Company, accounts for an additional 11%.⁵ The contracts have not been made available for public inspection, so we cannot say what mechanisms they may contain that will in effect allow the subsidiaries to avoid actually taking any ACP gas.

Contracts for the supply of gas that are entered into by subsidiaries of the proposed contractor pipeline's own owners, as demonstrations of public need, are inherently unreliable. Those subsidiaries are not at liberty to decide for themselves whether they actually need more gas. Or, if they do need more gas, whether they need it from this pipeline in particular. Their owners, who also own the pipeline, will decide those questions for them. And they will decide based not on any public need, but upon their own financial self-interests, interests which will include the profit they expect to make from the pipeline itself. Thus, as the Commission has pointed out, "A project that has precedent agreements with multiple new customers may present a greater indication of need than a project with only a precedent agreement with an affiliate." And "using contracts as the primary indicator of market support for the proposed pipeline project . . . raises additional issues when the contracts are held by pipeline affiliates." Policy Statement, 25-26, 16.

⁵ Percentages derived from ACP response to the Commission's Question No. 3, filed by ACP on December 8, 2016. APC provides information about its ownership in response to a Commission information request, a response filed February 28, 2017.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Z-3216

LO112-1
(cont'd)

The contracts entered into by ACP with Dominion and Duke subsidiaries are particularly suspect, as examination of the materials supplied by ACP and its owners shows. Approximately 82% of the gas transported by ACP, as we noted above, is contracted for by Dominion and Duke subsidiaries. Why exactly do those subsidiaries need that gas? ACP's answers to that fundamental question are wholly opaque. The Commission put the question to ACP in an information request dated November 23, 2016. ACP's answer, dated December 8, indicates, at best, that Dominion and Duke intend to treat their ACP gas as a possible redundant fuel source for their existing electrical generation plants. We quote ACP's answer below, with emphasis added.⁶

ACP asserts that Duke will use its pipeline "to meet *portions* of its existing . . . power generation facilities," where the gas will provide Duke an "*alternative* fuel source." Duke adds, in a supplemental filing, that ACP's pipeline "will provide . . . *additional supply*" for existing facilities.⁷ Similarly, Dominion will treat ACP's gas, ACP asserts, "as an important *factor* to the reliable delivery of gas to its generation fleet *from an overall portfolio perspective*." The pipeline will be directly connected with only two generation facilities, but it "*could*" be interconnected with other pipelines, which "*should*" allow gas to go to other facilities, thus providing "*additional sourcing flexibility*." ACP lists the existing Dominion facilities which its pipeline "*could*" serve.

In addition, Duke is constructing a plant to be completed this year "that *will be able to utilize* the transportation service from ACP." Dominion is constructing a plant to be completed

⁶ Except as otherwise noted, the discussion which follows relies upon and quotes ACP's response to the Commission's Question 3, filed December 8, 2016, with emphasis in all cases added.

⁷ Joint Supplemental Comments of Duke Energy Carolinas, et al., p. 1-2, filed February 17, 2017, emphasis added.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Z-3217

LO112-1
(cont'd)

next year, the Greenville plant, which “*could*” be served by ACP. But Dominion told the Virginia State Corporation Commission that the Greenville plant will “be fueled using natural gas with reliable firm transportation provided by Transcontinental Gas Pipe Line Company, LLC (“Transco”).” The plant will merely “*also have access*” to ACP pipeline gas.⁸

This Commission asked ACP to provide in particular information about any “proposed” electrical generation plants that the pipeline might serve. The Commission will note that ACP in its response provides no information about any “proposed” plants. It provides no information whatever about even prospective Dominion plants of any kind. With respect to Duke, ACP asserts that Duke is planning a number of plants for which it is evaluating siting locations, but for which the “locations . . . have not been finalized.” The plants are to be constructed between 2022 and 2031. But ACP does not say that its pipeline definitely would serve those prospective plants. It asserts only that unspecified “*quantities of natural gas*” from the pipeline “*would be available as a potential fuel source.*” Duke adds, in its supplemental filing, that the pipeline’s gas “*is expected to be available as a potential fuel source*” for an unspecified number of “additional power generation facilities.” Duke is, it says, “evaluating a number of siting locations . . . that *would provide access* to ACP.”⁹

So what is the Commission to make of this, ACP’s sole demonstration of “public need”? ACP claims that 82% of its gas will be purchased by its owners Dominion and Duke to generate electricity. Yet it fails to identify a single Dominion or Duke plant that definitely will use any ACP delivered gas. Instead it hides behind a series of vague generalities about what “could” be

⁸ Application of Virginia Electric and Power Company, before the Virginia State Corporation Commission, Case No. PUE-2015-00075, July 1, 2015, pp. 7-8, emphasis added.

⁹ Joint Supplemental Comments of Duke Energy Carolinas, et al., p. 2, filed February 17, 2017, emphasis added.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Z-3218

LO112-1
(cont'd)

done if the stars and the planets come into alignment in the proper season. Essentially, the gas will serve as some kind of redundant fuel source if it is needed and if it can be transported to existing plants, or possible future Duke plants. The undersigned Owners do not dispute that these aspirations are quite nice. But we do beg to point out that they constitute no demonstration of public need of any kind. Much less do they constitute a showing of a public need sufficient to justify the confiscation of our property. As the Commission has stated, "a project built on speculation (whether or not it will be used by affiliated shippers) will usually require more justification than a project built for a specific new market when balanced against the impact on the affected interests." Policy Statement, 26.

ACP thus has failed to show that new gas is needed in its service area, or that the existing pipeline infrastructure cannot meet future demand. Let's suppose, however, that reasonably anticipated demand might outstrip the capabilities of gas infrastructure as it exists today. That demand could still be met with relatively modest modification of the existing infrastructure. ACP has made no showing to the contrary. Its failure is especially telling. A pipeline proponent, the Commission recognizes, must make a stronger showing when it proposes "to serve markets already served by another pipeline." Policy Statement, 25.

Other filers have, however, submitted thorough studies to the Commission showing that existing gas transportation infrastructure, with relatively minor modification, will be sufficient to meet all reasonably anticipated demand in ACP's proposed service area.¹⁰ The service area, those studies have shown, is already well served by natural gas infrastructure. Relevant

¹⁰ "Are the Atlantic Coast Pipeline and the Mountain Valley Pipeline Necessary?: An Examination of the Need for Additional Pipeline Capacity into Virginia and Carolinas," Synapse Energy Economics, Inc., submitted by Shenandoah Valley Network, et al., Dec. 20, 2016; Statement of Thomas Hadwin, submitted on behalf of Friends of Central Shenandoah, April 12, 2016.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Z-3219

LO112-1
(cont'd)

modifications of that infrastructure are already proposed, or underway. They will significantly increase capacity from the Marcellus Shale Formation to ACP's proposed service area. Additional modifications are easily possible. Additional storage facilities, for example, will allow existing pipelines to meet periods of peak demand without adding transport capacity. In contrast to construction of an entirely new pipeline, these changes would involve relatively little new construction. In contrast to the extraordinary use of eminent domain that ACP proposes, they would require relatively little use of eminent domain. And, again, the conclusion follows: there is no genuine public need sufficient to justify the extensive taking of private property proposed by ACP.

The DEIS suggests that existing pipelines "would have to provide sufficient pipeline capacity to transport an additional 1.44 BCf/d of natural gas to the delivery points specified by the precedent agreements" signed by ACP.¹¹ This suggestion, we respectfully submit, is a fundamental error. It assumes that there is in fact a need to deliver gas in the quantity and to the places ACP proposes. Yet such a need is precisely what ACP has failed to show. It has submitted no demand study. It is unable firmly to commit even its own owners, with whom it has signed the precedent agreements, to use its gas at any of their electrical generation plants. At best, the gas will serve only as a potential alternative fuel source. Nor has ACP shown a necessity to deliver gas to any new gas-fired generation plant at a particular place. Duke has not yet even acquired the land for such plants. Why, then, should it be necessary for existing pipelines to duplicate ACP's unnecessary system? Those pipelines can, with modification, meet

¹¹ DEIS, pp. 3-4.

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

LO112-1
(cont'd)

all demonstrable public needs. That is the question before the Commission. Is ACP's pipeline required by the public convenience and necessity?

Some Dominion plants, lastly, which ACP "could" serve are coal fired plants. And although Dominion has made no commitment to convert these plants to gas, ACP implies in its application that they might be converted, and that such a conversion would serve the EPA's Clean Power Plan. But the EPA's Clean Power Plan is now moribund. It has been stayed by the US Supreme Court, and the new administration has made clear that it intends to withdraw and remake the Plan. Conversion of coal plants by Dominion would not, in any event, have served the Plan's climate change goals. The gas ACP proposes to acquire will be obtained by hydraulic fracturing, a process which incidentally releases methane, a far more potent greenhouse gas than carbon dioxide, into the atmosphere. Any plants newly reconstructed by Dominion will, moreover, last for 30 years, emitting carbon dioxide into the atmosphere for those 30 years. If, instead, the existing coal fired plants are allowed to remain in place until the ends of their useful lives in five or ten years, they can in the meantime be replaced with renewable sources for generating electricity. The net result will be far less carbon dioxide emitted into the atmosphere.

Conclusion

The undersigned Owners, as we have said, value their land their land for deeply personal reasons. The Commission may, under the Natural Gas Act, authorize ACP to take that land only if ACP shows that its proposed pipeline meets a public necessity. Yet ACP fails to demonstrate any concrete public necessity for its pipeline. It offers only speculative possibilities. *Could's, should's, and would be available's.* Other parties, in contrast, have shown the very absence of any necessity for ACP's pipeline. And the Commission will grant ACP the power to

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

LO112-1
(cont'd)

take the Owners' land, under its established policy, only if ACP demonstrates a public benefit sufficiently great to justify the extent to which it proposes to confiscate private property. Here ACP proposes to confiscate private property to a truly extraordinary extent. Yet ACP has shown essentially no clear, genuine, verifiable public benefit. Under the statute and its own policy, then, the Commission must not grant ACP the power to take our land.

Respectfully Submitted,

Roger and Joan Geary
478 Stover Shop Road
Churchville, VA 24421

John and Samantha Geary
714 Hotchkiss Rd.
Churchville, VA 24421

Scott D. Balin, JD
as Trustee, "Far Afield"
2158 Deerfield Valley Road
West Augusta, VA 24485

Wade A. and Elizabeth G. Neely
10190 Deerfield Road
Millboro, VA 24460

Lora and Victor Baum
919 Flordon Drive
Charlottesville, VA 22901
(property in Bath County, VA)

William F. and Lynn S. Limpert
250 Fern Gully Lane
Warm Springs, VA 24484

Jonathan M. and Pamela F. Ansell
159 Fortune's Point Lane
Roseland, VA 22967

James and Katherine McLean
Bay Harbor Brokerage Inc.
1553 Bayville St.
Norfolk, VA 23503
(property in Bath County, VA)

Fenton Family Holdings LLC
by: Will Fenton, member
39 Shelton Laurel Trail
Roseland, VA 22967

Fenton Inn LLC
by: Lilia Fenton, member
29 Shelton Laurel Trail
Roseland, VA 22967

Andrew L. and Susan E. Shea
360 Red Coat Lane
Wayne, PA 19087
(property in Nelson County, VA)

Wintergreen Property Owners Association
by: Jay Roberts, Executive Director
88 Wintergreen Drive
Wintergreen Resort, VA 22967

Nancy L. Avery
195 Flying Eagle Ct.
Nellysford, VA 22958

Roger R. and Susan D. Fulton
1134 Winery Lane
Roseland, VA 22967

(continued next page)

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

George C. and Margaret T. Bird
Valley Home Farm
2028 Valley Center Road
Monterrey, VA 24465

Susan Brooks
2368 Lee Hwy.
Mount Sidney, VA 24467
(property in Augusta County, VA)

Rockfish Valley Investments, LLC
by: Richard G. Averitt IV,
manager and member
88 Grace Glen
Nellysford, VA 22958

Demian K. Jackson
106 Starvale Ln.
Shipman, VA 22971

Hershel and Darlene Spears
2215 Spruce Creek Lane
Nellysford, VA 22958

Carolyn L. Fischer
184 Mountain Field Trail
Nellysford, VA 22958

Maki Family Trust
by: William Roger Maki, Co-Trustee
2352 Lyndhurst Road
Waynesboro, VA 22980
(property in Nelson County, VA)

Robert Calvin Day, Jr.
3337 Woodland Church Rd.
Buckingham, VA 23921

Robert F. and Barbara T. Fuhrman
215 Flying Eagle Ct.
Nellysford, VA 22958

Kimberly and Lloyd Bird
Valley Home Farm
2275 Valley Center Road
Monterrey, VA 24465

Susan Mitchell
1007 Winery Lane
Roseland, VA 22967

Hazel F. Palmer
506 Powtan Dr.
Lynchburg, VA 24502
(property in Nelson County, VA)

Dawn E. Averitt
16 Hopson Road
Norwich, VT 05055
(property in Nelson County, VA)

Carolyn J. Maki
2228 Rockfish Valley Highway
Nellysford, VA 22958

Susan Lazerson
14 Crystal Lane
Faber, VA 22938

M. Kathleen and Randy A. Forbes
503 Tunnel Hill Rd.
Millboro, VA 24460

Lorri Stone and Stuart Allen
17151 Katy Ln.
Beaverdam, VA 23015
(property in Nelson County, VA)

Jeffrey E. Fogel
Attorney at Law
913 E. Jefferson Street
Charlottesville, VA 22902
(property in Buckingham County, VA)

(continued next page)

LANDOWNERS COMMENTS

LO112 – Multiple Landowners (cont'd)

Henrietta F. Wilson
626 West Princess Anne Road
Norfolk, VA 23517
(property in Nelson County, VA)

Hazel M. Rhames Family Trust
by: Joseph L. Rhames, Trustee
2835 Penny Lane
Charlottesville, VA 22903
(property in Nelson County, VA)

Theresa D. Herman Revocable Trust
by: Theresa D. Herman, Trustee
499 Winery Lane
Roseland, VA 22976

Of Counsel:
Michael J. Hirrel
1300 Army Navy Dr. # 1024
Arlington, VA 22202
mhirrel@verizon.net
DC Bar No. 940353

Z-3223

LANDOWNERS COMMENTS

LO113 – Sally Adkins

Z-3224

Sally K Adkins, Valley Head, WV.

LO113-1

My comments will be in the form of highlighting some of former FERC chair Norman Bay's parting recommendations to FERC. The comments below are from someone, who as the chair, has been watching this process very closely and changing his mind about the process and issues. It would behoove the new commission to take his comments to the table and consider his suggestions.

In his written statement, Bay suggested the commission, he had chaired for nearly two years, ought to revisit how it weighs the pros and cons of pipeline projects. He made recommendations that pipeline project watchdogs have pitched for years.

Included among other recommendations in his statement, Bay said FERC ought to consider refining and expanding its evaluation of the need for new natural gas pipelines to guard against overbuilding.

Bay observed, "The development of natural gas pipeline infrastructure has become increasingly controversial." And he cited one especially hot-button reality: "Pipeline companies whose projects receive FERC approval have access to federal eminent domain to acquire easements across private property." "Private property advocates have alleged," Bay said, "that land is being taken by for-profit companies for projects that do not serve a public use."

In addition, Bay referenced FERC's approach to conducting environmental reviews of natural gas pipeline projects. He suggested broadening the focus — echoing fervent calls, voiced for years by environmental and conservation groups, for a wide-ranging environmental impact statement designed to collectively assess the effects of numerous projects.

Bay wrote, "Despite the growing importance of Marcellus and Utica gas production — it was 22.5 billion cubic feet per day in 2016 and is projected to surpass 44 billion cubic feet per day by 2050 — the commission has NEVER conducted a comprehensive study of the environmental consequences of increased production from that region."

In November 2015, Bay himself rejected conducting a programmatic environmental impact statement for the Mountain Valley Pipeline and other proposed interstate natural gas pipelines affecting Virginia and West Virginia, including the Atlantic Coast Pipeline.

But in a change of opinion he states, "Even if not required by NEPA, in light of the heightened public interest and in the interests of good government, I believe the commission SHOULD analyze the environmental effects of increased regional gas production from the Marcellus and Utica".

Bay's comments noted that "increased use of natural gas as a fuel to generate electricity has helped cut emissions of carbon, a greenhouse gas associated with coal and climate change," but he also suggested "FERC ought to consider more comprehensively the effects of other greenhouse gas emissions."

A comment about Bay, "he thinks for himself" and was "going to try to do what he thinks is right, at least as a commissioner."

LO113-1 See the response to comment CO46-1.

LANDOWNERS COMMENTS

LO113 – Sally Adkins (cont'd)

LO113-1
(cont'd) | HEED the comments of someone who has been there studying the issue every day and now advocates for the public to be heard, that environmental issues should be addressed, that there should be fairness in all considerations especially eminent domain, and that the need for these new pipelines should be seriously evaluated for overbuilding. Additionally, he even suggests that the commission should "revisit how it weighs the pros and cons of pipeline projects."

| What stronger words do you need?!

Z-3225

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina

United States of America

before the

Federal Energy Regulatory Commission

Atlantic Coast Pipeline, LLC
Dominion Transmission, Inc.

Docket Nos. CP15-554-000
CP15-554-001
CP15-555-000

The Draft Environmental Impact Statement for the
Proposed Atlantic Coast Pipeline and Supply Header Project
EIS-0274D

Comments by Louis and Yvette Ravina



Z-3226

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

TABLE OF CONTENTS

| | |
|--|---|
| I. OUR STATUS AS INTERVENORS..... | 1 |
| II. THE MISSION AND THE PROJECT APPROVAL POLICY OF THE FEDERAL ENERGY REGULATORY COMMISSION..... | 2 |
| A. The Commission's Mission..... | 2 |
| B. The Commission's Policy on New Pipeline Facilities..... | 2 |
| C. Balancing Public Benefits and Adverse Impacts..... | 3 |
| III. SUMMARY STATEMENT..... | 4 |
| IV. DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT..... | 7 |
| A. The Evaluation of Need and of Alternatives in the DEIS is Flawed..... | 7 |
| 1. The Applicant's Statement of Need is Inflated..... | 7 |
| 2. One Third of the "Need" for this Project is Already Met..... | 7 |
| 3. There are Alternative Sources of Supply..... | 8 |
| a) Mountain Valley Pipeline ("MVP")..... | 8 |
| b) Atlantic Sunrise Pipeline..... | 9 |
| c) WB Xpress Pipeline..... | 9 |
| 4. The ACP and MVP Both Limit Flexibility of Supply..... | 9 |
| B. The DEIS Ignores the Self Dealing Due to Affiliate Relationships..... | 9 |

Z-3227

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

| | |
|--|----|
| C. The DEIS Ignores the Fallacy of Low Cost Natural Gas..... | 10 |
| D. The DEIS Ignores the Danger of Overbuilding..... | 11 |
| E. Reliance on Environmental Inspectors is Unrealistic..... | 12 |
| F. The DEIS Assumes that Atlantic & DTI Will Comply with All Requirements and All Mitigation Practices..... | 13 |
| 1. Dominion's Disregard During Pipeline Construction..... | 13 |
| 2. Dominion's Violation of the Clean Water Act..... | 13 |
| 3. Pipeline Contractors Taking Short Cuts..... | 14 |
| G. The DEIS Fails to Address the Issue of Compensation for Damages..... | 15 |
| H. The DEIS Fails to Fully Address Damage to Wells and Springs..... | 15 |
| I. The DEIS Does Not Weigh the Real Dangers Inherent in Karst Areas..... | 17 |
| 1. The Danger of Blasting in Karst Areas..... | 17 |
| 2. The Danger of Any Construction in Karst Areas..... | 19 |
| J. The DEIS Does Not Seriously Consider the Impacts of Steep Slopes..... | 20 |
| 1. Almost 25% of the Mainline ACP Pipeline and 65% of the SHP Pipeline Loop are on Steep Slopes..... | 20 |
| 2. The "BIC Team" and "SAIPR" are More Hope than Reality..... | 20 |
| 3. Steep Slopes in Nelson County – a Case Study..... | 20 |

Z-32228

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

| | |
|--|----|
| 4. The Nelson County Report Casts Doubt on the Veracity of All Reports Addressing Steep Slopes Submitted by Atlantic..... | 22 |
| 5. Photos from the Blackburn Report..... | 23 |
| K. The DEIS Contains Incomplete and Incorrect Information..... | 23 |
| L. The DEIS Ignores the Environmental Consequences of Fracking..... | 24 |
| M. The DEIS Allows Atlantic to Trample on a National Treasure..... | 25 |
| N. The DEIS Bases the Socioeconomic Impacts on Faulty Analyses..... | 25 |
| O. The DEIS and the Real Impacts on Our Property and Our Lives..... | 27 |
| 1. The Pipeline Route Shows a Lack of Engineering Common Sense..... | 27 |
| 2. Atlantic has No Respect for Landowners and Pipeline Impacts..... | 29 |
| a) Lack of Simple Consideration..... | 29 |
| b) Impacts on Our Well and Spring..... | 29 |
| c) Blocked Access to Our Home..... | 30 |
| 3. Lost Property Value..... | 31 |
| 4. Atlantic has not Engineered the Project in Detail..... | 33 |

Z-3229

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

I. OUR STATUS AS INTERVENORS

We have serious objections to the proposed project that has been submitted for approval by Atlantic Coast Pipeline, LLC (“Atlantic”) and Dominion Transmission, Inc. (“DTI”).

We submit these comments on the Draft Environmental Impact Statement (“DEIS”) in the hope that the Commission will truly take the time to understand our position. As we will explain, for the proposed Atlantic Coast Pipeline (“ACP”) and its associated Supply Header Project (“SHP”) the scale weighing public good, on the one hand, and adverse impacts, on the other, comes down emphatically on the side of adverse impacts. If the Commission issues a certificate of public convenience and necessity for this project, then it will be nothing more than a grant of eminent domain for corporate gain.

We are both registered as intervenors with the Federal Energy Regulatory Commission (the “Commission” or “FERC”) in this proceeding. We have standing both as affected landowners, and as affected citizens of Augusta County and of Virginia. We own a 158 acre farm that is practically bisected by the route of the proposed pipeline.

We have received an easement compensation offer from Atlantic that does not come close to fair compensation for the long term and short term destruction of everything we have worked to create over the past 25 years. We refuse to even consider it. In fact, we will not surrender our property until it is confiscated in court under eminent domain.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

II. THE MISSION AND THE PROJECT APPROVAL POLICY OF THE FEDERAL ENERGY REGULATORY COMMISSION

A. The Commission's Mission

The mission of the Federal Energy Regulatory Commission is not to approve pipelines. If that was the case then it would be nothing more than a captive rubber stamp for the oil and gas industry. On the contrary, it is charged with helping “We, the People” by endeavoring to: (a) assist consumers in obtaining reliable, efficient and sustainable energy services; (b) ensure just and reasonable rates, terms and conditions, and (c) promote safe, reliable, secure and efficient infrastructure.

B. The Commission's Policy on New Pipeline Facilities

In 1999 the Commission issued a revised Statement of Policy¹ regarding the appropriate criteria to be used in deciding whether or not to authorize the construction of new pipeline facilities. In essence, the Commission is required to balance the public benefits against the residual adverse impacts. The applicant must show that the “public benefits that would be achieved by the project are proportional to the project's adverse impacts.”

The Commission listed the following as public benefits: “...meeting unserved demand, eliminating bottlenecks, access to new supplies, lower costs to consumers, providing new interconnects that improve the interstate grid, providing competitive alternatives, increasing electric reliability, or advancing clean air objectives.”

¹ United States of America, 88 FERC ¶ 61,277 Federal Energy Regulatory Commission Docket No. PL99-3-000, STATEMENT OF POLICY (September 15, 1999). All quotations in this section are from that statement.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

C. Balancing Public Benefits and Adverse Impacts

The Commission's policy is fair and rational. It views the amount of evidence necessary to establish the need for a project versus the adverse impacts of that project as requiring a balance. Thus "projects to serve new demand might be approved on a lesser showing of need and public benefits than those to serve markets already served by another pipeline." In addition, as part of that balance, it requires that if there are more interests adversely affected and if those impacts are more adverse, then the applicant must demonstrate greater public benefits from the project to balance the adverse impact.

Z-3232

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3233

III. SUMMARY STATEMENT

It is disturbing that the Draft Environmental Impact Statement does not come close to satisfying the policy standards for project approval established by the Commission. In fact, it seems to have been prepared in complete ignorance of the very mission of the Federal Energy Regulatory Commission.

- LO114-1 | It is essentially a whitewash – prepared to look impressive, and to appear to conform to the Commission’s written policy as well as to the requirements of the National Environmental Policy Act. It only does so by evading or ignoring the true facts.
- The DEIS treats all of the resource reports and statements of need submitted on behalf of Atlantic and DTI as the gospel truth, while ignoring or dismissing out of hand the carefully prepared arguments and documents submitted by the opponents to this project as not worthy of any consideration. This “thumb on the scale” method allows the DEIS to approve the project, seemingly without reservation. Yet, anyone with a drop of intelligence and common sense can easily see through the smoke and mirrors, and will know this is unjust.
- The end result, if unchecked, will be for the Commission to hand the club of eminent domain to a for profit corporation with no real public benefit involved and plenty of adverse impacts:
1. Atlantic inflated its overall need by 50%. Then, to tilt the table even further, it based those needs on captive affiliates, and not the free market.
 2. There are alternative pipeline infrastructure proposals which have lower costs and fewer adverse impacts. Actually, the infrastructure already exists to provide natural gas for power plants scheduled for operation in Virginia.

LO114-1 See the responses to comments CO6-1, and LO114-2 through LO114-25.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO114-1
(cont'd)

3. The logical start point to satisfy any natural gas needs in North Carolina is from Southside Virginia thus avoiding those areas on the ACP route that are most at risk for adverse impacts.
4. The natural gas price differentials between the Marcellus and Henry Hub will level out soon, probably before the ACP can be completed. At that point its justification as a less expensive fuel supply will evaporate.
5. Consumers of electrical power will see an increase in their costs, not a decrease as claimed.
6. Dominion Resources via its many affiliates has clearly demonstrated its lack of respect for the environment. There is no reason to trust that they will change. They propose Environmental Inspectors to ensure that all environmental requirements are complied with, but list no qualifications at all for this position. Worse – there is no arms length relationship insuring true authority for the inspector.
7. The need for a mechanism that insures fair and efficient compensation for damages is completely ignored. This is a huge project with very severe environmental consequences. Surely any individual seeking legal redress directly against Atlantic or DTI will be unfairly overwhelmed by their legal teams.
8. The real possibility of damage to individual water supplies is discounted. At the same time no mechanism is established to insure that landowners are supplied with the laboratory tests taken by Atlantic. This imposes an unfair financial burden on each landowner to pre-sample and post-sample in order to prove damage.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3235

LO114-1
(cont'd)

9. The potential for permanent, rather than temporary damage to water supplies in karst areas is ignored, contrary to filings by the Virginia Cave Board which were timely received by the Commission.
10. It is assumed that somehow, steep slopes can be dealt with in an environmentally responsible manner. Supposedly the "BIC Team" and the "SAIPR" will magically cancel the laws of nature.
11. The socio-economic reports submitted to the Commission are severely flawed. As one would expect, they show economic benefits from installation of the pipeline and no economic costs. The analysis by Key-Log Economics, LLC carefully and professionally explained why those reports tilted the playing field in favor of the pipeline, but they have been ignored.
12. Key-Log Economics quantified the adverse impacts on just a four county region in Virginia (Augusta, Buckingham, Nelson and Highland Counties). The annual adverse impact was about \$100 million per year, or about \$7.5 billion on a present worth basis.
13. The loss of property values is claimed to be very minimal and temporary, but this statement is only supported by pipeline industry sponsored research which is obviously biased. A high school freshman would know the real answer. In fact, landowners and realtors along the proposed ACP route have experienced buyers backing out of contracts, or simply not even considering affected properties.
14. The national forests are treated as a resource to be exploited for private gain instead of a treasure that must be defended at all costs. There was no serious attempt to find alternative routes for the pipeline. It was just preferred by Atlantic and DTI and that was that. Yet the adverse consequences are nothing less than severe.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO114-2 See the response to comment CO46-1.

IV. DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

A. The Evaluation of Need and of Alternatives in the DEIS is Flawed

We are deeply thankful for the education about pipeline infrastructure and natural gas pricing that Thomas Hadwin has shared with the many organizations that are involved with opposing this project, as well as with the Commission. The comments that follow are a very brief synopsis of what he has documented in detail. We urge the Commission to carefully consider his contributions to this process.

LO114-2

1. The Applicant's Statement of Need is Inflated

The primary purpose claimed by Atlantic for this project is to transport gas for use in new power plants and for use in power plants where coal is being replaced by natural gas because of the environmental and cost advantages. Residential and commercial needs in Virginia and North Carolina are only growing by about 0.1% per year and are already adequately served. The main section is a 42" diameter pipeline which is rated at 1.5 Bcf/d (billion cubic feet per day).

2. One Third of the "Need" for this Project is Already Met

In their description of the project the applicants note that it will supply gas to two new natural gas power plants in Southside Virginia. One is the recently completed Brunswick County Power Station and the other is the Greenville County Power Station which began construction last year. Yet both of these facilities, which require about 0.25 Bcf/d of natural gas each (0.5 Bcf/d total), will actually be supplied with gas from pipelines owned by Transcontinental Gas Pipeline Company ("Transco"). In other words, fully one third of the stated need for pipeline capacity is a "red herring". In fact, there is no new

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO144-2
(cont'd)

immediate unsatisfied demand involved in Virginia. Therefore the “bar” regarding the balance between benefits and impacts must be raised, with more weight given to adverse impacts.

There may be a need for additional pipeline capacity in North Carolina, but the logical connection point for that is the Transco pipeline in Southside Virginia.

In other words, there is no current need for the most risk prone 300 mile portion of the proposed project. It passes through areas that involve serious adverse environmental impacts which cannot be completely mitigated even by the most responsible construction techniques. Nature will not allow it.

3. There are Alternative Sources of Supply

LO144-3

The Atlantic Coast pipeline is one of several projects which propose to move natural gas from the Marcellus shale oil fields to markets in the Southeast. Because of this, there is the real possibility of overbuilding. By looking at these pipelines on an individual project basis the Commission may approve more projects than are really necessary to match the economically proven capacity of the Marcellus fields. This is an opportunity for the Commission to minimize the most adverse environmental impacts, and to minimize the need for taking of private land by eminent domain, and to instead select those projects with the least adverse impacts.

a) Mountain Valley Pipeline (“MVP”)

This is essentially a competitor to the Atlantic Coast Pipeline project. It provides one third more gas, at lower cost, with fewer miles of right-of-way disturbed. Despite this advantage there are superior alternatives to both the Mountain Valley Pipeline and the Atlantic Coast pipeline.

LO114-3 See the response to comment CO55-6.

Z-3237

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3238

LO114-3
(cont'd)

b) Atlantic Sunrise Pipeline

This is a Transco project. Transco's system is the largest in the country and they have an advantage since they can supply gas from both the Gulf Coast and from the Marcellus production areas. This pipeline will connect to the highest production areas in the Marcellus, and proceeds about 180 miles while connecting to multiple Transco pipelines.

LO114-4

c) WB Xpress Pipeline

Columbia Gas is proposing to upgrade an east-west pipeline to boost capacity. The project only involves less than 30 miles of pipeline, mostly as replacement pipe, and a compressor station upgrade.

4. The ACP and MVP Both Limit Flexibility of Supply

The Atlantic Coast Pipeline and the Mountain Valley Pipeline are both limited to carrying gas solely from the Marcellus production area. Natural gas needs will be better served if the Commission does not approve either of these projects. The alternative, of using the statewide network of the Transco and Columbia Gas pipelines can satisfy that need with other advantages as well. Transco's Sunrise project and Columbia's WB Xpress project carry a greater combined volume of gas at less cost and with less right-of-way required. In addition, their networks offer the advantage of selecting gas from either the Gulf Coast production areas or the Marcellus production area – whichever is cheaper.

B. The DEIS Ignores the Self Dealing Due to Affiliate Relationships

LO114-5

For the Atlantic Coast Pipeline, the lead developer is Dominion Transmission, Inc, which is a subsidiary of Dominion Resources. The gas will ultimately be sold to

LO114-4 See the response to comment CO46-1.

LO114-5 See the response to comment CO46-1.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3239

LO114-5 (cont'd) | Dominion Virginia Power, yet another subsidiary of Dominion Resources. This is hardly an arms length relationship. Duke Energy is another major owner of the proposed pipeline and it also has a less than arms length relationship with the electric utilities that it will sell the gas to, since they are also subsidiarics.

It is not possible to serve two masters with opposing interests. The shareholders of Atlantic seek to maximize profits while the ratepayers seek the most economical fuel. The ratepayers must lose while the shareholders cannot. This relationship deserves greater scrutiny.

LO114-6 | **C. The DEIS Ignores the Fallacy of Low Cost Natural Gas**

One of the justifications offered for the Atlantic Coast Pipeline is that the gas originates in the Marcellus shale production areas which is a source of low cost natural gas. Atlantic claims that ratepayers will enjoy the economic benefits that a long term supply of low cost natural gas will have on their power bills.

This is simply unrealistic as a long term benefit. At the present time natural gas from the Marcellus production areas is lower in price than the Henry Hub price, but that will not last. The Henry Hub is considered to be the primary price set for the North American gas marketplace because of its use in futures markets. Marcellus gas production has been somewhat stranded because there was not enough pipeline capacity to carry it to the existing gas distribution systems. As a result, the Marcellus gas has sold for less than the Henry Hub price. That gas price differential will level out as more pipelines are installed to connect the Marcellus production.

The “type” of gas will also impact the comparative price and availability. Marcellus gas is shale gas which is produced by hydrofracking. The Marcellus is now the

LO114-6 See the response to comment CO85-7 regarding rates.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO114-6
(cont'd)

largest natural gas production in the country, but the long term output of that type of well drops off more quickly than gas production from a traditional well. That means that some of the current advantage may be an illusion.

In fact, a study by a team of researchers at the University of Texas at Austin² found that the Marcellus gas price could actually end up being higher than the Henry Hub price.

LO114-7

D. The DEIS Ignores the Danger of Overbuilding

The figure below is from an article in Bloomberg New Energy Finance³. The black line represents expected production and the colored bars represent the planned pipeline capacity in Bcf/d.

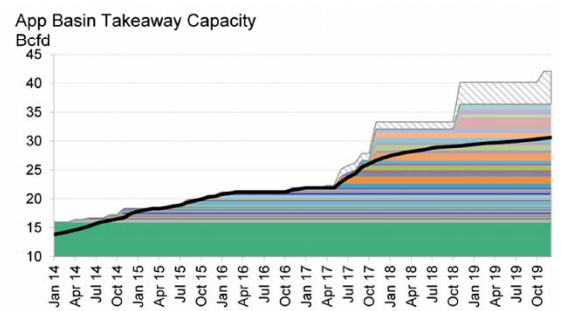


Figure 1 - Planned Northeast Pipeline Capacity versus Production Outlook

² Patzek, T. W., Male, F. & Marder, M. Proc. Natl Acad. Sci. USA 110, 19731–19736 (2013)

³ Bloomberg New Energy Finance *US Gas Insight: Mid-Stream Madness*, by Joanna Wu, March 2016.

LO114-7 See the response to comment CO46-1.

Z-3240

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3241

LO114-7 (cont'd) It would be wise for the Commission to take to heart the comments⁴ that outgoing Commissioner Norman Bay made in February of this year, regarding the Commissions review process. He offered the following advice to those that follow him:

It is in the public interest to foster pipeline capacity but also to insure that the entire industry remains a healthy one, not subject to costly boom-and-bust cycles. Pipelines are capital intensive and long-lived projects. It is inefficient to build pipelines that may not be needed over the long term and that become stranded assets.

Commissioner Bay's advice is certainly confirmed by looking at the takeaway capacity being planned for the Marcellus/Utica "play".

LO114-8 **E. Reliance on Environmental Inspectors is Unrealistic**

In Section 2.5.2 of the DEIS the Commission relies on a position referred to as an Environmental Inspector ("EI") to ensure that the contractors installing the pipeline adhere to the construction and mitigation procedures required by: the Commission; the state agencies; the federal agencies; the Atlantic application, and landowner easement requirements. According to the DEIS the Environmental Inspector is supposed to have the authority to stop the work and order corrections if any of the above-mentioned procedures are violated by the installing contractor.

This all sounds wonderful on the surface, but we doubt it will actually happen in practice. The description of their duties means that they need to be completely familiar with a plethora of environmental regulations and construction techniques. This requires a broad background, yet the DEIS makes no mention at all of the qualifications that will be required of an Environmental Inspector.

⁴ Federal Energy Regulatory Commission Docket No. CP15-115-000 (February 3, 2017)

LO114-8 As discussed in section 2.5.3, third-party compliance monitors would be selected and managed by FERC staff and would provide daily environmental compliance monitoring services for the projects. The third-party compliance monitors are separate from the EIs that would be employed by Atlantic, as described in section 2.5.2. The FERC third-party compliance monitors would provide daily reports to the FERC staff on compliance issues and make recommendations to the FERC Project Manager on how to deal with compliance issues and construction changes, should they arise.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3242

LO114-8
(cont'd)

We seriously doubt that an Environmental Inspector beholden to Atlantic for his salary will be able to resist the pressures at Atlantic from “above” which will surely be pushing for project completion.

LO114-9

F. The DEIS Assumes that Atlantic & DTI Will Comply with All Requirements and All Mitigation Practices.

What evidence does the Commission have that Atlantic and DTI will adhere to all of the requirements and mitigation practices imposed by the DEIS? What follows are some examples that are deeply disturbing.

1. Dominion’s Disregard During Pipeline Construction

Dominion’s lack of care in installing much smaller pipelines in West Virginia indicates that they usually trample on the environment rather than respect it. In 2015, Dominion Transmission was fined by the West Virginia Department of Health for violations. During a 16-month period, Department of Health inspectors reported sixteen incidents of sediment pollution; one incident of pollution with crude oil and produced water; and one incident of pollution by produced water. The violations impacted a total of seventeen streams. The Department of Health pointed out that Dominion was not forthcoming (i.e. they stonewalled) about the incidents. In response to this reprimand, Dominion Energy Communications Director Jim Norvelle made a statement that was the corporate equivalent of “the dog ate my homework”.

2. Dominion’s Violation of the Clean Water Act

Another example is the attitude of Dominion Virginia Power towards coal ash pollution. A federal judge recently ruled that they had violated the Clean Water Act by allowing about 3 million tons of coal ash stored in unlined pits

LO114-9

Atlantic and DETI would be legally required to ensure their projects follow the construction procedures and mitigation measures described in their applications and supplements including responses to staff data requests and as identified in the EIS (unless modified by any Order), and fulfills the intent of their various project-related plans. Failure to meet certain performance standards would result in issuance of noncompliance reports and, if the violation is repeated, could result in a stop-work order or enforcement actions by the FERC. If a company does not meet the conditions or regulations that apply to the project, FERC has authority to refer the matter to its Office of Enforcement.

Past issues related to Dominion are outside the scope of this EIS.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3243

LO114-9
(cont'd)

to contaminate the ground water which then leaches into the Elizabeth River. The pollutants include arsenic, among other substances. Dominion's "experts" claimed that the groundwater pollution did not migrate to the river; but the judge ruled that it was simply not true, and that the process of "letting nature take its course" is a "completely ineffective solution," which "may never get rid of the arsenic in the groundwater".

3. Pipeline Contractors Taking Short Cuts

In 2013 Public Citizen issued a report⁵ documenting shoddy construction practices in connection with the southern portion of the Keystone XL Pipeline. The title page, which summarizes their results is instructive:

This report presents evidence documenting numerous construction problems and apparent code violations that raise questions not only about the chances of a spill on the southern segment of the Keystone XL pipeline, but also about the quality of TransCanada's construction and in-house inspection system, as well as the ability of the federal government to oversee the process.

Problems included: peeled field patches; sags or bends in the pipes; dents; improper pipe support; improper back filling; and failure to separate topsoil from underlying substrate.

The rush to install pipelines from the Marcellus formation leaves very little doubt that the same problems will arise, including the lack of careful oversight by the various federal agencies, among them the understaffed Pipeline and Hazardous Materials Safety Administration.

⁵ TransCanada's Keystone XL Southern Segment: Construction Problems Raise Questions About the Integrity of the Pipeline, November 2013.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3244

LO114-10 | **G. The DEIS Fails to Address the Issue of Compensation for Damages**

Atlantic Coast Pipeline LLC, is a limited liability corporation. At several public meetings in the early stages of this process Dominion’s representatives avoided stating that Dominion would be responsible for the damage that they will certainly cause. Creating an “LLC” shields Dominion and its affiliates from direct liability. There is no doubt in our minds that an independent compensation authority, funded by Atlantic Coast Pipeline, LLC must be established. It should be similar to the fund established after the BP oil disaster in the Gulf of Mexico. This authority would be much more likely to assess realistic damages against Atlantic Coast Pipeline, LLC for the inevitable environmental consequences that will accompany installation of a pipeline that is larger, and operating under greater pressure than any pipeline previously installed by Dominion Transmission. It will also encourage Atlantic Coast Pipeline, LLC and their contractors to be serious about their obligations to the landowners and to the environment in the path of the pipeline.

H. The DEIS Fails to Fully Address Damage to Wells and Springs

LO114-11 | Section 4.3.1.5 of the DEIS ends as follows:

Prior to construction, Atlantic should complete the remaining field surveys for wells and springs within 150 feet of the construction workspace, and within 500 feet of the construction workspace in karst terrain, and file the results, including type and location, with the Secretary.

We object to the “within 500 feet” limitation for sampling wells and springs in karst terrain. The purpose of the sampling program is to monitor those supplies in case they are damaged by construction of the pipeline. This distance is arbitrary and inadequate. The connection between surface water and groundwater is determined by the karst structure and not by distance. In fact surface disturbance can alter flow or contaminate water with an impact that may be discovered miles away.

LO114-10 | The topic of financial liability is outside the scope of this EIS and is more properly addressed in legal forums.

LO114-11 | As discussed in section 4.3.1.7, Atlantic and DETI have developed a well sampling plan that presents procedures for pre-construction monitoring of all identified drinking water supply wells, which includes private, community, municipal/public wells, and springs within 150 feet of the construction workspace in non-karst terrain and within 500 feet of the construction workspace in karst terrain. If a damage claim is filed with Atlantic or DETI, Atlantic and DETI would conduct post-construction water quality tests, which would be analyzed by a certified laboratory, to determine if water supply wells and springs are affected by construction activities. If damage occurs, Atlantic and DETI have committed to providing a temporary potable water source, and/or a new water treatment system or well. We encourage anyone who believes their well or spring may be affected by construction of the proposed projects to complete a preconstruction water quality and yield survey. Should construction activities affect a well or spring, landowners can negotiate the delivery of alternative water supplies and/or water sources with Atlantic/DETI. If Atlantic and DETI are unresponsive or unwilling to negotiate, we encourage landowners to contact FERC’s Landowner Helpline to investigate the problem.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3245

LO114-11
(cont'd)

Section 4.3.1.7 of the DEIS states in part that:

Prior to construction, Atlantic and DTI would test water supply wells and springs within 150 feet of the construction workspace (within 500 feet of the construction workspace⁶ in karst terrain)."

It goes on to specify the water supply parameters to be tested. Unfortunately, we understand that Atlantic has not supplied many landowners with the test results for their wells and springs. For example, our immediate neighbor had their well sampled about nine months ago and they still have not received the results.

Despite repeated calls, they were advised that the delay was due to a (mythical?) backlog.

Later in Section 4.3.1.7 of the DEIS it clearly states that:

... the pre-construction water source tests described above would provide baseline information to determine whether construction activities have adversely affected water sources. Atlantic and DTI would conduct post-construction water quality tests to ensure water supply wells and springs are not adversely affected by construction activities.

In their comments on the DEIS filed on February 9, 2017, Atlantic refers to the previous paragraph and specifically disclaims any responsibility for post-construction sampling of wells and springs unless the landowner claims damage. By doing this they unfairly transfer the financial responsibility for the damage they cause onto the landowners, who must pay for expensive laboratory tests in order to determine whether or not damages have occurred.

⁶ As an example of Atlantic's tendency to shirk responsibility – we note that Atlantic has refused to sample our well and our spring even though they are both within 500 feet of the construction workspace and we are in a karst area. The workspace involves installation of a 2.5 million gallon water impoundment. We were refused several times verbally, but never in writing. And this despite letters of protest via certified mail that we have sent to: Doyle Land Services (the local representatives of Atlantic), Atlantic, and DTI.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3246

LO114-11
(cont'd)

Near the end of Section 4.3.1.7 the DEIS states that "If damage claims occur, Atlantic and DTI have committed to providing a temporary potable water source, and/or a new water treatment system or well."

The DEIS is completely silent about the responsibility for damage to a spring. A spring can be as, or more, valuable than a well, yet there is no provision to replace the quality and quantity of spring water that is an asset of the landowner. It is doubtful that this is an oversight.

If Atlantic or DTI decide that a treatment system will permanently cure the damage that they have caused, then, for the conceivable future, the landowner will incur operation, chemical, and maintenance costs due to that same damage. Atlantic and DTI must be required to pay over a lump sum compensation representing the present worth of those annual costs, computed for a reasonable period, say 20 years.

I. The DEIS Does Not Weigh the Real Dangers Inherent in Karst Areas

1. The Danger of Blasting in Karst Areas

LO114-12

Section 4.1.2.2 of the DEIS discusses Shallow Bedrock and Blasting. In that section it discusses some of the impacts of blasting:

Blasting of bedrock, particularly karst bedrock, could create fractures in the rock, temporarily affecting local groundwater flow patterns and groundwater yield of nearby wells and springs around the blast site, and affecting their water quality by a temporary increase in turbidity levels shortly after blasting.

No evidence at all is supplied or referred to in the DEIS which demonstrates that the impacts from blasting in karst are always temporary. And, in fact,

LO114-12 Details describing the precautionary measures to be taken during pipeline construction blasting are discussed in section 4.1.2.2 and also in Atlantic's and DETI's Blasting Plan. Potential impacts, and measures to reduce impacts, on groundwater are discussed in section 4.3.1.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3247

LO114-12
(cont'd)

the following information from the Virginia Cave Board⁷ completely contradicts that statement in the DEIS:

Water in karst aquifers primarily moves along solution channels; therefore, flow is highly dependent upon the direction and characteristics of these conduits. This is also true for fracture flow aquifers in non-karst settings. The impact from blasting can alter and disrupt these solution channels, thereby causing the water to flow along different conduits. This creates situations in which the water flows in different directions, or that water quality and quantity is altered. If these water quality or hydrologic changes occur, it is highly improbable that the previous groundwater conditions can be restored.

Blasting may affect localized depth to groundwater, recharge characteristics and water quality. Many of these potential effects are similar for karst versus non-karst settings. It should however be noted that since karst groundwater flow is highly dependent upon localized structural characteristics, any disturbance, such as blasting, that can affect localized structural characteristics have therefore a greater chance of altering groundwater flow in surficial karst aquifers. If these impacts do not directly affect deeper wells, they may still affect the well's recharge characteristics.

In addition, the Virginia Cave Board⁸ discusses groundwater contamination that may occur due to blasting:

Depending upon the explosive charge used, blasting can release a wide variety of soluble chemicals, such as nitrates, nitrites, perchlorates, and semi-volatile organic compounds, to name a few. These products can enter the local surface waters or groundwater and therefore contribute to water pollution. Other potential complications with blasting include the incomplete combustion of explosive material, improper selection of explosive product, the "leaking" of chemical charges into surrounding cracks and fractures prior to detonation, increased turbidity within wells and karst conduits, geochemical reactions caused by the exposure of fresh geologic surfaces, airborne gas and particles, and improper transportation and storage. These all can be minimized by a properly written and implemented blasting plan.

⁷ Letter from Virginia Department of Conservation and Recreation to Federal Energy Regulatory Commission (April 17, 2015) Re: Atlantic Coast Pipeline, VIRGINIA CAVE BOARD COMMENTS AND RECOMMENDATIONS ON THE PROPOSED DOMINION ATLANTIC COAST GAS PIPELINE

⁸ *Id.*

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3248

LO114-12
(cont'd)

2. The Danger of Any Construction in Karst Areas

Section 4.1.2.3 of the DEIS covers Karst Geology. On page 4-8 several sentences in the third paragraph give a serious appraisal of the dangers of constructing in Karst areas. Here are some examples:

The most prominent type of karst features in the ACP area are sinkholes, which comprise the greatest potential geohazard risk to any type of construction in karst terrain.

Potential impacts from sinkholes include property damage and injury from sinkhole collapse; and contamination of water resources
....

The Virginia Cave Board⁹ also stated that with regard to construction of pipelines in karst using trenching methods:

It should be noted that just because a trench did not intersect any existing conduits, does not mean that the karst's groundwater flow characteristics have not been altered. While trenching has the potential to create less impact to natural water flow through karst systems than blasting, trenching still can create karst impacts and these are not easily predicted. Ground disturbance of any kind in karst terrain can lead to complications, and trenching involves a lot of ground disturbance.

Later on in this section and also in Section 4.3.1.7 we are assured that somehow by the "magic" of mitigation everything will turn out all right in the end. This is not realistic, especially when each mitigation measure somehow includes the Catch-22 of it only being used "if possible". That is not very reassuring; in fact it is not acceptable.

To us, the most obvious and practical form of mitigation would have been to avoid sinkholes. Yet it doesn't seem as if Atlantic tried to do this at all.¹⁰

⁹*Id.*

¹⁰ For example, the pipeline is routed dangerously close to two mapped sinkholes on our farm.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3249

J. The DEIS Does Not Seriously Consider the Impacts of Steep Slopes

LO114-13

1. Almost 25% of the Mainline ACP Pipeline and 65% of the SHP Pipeline Loop are on Steep Slopes

The proposed pipeline route follows very steep slopes. The ACP crosses over and over 60 miles of slopes ranging from 20% to 35%. It also crosses just over 24 miles of slopes steeper than 35%. The SHP which is only 37.5 miles long crosses steep slopes for almost 65% of its length with slopes ranging from 20% to greater than 35%. The predominance of steep slopes in both the ACP and the SHP provides more than enough reason why the route of the ACP through those areas makes no sense at all.

2. The “BIC Team” and “SAIPR” are More Hope than Reality

The DEIS refers to Atlantic/DTI designating a Best in Class Steep Slope Management Team (“BIC Team”) and also a Slip Avoidance, Identification, Prevention, and Remediation — Policy and Procedure (“SAIPR”) which are supposed to magically solve every steep slope problem no matter how steep or how bad the condition. This truly seems more like advertising than engineering. The DEIS does not in any way evaluate the effectiveness of the BIC Team or the SAIPR. The Commission appears to simply assume that plans will be developed by Atlantic and DTI that will prevent adverse environmental impacts. But the most responsible way to deal with steep slopes is simply to avoid them, and find a better route with fewer adverse impacts.

3. Steep Slopes in Nelson County – a Case Study

Friends of Nelson has been particularly concerned about the impacts of the proposed pipeline on the steep slopes which are prevalent in Nelson County.

LO114-13 Refer to section 4.1.4.2 for a discussion of the mitigation measures that would be utilized in steep slope areas. See also the response to comment CO6-1.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-32250

LO114-13
(cont'd)

They engaged Blackburn Consulting Services (“Blackburn”) to review, assess, and comment on information submitted to the Commission on behalf of Atlantic.

Their report¹¹ (the “Blackburn Report”) examined the information that Atlantic used to determine the pipeline route, soil types along that route, slope stability, and erodibility.

They then developed their own predictions to identify landforms where soil has collected over time in geographic depressions, having been moved there either by gravity or water. Known as concave/colluvial landforms, these are known to be sites that are at high risk of debris flows/landslides when associated with steep slopes and a storm event. Blackburn mapped the area using a predictive model which they had previously developed for Loudoun County, Virginia in conjunction with the United States Geological Survey. They also mapped areas of shallow rocky soils which were also susceptible to debris flows and which would require blasting.

The map produced by Blackburn’s model was then checked for accuracy by overlaying it with a USGS map of all known debris flows in the area. These two maps matched up well, confirming the validity of their predictive map. They then did a field check at a few sites to further confirm the validity of their work.

The Blackburn Report concludes that the potential for debris flows in the very steep mountainous portions of Nelson County are underestimated by the reports submitted to the Commission on behalf of Atlantic. This was

¹¹ Analysis and Field Verification of Soil and Geologic Concerns with the Atlantic Coast Pipeline (ACP) in Nelson County, VA March 2017

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO114-13
(cont'd)

primarily due to Atlantic's use of soil maps which were not at a scale and detail sufficient to identify the vulnerable land forms that must either be avoided or safely mitigated. The danger involved is catastrophic failure, affecting not just the pipeline but the adjacent slopes, and, more importantly, the residents of Nelson County.

4. The Nelson County Report Casts Doubt on the Veracity of All Reports Addressing Steep Slopes Submitted by Atlantic

The situation in Nelson County is definitely not unique. It has only come to light because the citizens of Nelson County decided that they needed to document, from a geologists viewpoint, what they all knew from their own experience. The Blackburn Reports clearly states that:

Although Dominion was using the best information publicly available at the time, the referenced materials were created more for regional interpretation and were never intended to be used for the siting of major infrastructure.

The soil maps published in the Web Soil Survey were created at a scale that lacks sufficient detail to discern the vulnerable land forms that must be identified and either avoided or adequately mitigated, if possible, to insure the safety of the pipeline as well as protect the surrounding slopes, waterways and residents from a potentially catastrophic failure.

In other words – Atlantic may have had the best of intentions, but their methodology is completely invalid. The entire steep slopes analysis must be done over, but with a refined methodology.

Z-3251

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3252

LO114-13
(cont'd)

5. Photos from the Blackburn Report

These photographs illustrate quite graphically that attention to the real dangers of steep slopes is not academic; it is serious. Note the scale referenced to the person in each photograph.



Debris Flow



Depositional Fan

K. The DEIS Contains Incomplete and Incorrect Information

We were surprised to discover that, at least for features near our property, quite a bit of information supplied by Atlantic and incorporated into the DEIS is not correct. This cannot be a coincidence and indicates to us that much of the information in the DEIS is incorrect or has been omitted.

LO114-14

For instance, in appendix K-1 of the DEIS, Waterbody Crossings, page K-18, about halfway down the page it lists the stream that passes through our property,

LO114-14 Appendix K has been updated to list Jennings Branch as a perennial waterbody.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3253

| | |
|---|---|
| LO114-14 (cont'd) | Jennings Branch, as an intermittent stream. We have lived here for 25 years and it has never stopped flowing. |
| LO114-15 | Further, Table 4.3.1-1, on page 4-68, lists water wells in the vicinity of the ACP. Our well, which is near mile point 129.1, is not shown and it is within 500 feet of the facilities. Similarly, our spring which is right near our well should be shown on Table 4.3.1-2, which lists springs located in the vicinity of the ACP. It is also missing. |
| LO114-16 | Table 4.3.2-8, page 4-109, lists water impoundment structures for the ACP. At mile 129.1 it lists an impoundment located in one of our fields, but the water source is listed as the Middle River which is about 4000 feet away. We are quite sure that the stream passing through our property called Jennings Branch is the correct stream. |
| L. The DEIS Ignores the Environmental Consequences of Fracking | |
| LO114-17 | Section 3.1 of the DEIS, discusses the No Action Alternative and includes the following statement regarding natural gas versus coal: The burning of natural gas at power plants to produce electricity also results in reduced air emissions compared to other fossil fuels, such as coal and fuel oil. According to the EPA (2013a), natural gas produces at least 50 percent less carbon dioxide (CO ₂), almost 70 percent less nitrogen oxides (NO _x), and about 99 percent less sulfur oxides (SO _x) compared to a coal-fired power plant. Yet the DEIS never gave equal weight, or any consideration at all, to the very significant environmental consequences of the gas supply for the ACP, which is produced by hydraulic fracturing. The impacts of methane leakage at the well head are well known and should not have been so blithely ignored. |

- LO114-15 Comments noted. As discussed in section 4.3.1.5, we are recommending that Atlantic complete the remaining field surveys for wells and springs within 150 feet of the construction workspace, and within 500 feet of the construction workspace in karst terrain, and file the results, including type and location, with the Secretary prior to construction.
- LO114-16 The table has been updated to identify the water source as Jennings Branch.
- LO114-17 See the response to comment CO48-10.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3254

M. The DEIS Allows Atlantic to Trample on a National Treasure

LO114-18 We will address and submit separate detailed comments on the DEIS regarding our objections to Atlantic's and DTI's plans for the George Washington and the Monongahela National Forests as well as for the Appalachian Trail and the Blue Ridge Parkway.

But we must at least restate the obvious. Namely, that the DEIS fails to meet the regulatory standard to justify crossing these National Treasures. Atlantic and DTI must show that there is no other reasonable alternative before a permit can be considered. In this case they have failed that test; they selected the route that is merely preferable. Their application must be denied because it simply does not satisfy the law.

N. The DEIS Bases the Socioeconomic Impacts on Faulty Analyses

LO114-19 We base the following comments upon the submissions to the Commission by Key-Log Economics, LLC ("Key-Log").

Unfortunately, the resource reports submitted by Atlantic (Chmura, 2014, and ICF International, 2014) in connection with socioeconomic costs on the communities affected by the pipeline are greatly flawed. It is almost inevitable that a report commissioned by an applicant will give great weight to the supposed benefits while ignoring the true impacts on everything else.

In this case the studies display two common flaws: they misapply long outdated models and black-box tools that have been proven by experience not to have any merit when looking at long term economic effects. These flaws are aggravated by the fact that they take a myopic view of their task. They focus solely on the

LO114-18 Comment noted.

LO114-19 We disagree. See the response to comment LO59-1.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3255

LO114-19 | economic activity resulting from building and operating the pipeline rather than the
(cont'd) | full economic effects, both positive and negative.

In a filing¹³ by Key-Log in 2015 they make it clear why Atlantic prefers to downplay economic consequences:

From an economic efficiency standpoint, external costs are a problem because, being external to the firm imposing them—in this case Dominion Transmission—they do not bear on its decision making the way that expenditures on pipe, payments to contractors, or fees paid to engineering firms do. And when firms don't pay for things, they use too much of them,

The external costs of the ACP—all of them—must be counted if the decisions reached at the end of the process are to make any credible claim to having achieved an efficient or economically desirable outcome.

Key-Log's 2015 submission clearly explains the limitations and misapplications of the economic base models employed in the two Atlantic Reports. In particular the ICF report assumes that Marcellus gas prices will be lower than Henry Hub prices forever without explaining why.

The intentional weakness in the Chmura and ICF reports is that they turn a blind eye to many negative economic effects. These include environmental impacts, and the lost investments and lost jobs. Key-Log's 2015 filing goes on to state the following with respect to Nelson County, but it also applies to our Augusta County as well as other adjacent counties:

The ACP would upset this apple cart or, put another way, it would kill geese that are already laying golden eggs in the region. The pipeline will cause loss of ecosystem services, degradation of scenic and recreational amenities, and erosion of community character and cultural heritage while spawning a landscape more dominated by industrial uses and outside interests. The likely result will be that recent investments in appropriate economic development will not perform as hoped, and further development along the same lines will be discouraged.

¹³FERC Docket PF15-6-000, Scope of Analysis, Establishment of Alternatives and Total Economic Costs of Pipeline Development. April 28, 2015

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3256

LO114-19
(cont'd)

Workers, businesses and retirees who might otherwise choose a location along the pipeline route will opt for locations that retain more of their rural character, their productive and pleasing landscapes, and their quality of life.

A detailed study¹³ by Key-Log quantified the adverse impacts on just a four county region in Virginia (Augusta, Buckingham, Nelson and Highland Counties). The annual adverse impact was about \$100 million per year, or about \$7.5 billion on a present worth basis.

The Commission has unfairly tipped the scale in favor of Atlantic by dismissing the submissions of Key-Log Economics, LLC, and thereby ignoring the real adverse economic effects and public costs imposed by the pipeline.

O. The DEIS and the Real Impacts on Our Property and Our Lives

We own a 158 acre farm in Churchville, in Augusta County, Virginia. It is divided into two adjacent parcels – 150 acres of farmland and 8 acres that include our house and our well and spring.

LO114-20

1. The Pipeline Route Shows a Lack of Engineering Common Sense

Based on the pipeline as routed through our farm, we doubt if any forethought at all was involved in route selection. There are plenty of routes through nearby farms that do not involve steep slopes, yet they selected our farm, and in particular they mapped their route through the steepest slope on our farm – which they admit constitutes a “medium hydrotechnical hazard”¹⁴.

¹³ Economic Costs of the Atlantic Coast Pipeline: Effects on Property Value, Ecosystem Services, and Economic Development in Western and Central Virginia, by Spencer Philips, PhD, Cara Bottorff and Sonia Wang, February 2016.

¹⁴ Atlantic Coast Pipeline and Supply Header Project, Geologic Hazards Mapbook, Sheet 65 of 216

LO114-20 Comment noted. See the responses to Comment Letter LO77.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3257

LO114-20
(cont'd)

After the proposed pipeline route reaches the top of that steep slope it passes right through one side of a contained depression which is a clearly mapped sinkhole¹⁵. Then, further on, it passes within 200 feet of yet another clearly mapped sinkhole. Why select a path that may endanger the quality and quantity of our well and spring when there are other alternative routes? We can only believe that they simply do not care.

The easement offer from Atlantic contained a real surprise for us. It shows a 90,000 square foot rectangle marked: "Water Impoundment Area" in one of our fields without any explanation about its volume, method of construction, or purpose. No one from Atlantic ever actually spoke to us about the easement route or about this impoundment. Instead, we had to search the internet for relevant filings with the Commission and then had to pore through a filing titled: *Response to Data Requests of June 13, 2016* amounting to over 350 pages in order to find out exactly what a water impoundment was¹⁶. That then led us to yet another voluminous filing titled: *Response to Data Requests of October 26, 2016* where we were shocked to learn that the impoundment volume is 2.5 million gallons¹⁷.

The location of this impoundment is closer to our well and spring than the pipeline. We consider it another clear danger to the quantity and quality of our well and spring.

¹⁵ Dominion Pipeline Monitoring Coalition – Map Overlay Showing Sinkholes based on data from Virginia Dept of Mines, Minerals and Energy.

¹⁶ Question 15 subparts a & b

¹⁷ See Table 2.2.7-1, Jennings Branch

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3258

2. Atlantic has No Respect for Landowners and Pipeline Impacts

a) Lack of Simple Consideration

LO114-21

We opposed the Atlantic's right of survey access in court, yet when we lost we behaved properly. Once we received their "Notice of Intent to Enter" we contacted Atlantic by certified mail and politely requested that they call us 24 hours before entering so we could accompany their crews as they surveyed. Instead, their crews sneaked onto our farm unannounced, and from the back end – about a half mile from our house. We only discovered them by chance. Does the Commission find this behavior acceptable? Is it not obvious that this attitude will prevail in the future?

b) Impacts on Our Well and Spring

LO114-22
(cont'd)

This past November we were contacted by someone from Doyle Land Services, as representatives of Atlantic, with a request to sample our water supplies. When we asked for details about which supplies they would sample, it turned out they only wanted to sample the livestock pond at the rear of our farm. We questioned why they would not want to sample our well and spring which are very obviously much more important. We were told that they only sample within 500 feet of the pipe centerline. This is a direct contradiction to the requirements listed in the DEIS which states that wells and springs within 500 feet of the construction workspace are to be sampled. And, we regard even this requirement to be unrealistic with regard to potential impacts on water supplies.

We have been in touch with Doyle Land Services on and off since then, and they have continued to refuse to sample our well and spring which are both less than 500 feet away from the Water Impoundment Area. See Figure 2 which shows the front end of our property.

LO114-21 Permission to survey properties is not within FERC's jurisdiction. The right for a project sponsor to survey one's property is subject to the respective state laws pertaining to property rights and access for survey purposes. Generally, certain surveys, such as real estate assessment or visual resource surveys, can be conducted from public rights-of-way and therefore do not require landowner permission. This is similar to a property assessment conducted by municipalities for tax purposes. The NGA does not give FERC the authority to grant access to properties or easements for a project and only grants applicants the right of eminent domain if a project is approved. State law may differ.

LO114-22 Comment noted. See the response to comment letter LO-77.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3259

LO114-22

That impoundment is located at least 80 feet above the elevation of our well and spring. We are in a karst area, so any leakage will endanger our water supplies.

We believe that Atlantic has declined to sample in the hope that we will not bother to sample ourselves, and will therefore lack adequate documentation to seek legal redress. We plan to carefully document both quality and quantity, and will seek full compensation, including replacement water supplies, if ours are damaged.

LO114-23

c) Blocked Access to Our Home

The map sent by Atlantic along with their easement offer shows them completely blocking the only access we have to our home with “Extra Work Space” and a “Topsoil Segregation Area”. See Figure 2. How are we supposed to live there during construction? How are we supposed to get propane deliveries? Apparently Atlantic could care less and, of course, they did not offer compensation or a temporary bridge to solve this problem. Corporate greed trumps all.

LO114-23 See the response to comments CO8-1 and PM1-51.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO114-24 See the response to comment LO59-1.



Figure 2 – Pipeline Impact at the Front End of Our Farm

3. Lost Property Value

LO114-24

The proposed pipe route does not follow our property lines and fence lines. Instead it cuts through the approximate center of three of our fields and for all intents and purposes it divides our farm in half.

The DEIS maintains that the presence of a high pressure natural gas pipeline does not depress property values. They base this on literature reviews and discussions with real estate appraisers. Yet many of the reports it relies on were produced by the INGAA, the Interstate Natural Gas Association of America. That is hardly an unbiased organization.

Frankly, anyone with a drop of common sense would know that this statement is completely unrealistic. We have been told by farmers in our

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

LO114-24
(cont'd)

area that they would not think of buying our farm once the pipeline cuts through it.

We have also recently conferred with an experienced and knowledgeable real estate agent in our area with the thought of taking our losses now and leaving the area. She told us it was impossible to sell our farm until the land is completely healed. It will take years for our fields to recover. And, in fact our steep slopes, which are now protected by the trees we planted over 20 years ago, will never again be completely protected. They will always be an eyesore because we cannot plant trees on the right of way.

A report¹⁸ by Key-Log Economics, LLC supports our anecdotal experience.

They quote a survey of buyers which says it all:

In a survey of buyers presented with the prospect of buying an otherwise desirable home with a 36-inch diameter gas transmission line on the property, 62.2% stated that they would no longer buy the property at any price. Of the remainder, half (18.9%) stated that they would still buy the property, but only at a price 21%, on average, below what would otherwise be the market price. The other 18.9% said the pipeline would have no effect on the price they would offer.

Not incidentally, the survey participants were informed that the risks of "accidental explosions, terrorist threats, tampering, and the inability to detect leaks" were "extremely rare".

In years past the fact that a pipeline was buried near or within a property might be ignored by a potential buyer, possibly because the buyer lacked any knowledge about it. Those times have passed. Online tools have changed the way people look for a home, and buyers are fully informed. As a result, anyone can now easily find the flaws in a property and eliminate it from consideration.

¹⁸ Economic Costs of the Atlantic Coast Pipeline: Effects on Property Value, Ecosystem Services, and Economic Development in Western and Central Virginia, by Spencer Philips, Ph.D. Cara Bottorff and Sonia Wang, February 2016.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-3262

LO114-25

4. Atlantic has not Engineered the Project in Detail

We are dismayed at the lack of detail concerning the Water Impoundment Area shown in Figure 2. In the ACP filing titled: *Response to Data Requests of June 13, 2016* their answer to Question 15 is that they "... plan to allow the General Pipeline Contractor to select the above ground storage tank supplier provided the proposed tanks are equivalent to Extreme Plastic Plus's tanks." This is not a little 100 gallon tank, but a tank holding 2,500,000 gallons, and constructed with nothing more than what is essentially a steel ring wall with a pool liner to hold the water.

That is hardly an engineering solution. What makes matters worse is that they have selected a site location in one of our fields where the ground elevation changes by about 40 feet over the span of their Water Impoundment Area. Figure 2 shows contour elevations in the vicinity of the impoundment. How do they propose to place an open tank on such a slope?

And – why did they not site the Water Impoundment in a logical location. There are nearby fields within 600 feet of the pipeline route that are flat and are right next to Jennings Branch, the water source. Any leakage at that point would go back into its source and would not enter the convoluted karst groundwater system. See Figure 3.

There is also an agricultural access tunnel under Route 250 (shown on Figure 3) that could be used to pipe water from Jennings Branch to a tank on flatter land that is even closer to the proposed pipeline route.

Yet another logical location is at Mile Point 130.4. The land there is relatively flat and there is space adjacent to the proposed pipeline, with the Middle River, which has a greater flow, as the water source.

LO114-25 See the response to comment LO77-12.

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Z-32263

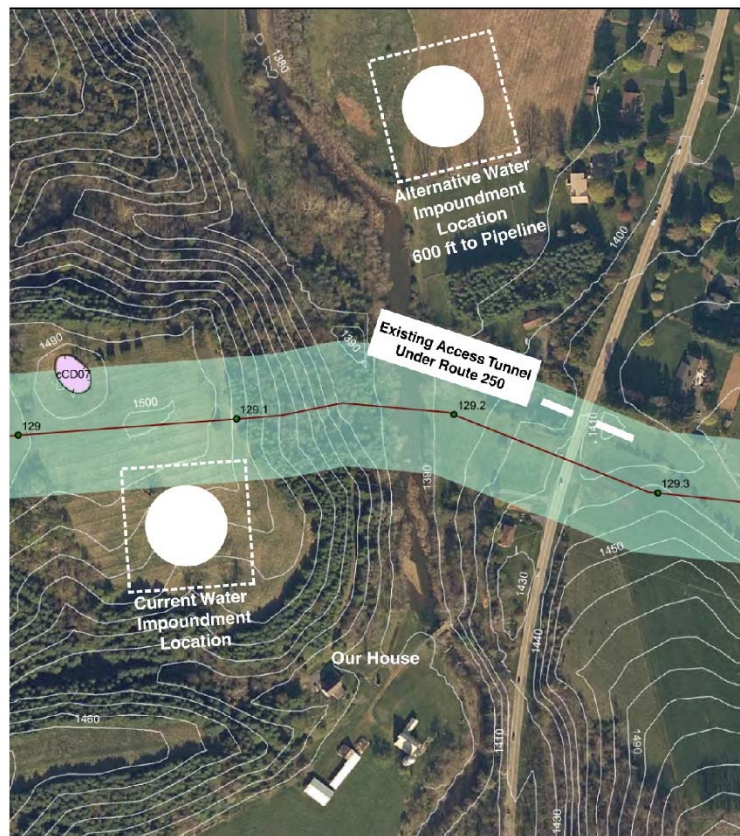


Figure 3 – A Better Water Impoundment Location

LANDOWNERS COMMENTS

LO114 – Louis and Yvette Ravina (cont'd)

Respectfully submitted,

/s/ Louis A. Ravina
Intervenor F308589
3383 Churchville Ave
Staunton VA 24401
310-710-8425
LouisARavina@gmail.com

/s/ Yvette J. Ravina
Intervenor F308600
3383 Churchville Ave
Staunton VA 24401
310-617-7198
YvetteJRavina@gmail.com

Z-3264

LANDOWNERS COMMENTS

LO115 – William S. Moore

William S Moore, Williamsburg, VA.
Dear Ms. Bose:

LO115-1 | The ACP directly cuts through a valuable section of our property in Nelson County that we had planned to build luxury mountain homes with 50 mile views. I want you and your staff to be aware of the unscrupulous tactics being used by Dominion and its subcontractors to obtain the easement rights to cross our property. They do not acknowledge the value they will be destroying and wish to pay us pennies on the dollar of the true value. We will not give in to these tactics and will insist that the process of eminent domain be used to extract the easement rights from us. We can only hope that a judge and jury will see the reality of what is happening and award us the fair and just value of what will be lost forever as our property can never be developed due to the proximity of the high pressure natural gas line proposed.

LO115-2 | We can only hope you and your staff will see the wisdom of having the ACP rerouted to another location that does not cut through the valuable sections of property around the Wintergreen Resort.

Regards, William S. and Carol M. Moore

LO115-1 Comment noted.

LO115-2 Comment noted.

Z-3265

LANDOWNERS COMMENTS

LO116 – Kirk Daniel Sorensen

LO116-1

Kirk Daniel Sorensen, Valley Head, WV.
I live on the border of Randolph and Pocahontas (WV) counties where the pipeline crosses.
My property has the only wetland around, where Douglas Fork River briefly surfaces from its
underground passage east to west. Why has not this wetlands been included in your work?
The water is being sampled but your pipeline passes right though this and ruin it. I grant you
that it is not a huge tract of land but it is all the birds and animals have in the area.

LO116-1 The wetland in question has been identified as a spring in table 4.3.1-2 of the
EIS.

Z-3266

LANDOWNERS COMMENTS

LO117 – Kirk Daniel Sorensen

LO117-1 | Kirk Daniel Sorensen, Valley Head, WV.
Why is a 42 inch high pressure pipeline run through a subdivision? Houses around it next to me will be incinerated if it leaks while it goes through a underground river (Douglas Fork) passing through fractured limestone. Can't anyone remember Bhopal? Even if it didn't ignite, the vapor cloud would certainly kill us. There would be no time for evacuation.

LO117-1 See the response to comment LO22-5.

Z-3267

LANDOWNERS COMMENTS

LO118 – Kirk Daniel Sorensen

LO118-1

Kirk Daniel Sorensen, Valley Head, WV.
Why won't the gas be odorized with mercaptan like any other natural gas pipeline? Cost is not a valid concern when routing a pipeline through a subdivision. I feel the route has been misrepresented by ACP as being through undeveloped properties. That may have been true when it went through the national forest but not with this route. We must have time to evacuate if there is trouble and right now there is no warning while a small problem turns into a big disaster. Evacuation is hard enough on WV dirt roads as it is.

LO118-1 The DOT's safety regulations in 49 CFR 192.625 describe the requirements for odorants in natural gas transmission lines. See also the response to comment LO22-5.

Z-3268

LANDOWNERS COMMENTS

LO119 – Kirk Daniel Sorensen

LO119-1

Kirk Daniel Sorensen, Valley Head, WV.
As the pipeline is routed through my front yard where it will pass through an underground river in limestone, I think it needs a permanent air sampling system with an evacuation alarm to indicate a leak. Don't you think we deserve a chance to survive a leak? Chemical plants have them and this pipe is just as risky as a plant.

LO119-1 Section 4.12.1 discusses monitoring during operation of the projects, including methods of leak detection.

Z-3269

LANDOWNERS COMMENTS

LO120 – Kirk Daniel Sorensen

Z-3270

LO120-1

Kirk Daniel Sorensen, Valley Head, WV.

In case of explosion or damage from a leak, will Dominion itself be responsible for restitution? The pipeline company might just declare bankruptcy and then us or our surviving heirs will be left with medical and property reconstruction bills. The pipeline company might act just like the bogus coal companies around here which just form dummy companies to mine and leave after promises are broken about reclamation and pensions. The parent company must be made responsible for all damages and eventual cleanup after the pipeline is shut down.

LO120-1 The topic of financial liability is outside the scope of this EIS and is more properly addressed in legal forums.

LANDOWNERS COMMENTS

LO121 – Jeffrey A. Mills

DOCKET NO: CP15-554
CP15-555

Supply Header Prospect (SHP)

JEFFREY A. MILLS
PENELOPE B. MILLS
1083 MILETUS RD.
SACEM WU 26426
(304) 782-3488

SECRETARY OF THE
ENERGY REGULATORY COMMISSION

ORIGINAL

Nathaniel S. Davis Sr. DEPUTY SECRETARY R 4:59
Federal Energy Regulatory Commission
888 FIRST STREET NE, Room 1A
Washington, DC 20426

I am a Doddridge County wva Landowner with 5 PARCELS of Land. I received letters from Dominion transmission Inc. in September 2014 that stated that they were planning to survey 2 parcels belonging to me for a 36" pipeline right of way. (Supply Header Prospect (SHP) Docket NO: CP15-554 OR CP15-555). I had my LAWYER notify them to stay off my PROPERTY. I later found out that Dominion was planning to locate this new pipeline on their existing 30" pipeline right of way. The existing right of way crosses my property on the top of a ridge (ONE HALF MILE FROM my house). I am NOT FOR this NEW right of way for MANY REASONS including ENVIRONMENTAL damage, safety issues etc. However, if the right of way must be built then using the existing right of way would be the best way by diminishing the ENVIRONMENTAL damage and reducing safety concerns and not causing as much PROPERTY damage.

I then received LETTERS from Dominion in JANUARY 2015 informing me that they were planning

Z-3271

LANDOWNERS COMMENTS

LO122 – Jeffrey A. Mills (cont'd)

Z-3272

LO121-1

to solve my other 3 PARCELS for the pipeline Right of way. ON 01-26-2015 I found that Dominion had changed its proposed route. their NEW proposed route would cut through the middle of my farm and be located within a couple hundred feet of my HOSE and BARNs. this new proposed route would have major environmental concerns, SAFETY concerns and would GREATLY reduce the use and value of my property.

I am writing to let you know that I am totally against the pipeline right of way being located on my property. However, if this project is approved please have Dominion change the route back to their original proposed route which would use the existing right of way and cause less harm to everybody. I have read that Dominion has stated that they were going to use their existing right of ways. PLEASE MAKE SURE they use their existing right of ways.

my property is located between Greenbrier Rd (Doddridge 17) and Buckeye Run Ad. (Doddridge 15). I have enclosed a topo map showing Dominion's existing right of way and Dominion's new proposed right of way. PLEASE note that the existing right of way runs mainly on a ridge top and
2 IS NEARLY LEVEL where as Dominion's newly

LO121-1 Comment noted. We believe that when taking all factors into consideration, the route has optimized collocation with existing rights-of-way to the extent practical.

LANDOWNERS COMMENTS

LO122 – Jeffrey A. Mills (cont'd)

Proposed route is located so as most of it is steep and it crosses 2 additional streams between Greenbrier Rd and Rockey Road. If you look at the topo map it is easy to see that the existing right of way is the best route and Dominion's newly proposed right of way makes no sense. Please do the right thing.

Sincerely,

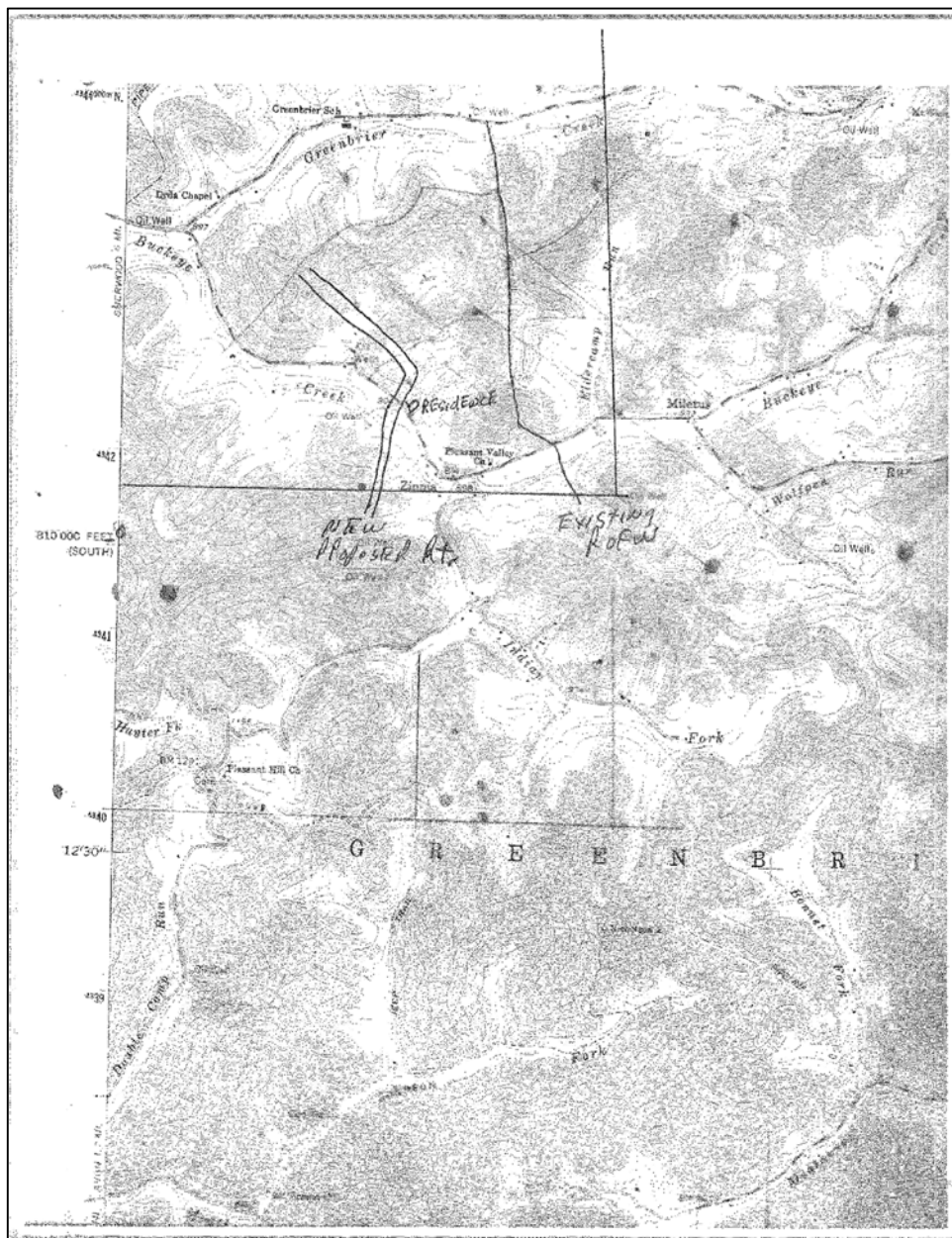
Jeffrey A. Mills

Z-3273

LANDOWNERS COMMENTS

LO122 – Jeffrey A. Mills (cont'd)

Z-3274



LANDOWNERS COMMENTS

LO122 – Rebecca L Harmon

Rebecca L Harmon, Swoope, VA.
April 3, 2017

Cheryl A. LaFleur, Acting Chairman
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington DC 20426

Dear Ms. LaFleur:

On behalf of my family and my neighbors, I respectfully submit these comments to the Federal Energy Regulatory Commission (FERC) on the Draft Environmental Impact Statement (DEIS) of the Atlantic Coast Pipeline (ACP), released in December 2016 (FERC docket #'s CP15-554-000, CP150554-001 & CP15-555-000). After several months of reviewing the DEIS statement, we have multiple concerns.

My husband and I are 26 years into a 30 year mortgage on our home which is situated on one acre in Augusta County. We are in the direct route of the proposed pipeline. With the permanent easement, the construction easement and an additional construction easement, our home will suffer a great devastation. We will lose our septic tank and our drain field, and this is our only waste management option available in the area we reside. We have had zero contact with Dominion in nearly a year as to how they intend to address this particular issue. The possibility of losing our home, is naturally, our first concern. It weighs heavy on us every day as it has since we received the very first letter from Dominion in August, 2014. One acre.

LO122-1

There is no mention in the DEIS statement of concerns over hum and flutter from this proposed pipeline. We will hear it. We will feel it. Again, one acre.

LO122-2

LO122-3

We are also concerned over the appropriate depth of the proposed pipeline through neighboring farmland. It is quite obvious we fall in the Class 1 section which requires a lower depth of cover than more populated areas. We are already aware the depth of the pipe itself is thinner due to the rural less populated area, and adding a lower depth of cover provides a ticking time bomb for us and our surrounding (yet few) neighbors. While the ACP believes we are dispensable in the event of a disaster, I assure you, OUR LIVES MATTER. The continual use of farm equipment over this lower depth of cover will highly increase the chance of an explosion.

LO122-4

Just within the last several months, 2 newly constructed homes in our area have had continual well issues. This is in part to being surrounded by caves within a two mile radius. There is one major local well company who will not accept clients in our area due to the cave and cavern issue. Within 30 miles of our home is an active volcano, Mole Hill and within 40 miles, Trimble Knob, another volcano located outside of Monterey in Highland County. We also have recognized earthquakes with a 60-75 mile radius as well. With this foundation of karst, this proposed pipeline is a major disaster in the works.

We greatly appreciate the opportunity to provide comments and ask that you turn down completely this proposed route of the Atlantic Coast Pipeline.

Sincerely,

Becci Harmon
3892 Morris Mill Rd
Swoope VA 24479
540-490-6089
bharmon3892@gmail.com

LO122-1 See the response to comment CO8-1. Section 4.8.3 discusses residential construction measures, including Atlantic's commitment to complete septic system repairs.

LO122-2 See the response to comment CO68-17.

LO122-3 As discussed in section 4.12, Atlantic and DETI would be required to comply with DOT safety standards to ensure safe operation of ACP and SHP, which include depth of cover requirements. We do not have the authority to require installation measures beyond what the DOT requires.

LO122-4 Comment noted. Mole Hill and Trimble Know are extinct volcanoes last active approximately 47 million years ago.

Z-3275

LANDOWNERS COMMENTS

LO123 – Bette Grahame

20170405-0048 FERC PDF (Unofficial) 04/04/2017

78 Eagle Mountain Drive
Shipman, VA 22971

FILED
SECRETARY OF THE
COMMISSION

2017 APR -4 P 3:58

REGULATORY DIVISION

ORIGINAL

March 30, 2017

Mr. Nathaniel J. Davis, Jr.
Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE
Room 1 A
Washington, DC 20426

Re: Docket #CP15-554-000 (ACP)

Dear Mr. Davis,

LO123-1

I would like this letter to go on record stating my opposition to the Atlantic Coast Pipeline coming through Nelson County, Virginia, including a portion of my property. My experience with the surveyors, who came on my property recently, confirmed my doubt as to how thoroughly studies are being conducted to insure that this pipeline will not lead to future devastation because of improper gathering of information prior to installation of the pipeline.

Although, I requested to meet with the surveyors on a particular day and at a specific time and location, they did not show up, and left me waiting several hours in expectation of their taking me to the site. When they finally showed up, they had already completed the work. The letter advising me of their coming on my property indicated they would take 1 day for flagging, 1 day to survey, 1 – 5 days for cultural studies, 1 – 3 days for environmental studies, 1 day studying soil resistivity, 1 – 3 days regarding threatened and endangered species. The surveyors told me the work was finished after about 2 hours at the site. This left me feeling very insecure about how seriously these important steps were being taken, not only on my property but on the entire route of the proposed ACP route. How is the impact on cultural and historical resources, steep slopes and slope failures, roads, bridges, emergency services and economic impacts to businesses, communities and landowners being evaluated?

LO123-2

Subsequently, I have learned that the DEIS was issued prior to FERC receiving detailed analysis for the purpose and need for the project. I also learned that more than 100 additional findings submitted by the ACP people never even made it to FERC for inclusion in the DEIS. Neither does it contain specific and detailed information submitted by individuals and local citizen groups regarding potential impacts. I urge you to revise the DEIS to include this important information. Please re-set the comment and review clock so that concerned members of the public and federal, state and local government authorities can have a full 90 days to review and comment on the revised DEIS.

LO123-3

I am told that the fracked gas, which will be transported via the ACP, will not last more than 15 years. What a terrible waste of money and destruction of private property for such a short span of time. There are ample pipelines to convey this gas. Please don't approve this very unnecessary, costly, pipeline to go

Thank you for considering my request.

Sincerely,



Bette Grahame

LO123-1 Atlantic and DETI completed surveys based on protocols that were reviewed and approved by the appropriate agencies prior to initiation. In addition, Atlantic and DETI submit completed survey reports documenting the results of their various environmental surveys to the applicable reviewing agencies, who had the opportunity to review and comment on the results. Further, FERC staff has reviewed all survey reports and results for the preparation of this EIS, and have taken into account the reviewing agencies' comments in our analysis.

LO123-2 See the response to comment CO6-1.

LO123-3 Comment noted. See also the response to comment CO6-1.

Z-3276

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr.

Z-3277

| | |
|----------------|---|
| | <p style="text-align: center;">ORIGINAL</p> <p>Atlantic Coast Pipeline Section: South of Beaverpond Creek Route adjustment.</p> <p>Charles F. Wulf, Jr. 3509 Harpers Rd NE Kenney, VA. 23872 (804) 478-4473.</p> <p>FILED SECRETARY OF THE DEPARTMENT OF TRANSPORTATION</p> <p>2017 APR -4 P 4 01</p> <p>Docket No: CP15-554 CP15-555</p> <p>REGULATORY COMMISSION</p> |
| <p>LO124-1</p> | <p>Dear Kimberly D. Bose, Secretary,</p> <p>I am writing about environmental concerns that affect the section of the ACP route south of the Beaverpond Creek route adjustment to the Mattawamy river in southern Dinwiddie County, VA. Thanks to Dominion and Doyle survey and land acquisition representatives. They made it clear that our comments, concerns and objections will never stand up to their experts on this pipeline project.</p> <p>With that information, I turned to two of my uncles that served 30 year careers in the U.S. Army. One in Artillery and the other in the ASA there CID, where he had several years experience working with counter-terrorist units.</p> <p>Their years of experiences and knowledge have proven to be very valuable. Though it's their military contacts with active and retired career military veterans that's the greatest help of all.</p> <p>These career veterans have the experiences and knowledge in Artillery, military operations, environmental impact studies required when dealing with live-fire high explosive artillery firing ranges like Fort Hood, Tx and Fort Pickett, VA. and civil engineers!</p> <p>The fact that this section of the ACP route is in an area greatly impacted by strong seismic (shockwave) activity, environmental and physical hazards without a protective safety buffer. That's used to usually protect the residents and in this case the ACP. From direct exposure to physical threats from misfired, overshot</p> |

LO124-1 Section 4.8.5.2 discusses impacts on Fort Pickett (and the Ward Burton Wildlife Foundation). Based on correspondence from the U.S. Department of the Army dated November 14, 2016, the agency believes that the ACP "is compatible with the purpose of the Fort Pickett Army Compatible Use Program" and that "the routes of the pipeline does not produce any significant risk to the current or future planned military operations in the installation." Issues related to terrorism and its potential effects on the proposed projects are addressed in section 4.12.4 of the EIS.

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

Z-3278

| | |
|---------------------|--|
| LO124-1 (cont'd) | <p>lowe high explosive artillery rounds impacting homes or residents. The strong seismic (shockwave) activity that shows the destructive power capable of causing structural damage to concrete foundations at least 6 feet below the surface, as well as above the ground. The environmental impact level that Fort Pickett is responsible for in this area, that the ACP will greatly increase. Causing considerable environmental concerns for Fort Pickett and the pipeline.</p> <p>In earlier conversations with those in command at Fort Pickett, VA. They assured us that the environmental impact study will show the addition of this natural gas pipeline, will definitely cause environmental problems for this area.</p> <p>This information was confirmed by other career Military Veterans. The fact is, if FERC had required a programmatic environmental impact study, the crucial information and evidence would have clearly shown that this section of the ACP route, will cause significant environmental concerns!</p> <p>The area of Fort Pickett, VA that is closest to this section of the ACP route. Is the most actively used area of Fort Pickett, VA. This area is also the source of the strong seismic (shockwave) activity from the impact & explosion of each and every high explosive artillery round. Which is a major part of the impact on the environment.</p> <p>Other major sources that greatly impact the environment in this area of Fort Pickett, VA. Includes the large number of high explosive artillery firing ranges, smaller weapon firing ranges, Fort Pickett's only driveway / supply route east of the restricted area of the target - high explosive impact area. Used to move large convoys of armored equipment, supplies and personnel. You also have the illumination flares used for night firing, controlled burns and accidental fires, Fort Pickett's active rock quarry, the Military air craft flight corridor that's directly</p> |
|---------------------|--|

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

above this section of the ACP route.

This flight corridor was created to provide a safe flight path east of the restricted area of the target-high explosive impact area, artillery and smaller weapons firing ranges.

Yet Dominion and FERC do not see the threat or hazards of a high volume, high pressure, unscented, highly explosive natural gas pipeline to low flying (tree top) helicopters and fighter jets.

The threat of a natural gas leak in this area will be high. (Evidence from a Multi-year seismic study would show this as a true fact.)

Natural gas leaking from a high volume, high pressure natural gas pipeline could easily produce a large enough gas cloud that a fighter jet flies through it. It will cause a major disruption in the air-to-fuel ratio, causing engine problems or failure at a very low altitude, causing the jet to crash and possibly ignite the leaking natural gas and exploding. You also have the risk of the extremely high temperatures of the exhaust or the flame itself igniting the natural gas explosion!

Then you have the high risk of a misfired and overshot live high explosive artillery round that impacts the pipeline, capable of destroying the pipeline or causing a significant gas leak.

The evidence is clear that overshot artillery rounds have impacted the area close to this section of the ACP route. Where a small barn was destroyed and two live unexploded artillery rounds were found in woods.

There has been other occasions that the sound of an impacting artillery round is louder and the strength of the seismic structures are stronger than usual. Making us survey the area for an artillery round.

This is the physical threat to be expected without a 3/4 mile wide protective safety buffer. The fact is, this section of the ACP route could easily uncover a live unexploded artillery round along the construction zone.

Z-3279

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

The evidence clearly shows that without a Programmatic environmental impact study and a Multi-year seismic study. Crucial information from both studies are intentionally being ignored and left out of the process.

This crucial information that's being left out, would allow the true threats to this section of the ACP route, its reliability and the complete environmental impact on this area. There's more than just the pipeline that impacts the environment along this section of the ACP route south of the Barverspond Creek bank adjustment to the Nattony river in southern Dinwiddie County, VA.

This section has been getting more and more attention from the Military. Waiting to see if FEMA will approve this dangerous and deadly ACP route.

Most are deeply troubled by the fact that this section of the ACP route has intentionally turned 90° into the most active, environment unfriendly area with physical hazards and absolutely no protective safety buffer.

Why would anyone intentionally make that 90° turn. When they could of continued the ACP route on a more direct route from that turn to the ACP/RTI crossing in Brunswick County, VA.

This direct route or any route adjustment to the east, would provide the protective safety buffer with the increase of distance between the ACP route and Fort Pickett, VA and its strong seismic (lockdown) activity, environmental and physical hazards.

The fact that the direct route would be more economical. Requiring 2 miles less pipeline, less private property they need to acquire for the ACP route and 2 miles less construction area.

In a time and age with terrorism. We are all troubled by an ACP route that is intentionally turned in to an area highly active with Strategic Military operations.

Thanks to Dominion experts, this extremely close location to numerous Strategic Military operations on Fort Pickett, VA and directly below the Military flight corridor. This section of the ACP route that Dominion has continuously insisted on throughout the process for this pipeline

Z-3280

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

project.

The value of both of these high profile targets to Moslem extremists is high. Yet Dominion's decision to locate this highly explosive weapon (ACP), conveniently located in the ideal strategic location to kill large numbers of U.S. and Foreign Military personnel.

This section of the ACP route, is a terrorist dream come true. If FERC approves this section of the ACP route, they will be equally responsible for providing terrorist with the perfect weapon and the ideal location to kill Military personnel, while stopping the flow of Natural gas in this super pipeline.

Moving this section of the ACP route to the area of the direct route. Prevents the ACP from being used as a deadly weapon! It also reduces or eliminates the strong destructive seismic (shockwave) activity, environmental and physical hazards. This is a win situation for Fort Pickett and the pipeline.

The overall opinion of our Military experts, Dominion route planners and experts have absolutely no idea or knowledge about what they are dealing with when it comes to the #1 largest live-fire military range in the United States.

The evidence clearly shows the lack of knowledge. When it comes to the three ACP routes that Dominion's expert decided on that threatens lives, military operations, the future of Fort Pickett and most of all "National Security".

Just looking at the three ACP routes that Dominion submitted to FERC. These ACP route did not require further surveys or studies to see the serious threats that awake all three ACP routes dangerous and deadly to U.S. and Foreign Military personnel. Why FERC could not see these serious threats is troubling.

According to a Doyle representative the alternate ACP routes on Fort Pickett were withdrawn due to environmental concerns.

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

The truth is, those environmental concerns for the alternate ACP routes on Fort Pickett, also directly effect this section of the ACP route south of the Beaverpond Creek route adjustment to the Northway river in southern Dinwiddie County, VA.

Since this section is not protected by a 3 mile wide protective safety buffer, this section is not protected from the strong damaging effects of the seismic shockwave activity or the environmental and physical hazards in and around this area of Fort Pickett, VA.

Blackstone, VA and the ACP route along the northern boundary of Fort Pickett, are examples of areas protected by a 3 mile wide protective safety buffer between the residents of those areas and live fire high explosive artillery ranges and the restricted area of the target high explosive impact area. With 3 miles between the residents and the high explosive impact area. All of the environmental and physical hazards are greatly reduced or eliminated. If not some windows would be damaged.

We can actually see live-fire artillery firing ranges. Those with a 3 mile wide protective safety buffer cannot.

We have the high explosive impact area 1 mile away. Those with the buffer are 3 to 6 miles away from the high explosive impact area.

Technically we live in an extension of Fort Pickett, VA. where the effects of the strong seismic shockwave activity is equal to that on Fort Pickett. While the environmental and physical hazards effect this area and Fort Pickett equally, the risks of danger are the same and so is the impact on the environment!

When Dominion states in their own literature that 1) The Best route is one that meets the operational and reliability needs while minimizing the impact on the environment, 2) Pipelines require regular ground and aerial inspection patrols, 3) Damage can occur to pipelines exposed to blasting, ground movement and earth disturbances (like strong seismic shockwave activity.)

Z-3282

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

If Dominion actually uses these as guidelines, looking at the true facts, how can any of these guidelines be successfully applied to this section of the ACP route between mile posts 256.5 and 259.2. Where the evidence shows that this pipeline will have to endure these strong seismic forces every time the high explosive impact area is active, for the life of this pipeline.

When you have seismic forces strong enough to cause structural damage to masonry and concrete foundations 6 feet below the surface, without a thorough and accurate seismic study, crucial information needed to accurately assess the whole area along the proposed ACP route, there's no way of knowing what kind of damage can occur or the extent of the damage. Simultaneous FERC cannot guarantee or assure us that this section will be safe or reliable!

Any error where FERC underestimates the destructive power of these seismic forces or the environmental and physical hazards, catastrophic gas leaks could plague this section of the ACP route with the high risk of a natural gas explosion that threatens U.S. and Foreign Military lives.

With the approval of this section of the ACP route, FERC will be turning a large diameter natural gas pipeline to an active live-fire high explosive artillery range, a military installation that plays a roll in this country's "National Security"!

A U.S. Army program to develop buffer zones around military bases to preserve the facilities function.

What happens if seismic activity causes gas leaks or explosion or a mis-fired highly explosive artillery round damages or destroys this large diameter natural gas pipeline? What happens to Fort Pickett's future?

With a natural gas explosion, the death and destruction will be catastrophic. Between the blast zone radius and the extended

Z-3283

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

affected by the extreme high temperatures from a natural gas explosion. High explosive artillery firing ranges where stock piles of munitions will be exposed to the extreme high temperatures. Will cause secondary explosions, expanding the area of death and destruction.

In the event of continued gas leaks or an explosion. How can the ACP and Fort Pickett continue to co-exist if Fort Pickett's Military operations are the direct cause of damage to the ACP.

It was my impression that ACP route applications were to avoid impacts on Fort Pickett.

The dangers and risks that affect Fort Pickett Alt route 3 also threaten the proposed route between milepost 256.5 to 259.2 plus the addition of the Military flight corridor used for aerial maneuvers around the east side of live-fire artillery ranges and the restricted area of the target-high explosive impact area.

The shared airspace above the ACP in the Military flight corridor, will at some point impact Fort Pickett with military helicopters and fighter jet and a regular aerial inspection patrol. One miss communication between the normal inspection patrol and Fort Pickett range control, we have a nuclear disaster or a serious problem that impacts military operations at Fort Pickett.

Due to the seismic activity, environmental and physical hazard that greatly affect this section of the ACP route between mileposts 256.5 to 259.2. Because there is absolutely no protective safety buffer that places 3 miles between the threats and hazards of Fort Pickett's artillery ranges and restricted area of the target-high explosive impact area and this highly explosive large diameter natural gas pipeline.

The best example of how a 3 mile protective safety buffer works. There is a 3 mile wide protective safety buffer between Blacksburg, VA

Z-3284

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

Approval of this section of the ACP route will impact the military operations at Fort Pickett. While doing the complete opposite of the program by the U.S. Army to preserve this military base function. The creation of a buffer with conservation easement plan, will be meaningless when they have to close Fort Pickett because of damage to the pipeline. The extremely close location of the ACP route to numerous physical and environmental hazards, will be the death sentence for Fort Pickett! While this pipeline should not impact military operations on Fort Pickett.

Honestly look at the map on page B 777 in the Volume II of the DEIS. Then locate the proposed ACP route between 256.5 and 260. (The most used area of the high explosive impact area is west of this section of the ACP route.)

Moving west from the proposed ACP route to Fort Pickett (where the pipeline goes from 1500 feet down to 75 feet at its closest point to Fort Pickett.) The first thing you will come across on Fort Pickett will be the driveway/supply route. The only road on Fort Pickett east of live fire artillery firing ranges and the high explosive impact area. So this route get a great deal of use. (Fort Pickett all route 3 was just east of this driveway.) From the driveway you immediately enter the area with all the live fire firing ranges. Less than a half mile from these ranges is the most used area of the high explosive impact area.

This section of the proposed ACP route is way to close to direct threats from Fort Pickett to call it safe or a reliable route to transport natural gas through a large diameter pipeline!

Military lives matter a great deal to us and those Veterans working with us. The big question is, what is more important to FEIC? This dangerous and deadly section of the proposed ACP route between mile post 256.5 to 260. Or protecting the military lives of those

Z-3285

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

training on the east side of Fort Pickett and within the Military flight corridor?

Honestly this is not a fight we can afford to lose, for the sake of US and Foreign Military personnel!

This country and our Military has a great deal to lose. If this irremediable pipeline location proves to be a catastrophic natural gas pipeline explosion, that kills a large number of Military personnel while destroying a large area of Fort Pickett!

It will be compared to 9-11! I remember the first attack on the World Trade Center in N.Y. After the terrorist were arrested, the blind Muslim terrorist leader remarked "next time the towers will crumble to the ground" No one took that threat seriously and look what happened on 9-11.

Will FEPC refuse to take the serious threats and risks of locating this section of the ACP route, extremely close to the #1 largest live-fire artillery range in the United States at Fort Pickett, VA? Can we afford to lose large numbers of Military lives? Or force a Military installation to gas leaks or an explosion, due to the location of this section of the ACP route?

The fact is pipelines have exploded without the exposure to strong seismic activity. Like the San Bruno, CA natural gas pipeline and the Williams-Traverseo natural gas pipeline in Appomattox, VA.

These two natural gas pipeline explosions will be small compared to an explosion on the ACP. With no excuse for the deaths and destruction at Fort Pickett, VA. "Save Military Lives" Move the ACP route to a location where a pipeline explosion will do no harm at Fort Pickett, VA!

"Thank you for your time and concerns."

Sincerely
Charles Wulf Jr.

(m)

Z-3286

LANDOWNERS COMMENTS

LO124 - Charles F. Wulf, Jr. (cont'd)

LO124-1
(cont'd)

In addition talking about the Beaverpond Creek route adjustment and Fort Pickett alt route 2 on page 3-40 Volume 1 of the DEIS.

The fluid proposed route (new route addition) is compatible with WBLF land management initiatives, while being further away from boundaries of Fort Pickett. The proposed route would also decrease the risk that the pipeline's activities would impact the base and vice versa.

If the proposed route between milepost 256.5 to 260.4 is closer to Fort Pickett and the high explosive impact area. That is the Fort Pickett alt route 2. Why wouldn't the proposed route between milepost 256.2 to 260.4 need to also be further away from boundaries of Fort Pickett. So that it could also decrease the risk that the pipeline's activities would impact the base and vice versa. The military flight corridor is still above the section of the proposed route between milepost 256.2 and 260.4! "Thank you again" Please move the ACP out to a location further away from the boundaries of Fort Pickett as you did with part of the proposed route between milepost 256.5 to around 259.00.

Sincerely
Charles Wulf Jr.

Z-3287

LANDOWNERS COMMENTS

LO124 – Charles F. Wulf, Jr. (cont'd)

Blue Ridge Environmental Defense League

www.BREDL.org PO Box 88 Glendale Springs, North Carolina 28629 BREDL@skybest.com (336) 982-2691

PIPELINE DANGERS

PIPELINES EXPLODE

These photos show the fire and damage from the Williams-Transco gas pipeline explosion in Appomattox, VA in 2008. The flames were 300 feet tall. The blast zone had a 1,125 foot radius. The pipeline, installed in 1955, was 30 inches in diameter and operated at 800 psi. Two homes were destroyed. Five people were injured, and another 100 homes suffered damage. Corrosion of the pipe caused the explosion. Williams was ultimately fined \$1 million for improper pipeline maintenance. Is that enough?



Blast Radius

Today we face much greater threats by the industry's rush to build larger diameter pipelines operating at higher pressures. The proposed Atlantic Coast Pipeline (ACP) and Mountain Valley Pipeline (MVP), would be 42 inches in diameter, operating at 1400 psi. The chart below shows the blast radius of a 42 inch pipeline operating at 1400 psi at 1100 feet. Data from actual blasts indicate the blast radius estimates are off by as much as 50% as indicated by the blast radius of the Appomattox explosion.

Sacrifice Zones

Pipelines are often constructed within a few hundred feet of existing homes, placing families in the blast zones. This seems to be acceptable to industry and government. Rural areas with lower population density, farming communities, and those with a majority of minority populations are consistently chosen for these projects. Why? These communities have fewer resources with which to fight back. Regulations are designed to make construction less expensive for industry to build in rural areas. Land is cheaper. The companies can construct their pipelines with thinner walled pipe and without certain safety features, saving them millions of dollars. Construction standards should not be lowered in rural areas simply because there are fewer people who would lose their lives or whose property would be devastated.

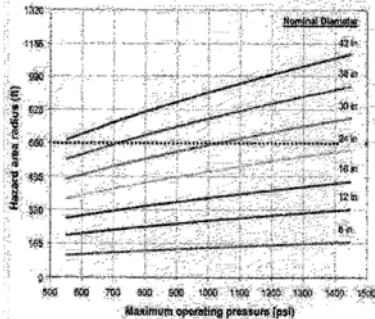


Figure 2.4. Proposed hazard area radius as a function of line diameter and pressure.

Z-3288

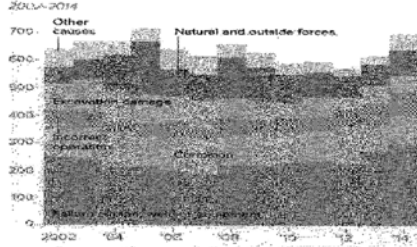
LANDOWNERS COMMENTS

LO124 – Charles F. Wulf, Jr. (cont'd)

Aging pipes, growing risk

Incidents caused by equipment failure, including welds on aging pipelines that the National Transportation Safety Board has warned about for decades, have risen by more than 60 percent since their low point in 2007.

INCIDENTS BY TYPE

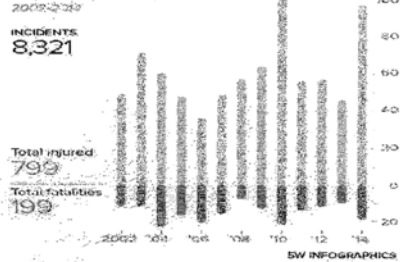


Source: Pipeline and Hazardous Materials Safety Administration

The human toll

The number of fatalities and injuries from pipeline incidents does not show a clear pattern in recent years. But in the past 13 years of records, the two worst years for deaths and injuries combined have come since 2010.

DEAD AND INJURED PEOPLE



BW INFOGRAPHICS

One would believe new pipelines would be safer than older ones, but a recent analysis of Federal data completed by the Pipeline Safety Trust indicates new pipelines are failing at an even higher rate. Gas transmission lines installed in the 2010's had an annual average incident rate of 6.64 per 10,000 miles, greater than the pre-1940's pipes which had an incident rate of 6.08 per 10,000 miles. "Last year, more than 700 pipeline failures killed 19 people, injured 97 and caused more than \$300 million in damage. Two of the past five years have been the worst for combined pipeline-related deaths and injuries since 2000."¹

Environmental Dangers

Compacted farm land yields fewer crops. Stream crossing construction causes water pollution. Improper construction techniques cause sediment and erosion problems as well as invasive species growth. Blasting causes the contamination or destruction of nearby wells and springs. Forest fragmentation and animal habitat destruction caused by acres upon acres of forested land being clear cut. There are destructive flood plain crossings and wetland devastation. The pipeline companies say they will mitigate these issues, but we know better. We have witnessed their failures.

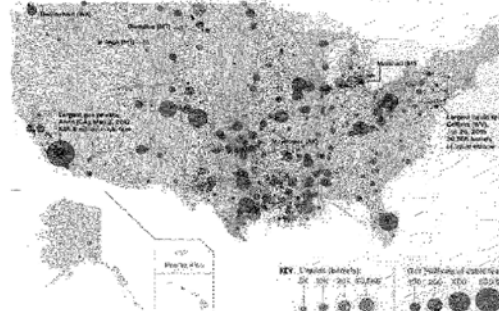
Explosions, leaks and spills

There is more than one leak, failure or rupture of an oil or gas pipeline every day in the United States. The incidents are concentrated in the oil patch states of Texas, Oklahoma and Louisiana and a cluster in the North Dakota Bakken formation. But pipelines traverse every state. Hazardous liquid spills are sized by the amount leaked into 32 gallon and gas leaks are measured by cubic feet.

ALL INCIDENTS IN THE UNITED STATES, 2010-15

Source: Pipeline and Hazardous Materials Safety Administration, 9/15/2015, Feb. 2015

TOTAL INCIDENTS: 3,141
DEATHS: 369
INJURIES: 78



Source: Pipeline and Hazardous Materials Safety Administration, Energy Information Administration



Devastating San Bruno gas pipeline explosion killed 8 people on Sept 9, 2010²

¹ <http://www.politico.com/story/2015/04/the-little-pipeline-agency-that-couldnt-117147#ixzz3mHKYE0Qy>

² <http://framework.latimes.com/2010/09/09/fire-in-san-bruno/>

Z-3289

LANDOWNERS COMMENTS

LO125 – Cora Perkins

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St., NE
Washington, DC 20426
RE: Atlantic Coast Natural Gas Pipeline: Docket #CP15-554-000

April 4, 2017

Dear Federal Energy Regulatory Commission and Ms. Bose,

I am Cora Perkins, my address is 509 Union Hill Road, Union Hill, Buckingham, Virginia 23921. Just across from the planned Virginia Atlantic Coast Pipeline compressor station on S. James River Highway/ Rt. 56 and Rt. 663 Union Hill Rd. I am a resident, landowner, and homeowner living in this house for 30 years. I was born in Union Hill and lived here all of my life. My parents were born and raised here, as was my husband's family.

As a homeowner, I want to request that FERC deny the application for building and operating a compressor station and pipeline in this residential, agricultural community.

LO125-1 | My grandchildren and great grandchildren visit regularly. They visit to relieve their respiratory conditions. The air here seems to curtail the symptoms. My granddaughter has asthma and finds it hard to breathe sometimes. I have had 4 open-heart surgeries, and the compressor station air emissions will have already known effects on me. My breathing is very bad at the moment. My home is within 1100 ft. of the proposed only Virginia ACP compressor station!

We must end building these plants in our rural green pastures.

Thank you for your consideration of this request.

Sincerely,
Cora Perkins

509 Union Hill Rd.
Buckingham, VA 23921

LO125-1 Section 4.11.1 includes our analysis on air quality, including construction, operation, and fugitive pipeline emissions. We conclude that the impacts from the pipelines and new and modified compressor stations, when combined with the existing background levels, would comply with the NAAQS, which were established by the EPA to be protective of public welfare and human health, including children, the elderly, and sensitive populations, and would not result in a significant impact on air quality.

Z-3290

LANDOWNERS COMMENTS

LO126 – Emma L. Earnst

Emma L Earnst, Charlottesville, VA.

After the Federal Energy Regulatory Commission's draft Environmental Impact Statement (DEIS) for the Atlantic Coast Pipeline was released in December, many organizations, including Preservation Virginia, are considering it to be incomplete.

The Atlantic Coast Pipeline (ACP) and the Mountain Valley Pipeline (MVP) are part of an unprecedented expansion of fracked-gas infrastructure projects across Virginia, West Virginia and North Carolina that threaten to damage many rural historic districts and hundreds of miles of forests and farmland. In May 2016, Preservation Virginia's annual Most Endangered Historic Places list included a thematic entry for NATURAL, HISTORIC AND CULTURAL RESOURCES THREATENED BY UTILITY INFRASTRUCTURE PROJECTS STATEWIDE in response to the threat.

LO126-1 | Of particular interest is the area of Union Hill/Woods Corner in Buckingham County, currently under review by the Department of Historic Resources as a potential Rural Historic District. Though this area is shown as the site for the ACP's only compressor station in Virginia, the DEIS makes no mention of the archaeological, historic and cultural resources located there. The proposed Union Hill/Woods Corner Rural Historic District consists of a rural community established on former plantation land by African Americans after Emancipation. These types of free African-American communities have not been adequately studied in Virginia. They have the potential to yield provide invaluable information on the successful establishment of post-Emancipation communities where the majority of residents were once enslaved.

LO126-1 See the response to comment CO49-1.

Z-3291

LANDOWNERS COMMENTS

LO127 – Teresa Rhodes

20170410-0053 FERC PDF (Unofficial) 04/07/2017

**FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC COAST PIPELINE AND SUPPLY HEADER PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS**

ORIGINAL

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below; or (3) electronically filed.¹

For Official Mail Filing, Send To:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

FILED
SECTION OF THE
COMMISSION
2017 APR - 7 P 4: 29
REGULATORY COMMISSION

As applicable, please indicate project(s) you are commenting on:

- Atlantic Coast Pipeline: Docket No. CP15-554
- Supply Header Project: Docket No. CP15-555
- All of the above

COMMENTOR'S NAME AND MAILING ADDRESS: (Please Print)

See attached
Teresa Rhodes
2009 Devil's RaceTrack Rd. Four Oaks, NC 27524

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

see attached

¹ The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at <http://www.ferc.gov> under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account".

Z-3292

LANDOWNERS COMMENTS

LO127 – Teresa Rhodes (cont'd)

20-70410-0053 FERC PDF (Unofficial) 04/07/2017

I am Teresa Rhodes of Johnston County and I am against the Atlantic Coast Pipeline, FERC Docket #15-554-000. I am a landowner and it impacts 3 tracts of our land.

Reasons that I am against this pipeline:

- LO127-1 | **1. The route of the pipeline is going through land that has been in my family for over 100 years. My children and grandchildren will not be able to use this land to build homes, farm or develop because the pipeline is going through the middle of 2 tracts. Who wants a house next to a pipeline? The other tract is going behind my house in timberland.**

- LO127-2 | **2. We are farmers and the crops will be impacted for 15 to 20 years due to the construction and disruption of the soil decreasing the yield of soybeans and corn crops. This will in return affect the income for the farmer who already has to face high prices for seeds, chemicals and fertilizers. Farmers are important to this nation as a food source for our animals and people. I feel that this project is targeting the poor rural areas and taking thousands of acres of farmland where they can use thinner, cheaper construction materials to decrease the costs of construction and pay less for the land. Using thinner and cheaper construction materials than that used for densely populated areas is discriminating against the rural people of this country. We and our children are just as important as the ones living in large cities and other areas. Other issues are that farmers will not be able to use heavy equipment over these pipelines. They will need to have special crossing pads for this heavy equipment; another added expense. 15 to 20 years of reduced yield will greatly impact the economy and food source of many counties and ultimately this nation. Farming and agriculture is vital to our nation.**

- LO127-3 |

LO127-1 See the response to comments CO68-12 and CO80-8.

LO127-2 Comment noted.

LO127-3 As described in section 4.12.1, the list of HCAs follows the DOT rules that define a HCA as an area where a natural gas pipeline accident could do considerable harm to people and their property, and requires an integrity management program to minimize the potential for an accident. This definition satisfies, in part, the Congressional mandate for DOT to prescribe standards that establish criteria for identifying each natural gas pipeline facility in a high-density population area. We do not have the authority to require pipe thicknesses beyond what the DOT requires. Per DOT regulations, Atlantic and DETI would be required to design and construct the pipeline based on identified area classifications and HCAs at the time of construction. If a subsequent increase in population density adjacent to the right-of-way results in a change in class location for the pipeline, Atlantic and DETI would reduce the MAOP or replace the segment with pipe of sufficient grade and wall thickness, if required to comply with DOT requirements for the new class location or HCA.

Section 4.12.1 has also been revised to include discussion of potential safety impacts from heavy farm equipment and other large vehicles crossing the pipeline in open areas (i.e., not at road crossings).

Z-3293

LANDOWNERS COMMENTS

LO127 – Teresa Rhodes (cont'd)

20170410-0053 FERC PDF (Unofficial) 04/07/2017

Z-3294

LO127-4

3. Safety issues: Explosions and leaks will impact my neighborhood and many others. This will involve many of my family and friends who live close by the route of the pipeline. They say they are safe, but 1 explosion or leak is one too many. The blast zone for a 42 inch diameter pipeline with 1400psi would be at 1100 feet to 1400 feet. According to the Pipeline Safety Trust a 36 inch pipeline operating at 1460psi has a potential blast radius of approximately 900 feet to 1000 feet or more on both sides of the pipeline. These people in this sacrifice zone are mothers, daddies, children, family and friends. Vinyl siding and even blinds have been reported to melt from the heat of the blasts. The pipeline route in Johnston County goes close to schools (Meadow School) where my grandchild attends and is close to my church and goes behind my house. In these rural areas the pipelines are of cheaper, thinner walls and without safety features which saves them millions of dollars in construction. Some leakage is considered to be the norm for these pipelines, but this will seep into the ground water, wells and affect the environment. As you know natural gas is odorless and many times a leak is only known by evidence of dead vegetation. It has been reported that leaks are underreported by pipeline officials. Federal data by the Pipeline Safety Trust show that newer pipelines are failing at greater rates than older ones due to corrosion issues. The National Transportation Safety Board has found existing pipelines are not all receiving the attention necessary to prevent disasters and tragedies. We should not be a "sacrifice zone" for the corporate profits of Dominion Resources, Duke Energy, Piedmont Natural Gas and Southern Company Gas. Many residents in our county do not even know they are near a pipeline because they are not landowners and I am sure this is the case for many other areas. I have talked with people who work at a natural gas plant and they said they would not buy a home near a natural gas pipeline. Would you want to live beside one with the possibility of leaks and explosions?

LO127-5

4. Timber will be clear cut and will not be able to be replaced. This will impact the environment and our children's future yield of the timber land. As well this will have an impact on the natural habitat for animals and wildlife. It is also going under the Neuse River which is behind my home; many

LO127-4 See the response to comment LO22-5.

LO127-5 Comment noted. Impacts and associated mitigation measures for vegetation and wildlife habitat are discussed in sections 4.4 and 4.5, respectively.

LANDOWNERS COMMENTS

LO127 – Teresa Rhodes (cont'd)

20170410-0053 FERC PDF (Unofficial) 04/07/2017

Z-3295

- LO127-6 | communities get their water source from this river. Going under many streams and river crossings will cause water pollution during construction and disrupt the environment. This pipeline is not needed because the
- LO127-7 | natural gas is projected to last only a limited time (many have said that the gas will not even last the projected 20 years that Dominion has said); there is far less gas in the underground shale than federal regulators claim; too many pipelines are being planned for the amount of gas underground; and the cost to our communities is not to be compared to what these energy companies will reap. This is a high pressure transmission line and there are no taps; so this is for the benefit of these companies for profit. They say this natural gas is not for export, but I believe they will export this natural
- LO127-8 | gas. Any jobs or tax revenue will be only during the construction phase and very few jobs will be lasting, so the economic benefit will be very little for the communities. Only 18 permanent jobs for NC.
- LO127-9 | 5. Eminent Domain for the purpose of advancing private interests is inappropriate. This pipeline (already have pipelines near in our county and in the state) will only benefit Dominion, Duke Energy, Piedmont Natural Gas and Southern Company Gas and their shareholders.
- LO127-10 | 6. Fracking has been the cause for earthquakes in areas where gas is fracked and this is disrupting our infrastructure of the land.
- LO127-11 | 7. Flooding: area of Johnston County has had in the last 20 years 2 incidents of what is called 100 year floods. The areas that this pipeline is in these areas that flood and with last Hurricane Matthew flood waters caused large pipes in the roads to be broken into. What will happen to these natural gas pipes when the flood waters come? Our county suffered enough with roads and water pipe damage and do not need a natural gas pipeline in these areas.
- LO127-12 | 8. Methane gas will be leaked into the atmosphere and it has been said that the amount of methane gas leaked will have an impact of more than 20-25 coal plants impacting the warming of the climate.

- LO127-6 | Comment noted.
- LO127-7 | See the response to comment CO46-1.
- LO127-8 | Comment noted.
- LO127-9 | Comment noted.
- LO127-10 | See the response to comment CO48-10.
- LO127-11 | We have taken flooding into consideration.
- LO127-12 | Comment noted.

LANDOWNERS COMMENTS

LO127 – Teresa Rhodes (cont'd)

20_70410-0053 FERC PDF (Unofficial) 04/07/2017

I implore you not to grant a Certificate of Public Convenience and Necessity to the ACP because it is not for the public interest and is not a necessity for Johnston County and many other areas. This pipeline is for only the private interests of these companies.

Z-3296

LANDOWNERS COMMENTS

LO128 – Marcia Gibbons

20170410-5041 FERC PDF (Unofficial) 4/9/2017 6:43:00 PM

April 9, 2017

Marcia Gibbons
312 Perry Lane
Lovington, VA 22949
Docket #: CP15-554-000
FERC ID#: F288882

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First St. N.E., Room 1A
Washington, DC 20426

Dear Mr. Davis:

I am writing to your commission to state unequivocally that the Forest Service **should not** accept the proposed amendments of the Land and Resource Management Plan (LRMP) that would allow large scale infrastructure, in this case the ACP, to be built across the George Washington National Forest and the Monongahela National Forest.

Here are my Reasons:

LO128-1

1. Current energy research on demands for natural gas say that new pipeline infrastructure is not needed to supply present and future U. S. needs. In the June 2015 issue of *Forbes* magazine, a recent study by the U. S. Department of Energy (DOE) maintains this very position because, they stated, we're currently only using 46% of our existing pipeline capacity. In this same article the Environmental Protection Agency (EPA) projected that demand for natural gas will fall over the next few decades as renewable energies come online, but the infrastructure for natural gas pipelines will last well beyond their use. How will this affect our beautiful forest lands?
2. The 15% rate of return guaranteed by FERC to the ACP applicants, should this project be approved, can't help but motivate the ACP energy companies (Dominion, Duke, Piedmont Gas etc.) to take shortcuts and manipulate their data to get this project approved at all costs. The customers for this gas are the affiliates themselves. This is only further proof that this project is not for public convenience and necessity, but is driven by the promise of big profits for their stockholders. Those property owners whose land will be sacrificed through the use of eminent domain, as well as the *public lands of our National Forests*, are paying a huge price without legitimate cause!

LO128-2

3. Friends of Nelson (FON) members who have been reading the DEIS for the ACP have discovered that large sections in the DEIS were pulled directly ("plagiarized") from Dominion's Resource Reports. How strange. But then... the following information was just released by www.nuttallegal.com Posted on April 4, 2017 was the article, "*Atlantic Coast Pipeline: A Small*

LO128-1 See the response to comment CO46-1.

LO128-2 See the response to comment CO68-9.

Z-3297

LANDOWNERS COMMENTS

LO128 – Marcia Gibbons (cont'd)

20170410-5041 FERC PDF (Unofficial) 4/9/2017 6:43:00 PM

LO128-2
(cont'd)

Scandal" which makes this discovery quite clear. Merjent was contracted by FERC to produce the ACP's DEIS. Natural Resources Group wrote the Resource Reports for Dominion. It turns out eight of the Merjent employees that worked on this DEIS had also worked for the Natural Resources Group and were directly involved in the production of Dominion's Resource Report. In addition to this astounding discovery, it turns out that the Natural Resources Group listed Merjent as one of its clients. This is clearly a HUGE CONFLICT OF INTEREST, and calls the integrity of the entire DEIS, as well as its validity, into question.

LO128-3

So, why should the Forest Service allow changes to amendments that protect the integrity of our public lands when the companies that are requesting such changes do not respect citizen owned private and public property, scientific data, and legitimate energy trend information? It seems to me that the ACP and FERC have colluded to put profit agendas over public convenience and necessity. Affected citizens will hold these parties accountable and will take legal action where necessary to prevent these bogus groups with their bogus documents from grabbing our precious lands.

Forest Service personnel, please continue to oppose the ACP's encroachment on our irreplaceable National Forests.

Sincerely,
Marcia Gibbons, Intervenor
Landowner in Nelson County, VA

LO128-3 See the response to comment PM4-27.

Z-3298

LANDOWNERS COMMENTS

LO129 – James Bolton

April 10, 2017

James Bolton
312 Perry Lane
Lovington, VA 22949

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Comments of James Bolton, Intervenor, Re: the Proposal that the USGA Forest Service Issue a Special Use Permit and Amend its Management Plan to Accommodate the Atlantic Coast Pipeline and Supply Header Project (Docket Nos. CP15-554-000, CP15-554-001, and CP15-555-000 FERC/EIS-0274D)

Deputy Secretary Davis and Members of the Commission;

As required by the National Environmental Protection Act (NEPA), a detailed and objective analysis of the effects of any major federal action with the potential to affect the environment must be undertaken to identify and thoroughly analyze the potential environmental impacts of such a project. In December of 2015, your Commission released the Draft Environmental Impact Statement (DEIS) for the Atlantic Coast Pipeline (ACP) and associated Supply Header Project that purports to be the first step in the fulfillment of this requirement, and has invited public comment on the document. The information presented in this document also purports to provide the factual basis on which agencies such as the USDA Forest Service must rely in formulating their responses to the impacts of the project.

The proposed route for Atlantic Coast Pipeline would cross 21 miles of National Forest land in West Virginia and Virginia, including portions of both the Monongahela and George Washington National Forests. In order for the project to be constructed, the USDA Forest Service must not only issue a special use permit to allow the pipeline to be built on National Forest lands by creating a new utility corridor through both forests, but would also be required to amend its recently developed Land and Resource Management Plan (LRMP) to relax its established standards that apply to the protection of water quality, soil stability, and stands of old growth timber, as well as the recreational potential of the land under its management. As the USDA Forest Service has invited public comment on these actions, the present document has been prepared in response this invitation .

Z-3299

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

Z-3300

Forest Service Mission and Policy:

The National Forest System web site (<https://www.fs.fed.us/about-agency/what-we-believe>) states the following:

“The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.”

Furthermore, among the activities listed as being “...set forth in law...” to facilitate the realization of its mission, the first three are:

- *“Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated lands.*
- *Listening to people and responding to their diverse needs in making decisions.*
- *Protecting and managing the National Forests and Grasslands so they best demonstrate the sustainable multiple-use management concept.”* (Emphasis added).

Clearly, the Forest Service’s primary mission, as mandated by law, is to “conserve” and “sustain”, the health, diversity, productivity, and beauty of the lands under its supervision and protect them for the use and enjoyment of both present and future generations of the American people (who are, in fact, its owners by heritage), in such a way as to successfully balance multiple uses and diverse needs that may often conflict with each other in a way that is sustainable. It has, in fact, clearly expressed this in its letter to the Commission dated July 30, 2015.

“Forest Service policy relating to the use of NFS lands. §2703.2(2) state to authorize use of NFS lands only if: a the proposed use is consistent with the mission of the Forest Service to manage NFS land and resources in a manner that will best meet the present and future needs of the American people....” (Comments of the U.S. Forest Service, Atlantic Coast Pipeline project No. PFIS-6-000, Draft Resource Reports, p. 1, Point 7, July 30, 2015.) (again, emphasis added).

It is, perhaps, instructive to note that nowhere in either its mission statement or the list of legally-mandated primary activities is there any mention of allowing activities that do not contribute to, or are in outright contradiction of, these goals. Nor are there references to listening and responding to the needs of entities other than people, i.e. persons. We do not, for example, find mention of facilitating, or even balancing, the needs of infrastructure project, or other, developers, or to the convenience of corporate entities, especially those that are not public utilities and are therefore not directly serving the needs of the people. (ACP, LLC is proposed to be a natural gas pipeline company under the federal Natural Gas Act, 15 U.S.C. § 717, and is not listed as a regulated gas utility on the Virginia State Corporation Commission’s web site, nor will it be engaged in the business of providing natural gas service to the public.)

As is the case with any responsibility that requires an effort to balance the pros and cons of potentially conflicting uses, the Forest Service’s mandated responsibility to evaluate, weigh, and compare the

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

Z-3301

various uses of the land under its jurisdiction while remaining true to its mission certainly cannot be characterized as an easy one to implement, and clearly the process must be based on carefully collected and considered data if it is to be in any way fair, balanced, and impartial. There can be no room for opinion, unsubstantiated conjecture or mere assumption in this process.

The Forest Service has, in fact, recently negotiated just such a lengthy and difficult deliberative process as it carefully weighed and balanced the myriad issues that required consideration in the production of its 2014 Revised Forest Plan that was developed over a period of several years with multiple opportunities for public input. On the very heels of the adoption of this comprehensive and carefully-considered document, ACP is now asking that the standards it has set be lowered in order to reconcile it with the potential effects of constructing its pipeline through National Forest lands.

Specifically the Forest Service would be asked to:

- Amend the forest plans for the George Washington and Monongahela national Forests to lower the standards regarding water quality, soil erosion, resulting from the construction of both the pipeline itself as well as access roads (including those in a Scenic River Corridor), the clearing of old-growth forest
- Accept an unprecedented loss of forested land that would amount to a total of some 2400 acres of core forest including ongoing vegetative restoration projects and vegetative communities of special concern, and result in corresponding increases in the fragmentation of forest habitat, pathways for the spread of invasive vegetation, and decreased forest regeneration. (DEIS pp. 5-7 through 5-9.)
- Accept the negative effects of the project on many endangered and sensitive species that it is mandated to protect.
- Accept the loss of significant scenic viewshed.
- Accept the increased potential for severe erosion, landslides and the resulting increase in stream sedimentation due to heavy rainfall events.

The DEIS Is Incomplete and Fails to Fully Inform the Forest Service If and How Impacts of the Project can be Mitigated:

LO129-1 | Unfortunately, the Draft Environmental Impact Study that has been issued for the project, and on which the Forest Service must rely in order to adequately analyze and weigh its effects and assess the potential for the success of steps designed to mitigate them, is incomplete and does not provide much of the necessary information.

In particular:

- The DEIS discussion of erosion of soils is incomplete: *“Data that was collected during the surveys is under review and will be used to determine soil mitigation Conclusions and Recommendations 5-4 and restoration procedures that would be implemented during*

LO129-1 See the response to comment CO5-1.

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

LO129-1
(cont'd)

construction and operation of the pipeline facilities within each National Forest.... Analyses are ongoing to determine whether impacts would be minimized with the construction and restoration plans proposed by Atlantic and DTI.' (DEIS, pp. 5-3 and 5-4.)

- The discussion of maintaining water quality in the DEIS is incomplete. "While site-specific drawings for most of the major waterbodies crossings have been provided, crossing design specifications and locations have changed since the most recent sitespecific drawings were submitted, and site-specific construction and restoration measures have not been incorporated into the plans." (DEIS, p. 5-5.) (Emphasis added.)
- The DEIS recognizes that the project would, in fact, "contribute to forest fragmentation" (DEIS, p.5-7.) and that "Fragmentation of forested habitat would make the right-of-way permanently unsuitable for interior forest species." (DEIS, p. 5-10.), and also that its discussion of forest fragmentation is not complete: "We have also recommended that.... Atlantic and DTI discuss how the creation of forest edge or fragmentation would affect habitat and wildlife, including potential impacts on federally listed threatened and endangered species and migratory birds, and the measures that would be implemented to avoid, minimize, or mitigate impacts on interior/core forest habitat." (DEIS, p. 5-9.) Obviously, once the forest has been cleared, planted with non-arboreal species, and maintained in that condition, the effects of forest fragmentation cannot be fully mitigated.
- The DEIS admits that the project's impact on forest vegetation communities would be "long-term to permanent". (DEIS, p.5-8.) Expected problems with establishing non-arboreal vegetative cover, especially mountainous areas and steep slopes would result in significant erosion and water quality problems both immediately and for many years in the future."¹
- The DEIS is incomplete in its discussion of threatened special -status species: "Atlantic and DTI have not provided conservation measures to address potential impacts to these species in all cases." (DEIS, p.5-12.) Many of the biological surveys for special species may not be completed until September 2017; therefore, survey results are not included in the DEIS. The document identifies only five species that would be adversely affected, but the US Fish & Wildlife Service has identified 30 federally threatened or endangered species, 2 designated critical habitats, 1 proposed species, 5 proposed critical habitats, and 6 species under review for federal listing that are known to occur along the ACP route.
- The DEIS states that the ACP would not meet Forest plan standards for scenic integrity and is incomplete regarding its discussion of effects on viewsheds and and thus would require a plan amendment to bypass the standards : "The cleared and maintained permanent right-of-way in heavily forested areas would create a visual contrast more noticeable to viewers and result in a greater degree of visual impacts." And; "Consultations with the MNF, GWNF, and ATC are ongoing and we have recommended that Atlantic provide documentation that the F-S

Z-3302

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

LO129-1
(cont'd)

concur with the conclusions and determinations of effect included in its Visual Impact Assessment.” (DEIS, p. 5-18.)

- The DEIS not only admits that the construction of the project *“...in steep terrain or high landslide incidence areas could increase the potential for landslides to occur.”* (DEIS, p.5-2.), but also that its discussion of the potential for such events is not complete, e.g., *“Because Phase 2 analysis, field surveys at all evaluation sites, and final measures related to slope hazards have not yet been completed for ACP and SHP, we have recommended that prior to construction Atlantic and DTI file all outstanding geotechnical studies and the results of geohazard analysis field reconnaissance...”* (DEIS, p.5-2.) Again; *“On the MNF and GWNF, Atlantic has not provided the information requested by the FS to access potential project-induced landslide hazards and also the effectiveness of proposed mitigation measures for restoration of steep slopes. Therefore, we have recommended that prior to the close of the draft EIS comment period Atlantic file the plans, typical drawings, and site-specific designs of representative construction segments to display the magnitude of the proposed slope modifications (cuts and fills) for the NFS lands as requested by the FS.”* (DEIS, p. 5-3.) Finally, anticipated problems with establishing non-arboreal vegetative cover, especially mountainous areas and steep slopes would result in significant erosion and water quality problems both immediately and for many years in the future.”²

As so much of the data on each of these focus areas, and others, is still incomplete and therefore cannot inform the Forest Service regarding its decision to issue a Special Use Permit and amend its Management Plan, or be adequately considered and analyzed by other parties for that matter, the document must be regarded as premature at the very least, and by virtue of its stated commitment to transparency, impartiality, and protection of the public, the Commission’s responsibility must be to wait until all data has been collected, submitted and compiled into a coherent and systematic document before proceeding further. Only by so doing will the information it presents provide the opportunity for sufficient analysis and evaluation by all concerned agencies and the public. Even if this incompleteness was the only problem with the DEIS, it would represent reason enough for the Forest Service to reject it as including data sufficient to base a decision as weighty as granting a special Use permit and amending its established plan for forest management. There are, however, additional reasons to call the document into question. Even the additional recognition that the document is clearly inadequate in terms of the presentation of thorough, well-reasoned analysis, and, instead, frequently relies on conjecture and presumption rather than actual evidence to support its conclusions and recommendations, does not fully address its shortcomings.

Z-3303

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

Z-3304

The DEIS Fails To Demonstrate Sufficient Need for the Project to Justify the Impacts of the ACP on the National Forests:

LO129-2 | Comments³ and studies⁴ submitted previously to the Docket have explored the Purpose and Need for the ACP in great detail and have concluded that there is, in reality, no actual real-world need for the ACP and that the gas that it would transport can be supplied to the stated delivery points more cheaply by existing infrastructure including the Transco and Columbia systems. While these systems could require additional modifications, these would be minor in scope and far less expensive and impactful than construction of a new pipeline. All of the power stations that have been mentioned by Dominion Virginia Power and Duke Energy, the two majority partners in ACP, LLC., as being served by the ACP are, for example, already supplied by Transco through either existing lateral pipelines or ones under construction. Instead of recognizing this reality, the DEIS chooses to use the existence of “precedent agreements” for transportation capacity as the measure of need for the project, even though the vast majority of the stated capacity is contracted for by the Dominion and Duke, the controlling partners in the project, which, in turn, allows the suspicion of anti-competitive self-dealing to enter the analysis.

Atlantic has Failed to Demonstrate that It Can Be A Reliable Partner to the Forest Service:

LO129-3 | Unfortunately, the history re: ACP’s proposal to construct the project over National Forest lands has also been fraught with difficulties in terms of the, gathering, accurate analysis, and timely submission of crucial data that the Forest Service needs to do its job. For example, a comment filed by the Forest Service with your Commission on Nov. 5, 2015 details the failures of the project developers to follow specified procedures for the collection of soil survey data in the National Forests, or to heed requests by the FS to review the qualifications of field personnel. Perhaps most disingenuously, the developers also apparently attempted to misrepresent who actually conducted the surveys.⁵ Given the lengths that they have been willing to go to cut corners in the collection of data, one can only wonder how much of the data they have already submitted, and are continuing to submit, may also be of questionable quality and designed to mislead rather than provide accurate and impartial information. (In the bigger picture this failure is especially troubling because, unlike the Forest Service, it is unlikely that the general public possesses either the expertise or the resources to monitor either the methodologies employed in surveys on privately-owned land, or the qualifications of the personnel conducting them.)

The DEIS Fails to Inform the Forest Service in an Independent, Fair, and Impartial Manner:

LO129-4 | As if this weren’t enough to question the validity of the methodology employed and the conclusions reached in the DEIS document, it has also recently become apparent that there is an inherent conflict of interest involved in its production, i.e. that the consulting company that was hired by the Commission to produce the DEIS (Merjent) was not only staffed largely by former employees of the Natural Resources Group, the firm that was hired by ACP, LLC, the pipeline developer, to produce the project Resource Reports, but neither company disclosed to the Commission any potential conflicts having to do with “...any past and current ‘direct or indirect relationship’ with ‘any business entity’ that could be affected in any way by the proposed work.”⁶ More specifically, not only was NRG listed until recently on Merjent’s web site as one of its clients, but the eight Merjent employees that had previously been on

LO129-2 | Comment noted. See also the responses to comments CO6-1 and CO46-1.
LO129-3 | FS response: The FS and FERC have received additional information and analyses since the draft EIS and have incorporated them into the final EIS. Additional mitigation measures and monitoring procedures have been identified that will be incorporated into the COM Plan and Special Use Permit, if issued.
LO129-4 | See the response to comment CO68-9.

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

LO129-4
(cont'd)

the Natural Resources Group (NRG) staff, including the project manager and deputy project manager, all signed off on the publication of the DEIS. So, essentially the DEIS was produced under the auspices of (and perhaps largely by) the very same people who had previously been paid by ACP to collect and analyze the data involved.

And NRG's fingerprints are, in fact, all over the DEIS. As the author observed in a previous comment on the DEIS submitted both orally and in writing at the so-called public hearing held on Feb. 22, 2017 in Nelson County, VA, there are numerous examples where wording found in the Resource Reports is apparently lifted word-for-word, only to reappear in virtually the same form in the DEIS. For example, in FERC's DEIS, **Sec. 3.2.2.1, Existing Transco Pipeline System** (p.3-4), produced by Merjent, we find:

"Construction of new mainline or lateral pipelines would also be necessary to reach the same delivery points as ACP in southeastern Virginia (approximately 160 miles) and North Carolina (approximately 180 to 200 miles).... The environmental impacts associated with these upgrades and new pipeline construction for the Transco system (a combined total of 640 to 680 miles of new pipeline) would likely be similar to the impacts of ACP and SHP, and we have not identified or received any information that suggests the alternative would provide a significant environmental advantage over ACP and SHP."

While, going back to Atlantic and DTI's document **Resource Report 10, Sec. 10.6.1.1, Transcontinental Pipeline Company** (p. 10-17), produced by NRG, we find:

"...construction of new mainline or lateral pipelines would be necessary to reach the same delivery points as the ACP in southeastern Virginia (approximately 160 miles) and North Carolina (approximately 180 to 200 miles). The environmental impacts associated with the upgrades and new pipeline construction for the Transco system (a combined total of 640 to 680 miles of new pipeline) would likely be greater than those of the ACP. Therefore, the theoretical modifications to the existing system would provide no environmental advantage over the ACP."

Again, from sections of both documents that discuss a possible alternative using the Columbia Gas Transmission System;

"About 400 miles of new pipeline loop would be required to reach the proposed ACP delivery points in southern Virginia. Additional new pipeline construction would also be required to reach the delivery points in North Carolina, much of which could be similar to the proposed AP-2 mainline for ACP. The environmental impacts associated with construction of these facilities would likely be similar to or greater than those of ACP, and we have not identified or received any information that suggests the alternative would provide a significant environmental advantage over ACP and SHP. For this reason, and the fact that the current system does not meet ACP's purpose and need,

Z-3305

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

Z-3306

LO129-4
(cont'd)

modification of the Columbia pipeline system is not considered a viable alternative to ACP and SHP.” (DEIS, p.3-5)

And;

“...up to 400 miles or more of new pipeline could be required to reach the proposed ACP delivery points in southern Virginia. Additional pipeline construction would also be required to reach the proposed delivery points in Brunswick County, Virginia (approximately 10 miles) and in southern North Carolina (approximately 170 miles), much of which could be similar to the proposed AP-2 mainline for the ACP.

.....The environmental impacts associated with construction of these facilities would likely be greater than those of the ACP, so these theoretical modifications to the existing Columbia system would provide no environmental advantage over the ACP. For this reason, and the fact that the current system does not meet the ACP’s purpose and need, the Columbia system in the Mid-Atlantic region is not considered a viable alternative to the ACP.” (RR10, p. 10-18)

The aspect of this apparent collusion that is really troubling is that it is not only wording itself, but also the very conclusions, and the rationale for reaching them, that has apparently been lifted from the one document and inserted in the other. This observation must obviously lead directly to the suspicion that the DEIS does not actually reflect the analysis and conclusions re: the ACP by “the Commission’s environmental staff” as claimed (DEIS p. E5-1 and p.5-1), but by the project developers themselves. And if this is (as it appears to be) in fact the case, then the integrity and accuracy of the entire DEIS document must be called into question and ultimately disregarded by both the stakeholder agencies and the public.

Conclusion:

LO129-5

In light of the incompleteness of the data presented in the DEIS, the many instances of conjecture and supposition resorted to in justifying its conclusions, the past willingness of ACP to both submit flawed and misleading survey information and misrepresent the qualifications of the personnel hired to perform them, and the apparent collusion between ACP and the Commission’s subcontractor in its production (that results in favorable treatment of the developer’s analysis and conclusions), neither the Forest Service, any other involved agency, or the general public should accept or base any subsequent decisions on any information contained in it, including its recommendations or conclusions. Furthermore, since previous submissions to the docket record clearly show that this project is, in reality, not needed, there is no valid argument for the public utility and necessity of the project, and no justifiable reason to either expect the Forest Service to lower its standards to allow the project to be constructed through the National Forests, or, for that matter, to allow private property to be taken through eminent domain. In the end, the National Forests in question are, after all, **forests**, not “National Utility Corridors” or “National Economic Opportunity Zones”, and if they are to remain forests, certain safeguards must be carefully and vigorously maintained. For the reasons stated above, I urge

LO129-5 Comment noted.

LANDOWNERS COMMENTS

LO129 – James Bolton (cont'd)

LO129-5 (cont'd) | the Forest Service to reject the proposal that it issue a Special Use Permit for the Atlantic Coast Pipeline and refrain from lowering its standards for managing the lands under its protection.

Respectfully submitted,

James Bolton

Notes:

1. Blackburn Consulting Services, LLC, [Nelson County Report](#), Report Analysis and Field Verification of Soil and Geologic Concerns with the Atlantic Coast Pipeline, March 2017, p.35. (<http://friendsofnelson.com/wp-content/uploads/2017/03/Final-Steep-Slope-Report-March-2017.pdf>)
2. Ibid.
3. Hadwin, Thomas, "Comments by Friends of the Central Shenandoah re: Atlantic Coast Pipeline and Supply Header Project Draft Environmental Impact Statement," submitted March 31, 2017. And; Bolton, James, "Comments of James Bolton on the Purpose and Need for the Atlantic Coast Pipeline", Accession Number: 20170317-5073, submitted March 17, 2017. (<https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14521950>)
4. Wilson, R., Fields, S., Knight, P., McGee, E., Ong, W., Santeen, N., Vitolo, T., Stanton, E., [Are the Atlantic Coast Pipeline and the Mountain Valley Pipeline Necessary?](#), An examination of the need for additional pipeline capacity into Virginia and Carolinas, Synapse Energy Economics, Inc., Cambridge, Massachusetts, Sept. 12, 2016, p.18.
5. Comments Regarding Soils Surveys Conducted to Date, OEP/DG2E/Gas 4, Atlantic Coast Pipeline, LLC, Docket No. PF15-554, November 5, 2015.
6. <http://www.truth-out.org/news/item/40099-firm-hired-by-ferc-to-review-dominion-s-atlantic-coast-pipeline-linked-to-project-s-main-environmental-contractor>

Z-3307

LANDOWNERS COMMENTS

LO130 – Chapin Wilson

Z-3308

**Comments made at FERC Session on the Atlantic Coast Pipeline (ACP) DEIS
Nelson County – February 22, 2017
Chapin Wilson, 6438 Laurel Rd. -- Shipman, VA 22971**

My home is about ¼ mile from the proposed pipeline route, well within the blast zone, and our family has adjacent land that is in the study corridor. My comments address the following in the DEIS: climate change, safety issues and alternative choices that exist in the renewable energy sector. It is disturbing that they are a mainly a reiteration of comments I made nearly 2 years ago at the March 2015 FERC scoping session, and along with many others who made similar comments, were disregarded in the DEIS.

Bad for Climate Change:

LO130-1 | The DEIS sections on climate change are woefully inadequate and conclude that "the project would not significantly contribute to greenhouse gas cumulative impacts or climate change." (pg. 4.513.) This proposed pipeline is not going to be good for climate change. I am so tired of hearing about how natural gas brings us clean energy. There is nothing natural about this gas, no more than coal and oil are natural. Methane is an extraordinarily dangerous greenhouse gas that leaks at every stage of production, processing, storage and distribution. Methane is initially far more devastating to the climate because of how effectively it absorbs heat. In the first two decades after its release, methane is 84 times more potent than carbon dioxide. This pipeline would only exacerbate the rate at which the Earth's atmosphere is already warming and lead to rising sea levels.

Proliferation of Pipeline Accidents:

LO130-2 | Since 2010, there have been 4,215 pipeline incidents, averaging 1.6 incidents per day. These accidents have included 635 fires and 230 explosions, resulting in 100 reported fatalities, 470 injuries and property damage exceeding \$3.4 billion. (Pipeline Hazardous and Safety Materials Administration.) There have been 828 incidents with natural gas transmission and gathering pipelines and 736 incidents with natural gas distribution. In our area, we know all too well about the consequences of a pipeline rupturing in Appomattox in 2008. And -- the ACP is a very large pipeline, so a nearby blow-out would mean that I and my neighbors would be incinerated. Since the Atlantic Coast Pipeline is a Limited Liability Corporation registered in Delaware, does this mean they have no responsibility for any accidents that might occur? Won't they just bankrupt that corporation and open another?

There are Far Superior Alternatives to Pipelines for the Environment and the Economy:

LO130-3 | ACP needs to pursue alternatives in a meaningful way as many other states have done. Virginia lags far behind in solar power, and is currently ranked 39th nationally in solar electric capacity per capita. In 2015, just 10 MW were installed, a \$28 million investment. Compare this to our neighbor North Carolina, ranked 5th nationally. In the same year, Carolina installed 1,140 MW and invested \$1.698 billion. (www.environmentvirginiacenter.org; www.seia.org.) By the way, whatever happened to the windmills Dominion was going to install on the 113,000 acres for which they won a bid off the VA Capes? Once completed, this would produce enough power for 700,000 homes, according to the Bureau of Ocean and Energy Management, which hosted the online auction.

And jobs? Well, the trends for permanent jobs are in the renewable sectors. A recent article in *Forbes*, citing a recent Department of Energy study, reported that more people were employed in solar power

LO130-1 | Comment noted.

LO130-2 | The topic of financial liability is outside the scope of this EIS and is more properly addressed in legal forums. See also the response to comment CO67-15.

LO130-3 | See the response to comment CO66-2.

LANDOWNERS COMMENTS

LO130 – Chapin Wilson (cont'd)

LO130-3
(cont'd)

last year than in generating electricity through coal, gas and oil energy combined. Solar power employed 43% of the electric power generation sector's workforce in 2016, while fossil fuels accounted for just 22%. Solar energy added 73,615 new jobs to the U.S. economy over the past year, while wind added a further 24,650.

By expanding natural gas, the ACP will undermine and delay movement toward clean energy. FERC should abandon its outdated and high risk approach. Contrary to ACP's claims, there are no benefits to the proposed pipeline. Not to my family, not to Nelson County, not to the environment. Only risks that we can't afford.

Z-3309

LANDOWNERS COMMENTS

LO131 – Tyler Bird Paul

To: FERC

From: Tyler Bird Paul for Valley Home Farm, Valley Center, Highland County, VA

Date: 18 March 2017

RE: Atlantic Coast Pipeline

LO131-1 Sections 4.7.1.1 through 4.7.1.4 include updated information and discussions/ consultations with the FWS regarding known roost trees.

LO131-1

I would like to remind you that, according to Rick Lambert, a noted geological expert in Highland and Bath Counties: "A documented Indiana bat roost tree is located 1.33 miles to the west of the Dever Spring recharge area in the proposed pipeline ROW on Big Ridge, located between Townsend and Erwin drafts. A second documented Indiana bat roost tree is located 2.15 miles north of the recharge area. A third documented Indiana bat roost tree is located 1.12 miles to the south-west of the recharge area. A fourth documented Indiana bat roost tree is located 0.10 of a mile south-east of the recharge area on the east side of Back Creek Mountain (McShea & Lessig, 2006). A documented Virginia Big-eared bat hibernacula is locate 1.5 miles north of the Dever Spring recharge area (VHG, 2016)."

This is yet another good reason to seriously reconsider the building the pipeline in this vicinity.

Z-3310

LANDOWNERS COMMENTS

LO132 – Tyler Bird Paul

To: FERC

Cc: Brittany Moody, Greg Park, Emmett Toms, Tom Farrell, Dominion Resources

From: Tyler Bird Paul, for our Valley Home Farm, Valley Center, Highland County, VA

Date: 17 March 2017

RE: The Atlantic Coast Pipeline Route

LO132-1

I would like to remind you of the detailed geological report filed with you in June of 2016 by Rick Lambert, notable geological expert in the Highland and Bath counties of Virginia. [20160602-5266 FERC PDF 6/2/2016 12:30:49 PM]

Mr. Lambert carefully mapped and painstakingly explained the many reasons that the ACP route is not only unsuitable, but will be frankly quite reckless, ruinous and destructive for the delicate terrain and pristine water sources of these counties.

In his report, Mr. Lambert, in particular, warns: *"The center of Little Mountain is made up of non-carbonate sandstones of Ordovician (east side) and Silurian (top and west side) ages. These sandstones trap rainwater. It flows either northeast or southwest depending on the dip of the strata, and escapes at nick points on the mountain where high mountain springs appear. The water flows down gradient until it reaches a soluble karst unit where it sinks and either replenishes the karst aquifer and/or resurges at a karst spring or springs. This happens on both sides of the mountains.*

By proposing to place the pipeline ROW on top of Little Mountain, Dominion is not only putting at risk the high mountain Ordovician aquifers recharging Dever Spring but the Silurian/Devonian aquifers of the west side of Little Mountain. Sediments and pollution laden sediments will not only flow down the east side of the mountain into the high mountain aquifer feeding the multiple springs which

LO132-1

See the response to comments SA12-1 and CO72-1. We received a comment, which included a study that expressed concern that pipeline construction could "behead" karst conduits supplying water to springs. We reviewed the study, and did not find the supporting data that would lead to this potential conclusion. Atlantic's karst consultant concluded that beheading of underground feeder streams is unlikely to occur because the typical trench excavation depth is 10 to 12 feet, which is not likely to intercept underground conduits. We concur with that conclusion.

Z-3311

LANDOWNERS COMMENTS

LO132 – Tyler Bird Paul (cont'd)

LO132-1
(cont'd)

appear at the head of each hollow, but flow down the west side of the mountain into the high mountain aquifers which feed springs on that side. Crossing mountains, made up of karst, perpendicular to the karst can minimize the numbers of aquifers and springs impacted.

The dangers of beheading and sedimentation from construction to karst springs is well documented (MNF, 1981). The impact to the endangered Indiana bat by removal of documented and undocumented roost trees will only increase the stress White Nose Syndrome has placed on this species. The Atlantic Coast Pipeline must not be approved as proposed on Big Ridge or in the Dever Spring Recharge Area. No amount of mitigation or compensation will alleviate this risk.”

Z-3312

LANDOWNERS COMMENTS

LO133 – Tyler Bird Paul

20170322-5022 FERC PDF (Unofficial) 3/22/2017 7:30:07 AM

To: FERC

From: Tyler Bird Paul, Highland County, Virginia

Date: March 22, 2017

RE: The Atlantic Coast Pipeline

We are asking FERC to please not rubberstamp Dominion's proposed plans to build the Atlantic Coast Pipeline. We site for you and support the thoughtful conclusions of the Allegheny-Blue Ridge Alliance, respectfully opposing construction of the ACP:

The proposed pipeline, 600 miles in length, would be 42 inches (nearly 4 feet!) in diameter, requiring excavation of an 8 to 12-foot-deep trench and a 125-foot-wide construction corridor. It would traverse steep mountain slopes and fragile karst topography, presenting a potential hazard to regional water supplies but without benefit to the communities and citizens it would affect.

- Z-3313
- LO133-1 |
 - The ACP is not needed to assure needed future energy supplies. Numerous studies have been conducted, including some by the Federal Government and industry, which conclude there is sufficient capacity in existing pipelines. Furthermore, building new pipelines would be further unnecessary in the longer term because renewables (wind and solar) are the predominate source of new generating capacity being built in the nation.
 - LO133-2 |
 - The ACP will *not* bring jobs and economic benefits to affected communities. The people hired to construct the pipeline would not be local to VA, WV or NC, but would be contracted help from outside the area. The permanent positions created would be miniscule compared to the jobs permanently lost due to businesses that would be disrupted, particularly in the tourism industry. Further, depressed property value and reduced demand for affected real estate would adversely affect localities.
 - LO133-3 |
 - The ACP will devastate the environment of one of the nation's important ecosystems.
 - Threaten the integrity and safety of water supplies in the immediately affected communities and other communities that are dependent upon water originating in the Allegheny-Blue Ridge region;
 - Endanger the structural character and seriously increase the possibility of long-term erosion in the steep mountain terrain through which the routes would pass;
 - Present serious safety risks because of the proven instability of the karst topography that these proposed routes would traverse, as well as the danger of pipeline failures;
 - Harm the habitat of many protected and unique species of plants and animals;
 - Compromise the intended uses of public lands, particularly the Monongahela and George Washington National Forests; and
 - Degrade the usefulness of affected agriculture and forest resources.

LO133-1 See the response to comment CO46-1.

LO133-2 Comment noted.

LO133-3 See the response to comment LO18-1.

LANDOWNERS COMMENTS

LO133 – Tyler Bird Paul (cont'd)

20170322-5022 FERC PDF (Unofficial) 3/22/2017 7:30:07 AM

LO133-4 | The ACP will deprive, by using eminent domain for private gain, private land owners of their property rights.

LO133-4 Comment noted.

Z-3314

LANDOWNERS COMMENTS

LO134 – Tyler Bird Paul

20170322-5114 FERC PDF (Unofficial) 3/22/2017 1:03:09 PM

To: FERC
From: Tyler Bird Paul, Highland County, Virginia
Date: 22 March 2017
RE: The Atlantic Coast Pipeline – Threat to Endangered Species

Cc: Brittany Moody, Greg Park, Emmett Toms

LO134-1

On March 21, 2017, the Rusty Patched Bumblebee was added to the Endangered Species list.

This is an Endangered Species that I believe now needs to be responsibly surveyed for in Highland and Bath Counties. I respectfully request that FERC consider the Rusty Patched Bumblebee as an environmental barrier to the path of the Atlantic Coast Pipeline.

I expect you will find that Dominion, also, will be especially concerned about the bumblebee because of their own Pollinator Initiative. Dominion states in their colorful APC publication that:

LO134-1

Section 4.7.1.16 provides an updated discussion of the rusty patched bumble bee, including potential impacts and avoidance, mitigation and conservation measures.

Z-3315

LANDOWNERS COMMENTS

LO134 – Tyler Bird Paul (cont'd)

20170322-5114 FERC PDF (Unofficial) 3/22/2017 1:03:09 PM

LO134-1
(cont'd)

Atlantic is implementing a pollinator initiative to restore portions of the ACP right-of-way with a variety of plants that attract pollinator species."

And they go on to explain that:

Pollinators are essential for the production of many of the fruits and vegetables that we eat daily. Insects that pollinate, primarily bees and butterflies, have been in decline in large part due to loss of habitat."

I earnestly hope and pray that FERC and Dominion will see clear to protect the habitat of this particularly important and endangered pollinator.

Z-3316

LANDOWNERS COMMENTS

LO135 – Tyler Bird Paul

20170324-5036 FERC PDF (Unofficial) 3/24/2017 8:17:06 AM

To: FERC
From: Tyler Bird Paul, Highland County, Virginia
Date: 24 March 2017
RE: ACP Route threatens Endangered Species

LO135-1

We respectfully request FERC to address the adverse affects that the Atlantic Coast Pipeline will have on the federally endangered Indiana Bat, as well as the Virginia Big Eared Bat and the Brown Bat. Federal listing as an endangered species protects the Indiana bat from being harmed, harassed, or killed and requires federal agencies to conserve the species.

Please see the following excerpts from Mr. John Bruce's article in *The Recorder* (Bath and Highland Counties), 23 March 2017:

More than 90 percent of the two most common bat species in Highland and Bath counties are gone due to [White Nose Syndrome](#), and the proposed [Atlantic Coast Pipeline](#) route would closely brush documented habitat federally endangered bats hoped to return.

A recent survey of bat habitats coordinated by the Virginia [Department of Game and Inland Fisheries](#) found the number of once-common little brown bats was down 99 percent from the previous survey two years ago. The count for tri-colored bats was down 93 percent.

A third species, the federally endangered Indiana bat, "was declining before WNS showed up and is still declining," noted Rick Reynolds, DGIF wildlife biologist.

LO135-1 Sections 4.7.1.1 through 4.7.1.4 have been updated, and include discussions of potential impacts and avoidance, mitigation, and conservation measures.

Z-3317

LANDOWNERS COMMENTS

LO135 – Tyler Bird Paul (cont'd)

20170324-5036 FERC PDF (Unofficial) 3/24/2017 8:17:06 AM

LO135-1
(cont'd)



According to [Virginia Cave Board](#) member Rick Lambert of Monterey, who participated in the survey, a documented Indiana bat roost tree is located less than 300 yards from the pipeline study corridor centerline. The tree is 1.33 miles to the west of the Dever Spring recharge area on [Big Ridge](#), between Townsend and [Erwin](#) drafts. A second documented Indiana bat roost tree is located 2.15 miles north of the recharge area. A third is 1.12 miles to the southwest of the recharge area, and a fourth is a tenth of a mile southeast of the recharge area on the east side of [Back Creek Mountain](#).

A Virginia Big-eared bat hibernacula is 1.5 miles north of the Dever Spring recharge area.

Declining Indiana bat populations, caused by human activity, prompted their listing 50 years ago as "in danger of extinction" under the Endangered Species Preservation Act of 1966. The bat is listed as endangered under the current [Endangered Species Act](#) of 1973.

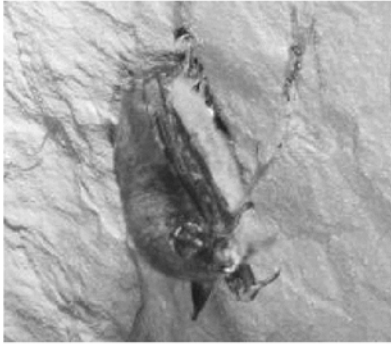
Z-3318

LANDOWNERS COMMENTS

LO135 – Tyler Bird Paul (cont'd)

20170324-5036 FERC PDF (Unofficial) 3/24/2017 8:17:06 AM

LO135-1
(cont'd)



This little brown bat was found alone and suffering from white nose syndrome. (Photo courtesy Rick Lambert)

Listing protects the Indiana bat from being harmed, harassed, or killed and requires federal agencies to conserve the species.

While not a specific threat to some bat species, the proposed pipeline's route could harm the federally endangered one, Lambert explained.

Excerpt from The Recorder, Monterey, Virginia, article by John Bruce, 23 March 2017

Z-3319

LANDOWNERS COMMENTS

LO136 – Teresa Rhodes

20170404-0171 FERC PDF (Unofficial) 04/03/2017

FEDERAL ENERGY REGULATORY COMMISSION ATLANTIC COAST PIPELINE AND SUPPLY HEADER PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below; or (3) electronically filed.¹

ORIGINAL

For Official Mail Filing, Send To:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

As applicable, please indicate project(s) you are commenting on:

- Atlantic Coast Pipeline: Docket No. CP15-554
- Supply Header Project: Docket No. CP15-555
- All of the above

RECEIVED
2017 APR -3 P 4:56
FEDERAL ENERGY REGULATORY COMMISSION

COMMENTOR'S NAME AND MAILING ADDRESS: *(Please Print)*

Teresa Rhodes
2009 Devil's Racetrack Road
Four Oaks, N.C. 27524

COMMENTS: (PLEASE PRINT) *(continue on back of page if necessary)*

Attached

¹ The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at <http://www.ferc.gov> under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account".

Z-33320

LANDOWNERS COMMENTS

LO136 – Teresa Rhodes (cont'd)

20170404-0171 FERC PDF (Unofficial) 04/03/2017

I object to the ACP for many reasons: Just a few are:

LO136-1 The 36 inch diameter transmission pipeline is going through farmland and timberland that has been in my family for over 100 years. My children and grandchildren will not be able to build homes, develop or harvest timber from this land. My daughter wanted to build a home where the pipeline is going. Who

LO136-2 would want a home near a pipeline where there is a constant threat of leakage and explosion?

Family and friends live close by this proposed route and will be impacted even though their land is not involved. According to the Pipeline Safety Trust a 36" pipeline operating at 1460 pounds per square inch has a potential blast radius of 900 to 1000 feet or more on both sides of the pipeline. These people are mothers, daddies, children, family and friends and are living in the so called "sacrifice zones" and blast zones. Would you be willing to sacrifice them for the profits that Duke Energy, Dominion, Piedmont Gas and AGL will make off this pipeline if they were your family? Sacrifice zones are called such because they can use thinner grade, cheaper pipe in rural areas and purchase the land cheaper. A higher grade of pipe is used in densely populated areas. Rural areas should not be sacrificed so these companies can reap the benefits of cheaper construction. The National Transportation Safety Board has found existing pipelines are not all receiving the attention necessary to prevent disasters and tragedies. One tragedy is ONE too many.

LO136-3 Farmers will be impacted for years to come. NC and Johnston County are known for agriculture. An article I read recently was titled "If NC wants to feed itself and the world it needs to save its farms"

Small farmers find it hard enough to make a living. The article quoted "most farmers in NC are working harder for less" and the number of farms are decreasing every year. Crop yield will be impacted for 15-20 years; they are only paying for 2 years of crops. This will impact the income of farmers who already have to face high prices for seeds, chemicals, fertilizers and other costs. Farmers are important to this nation as a food source for animals and people. Thousands of acres of farmland and timberland will be taken. All this for maybe 18 permanent jobs in NC and maybe 5 in Johnston County.

LO136-4 Timberland will never be able to be replaced; this will impact the environment and our children and future generations yield of timberland; as well as impact the natural habitat for animals and wildlife.

LO136-5 The pipeline is going under the Neuse River which many communities and cities get their water supply. Water pollution will be caused by the effect of this pipeline under streams and river crossings and will disrupt the environment. They intend to use a more invasive method for construction for the Neuse River. Open trenching will strip the stream banks of topsoil and trees and excavate part of the riverbed to install pipe. River water will be diverted so as not to stop if from flowing downstream. Trenching and clearing would disrupt wildlife habitat and possibly kill aquatic life. Open trenching could send dirt downstream and increase the sediment which decreases oxygen content of the water and result in fish kills and could put more work on water treatment plants to get the sediment out of drinking water.

LO136-1 See the response to comments CO68-12 and CO80-8.

LO136-2 See the response to comment LO22-5.

LO136-3 Comment noted.

LO136-4 See the response to comment CO80-8.

LO136-5 These impacts, along with the measures to minimize impacts, are discussed in section 4.3.2.6.

Z-3321

LANDOWNERS COMMENTS

LO136 – Teresa Rhodes (cont'd)

20170404-0171 FERC PDF (Unofficial) 04/03/2017

LO136-5 (cont'd) | Our clean water for drinking is important. We cannot live without water. This pipeline will also go under our water lines in the county .

LO136-6 | The DEIS (Direct Environment Impact Statement) said that long term cumulative Impacts would occur on forested wetlands and forests and associated wildlife habitats.

LO136-7 | Methane Gas is a colorless, odorless gas that is the primary component of natural gas and is a major greenhouse gas; Methane is 21 times more powerful than carbon dioxide, byproduct of coal, in absorbing and keeping heat in the atmosphere. It stays in the atmosphere about 9-15 years and contributes to climate change. (NHI) Natural gas is not cleaner and does not reduce greenhouse gases.

LO136-8 | Some leakage and venting is normal for natural gas pipelines and this can seep into ground water, wells and affect the environment. Many times since natural gas is odorless the only evidence of leakage is dead vegetation.

LO136-9 | Scientists say that the amount of natural gas in the underground shale in West Virginia has been exaggerated by these companies and will not last the projected 20 years. This is to be a high pressure transmission line with no taps and will be for the benefit of these companies at a great cost to our communities;

LO136-10 | Flooding: this concerns me in areas where the pipe line is routed; This 36 " diameter pipeline is going under roads and fields that have potential to flood. We know this county has had (2) two 100 year floods in the past 20 years. In October, 2016 roads were breached due to flood waters. What will happen to the pipelines when the flood comes?

LO136-11 | Eminent Domain: These companies can take your land by eminent domain if you do not wish to sell. This pipeline will be for the profit of these big businesses and their shareholders. Not for the residents of our county and state. They require a permanent easement of your property; you will still have to pay taxes on this land forever and they will have the easement forever even when the natural gas runs out. I feel like the consumers will be paying for the \$6 billion construction of this pipeline with rate hikes. Who knows what the cost of maintenance if an explosion occurs?

Eminent domain by private companies should not be allowed.

LO136-6 | Comment noted.

LO136-87 | Air quality impacts are discussed in section 4.11.1.

LO136-8 | Comment noted.

LO136-9 | See the response to comment CO46-1.

LO136-10 | We have taken flooding into consideration.

LO136-11 | Comment noted.

Z-3322

LANDOWNERS COMMENTS

LO137 – Randy A. and M. Kathleen Forbes

Randy A. and M. Kathleen Forbes
503 Tunnel Hill Road
Millboro, Virginia 24460

April 2, 2017

Mr. Nathaniel J. Davis, Sr Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Docket #CP15-554-000 & CP15-554-001
Proposed Atlantic Coast Pipeline

Dear Mr. Davis,

LO137-1

We are writing to express our concerns with the DEIS for the proposed Atlantic Coast Pipeline. As I stated in my comments to FERC on February 28, 2017 in the public comment session, there seems to be a theme to rush through the review process for this proposed project and it shows in this DEIS. There is such a vast amount of missing information; it makes us all wonder why it was printed in the first place. How are we to evaluate and comment intelligently on studies and information that is simply not available, yet is relevant to your decision making process?! And a good bit of what IS there is incomplete or inaccurate. I expected much better from FERC. I expected a thorough and ethical review of all submissions. This DEIS is so general in its conclusions, it seems to have been cut and pasted from a master document with very few nods to the comments submitted by landowners and other stakeholders. It seems, in fact, to agree entirely with submissions of the applicant without seriously considering the many concerns, comments and studies submitted by the very people who know this land intimately. It glosses over very real consequences to building in this mountainous, karst-riddled terrain by saying environmental damage will be "unlikely", "temporary", "minor", "mitigated by the applicant" and, probably the most overused, "not significant." I lost track of how many times FERC considered the destruction of our pristine environment "not significant." I know a lot of people who live here who would disagree with that flippant assessment.

LO137-1 See the response to comment CO6-1.

Z-3323

LANDOWNERS COMMENTS

LO137 – Randy A. and M. Kathleen Forbes (cont'd)

Z-3324

LO137-1 (cont'd) | I predicted in my February 28th comments that ACP would submit requested information in filings very close to the April 6th deadline, not allowing enough time to be reviewed and commented on by others. These late submissions and other missing information/studies should be included in the DEIS. Since it is not, we respectfully request that the DEIS be revised and the comment period extended to allow an opportunity for stakeholders to respond appropriately. We fail to see how FERC can make a decision before that happens.

LO137-2 | This document fails to provide evidence of the need for this project. Others have addressed this topic in length and more detail than I will here, but I agree that the applicant using their own contracts as proof of public need is insufficient to balance out the environmental & socioeconomic damage the ACP will produce. Their own unwillingness to pay others (Transco, et al) to supply gas for their proposed LNG power plants will only be forcing captive customers to pay for their unnecessary pipeline. Making money is a powerful motivator for any large company, and the prospect of a 14-15% rate of return is an attractive investment, but existing pipelines with minor adjustments makes much more sense for the public and are sufficient for their actual needs. ACP's assertion that their supply can only be provided by this pipeline is misleading. And the taking of property through eminent domain for private company gain is criminal and will likely be litigated as such if approved.

LO137-3 | In analyzing the DEIS and its arguments for the current route, I am still aghast that they think it is a good idea to come through the mountains in this region. ACP has especially seemed to dig its heels in about the GWNF-6 alternate route, even though it was rejected completely when the idea of this pipeline was still germinating in Dominion offices. They touted it as too dangerous, too expensive, admitted they would be unable to stabilize our steep mountainsides, etc. Being committed to a bad idea still makes it a bad idea! It seems they were surprised when they were routed out of the National Forest in Highland County. Their lack of foresight in exploring other options seemed to panic them and they just fell back on this same bad idea. I was dismayed to read FERC's circular logic in their analysis of the current route, alternate routes and other options. The only one that makes sense to us is the No-Action Alternative. The reason FERC couldn't find another route that didn't offer "significant advantages over the current route" is because there isn't one—this area is not conducive to pipeline

LO137-2 See the response to comment CO46-1.

LO137-3 Comment noted.

LANDOWNERS COMMENTS

LO137 – Randy A. and M. Kathleen Forbes (cont'd)

Z-3325

| | |
|---------|---|
| LO137-4 | building—ANYWHERE! Hence, why it's such a bad idea in the first place. There is a reason why no pipelines have been built here before—our predecessors had better common sense than we seem to have today! There is just simply no good way to cross these mountains without massive damage to the environment—including to the air, water, wildlife, forests, and humans. I reject FERC's conclusions that they will be "not significant." There are plants and animals in this area that I have never seen elsewhere. To say that a survey crew can come through in a few hours and document everything that is in the path of this monstrosity is not performing our due diligence to this unique area. And to perform any in-depth studies later, after the comment period, illustrates a need for change in this review process. |
| LO137-5 | This pipeline, if approved, will destroy our property as we know and love it. It will wipe out approximately 5 acres of mature hardwood forest that serves as a privacy barrier and contributes significantly to the solitude and serenity of our property. The ROW will allow trespassers easy access to our land and has in fact already promoted vandalism related to the path. The loss of these trees is something we can never replace or see again in our lifetime. Now, we learn that not only will the construction ROW be 125 feet but that extra work spaces will take another 25-50 feet! There was no mention of this before and according to a map mailed to us from ACP, in one place where two work spaces overlap, the temporary ROW will now remove a 175+ foot wide swath of trees! Their map also shows the construction ROW cutting through two springs that they were shown during their survey but are not noted on their maps or in the DEIS. |
| LO137-6 | |
| LO137-7 | It took us two years of searching to find this land and over 20 years of sacrificing and saving to purchase. We had hoped to retire there. Now, if approved, FERC will have allowed ACP to steal this haven from us & completely destroy it. It will no longer hold the value for us that it once did. FERC is incorrect in its conclusion that the pipeline will not affect property values; it has, in fact, already done so. I know of several properties for sale that have been passed over simply because of the possibility of this pipeline. I wouldn't buy land with the ACP running through it—given the choice I would look elsewhere—and that is just what is happening here now. In order to sell these properties, the price will have to be drastically reduced to overcome objections to the pipeline's presence. The DEIS mentions literature searches to support their conclusion of an "insignificant" effect on real estate values, but studies funded by the gas industry on this topic are hardly |

- LO137-4 See the response to comment LO18-1.
- LO137-5 See the response to comments CO68-12 and CO80-8.
- LO137-6 As discussed in section 4.3.1.5, we are recommending that Atlantic complete the remaining field surveys for wells and springs within 150 feet of the construction workspace, and within 500 feet of the construction workspace in karst terrain, and file the results, including type and location, with the Secretary prior to construction.
- LO137-7 See the response to comment LO89-4.

LANDOWNERS COMMENTS

LO137 – Randy A. and M. Kathleen Forbes (cont'd)

Z-3326

| | |
|---------|---|
| LO137-7 | unbiased and certainly don't testify to our local reality. I've been told that local real estate agents will be making comments to FERC on this topic and it is my hope that FERC will take them seriously. |
| LO137-8 | The DEIS also seems to skim over the topic of safety. Although FERC and the industry promote the idea that an explosion is a rare occurrence, when explosions do occur, they are devastating. It has been proven that the more recent installations are also the most accident prone. Given the challenges of the topography, the size of the pipe (& the fact that a pipe of this size has never been put through terrain this steep), the fact that it has been discovered that ACP will be utilizing cheap Korean steel for the pipe, and the push to rush the process and installation, I am not so confident as the DEIS that this pipeline would be safe. I would say that we are being set up for the perfect storm, and it won't be a matter of "if" but "when." This area in Bath County is surrounded by National Forest and serviced by narrow, winding roads. Most places in the area of the pipeline path have one road in and out. A good portion of that road, especially Deerfield Road in Bath & Augusta counties, is in the Blast Zone. An explosion scenario here would be the stuff of nightmares. The ability of our small group of volunteer firefighters to fight a forest fire (as it would most assuredly become) of those proportions with extremely limited access is doubtful; they have neither the manpower nor the resources. The loss of life and property would greatly exceed the pipeline path. (Think destruction on the level of the fire in the Great Smoky Mountains near Dollywood last year.) On a more personal level, the pipeline path crosses the front of our property, cutting us off from the only road in and out of the area. With a near vertical mountain behind us, we would be trapped (assuming we survived an initial explosion) with no means to escape. I don't consider that "insignificant." WE and our neighbors are not "insignificant"! I'm pretty sure all of Deerfield Road should be considered a high consequence area, yet it is not noted as such in the DEIS. |
| LO137-9 | This DEIS was a great disappointment. It completely ignores the impact on climate change and FERC's responsibility to consider this project's massive contribution to it, as is required by NEPA. At what point do we say "enough is enough"?! When are there ENOUGH pipelines?! When do we stop destroying our environment for our human greed? I realize how easy it is, living in the city and commuting to the suburbs, to become disconnected to the environment & to understand it's impact in your daily lives. Here in the mountains, we live with |

- LO137-7 See the response to comment LO89-4.
- LO137-8 We disagree. See the responses to comments CO67-14 and CO48-2.
- LO137-9 See the response to comments CO55-3 and CO55-4.

LANDOWNERS COMMENTS

LO137 – Randy A. and M. Kathleen Forbes (cont'd)

LO137-9
(cont'd)

nature everyday and we can point to the spot where the spring that feeds the rivers that run through your city begins. The ACP will be plowing through many of these springs and streams. To think that this project will not have a far-reaching effect is either naïve or willfully ignorant. To think that removing so many acres of trees in a massive forest will not have a significant impact downstream is inaccurate. To think that disturbing delicate ecosystems and the plants and creatures that live there will have no effect on everyone beyond the pipeline path is misinformed. To think that the methane released from the fracking process that this pipeline would support will not have a harmful effect on, not only our state, but our world, is a crime against humanity, because the future of humanity is at stake. That might sound a little dramatic, but FERC's refusal to consider this project within the scope of all projects is exactly the mindset that contributes to this slide into irreversible environmental destruction; the cumulative effects of these projects DO MATTER! We cannot continue to damage our environment and not bear the consequences. There is a tipping point where our world cannot sustain what we are doing to it and I fear we are nearing it at a faster and faster pace. If we don't put a halt to these unnecessary projects like the ACP, that are so detrimental to the air we breathe and the water we drink, we will have left our children living on borrowed time simply because a few people want to pad their stock portfolios now. It's time to draw a line to protect instead of destroy our few remaining natural spaces and reverse this trend.

This DEIS needs to be rewritten to include all of the pertinent information or, better yet, please just deny the permit for the ACP. It's still a bad idea.

Respectfully,

Randy and Kathleen Forbes

Z-3327

LANDOWNERS COMMENTS

LO138 – Beverly S. Lacey

Z-3328

Beverly S. Lacey, Nellysford, VA.
Atlantic Coast Pipeline/Docket # PF15-6
Re: inadequate DEIS

Blue Heron Farm
1272 Glenthorne Loop
Nellysford, VA 22958
April 5, 2017

Nathaniel J. Davis, Jr.
Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE.
Room 1A
Washington, DC 20426

Re: Docket #CP15-554-000 (ACP)

- LO138-1 | As landowner on an alternate route of the ACP, I am very concerned about the incomplete Draft Environmental Impact Statement for the proposed Atlantic Coast Pipeline FERC released. While it includes hundreds of pages of information submitted by the applicant, much specific and detailed information submitted by individuals and local citizen groups regarding potential impacts has been omitted. In its place is a cursory statement of a general issue, and dismissal of the issue as "insignificant."
- This deprives members of the public and local, state and federal agencies of critical information necessary to evaluate and comment on the environmental impacts of the proposed pipeline. This includes impacts on cultural and historical resources, steep slopes and slope failures, roads, bridges, emergency services and economic impacts to businesses, communities and landowners.
- LO138-2 | Most critical, however is the absence of any detailed analysis for the purpose and need for the project that is also clearly required by the National Environmental Policy Act.
- LO138-3 | In addition, Atlantic Coast Pipeline LLC subsequently submitted more than 100 additional filings after the DEIS was released, most of which contain environmental information that could have and should have been included in the DEIS.
- I request that FERC
- 1) create a revised DEIS that includes the aforementioned information, and
 - 2) re-set the comment and review clock so that concerned members of the public and federal, state, and local government authorities can have a full 90 days to review and comment on the revised DEIS.

Thank you for your time.

Beverly S. Lacey
1272 Glenthorne Loop
P.O. Box 713
Nellysford, VA
22958

- LO138-1 | See the response to comment CO6-1.
- LO138-2 | See the response to comment CO46-1.
- LO138-3 | See the response to comment CO6-1.

LANDOWNERS COMMENTS

LO139 – Berkeley Laury

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St., NE
Washington, DC 20426
RE: Atlantic Coast Natural Gas Pipeline: Docket #CP15-554-000

April 4, 2017

Dear Federal Energy Regulatory Commission and Ms. Bose,

LO139-1

I want to know who is going to watch all these workers at the proposed ACP compressor station in Union Hill, Buckingham, Virginia? Also, what if some of the workers cause trouble? Can we get them off our land if some one does the wrong thing? How long will it take the workers to build it? Will ACP pay for going across your land? If someone gets sick from the compressor station emissions, will ACP pay the doctor bill? How is it going to affect the deer and other game?

All these questions are not answered in the FERC DEIS. They must be before anything goes forward on this project.

Berkeley Laury
1048 Shelton Store Rd.
Buckingham, VA 23921

Mailing address:
1048 Shelton Store Rd.
Wingina, VA 24599

LO139-1

The anticipated project construction schedule is provided in section 2.4, although this is dependent upon many factors and is subject to change. The Landowner Complaint Resolution Procedure is discussed in section 4.8.3, and the landowner easement process is discussed in section 4.8.2. Wildlife and special status species are discussed in section 4.5 and 4.7, respectively. Air quality and potential health impacts are discussed in section 4.11.1. The topic of financial liability is outside the scope of this EIS and is more properly addressed in legal forums.

Z-3329

LANDOWNERS COMMENTS

LO140 – Janice Jackson and Chapin Wilson

Z-3330

April 5, 2017

Janice Jackson and Chapin Wilson
6438 Laurel Rd
Shipman, VA 22971

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington DC 20426

RE: DEIS of the Atlantic Coast Pipeline: Docket No. CP15-554-000

We live adjacent to the East of Lovingson route in Nelson County, family land is in the study corridor, and we are in the "blast zone." We gave comments at the Nelson County listening sessions and now are submitting additional comments about the personal impact of this proposed pipeline, and its negative effects on natural, cultural and historical resources in our area, Dutch Creek and Wheeler's Cove.

LO140-1 | The DEIS ignored significant input that was submitted by citizens like us, interest groups, businesses and local governments, and there are glaring gaps in information. Subsequent to the DEIS' publication, ACP went on to issue more than 6,000 of pages of supplements and revisions (some as recently as last week) that were never incorporated into FERC's analysis. It is impossible for citizen stakeholders to participate meaningfully in the comment process when the DEIS is so incomplete and the information provided by Dominion remains a moving target.

In light of this, we ask that you rescind the DEIS and issue an updated version that provides a fair process for affected landowners and multiple stakeholders to provide input.

LO140-2 | One of the areas where we have previously raised concerns with FERC is environmental impact. The DEIS concludes that "construction and operation of ACP would result in temporary and permanent impacts on the environment" and that "we have also determined that constructing the pipelines in steep terrain or high landslide incidence areas could increase the potential for landslides to occur." But then the DEIS essentially dismisses these concerns and treats them as mitigatable, at one point saying that specific mitigation measures would *reasonably* reduce the environmental impacts resulting from construction and operation of ACP..." Reasonable to whom, we ask? How can erosion and the resulting negative impacts be mitigated?

Below are the key points that we have previously submitted and are submitting once again to counter FERC's conclusions.

LO140-3 | This area contains one of the largest, least fragmented, intact forests east of the Blue Ridge. It has been identified by the Virginia Department of Conservation and Recreation as worthy of protection. This interior forest core hosts numerous migrating and nesting birds, including the Cerulean Warbler, one of the bird species that is most at risk of extinction without significant conservation actions to reverse declines and reduce threats.

LO140-1 | See the response to comment CO6-1.

LO140-2 | Refer to section 4.1.4.2 for a discussion of the mitigation measures that would be utilized in steep slope areas.

LO140-3 | Comment noted. Refer to section 4.5.6 for a discussion of interior forest fragmentation, and appendix S for species-specific impacts and mitigation for the cerulean warbler.

LANDOWNERS COMMENTS

LO140 – Janice Jackson and Chapin Wilson

Z-3331

| | |
|---------|---|
| LO140-4 | <p>It is an area that the USGS says is 100% landslide prone. Much of the route has slope steepness of 25% – 40%, and greater than 40% in several sections up to and down from Thoroughfare Gap and Bailey and Peavine Mountains. The ACP would level narrow ridgetops and use steep roads for access, leaving vertical slopes prone to severe erosion, especially during heavy rainstorms that are common in the County, putting people, property and water quality at extreme risk.</p> |
| LO140-5 | <p>The route would parallel and cross Dutch Creek and Falls Creek, which are major tributaries of the Rockfish River that flows into the James River thence the Chesapeake Bay. Disturbances in these creeks will eventually affect the Bay. Water bodies in the National Wetland Inventory and 100 year floodplains would need to be crossed.</p> |
| LO140-6 | <p>Much of the area is part of the Dutch Creek Agricultural Forest District (AFD), which brings extensive restrictions against development of land to a "more intensive use," requiring a detailed review process to approve or deny proposed changes. FERC concludes in the DEIS -- without any consultation with the Nelson County AFD Advisory Committee or any local authority, and without presenting any analysis -- that the intrusion into the Dutch Creek AFD by the ACP "would not result in a significant or diverse effect on agricultural and forestal lands enrolled as a Virginia Agricultural and Forestal District."</p> <p>We request a more thorough assessment of landslide risks in Nelson County, and impact of mountain top removal and on wetland and stream crossings, and a detailed inclusion of the Dutch Creek Agricultural Forest District restrictions that would be violated.</p> |
| LO140-7 | <p>Our community has also submitted information about the historical and cultural significance of this area. The DEIS concludes that environmental justice populations would not be disproportionately affected by the pipeline. Here, the proposed route and access roads would go through land of families who are descendants of Jamaican slaves, Cherokees, and Irish/German immigrants. There is land that has been on record with the current family since the mid-1800's, who have worked and shepherded it for 7 generations. Now, for-profit companies want to seize and desecrate their property.</p> <p>We have brought attention to the deep cultural attachments to the natural, physical and spiritual environment that this family and others in Nelson County have developed. FERC dismissed this in the DEIS, by saying that "We do not anticipate any negative impacts on the Nelson County community's cultural attachment to the landscape." This statement is made without doing any kind of cultural assessment. We find this to be non-responsive and insulting. We have repeatedly stated that cultural attachment is non-economic and non-transferable, and that its loss cannot be mitigated through monetary compensation or by the receipt of comparable land.</p> <p>The route would also traverse the length of an area formerly known as "Indian Cove." The original railroad bed of the Alexandria and Orange Railroad route is proposed to be a major access road.</p> <p>None of these concerns were addressed in the DEIS. We once again request that FERC consider the historical and cultural significance of this area.</p> <p>As affected community members, we could not disagree more with the conclusions in the DEIS that impacts on the natural and human environments during construction and operation of its facilities would be minimized. With so many gaps and so much missing information, and with thousands of subsequent pages that were not included in the DEIS analysis, how could FERC possibly come to these conclusions? We reiterate – rescind the DEIS and issue an updated version. This is the only reasonable and fair action that FERC can take.</p> |

LO140-4 Comment noted. See also the response to comment LO18-1.

LO140-5 Comment noted.

LO140-6 An explanation for the conclusion was presented and, in summary, notes that while the permanent right-of-way would result in the conversion of forest land to open land, this would not result in the development of a more intensive use or rezoning to a more intensive classification. The landowner may choose to cultivate the converted open land as agricultural land, and Atlantic would compensate the landowner for the loss of the trees. Areas outside of the permanent right-of-way would be able to continue within the pre-existing land use following construction. Operation of the project on the parcel would be of an equivalent or lower intensity than the activity it would replace.

Also see the response to comment PM1-51.

LO140-7 See the response to comment LO43-1.

LANDOWNERS COMMENTS

LO141 – Carson and Bonnie Ralston

April 3, 2017

ORIGINAL

FILED
2017 APR 19 10 19
FEDERAL ENERGY REGULATORY COMMISSION

Mr. Nathaniel J. Davis, Sr.
Deputy Secretary, FERC
888 First Street NE, Room 1A
Washington, DC 20426

FERC Docket # CP15-554-000 Atlantic Coast Pipeline

Dear Mr. Davis,

LO141-1 Enclosed is information regarding the Wellhead Protection Area around the Deerfield, Virginia well. This is a public well that serves the surrounding community. The proposed Atlantic Coast Pipeline passes through this Wellhead Protection Area, less than a mile from the actual well. The pipeline also crosses Hamilton Branch (approximate milepost 107.5), a sinking stream, which is a major contributing source to the public well.

Considering the karst topography of this area, we are concerned that the public water supply of Deerfield, Virginia will be effected if the proposed Atlantic Coast Pipeline is located within this Wellhead Protection Area. Augusta County has a Source Water Protection Ordinance to safeguard all its public water supplies.

Please reference the enclosed map showing both the Deerfield Wellhead Protection Area and the proposed Atlantic Coast Pipeline route. Also enclosed is the complete report, Delineation of a Wellhead Protection Area for the Deerfield Well, completed by Emery & Garrett Groundwater Investigations, LLC.

Thank you very much,

Carson Ralston
Bonnie Ralston
Carson and Bonnie Ralston
3441 Deerfield Valley Road
Deerfield, VA 24432

The attachments to this letter have been reviewed by FERC staff and can be found on the FERC eLibrary site under FERC Accession No. 20170406-0026.

LO141-1 The text of section 4.3.1.4 has been revised to state the project would cross the Zone 2 wellhead protection area for the Deerfield Well.

Z-3332

LANDOWNERS COMMENTS

LO142 – Rob Boyette

Rob Boyette, Lucama, NC.
Statement by Commissioner Rob Boyette
Monday, March 6, 2017
Wilson County Board of Commissioners Meeting – Concerns of the Public

I want to thank the citizens of Wilson County who came before our board tonight to voice their concerns over the Atlantic Coast Pipeline. Your opinions are always welcome at our meetings. The pipeline enters our county north of Sims and exits near Kenly. This stretch of the line is considered to be in a rural area. Some residents in the area are in support of the pipeline; as evidenced tonight, others stand in opposition.

All residents can make the best decisions for them and their families when they have been properly informed. I believe two specific areas must be addressed before the Federal Energy Regulatory Commission decides on the pipeline's future.

LO142-1 1. Statements made by government officials, pipeline owners, and their marketing agents that the pipeline will spread natural gas throughout our county and region are not true. In western Wilson County, no infrastructure is in place to distribute gas. Furthermore, no funding is available for such distribution, and no private or public utility has existing plans to create distribution in this area.

LO142-2 2. Research indicates the possibility that the quality of materials and methods used in "rural" areas may be different from that used in urban or more developed areas. I believe that rural citizens in our county deserve the same quality protection as any other residents. Safety and security for our citizens must not be compromised for the sake of producing a cheaper pipeline.

Again, I respect the rights of landowners to make their own decisions regarding the future of their property. My statement tonight is in support of transparency and truth in any decisions made regarding the Atlantic Coast Pipeline.

LO142-1 See the response to comment CO46-1.

LO142-2 As described in section 4.12.1, area classifications are based on population density in the vicinity of pipeline facilities, and specify more rigorous safety requirements for populated areas. In addition, the list of HCAs included in section 4.12.1 of the EIS follows the DOT rules that define a HCA as an area where a natural gas pipeline accident could do considerable harm to people and their property, and requires an integrity management program to minimize the potential for an accident. This definition satisfies, in part, the Congressional mandate for DOT to prescribe standards that establish criteria for identifying each natural gas pipeline facility in a high-density population area. We do not have the authority to require pipe thicknesses beyond what the DOT requires. Per DOT regulations, Atlantic and DETI would be required to design and construct the pipeline based on identified area classifications and HCAs at the time of construction. If a subsequent increase in population density adjacent to the right-of-way results in a change in class location for the pipeline, Atlantic and DETI would reduce the MAOP or replace the segment with pipe of sufficient grade and wall thickness, if required to comply with DOT requirements for the new class location.

Z-3333

LANDOWNERS COMMENTS

LO143 – Peter Blake

Peter Blake, Richmond, VA.
April 5, 2017

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Atlantic Coast Pipeline docket#: CP15-554
Dear Ms. Bose,

LO143-1 | I want to express my opposition to this project. I am particularly concerned about the impact on the historic farms along Valley Center Road in Highland County. The proposed mountain-top removal will cause lasting damage to water resources on which the farms depend. Our family has farmed in the region for generations.

LO143-2 | We purchased 160 acres in the area over 10 years ago and want to see that our water resources and superb mountain views are preserved for years to come. The pipeline path jeopardizes our water, our property values and the livelihood of dozens of our friends and families.

LO143-3 | I do not believe that the private benefit for shareholders outweighs the prosperity of our community and urge you to deny the application for the pipeline through our community. Sincerely,

Peter Blake
8847 Riverside Drive
Richmond, VA 23235

616 Shady Lane
Monterey, VA 24465
Pablake88@gmail.com

LO143-1 Potential impacts, and measures to reduce impacts, on water resources are discussed in section 4.3.

LO143-2 Comment noted.

LO143-3 Comment noted

Z-3334

LANDOWNERS COMMENTS

LO144 – Janice Jackson

Z-3335

2017 02 18 Janice Jackson-Cultural and Historic

From: Janice Jackson <jjacksonconsult@earthlink.net>
To: 'Robert Carter' <robertcart@gmail.com>; Andy Wright <DutchCreekFarm@aol.com>
Cc: 'Helen Kimble' <hkhelenkimble@gmail.com>; Marilyn Shifflett <mmsedit@aol.com>
Sent: Sat, Feb 18, 2017 10:26 am
Subject: RE: Nelson Historic and Cultural References in DEIS

LO144-1

Bob -- Here you go. References to historic, cultural and archaeological sites and issues in Nelson, plus some related generic content that you will probably want to review. Not sure if you have the printed or DVD version of the DEIS, so am giving a couple of citations. There may be some additional key words I didn't select that you'll want to try. Already did key word search for: Nelson County; Wingina; Warminster, Rockfish and Norwood-Wingina historic districts; African American; cultural resources; cultural attachment; archaeological; Camille; NHPA; SHPO (see notes on those 2 below.)

Volume 1:

Generic References:

Cultural Issues and Concerns Raised:

Table 1.3-1 on page 1.18, page 60 on DVD, lists several cultural resources raised during public scoping.

Section 106:

Generic discussion on pg. 1.22-23, pgs. 64-65 on DVD.

Construction and "Restoration" Plans:

Table 2.3.11, pg. 2-27, pg. 99 on DVD. Plans for Unanticipated Discovery of Historic Properties or Human Remains

Section 2.3.2.1, pg. 102 on DVD. Survey and staking of cultural resources

Section 2.5.5, pg. 123 on DVD. Post-Approval "Variance Process"

Routing Sections:

Section 3.36 on pages 3.25 – 3.28, starting on page 151 on DVD. In depth discussion and map of route alternatives in Wingina. Discussion of the Warminster District and mausoleum on pg. 3-27.

Section 3.41, pages 3.44 – 3.48 address the Spruce Creek Route variation in the Rockfish area, with specific references to the historic district on page 3.44 and 3.47, pages 170 and 173 on DVD.

Cultural Resources:

Very key Section 4.10, starting on page 4.414, page 597 on DVD. Starts out with general discussion on treatment of historic properties and how they would be mitigated.

LO144-1 Comments noted.

LANDOWNERS COMMENTS

LO144 – Janice Jackson (cont'd)

Z-3336

LO144-1
(cont'd)

Construction and operation of ACP and SIIP could adversely affect historic properties (i.e., cultural resources listed or eligible for listing in the NRHP). These historic properties could include prehistoric or historic archaeological sites, districts, buildings, structures, and objects, as well as locations with traditional value to Native Americans or other groups. Such historic properties generally must possess integrity of location, design, setting, materials, workmanship, feeling, and association, and must meet one or more of the criteria specified in 36 CFR 60.4. Direct effects could include destruction or damage to all, or a portion, of an historic property. Indirect effects could include the introduction of visual, atmospheric, or audible elements that affect the setting or character of a historic property.

If a historic property would be adversely affected by the projects, avoidance or other mitigation would be proposed. Avoidance might include, but would not be limited to, realignment of the pipeline route, relocation of temporary workspace, use of boring, or changes in the construction and/or operational design. Mitigation might include the systematic professional excavation of an archaeological site, the preparation of photographs and/or measured drawings documenting standing structures or other historic features, or the use of landscaping or other techniques that would minimize or eliminate effects on the historic setting or ambience of standing structures or other resources.

Virginia discussion starts on page 4.418. See Chart 4.10.1-2 of NHRP-eligible or unevaluated cultural resources sites, starting on page 4.420, DVD pg. 603, and particularly 4.422 for Nelson.

Historic Districts:

Starts on page 4.424, page 607 on DVD, with mention of Warminster, Rockfish and Norwood-Wingina districts.

We received numerous comments, including letters from the Nelson County Historic Society, about possible project impacts on the Warminster Rural Historic District, a property located in Nelson County, Virginia and determined eligible for listing in the NRHP in 2015. Atlantic surveyed the historic district for

LANDOWNERS COMMENTS

LO144 – Janice Jackson (cont'd)

LO144-1
(cont'd)

ACP and recommended that it retains sufficient integrity to remain eligible for listing; the VDHR agreed with this recommendation. Since Atlantic's survey, the Nelson County Historical Society filed a comment letter along with supporting material reporting that the VDHR Evaluation Committee approved an expansion of the NRHP-eligible boundary of the Warminster Rural Historic District. The newly drawn boundary now includes historic African-American properties, such as the Woodson Store, the Black Odd Fellows Hall, five cemeteries, and African-American homes. The pipeline corridor now crosses approximately 2.3 miles of the Warminster Historic District. Atlantic has committed to assess potential effects of ACP on the historic district, consult with the VDHR and other interested parties as needed, and make recommendations for further evaluation or mitigation of adverse effects.

Cultural Attachment:

Nelson addressed in an incredibly insulting way on page 4.426, DVD page 609.

We received multiple comments regarding cultural attachment. The letters requested that the FERC conduct an assessment of the cultural attachment that residents of Nelson County, Virginia experience, and consider whether this experience is threatened by ACP.

Historic preservation laws and regulations do not require an assessment of cultural attachment, and do not recognize a property type defined by cultural attachment. The laws do, however, recognize several property types that can convey the experience of cultural attachment, such as historic districts, historic landscapes, and traditional cultural properties. The FERC would review, in consultation with state and federal agencies as well as stakeholders, adverse effects on historic properties, including the several historic districts, in Nelson County. Because the historic districts are primarily comprised of aboveground structures, and the main facility of the project is an underground pipeline, the chief adverse effect to historic districts would be alteration of the setting such as the altered view because of the visible pipeline corridor. **We do not anticipate any negative impacts on the Nelson County community's cultural attachment to the Cultural Landscape.**

Z-3337

LANDOWNERS COMMENTS

LO144 – Janice Jackson (cont'd)

Z-3338

LO144-1
(cont'd)

Communications:

Page 4.434, pg. 617 in DVD, mentions Nelson:

Nelson County Historical Society, Augusta County Historical Society, Preservation Virginia, and the Rockfish Valley Foundation have requested copies of cultural resources investigation reports completed for the project in Virginia. These reports are not available to the public because they contain information about the location and significance of archaeological sites, protected by section 304 of the NHPA. Atlantic is assisting these stakeholders by consulting with the VDHR, which would coordinate the sharing of survey reports following the signing of confidentiality agreements with the organizations.

SHPO Consultations:

Pg. 4.432-4, DVD page 615. Note – there are other references to SHPO throughout Volume 1, if you want to do a word search.

Compliance with NHPA:

Section 4.10.7, pg. 4-438-9, pg. 621 on DVD provides general discussion. Other references throughout Volume 1.

Conclusions:

Section 5.1.10 gives summary of Cultural Resources, pages 5.21 -5.22, DVD page 718. Mentions Nelson County and Warminster and Rockfish Historic Districts.

Camille:

Brief mention of Camille in the Geology Section 4.1, pg. 4-29, pg. 212 on DVD.

VOLUME II:

Route Maps:

Might want to take a look at latest routes through Nelson, Maps 50 -56, starting on pg. 194 on DVD

LANDOWNERS COMMENTS

LO145 – James R. Bolton

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

April 4, 2017

James R. Bolton
312 Perry Lane
Lovington, VA 22949

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments of James R. Bolton, intervener, Re: the Draft Environmental Impact Statement for the Atlantic Coast Pipeline and Supply Header Project (Docket Nos. CP15-554-000, CP15-554-001, and CP15-555-000 FERC/EIS-0274D)

Deputy Secretary Davis and Members of the Commission;

As required by the National Environmental Protection Act (NEPA), a detailed and objective analysis of the effects of any major federal action with the potential to affect the environment must be undertaken to identify and thoroughly analyze the potential environmental impacts of such a project. In December of 2015, your Commission released the Draft Environmental Impact Statement (DEIS) for the Atlantic coast Pipeline (ACP) and associated Supply Header Project that purports to be the first step in the fulfillment of this requirement, and has invited public comment on the document. The present comment has been produced in response to this invitation.

Previous comments and studies have addressed the inadequacies of the DEIS in terms of its failure to provide sufficient data from which to draw accurate and well-reasoned conclusions regarding the propensity of landslides and debris flows in areas traversed by the proposed route of the ACP. Most notably, the Nelson County Report prepared by Blackburn Consulting Services has pointed out in much geotechnical detail many such deficiencies and issues that must be addressed in the final EIS document. It is not the purpose of this document to reiterate these points, but rather, since I am a landowner whose property is located in one of the areas in Nelson County, Virginia that is both a focal point for the general concern over landslide and debris flow potential as well as for the Blackburn Study, I am writing primarily to share some perhaps less technical information regarding the general topography, and history of this region that nonetheless relates to the construction of the project.

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

The area in question, which is known as Davis Creek after the stream that drains its watershed, is located at the heart of a cluster of mountains contiguous with the Blue Ridge chain that lies roughly between US Rt. 29 to the east, VA Rt. 151 to the west, VA Rt. 6 to the north and VA Rt. 56 to the south. This area, of which the Davis Creek watershed is typical, is noted for its rugged terrain and is characterized by narrow mountain ridges consisting mainly of ancient granite bedrock flanked by steep, rocky slopes descending into narrow valleys or “hollows”, in many places little wider than the streambed that drains them. The Davis Creek watershed is consequently at the heart of an area that is according to the Virginia Department of Mines, Minerals and Energy (DMME), especially prone to landslides and debris flows “because of the presence of steep slopes and highly fractured bedrock over [sic] shallow soils.”¹

The propensity for the occurrence of landslides was, in fact, dramatically demonstrated in Nelson County on Aug. 19, 1969, when heavy rains associated with the remnants of Hurricane Camille funneled down the steep slopes, resulting in “thousands of debris flows in Nelson, Amherst, and Rockbridge Counties that killed 153 people”². The casualties were, in fact, greatest in the Davis Creek watershed where entire families disappeared and 53 people lost their lives, and where the roadsides are in fact still lined with boulders the size of automobiles that were swept down from the mountainsides in 1969, and now serve as abiding reminders of “the flood”, as it is locally referred to.

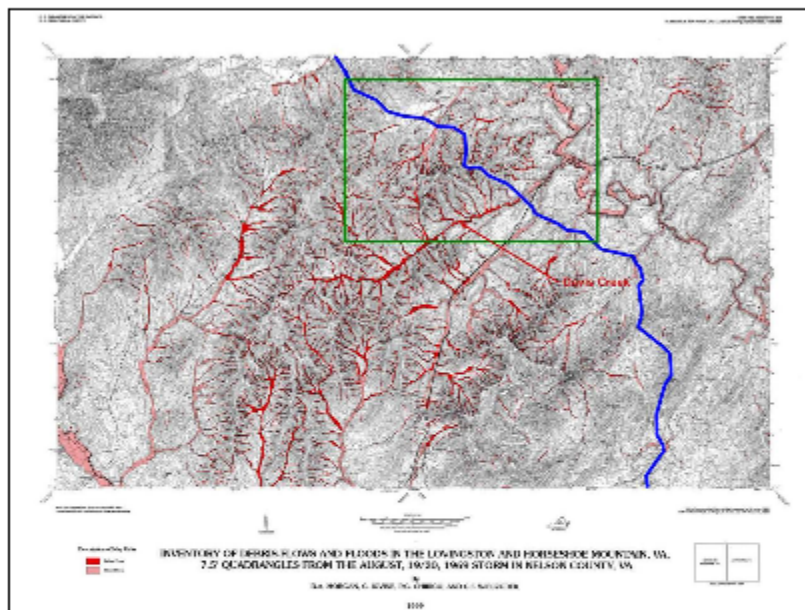
While a former “preferred” route for the ACP that had been proposed to cut directly through the Davis Creek watershed has now been modified to avoid some of the area in question, the current route nonetheless still closely skirts the area, running along a narrow ridgetop including Roberts Mountain, that forms the northeastern boundary of the watershed and thus still has the potential to affect the stability of the previously impacted slopes. (See Figure 1, below, which is based on a USGS topo map depicting the debris flows resulting from the 1969 rainfall event.)

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170430 3:57 PERC DDP (Dncstc10a) 4/6/2017 8:23:44 AM

Figure 1:



(The current route of the ACP has been superimposed on this USGS map of debris flows resulting from rainfall associated with Hurricane Camille in 1969. For clarity, the discussed area (rough the mountains bordering Davis Creek (inset bordered in green), has been enlarged and appears as Figure 2 on the next page.)

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

LO145-1

(Before moving on, it is worth noting in the material quoted above that “maximizing ridgeline construction” seems to be assumed to be a method intended to mitigate the effects of construction in steep terrain by avoiding areas of steep inclines. While this may be generally true, the mitigating nature of ridgeline construction does not necessarily result in less disturbance of the existing grades in areas including ridgelines, such as those in the area in question, that may be narrower than the proposed width of the construction right-of-way. In these cases, where the narrow topography would presumably require the removal of even more of the existing under-layer to achieve a wide enough work space, the selection of ridgelines as the preferred option may well result in more disturbance of the existing natural grade, and more “spoil” that would either need to be pushed to the edges of the ROW, where it would pose an even more serious threat as far as slippage potential and the health of borderline tree growth is concerned, or be hauled away to be deposited elsewhere.)

In any event, while the Commission states as in DEIS Sec.5.1, **Conclusion of the Environmental Analysis**,

“As part of our review, we developed specific mitigation measures that we determined would appropriately and reasonably reduce the environmental impacts resulting from construction and operation of ACP and SHP. We are therefore recommending that our mitigation measures be attached as conditions to any authorizations issued by the Commission. A summary of the anticipated impacts, our conclusions, and our recommended mitigation measures is provided below, by resource area.” (DEIS, p. 5-1)

The “specific mitigation measures” that follow in **Sec. 5.1.1, Geological Resources**, however, actually contain little, if any, further information regarding mitigation measures, i.e.:

“Because Phase 2 analysis, field surveys at all evaluation sites, and final measures related to slope hazards have not yet been completed for ACP and SHP, we have recommended that prior to construction Atlantic and DTI file all outstanding geotechnical studies and the results of geohazard analysis field reconnaissance; any recommendations proposed following the geotechnical studies and geohazard analysis field reconnaissance; a status of the BIC Team analysis related to ACP and SHP; and standard mitigation designs for each of the seven categories that would be implemented in slope hazard areas during construction and operation of the projects. Also, Atlantic and DTI have developed a SAIPR to avoid, minimize, and mitigate potential landslide issues in slip prone areas prior to, during, and after construction. Because the SAIPR only addresses the portion of ACP and SHP located in West Virginia, we have recommended that Atlantic and DTI verify that the SAIPR document applies to the entire ACP and SHP and not just the portions within West Virginia prior to construction.” (DEIS, p.5-2)

In other words, not only was the information required to even begin to address mitigation measures for construction in areas including steep terrain incomplete at the time of writing, but information that apparently has been developed, i.e. the Slip Avoidance, Identification, Prevention, and Remediation procedure is not even included in the document to allow adequate review by the public. (Appendix F does include a brief mention of this SAIPR document as well as a bullet list of some mitigation measures that “will be implemented during construction” (DEIS, p. F-12), but neither confirms that these measures are, in fact, a part of the SAIPR document and are to be applied to the construction of the ACP, nor explains the rationale for adopting these measures or clarifies how these measures would actually

LO145-1

Atlantic and DETI have confirmed that the Slip Avoidance, Identification, Prevention, and Remediation – Policy and Procedure applies to the entire project. While information was still pending at the time of issuance of the draft EIS, the lack of this final information does not deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the projects or a feasible way to mitigate or avoid such effect.

If the projects are authorized, Atlantic and DETI would be required to complete all surveys. Once surveys are completed, Atlantic and DETI would file its survey findings and documentation of consultations/federal permits required and incorporate this work into its final plans. Staff will review and verify that the information does not alter the EIS conclusions, and that all Commission’s conditions have been met, prior to any construction approval. All this information would also be available on the Commission website for review by other agencies and the public. As in all Commission proceedings, rehearing requests would be considered after any Commission decision.

Atlantic and DETI have reviewed independent geological studies filed on the Commission docket and provided responses and/or revisions where appropriate.

Z-3343

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

LO145-1 (cont'd) function or in what specific areas they would be applied. Given this lack of pertinent information the public is denied the opportunity to analyze and comment on their either their general appropriateness or applicability to specific conditions along the route.

LO145-2 In the meantime, it is widely acknowledged that disturbance of steep slope terrain by previous slippage episodes as well as construction activities such as the cutting of forest cover and the removal of tree root systems, along with subsequent excavation, blasting, and redistribution of soils, increases the potential for soil slippage. As the Virginia DMME has stated;

“Areas that are prone to mass movement include areas where landslides have occurred in the past; steep slopes with an angle greater than 30 degrees; oversteepened cuts and fills.....Research in North Carolina has revealed that about fifty-six percent of recent landslides happened on slopes that had been altered in some way by development.”³

It is difficult to identify both an area less historically affected by landslides than the area including and immediately surrounding Davis Creek, as well as a construction project with the potential for further disturbing more steep terrain than the activities associated with building the ACP. As the following photographs taken along Davis Creek in 1969 attest, the potential devastation from this rain event was nothing short of disastrous, even though at that point the mountainsides had not been previously disturbed in any significant way. And certainly, in light of the above statement, the potential for subsequent landslides and debris flows can only have been significantly exacerbated by the disturbance associated with the 1969 event.

LO145-2 As discussed in section 4.1.7, we conclude that constructing the pipelines in steep terrain or high landslide incidence areas could increase the potential for landslides to occur. However, Atlantic and DETI would comply with DOT regulations, specifically 49 CFR 192.317(a), which require pipeline operators to protect transmission pipelines from hazards, including landslides. Regulations at 49 CFR 192 also specify pipeline design requirements to ensure safe pipeline operation (including pipe stress requirements/testing), and require consideration of external loads in pipeline design. Adherence to DOT’s pipeline safety regulations would minimize the risk of landslides in the project area. Atlantic and DETI are currently working to provide documentation of the likelihood that their proposed design features and mitigation measures would minimize the risk of landslides in the project area.

Z-3344

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

Photos:



7



Z-3345

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)



Z-3346

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)



Z-3347

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)



13



14

Z-3348

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)



15



16

Z-3349

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

LO145-2
(cont'd)

As the above photographs clearly illustrate, heavy rainfall events can and do occur in the region crossed by the ACP, and can and do cause catastrophic slope failure. Furthermore, once an event such as these photographs document has occurred, one of the resulting consequences is that the slopes involved have an even greater propensity to slip in the future. Surely the additional effects of pipeline construction can only exacerbate this propensity by functioning to further destabilize the terrain to the point where any attempts at mitigation may likely be totally ineffective. Indeed, the success of such attempts is likely to be highly questionable according to the Blackburn Report due to the inadequacy of the soil-stabilizing capacity of non-arboreal cover (if such cover can be established in the rocky mountaintop soils involved in the first place). In addition, while these photographs were taken on Davis Creek, where the rainfall is thought to have been the heaviest, such effects were certainly not limited to this watershed, as similar damage occurred elsewhere in Nelson County as well as in adjacent counties along the Blue Ridge in areas with similar topology. It therefore seems reasonable to assume that if the heaviest rainfall had occurred elsewhere, including over the many other areas along the pipeline route with similar terrain, the results would have been comparable, and thus what occurred in the Davis Creek watershed in 1969 can be rightly viewed as red flag warning of the potential for similar occurrences elsewhere along the ACP's route with similar geology and topography. While it is of course impossible to predict when heavy rain events such as that associated with Camille will recur, according to the DMME, "Significant rain events that trigger landslides occur in Virginia every 10-15 years." There was, for example a similar event in 1995 in Madison County, Virginia that produced more than 500 debris flows.⁵ It is also possible, if not probable, that climate change will result in an increase in the prevalence of these events. According to the American Association for the Advancement of Science;

"Global warming will...lead to shifting precipitation patterns and concentration of precipitation into heavier downpours..."⁶

Clearly, these factors are both significant and have not been sufficiently addressed in the DEIS in its current form. I therefore respectfully call for a new version of the DEIS document to be produced—one that addresses both the factors mentioned herein as well as the many other deficiencies that have been brought to the Commission's attention during the comment period—and also incorporates and considers any and all outstanding information that has been and may be submitted by the developers and others in the future. Only then will a sufficiently coherent and inclusive document be available for review and analysis by the various agencies involved, as well as the public. The Commission owes the stakeholders this degree of due diligence by virtue of its acknowledged role to protect both the public and the environment from any unnecessary intrusion and impact resulting from the construction of the projects such as the ACP.

Respectfully submitted by,

James Bolton

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

Notes:

1. <http://www.dmme.virginia.gov/DGMR/landslides.shtml>
2. Ibid.
3. Ibid.
4. Riner, E.C., York, Brower, et al, 1969.
5. <http://www.dmme.virginia.gov/DGMR/landslides.shtml>
6. The AAAS Climate Science Panel, What We Know: the Reality, Risks and Response to Climate Change, p. 6.
http://whatweknow.aaas.org/wp-content/uploads/2014/07/whatweknow_website.pdf

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

April 5, 2017

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comments of Joyce Burton, Intervenor

Re: The Draft Environmental Impact Statement for the Atlantic Coast Pipeline and Supply Header Project (Docket Nos. CP15-554-000, CP15-554-001, and CP15-555-000. FERC/EIS-0274D)

Dear Mr. Davis and Members of the Commission,

In response to the risks posed by building the ACP through the steep, landslide-prone terrain incomprehensibly chosen by ACP as the route for this project, the DEIS repeatedly refers to the Slip Avoidance, Identification, Prevention, and Remediation – Policy and Procedure (SAIPR) document which was part of “Resource Report 6 (Geological Resources) (Final)” that was released back in September of 2015. In drawing its conclusions about the extent of the adverse environmental impacts that will be associated with the ACP project, FERC relies on the assumption that “Atlantic would implement its BIC Team and SAIPR to plan for construction through geological hazards.”¹ and in multiple places goes on to “recommend that Atlantic and DTI verify that the SAIPR document applies to the entire ACP and SHP and not just the portions within West Virginia.”^{2,3} Further, it asks that this clarification occur “prior to construction.”⁴

Among the many thousands of pages of “supplemental” filings that Dominion has buried stakeholders under since the release of the original, glaringly incomplete, Draft Environmental Impact Statement, was a document with a title page that reads: “Slope Stability Policy and Procedure for Pipeline Design, Construction and Right of Way Maintenance, Dominion Transmission Inc., Engineering Services Reference Manual 9/28/2016”. It was included in their January 27, 2017 filing, as “Attachment C” within the larger “Appendix C” which itself was a revision/expansion of the Construction, Operations and Maintenance (COM) Plans that had been part of the original DEIS. This “Slope Stability Policy and Procedure” appears to be a replacement for the prior SAIPR, and the revised COM Plan *does* explicitly specify that it “applies to both West Virginia and to Virginia.”⁵ (See for example Secs. 2.1.9.5, 8.4, and 10.3.1.6)

I will leave the technical concerns about this document to the geologists and engineers that are reviewing this DEIS, however **I have three points that I request that FERC address explicitly and unambiguously in a new DEIS**, so that citizen stakeholders can know what ACP is proposing to do (or not do!) and how it plans to minimize the dangers this project poses to us and our lands.

Z-3352

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

Z-3353

LO145-3 | 1) Both the SAIPR and the new Slope Stability Policy and Procedure document were filed as part of the COM Plan. However, the COM Plan states explicitly that, "This COM Plan applies only to US Forest Service lands crossed by the ACP Project."⁶ **Does this mean that ACP's Slope Stability Policy and Procedures do NOT apply to the steep, slip-prone slopes that the project will cross on private lands? And if so, then what construction and restoration/rehabilitation standards ARE being applied to private, slip-prone lands?** As has been noted many places in the docket by numerous commenters and intervenors, there are other mountains along the route that have similar, sometimes even more extreme, landslide-prone terrain than the USFS lands being crossed by the ACP.

LO145-4 | 2) Regarding the mysterious, unavailable-for-review Best In Class program (which the DEIS admits in section 5.2 and elsewhere was still under development at the time that FERC concluded its environmental impact analysis): **Do the BIC program standards apply only to USFS and other public lands? What standards will be applied to address landslide dangers on private lands?** Why aren't these standards available for stakeholder review during the DEIS process, as NEPA standards should mandate? When will they -- or, even better, site-specific construction and rehabilitation plans -- be made available to the people whose vulnerable, slip-prone lands will be crossed by this project?

LO145-5 | 3) In the Slope Stability Policy and Procedures, DTI's applicability matrix indicates that standards set forth in the document will be incorporated into "New pipeline projects that begin permitting after 9/30/2016."⁷ This date is more than a year after the corresponding date (8/10/2015) listed in this matrix in the prior version of the SAIPR document⁸.

When ACP/SHP applied to FERC to permit this project on September 18, 2015, it was clear that the SAIPR standards pertained at least to the DTI (i.e. West Virginia) portion of the project. However, this change of the date in the applicability matrix to more than a year after the start of the ACP permitting process raises concerns that Dominion may have no intention of applying these standards to the ACP.

The Slope Stability Policies and Procedures is a general, DTI-wide document.⁹ Nowhere does it state that it is specifically applicable to the ACP. Given the date listed on the matrix, it could be construed that although DTI intends to incorporate these policies into its future projects, the ACP itself would be exempt because its permitting process *started before 9/30/2016*. Again, while I cannot comment on the sufficiency of the standards set forth in this document, or whether they are comparable to the ones set forth in the SAIPR document that FERC had incorporated into its DEIS analysis, **FERC and ACP must confirm for the record that ACP project is going to be held to at least these stated standards.**

Under the best of circumstances, trying to understand the full depth and breadth of the impacts of the proposed ACP is a huge hurdle for stakeholders to clear. But we citizens are highly motivated; we deeply love the lands and communities that this project is slated to cross. Given adequate time, prompt, organized, and comprehensive information, we are up to the task.

LO145-3 Atlantic and DETI have confirmed that the SAIPR applies to the entire project.

LO145-4 The BIC Team applies to the entire project. The development of mitigation strategy will continue during the pipeline design phase. See also the response to comment CO6-1.

LO145-5 Atlantic and DETI have confirmed that the SAIPR applies to the entire project.

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

LO145-6

However, that hurdle becomes unacceptably high when we are presented with a mind-spinning maze of ever-changing filings and ambiguously defined standards to decipher.

One of the purposes of a DEIS is to assist stakeholders in understanding the project's potential ramifications. The job of the stakeholders is then, essentially, to partner with FERC by making intelligent, pertinent comments that would provide the Commission with some of the additional data necessary to fully and accurately assess the project and render realistic, fact-based decisions about the extent and significance of its adverse impacts. NEPA requires this. In the absence of timely details about the ACP's proposed Slope Stability Policies and Procedures and Best In Class programs, and clarification regarding whether they apply to the private lands along the route (and if not, what standards DO apply to private lands), it is impossible for us to do that and we are deprived of the safeguards guaranteed to citizens under NEPA.

Because of this, I urge FERC in the strongest terms possible, to suspend the current review process. ACP must provide the outstanding information noted in this and hundreds of other stakeholder comments -- including site-specific plans for ALL vulnerable, slip-prone slopes. Only after that is completed will it be possible for FERC to effectively compile the that information, thoroughly and responsibly weigh the impacts, and produce a unified, comprehensive DEIS for stakeholders to review.

Sincerely,

Joyce Burton

¹ Atlantic Coast Pipeline and Supply Header Project Draft Environmental Impact Statement (hereafter referred to as ACP/SHP DEIS), Volume I, Section 4.13.3.1 (Environmental Analysis, Slope Stability), p. 4-495. Published by FERC, December 30, 2016.

² Ibid., Volume I, (Executive Summary), p. ES-5.

³ Ibid., Volume I, (Conclusions and Recommendations, Geological Resources), p. 5-2.

⁴ Ibid.

⁵ Second Draft of the Construction, Operations and Maintenance Plan. Submitted to FERC by ACP January 27, 2017. FERC Docket # CP15-554-000, Accession No. 20170127-5202. (Appendix C).

⁶ Ibid., Section 2.1.1.1

⁷ Dominion Transmission Inc. Slope Stability Policy and Procedure for Pipeline Design, Construction and Right of Way Maintenance, (Section 1.0, p. 2-4). Document dated 9/28/2016. Submitted to FERC by ACP January 27, 2017. FERC Docket # CP15-554-000, Accession No. 20170127-5202. (Appendix C, Attachment C).

⁸ Resource Report 6 (Geological Resources), Appendix 6D, Slip Avoidance, Identification and Remediation – Policy and Procedure. Submitted to FERC by Dominion/ACP on September 18, 2015.

⁹ Dominion Transmission Inc. Slope Stability Policy and Procedure for Pipeline Design, Construction and Right of Way Maintenance, (Policy), page 1. Document dated 9/28/2016. Submitted to FERC by ACP January 27, 2017. FERC Docket # CP15-554-000, Accession No. 20170127-5202. Appendix C, Attachment C.

LO145-6 See the response to comment CO6-1.

Z-3354

LANDOWNERS COMMENTS

LO145 – James R. Bolton (cont'd)

20170406-5157 FERC PDF (Unofficial) 4/6/2017 8:23:44 AM

Marilyn M Shifflett, Nellysford, VA.
Submitted on behalf of Heidi Cochran, Afton, Virginia

To Whom It May Concern,
Atlantic Coast Pipeline #0215-554-000

In regards to the DEIS vol.1, Table 4.9.6-1

Highways Listed for Nelson County, Va.

LO145-7

In the listing of highways, please note Highways 15 and 360, DO NOT EXIST in Nelson County. Highways 151 and 6, which will be heavily impacted do exist.

It concerns me that's something as simple as stating correct roads through a County cannot be obtained. I feel this should be addressed. We have very few highways for travel through our one traffic light county.

I know this has been mentioned to FERC in the past and still not corrected. Makes me wonder about the ability to keep my community safe, if they cannot even get the roads correct. These roads must be made available for emergency vehicles even if the ACP does not acknowledge their existence.

Heidi Cochran

LO145-7 Table 4.9.6-1 has been revised to correct this error.

Z-3355

LANDOWNERS COMMENTS

LO146 – Peggy Quarles

20170406-0412 FERC PDF (Unofficial) 4/6/2017 2:24:21 PM

Peggy Quarles
1280 Inglecress Drive
Charlottesville, VA 22901

April 6, 2017

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

ATTN: Atlantic Coast Pipeline Comments
FERC Docket 15-554

Dear Mr. Davis and Members of the Commission:

This letter provides comments on the Draft Environmental Impact Statement (DEIS) for the Atlantic Coast Pipeline application under consideration by your Agency (CP-15-554) and issued on December 30, 2016. My comments fall into several categories: (1) substantive deficiencies; (2) process or legal deficiencies and (3) comments on the Forest Service actions required, including the issuance of a special use permit and changes to the Land and Resource Management Plans (LRMPs) for the George Washington and Monongahela National Forests.

(1) Substantive Deficiencies in Relation to Economic, Environmental and Cultural Impacts

The draft EIS does not address or explain the conclusions relating to a multitude of issues and concerns raised about the ACP, including public comments, FERC questions and Forest Service issues. I concur with the many comments on the draft EIS which have already been received and posted in the docket with respect to these issues, including:

LO146-1

- Value of the High Alleghenies. This area is the largest intact, high value forest in the Eastern US. Cutting through this area in any location will lower its resiliency in the face of climate change and reduce biodiversity. There is no other place of this value and the pipeline would create a permanent corridor of north/south forest fragmentation. The U.S. Forest Service, National Park Service, The Nature Conservancy and other environmental agencies and organizations are examining projects at the landscape level in order to recognize the intrinsic values of large ecosystems. The landscape level impacts cannot be mitigated. They are not addressed in the DEIS.

LO146-1 Comment noted. Refer to section 4.5.6 for a discussion of interior forest fragmentation.

Z-33356

LANDOWNERS COMMENTS

LO146 – Peggy Quarles (cont'd)

20170406-5412 FERC PDF (Unofficial) 4/6/2017 2:24:21 PM

Quarles Comments on ACP DEIS
April 6, 2017
Page 2

Z-3357

- LO146-2 • Cave systems in Bath, Pocahontas and Highland counties. The GWNF6 route crosses significant areas of Karst and extensive cave systems. These include the Burnsville cave system, which contains 97 known caves and over 80 miles of surveyed passage ways, and two caves designated as a National Natural Landmarks by the National Park Service. The cave systems impacted by the pipeline and access roads are documented homes of Indiana bats, other protected bat species and endangered invertebrates. Impacts to these karst systems cannot be mitigated. Richard Lambert, an expert in Virginia cave systems has submitted extensive comments and maps discussing the four karst systems in Bath and Highland Counties, the inadequacy of Dominion's proposal to protect these areas, and the potential impacts. See Richard Lambert's Report "Assessments of Four Karst Systems In Highland-Bath Counties, Virginia Along the GWNF-6 Route Of the Proposed Atlantic Coast Pipeline." The DEIS does not address Lambert's concerns.
- LO146-3 • Wingina community and cultural attachment. The town of Wingina in southern Nelson County would be crossed by the ACP. Members of the Woodson family there are descended from the enslaved African Americans who were bought to work the land for the Cabell family. Following emancipation, these once enslaved people and their families were able to obtain ownership of some of that same land. They are proud of their heritage, fiercely loyal to their family and community and have a special bond to the land which represents their freedom, equality and access to opportunity as Americans. As their family letters to FERC attest, requiring them to sacrifice their lands for the ACP would be a violation of this special bond. See http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20160602-5407.
- LO146-4 • Economic impact on Wintergreen and Wintergreen community. Wintergreen is the economic engine of Nelson County, providing the largest number of jobs and the highest percentage of tax revenues. It was recently purchased, and the purchasers had planned to expand the resort facilities with significant investments. These investments are now on hold, pending decisions on the ACP application. It is arguable that the loss of planned jobs from these deferred investments far exceed the total permanent job additions afforded by the ACP in Virginia. Wintergreen's viability as a resort and community is at stake. Concerns about construction impacts, safety, and loss of resort use by visitors are real and significant. The Friends of Wintergreen have actively argued their case, including proposing alternatives, and it is a persuasive case that is treated in only cursory way in the DEIS. Also, See discussion of Reid's Gap below.
- LO146-5 • Economic impact on Spruce Creek Resort business development. I donot understand why the DEIS does not acknowledge and address the impacts on this particular property owner. The owners have thoroughly documented the reasons why the pipeline location would impact their business plans and their determination that the development will not be viable if the pipeline is located through their property. What information or expertise do you have to determine otherwise? The DEIS does not credibly address this issue.
- LO146-6 • Economic impact on agro/eco tourism mountain economics. Throughout the High Alleghenies, recreational tourism is a primary source of revenue. In the West Virginia

- LO146-2 Sections 4.7.1.1 through 4.7.1.4, and section 4.7.1.13 discuss potential impacts on karst, including updated consultations with the FWS regarding avoidance and conservation measures.
- LO146-3 The Wingina community locations have been added to the Warminster Rural Historic District. This historic district is discussed in section 4.10.1.1. A discussion of cultural attachment is in the same section.
- LO146-4 Sections 4.9.5 and 4.9.8 included our discussion of potential impacts on the Wintergreen Resort.
- LO146-5 Sections 4.9.5 and 4.9.8 included our discussion of potential impacts on the Spruce Creek Resort development.
- LO146-6 Potential impacts on the local economy and specifically impacts on recreation and tourism are discussed in section 4.9.5 of the EIS. Our analysis concluded that based on the impacts identified and Atlantic and DETI's proposed measures to reduce impacts, the projects would not result in significant or adverse impacts on recreational or special interest areas. As such, and given the relative short timeframe for construction, we conclude the projects would not result in significant or adverse long-term impacts on tourism. Potential impacts on public and private recreation resources in the project area are assessed in more detail in section 4.8.

LANDOWNERS COMMENTS

LO146 – Peggy Quarles (cont'd)

Z-3358

| | |
|---|---|
| 20170406-5412 FERC PDF (Unofficial) 4/6/2017 2:24:21 PM | |
| Quarles Comments on ACP DEIS April 6, 2017 Page 3 | |
| LO146-6 (cont'd) | mountains, many hunters and fisherman are attracted to the area. Hiking and camping brings other visitors. This recreational/eco tourist economy has been complemented by the development of scenic railroads and bike trails. Highland County, Virginia has promoted the maple sugar festival to attract visitors to this unique activity. Bath and Nelson Counties have a full range of resort options, from small bed and breakfast to major resorts. All of these economic activities are built on the reputation of the area as pristine and unspoiled. The water is clean, the noises are from bullfrogs and birds, and the traffic is non-existent. |
| LO146-7 | <ul style="list-style-type: none"> • <u>Risk of and impact of extreme weather events, such as Hurricane Camille.</u> In 1969, Hurricane Camille devastated the mountains of Nelson County just south of Wintergreen, resulting in horrific loss of life and property. This event and the fear of similar events are now part of the history and culture of the community. When you receive comments about what might happen if a buried pipeline becomes a conduit for flood waters off of the mountains in the middle of the night, the concern is genuine and real. Keep in mind that smaller versions of this weather pattern are typical of the High Alleghenies. The sudden convergence of weather systems causes damage on a smaller scale than Camille, frequently but unpredictably. Any of these events could damage the pipe, severely contaminate the surrounding areas and pose a risk to public safety. |
| LO146-8 | <ul style="list-style-type: none"> • <u>Crossing Reid's Gap.</u> Dominion proposes to install the pipeline under the Blue Ridge Parkway (BRP) and the Appalachian Scenic National Trail (AT) at Reid's Gap, where the Forest Service and private landowners own the land. The entrance to Wintergreen Resort is directly below the gap to the East. To avoid open trench crossing of the AT and BRP, Dominion proposes to put approximately 5,000 feet of pipe in the ground at a depth approximately 850 feet below the highest point. They propose to use Horizontal Directional Drilling (HDD), or in the case of failure a shorter Direct Pipe method higher on the slope. Dominion Pipeline Monitoring Coalition submitted to the docket a detailed analysis of the proposed HDD and contingency plan for this crossing. FERC must respond to DPMC's substantive questions and provide a detailed engineering analysis, including risks, feasibility and environmental impacts. |
| LO146-9 | <ul style="list-style-type: none"> • <u>Risk of slope failure.</u> The U.S. Forest Service has publically expressed their concerns about the risk of slope failure, landslide and sedimentation and requested detailed analysis and studies of specific slopes to demonstrate that the pipeline can be constructed and operated safely and with acceptable impacts on steep slopes with unstable soils and a high likelihood of intense, high precipitation events. A study by Blackburn Consultants, LLC recently submitted to the docket analyzes the landslide vulnerability in Nelson County. These concerns on the private property along the Blue Ridge in Nelson County. These concerns should be responded to fully by both FERC and the Forest Service. |
| LO146-10 | <ul style="list-style-type: none"> • <u>Impacts on head waters and critically sensitive streams.</u> The proposed ACP crosses a huge number of streams, rivers and water bodies, all of which are critical to the Region served by these watersheds, including our major Eastern Rivers. It is not an understatement to point out that the security of our country is dependent on the |

- LO146-7 Comment noted.
- LO146-8 See the responses to comment letter CO86.
- LO146-9 Comment noted.
- LO146-10 Comment noted.

LANDOWNERS COMMENTS

LO146 – Peggy Quarles (cont'd)

20170406-5412_FERC_PDF (Unofficial) 4/6/2017 2:24:21 PM

Quarles Comments on ACP DEIS
April 6, 2017
Page 4

- LO146-10 (cont'd) | stewardship of this resource and that if we do not focus on water quality and impacts now, the quality of life of future generations will suffer.
- LO146-11 | • Consideration of Climate Impacts. The DEIS devotes a few sentences to the contribution that the continued use of fossil fuel makes to global climate change. I urge FERC to revisit the scientific record documenting the causes and impacts of climate warming.
- (2) Process Deficiencies
- FERC's failure to address fully or in a meaningful way in the Draft EIS the myriad of issues raised above, appears to be caused by a combination of process issues, agency culture, and low standards for and capability to perform effective impact analysis.
- LO146-12 | • DEIS and Incomplete Analysis and Data. The DEIS is filled with gaps and omissions. Clearly when the document was being prepared, Dominion had not yet submitted many required reports and analysis. As a result, the DEIS is inadequate and the draft conclusions unreliable. It must be retracted and reissued based on the full record and thorough analysis.
- Schedule vs. Content. Observing the process and the poor quality of the DEIS, one can only conclude that FERC is more interested in meeting industry requested and management-mandated schedules than standards of completeness or quality. It is not clear from the DEIS that FERC reviewed the volumes of public comments were reviewed and a determination made as to their accuracy and relevance.
- LO146-13 | • Lack of opportunity for public comment. The NEPA process requires that the public have an opportunity to comment in a meaningful way on the findings of an agency prior to taking government action. This opportunity has not been provided and it will not meet the regulatory standards. On important issues, such as slope stability and HDD crossing approaches, the public does not currently know what FERC is thinking, much less how it came to that unknown conclusion. We cannot review and respond to what we do not know. The process requires that the record and analysis is complete before public review and comment. And just because Dominion has submitted information during the comment period, does not mean that the public has had a fair chance to receive or review. In regard to recent Dominion submissions, we cannot assume that the submissions are complete, correct or consistent with FERC or Forest Service analysis.
- LO146-14 | • Apparent willingness to allow submission of important data after Certificate is issued. The DEIS confirms that FERC is willing to allow Dominion to submit data, not only after the draft and Final EIS, but after the certificate is issued. What kind of a process is that?
- LO146-15 | • Apparent endorsement of Dominion proposals to defer decisions until construction is underway. Dominion has repeatedly asked us to "trust" that they both know what they

- LO146-11 See the response to comments CO55-3 and CO55-4.
- LO146-12 See the response to comment CO6-1.
- LO146-13 See the response to comment CO60-1.
- LO146-14 FERC's Certificates are typically conditioned. This means that certain information listed in FERC Certificate must be provided prior to construction in order to be granted authorization to begin construction. Still other information must be provided prior to authorization to place the pipeline into service. However, such conditions pertain to follow-up information related to preparing for construction, addressing project-specific issues, and/or achieving satisfactory restoration or disturbed areas. The details of these types of follow-ups are not necessary to have in hand for the NEPA document, and we can base our conclusions, in part, on their future implementation.
- LO146-15 Atlantic and DETI would be legally required to ensure their projects follow the construction procedures and mitigation measures described in their applications and supplements, including responses to staff data requests and as identified in the EIS (unless modified by the Order). Failure to meet certain performance standards would result in issuance of noncompliance reports and, if the violation is repeated, could result in a stop-work order or enforcement actions by the FERC. If a company does not meet the conditions or regulations that apply to the project, FERC has authority to refer the matter to its Office of Enforcement.

Z-3359

LANDOWNERS COMMENTS

LO146 – Peggy Quarles (cont'd)

20170406-5412_FERC_PDF (Unofficial) 4/6/2017 2:24:21 PM

Quarles Comments on ACP DEIS
April 6, 2017
Page 5

LO146-15 (cont'd) | are doing and are committed to doing a good job. We have no evidence to support that trust. In the DEIS FERC endorses this approach, noting that various decisions will be made in the field, or during construction.

LO146-16 | • Failure to examine or address public need. For FERC, demonstration of public need is based primarily on Dominion's proof that they have contracts in hand. And FERC does not examine information which would provide insight into the public need demonstrated by these contracts, even when the contracts are with affiliated companies and are not arm's length transactions. There have been many public submissions on this topic and former Chairman Norman Bay recommended that FERC change its approach to examining need in a Special Statement before leaving the Agency on February 3, 2017. Need for the ACP has not been adequately addressed and justified in the DEIS.

• Potential for overbuilding and stranded assets. FERC's own analyses demonstrate the risk that pipeline infrastructure may exceed the needs of the Regions, resulting in unnecessary and unjustified environmental harm and stranded assets. Ratepayers in the region will ultimately bear the cost of this, not the companies. Chairman Bay warned that this could occur. See Special Statement from Commissioner Bay, February 3, 2017.

LO146-17 | • Failure to adequately consider alternatives. The requirement to evaluate alternatives, including the no action alternative, is the heart of the NEPA process. The concept is that agencies must evaluate alternatives with equal effort and thoroughness and weigh the relative merits of those alternatives to come to the best possible decision. FERC's process undermines this fundamental question. There is little evidence in the record or in the DEIS of how Dominion collected and analyzed alternatives. Dominion persistently promoted and focused on the most direct route through the Alleghenies, instead of looking for the least impactful route or how the pipeline could be effectively co-located with existing utility easements. The result is that the proposed ACP route has the lowest percentage of co-location of any major pipeline proposal. This is not acceptable and should be directly addressed by FERC.

(3) Comments on Potential Forest Service Actions

The DEIS discusses the need for the US Forest Service to issue a Special Use Permit (SUP) and to modify the Land and Resource Management Plans for two Forests. Based on the DEIS, other comments, Dominion's submissions and the Forest Service questions and comments on these submissions, I object to the issuance of an SUP or modifications to the LRMP's for the ACP.

LO146-18 | • Adequacy of draft EIS to meet Forest Service standards. The U.S. Forest Service has extensive experience in the collection and analysis of data to support Forest Service actions and decisions. This is reflected in regulations and guidance governing this process and the Environmental Impact Statements issued by the USFS in the past. It can only be said that this DEIS does not follow these standards and procedures and must be a

LO146-16 See the response to comment CO46-1.

LO146-17 See the response to comments LA17-1 and CO55-6.

LO146-18 FS response: Since the draft EIS, Atlantic has provided additional information and analyses as requested by the FS to evaluate the effects of the proposed project. The FS has worked with Atlantic to develop project design features, mitigation measures, and monitoring procedures to ensure that NFS resources are protected. The FS' ROD will determine if FERC's final EIS adequately discloses the environmental effects of the proposed action and if so, the FS will adopt the analysis to support its decisions on plan amendments and special use permit issuance. See also the responses to comments CO5-1 and PM4-027.

Z-33360

LANDOWNERS COMMENTS

LO146 – Peggy Quarles (cont'd)

20170406-5412_FERC_PDF (Unofficial) 4/6/2017 2:24:21 PM

Quarles Comments on ACP DEIS
April 6, 2017
Page 6

- LO146-18 (cont'd) | source of embarrassment to most USFS employees responsible for this work. The question at hand is what can be done to meet the quality standards to support a decision one way or another. I recommend that the U.S. Forest Service either insist that FERC revise and reissue the draft EIS for the ACP or determine that they must issue their own supplemental EIS as the basis for sound decision making.
- LO146-19 | • Dominion has failed to document how the ACP cannot be built on private lands, a requirement for approval of SUPs.
- LO146-20 | • Need to comply with Land and Resource Management Plans (LRMPs). The LRMP is designed to govern what happens, when and by whom on Federal lands in a particular forest. It is not a casual document or a broad generalization about what should happen on federal lands nationwide. Each desired condition, goal, objective, standard, guideline and use is tailored to a specific place and is based on scientific data, methods of analysis, and extensive public participation. The result of this process is a detailed LRMP and an Environmental Impact Statement supporting and justifying each decision that is made and each public comment that has been considered and responded to. Once this process is complete, shouldn't every project proposal simply be judged by whether or not it complies with these requirements? Why would an applicant such as Dominion operate on the assumption that exceptions should be made just for them? And why would this be in the public interest? If a project application does not meet the plan requirements, ask for modifications until it does or simply disapprove. The DEIS admits that the ACP will not conform to the LRMPs, so the Forest Service decision to deny should be clear and straightforward. Asking for "project level" exceptions is not acceptable.
- LO146-21 | • Need to designate a Utility Corridor in the GWNF LRMP. Even worse, is the need to change the LRMP for the George Washington National Forest to "approve" a Rx5C – Designated Utility Corridor. As stated in the DEIS, "This amendment is considered a 'plan-level' amendment and would change future management direction for the lands reallocated to the new Rx." In other words, this would change the use of that land permanently, allowing the corridor to be used for other utilities or other pipelines. Where is the analysis of the impacts of this use? In this DEIS? Or will the Forest Service undertake an independent analysis of this major change in the LRMP?
- LO146-22 | • De Facto/presumptive utility corridor on private lands. One reason that a separate analysis should be undertaken is the potential impact on private lands adjacent to the forests. The Forest Service has an obligation to analyze the context, both environmentally, culturally and socially, of its land use management on the surrounding communities. This has not been analyzed and documented in the DEIS.

There is a high level of distrust in Dominion's commitment to your process and your agency's commitment to an adequate review under NEPA. The application of record fails to meet both NEPA and Forest Service requirements to submit and document alternatives or environmental impacts. The application in its current state, despite its length, is masterfully

- LO146-19 | FS response: Section 3.3.4.1-National Forest Avoidance Route Alternatives describes potential routes to the north and to the south that would avoid NFS lands. However, these potential alternative routes were not recommended due to various factors, as discussed in the EIS.
- LO146-20 | FS response: Section 28 of the Mineral Leasing Act of 1920, as amended, allows the use of NFS lands for pipelines. If FERC determines that there is a public need for the pipeline and there is no route that could avoid NFS lands, the FS must consider the authorization. If the project is not consistent with the LRMPs, FS regulations at 36 CFR 219.15 provide procedures for resolving inconsistency with plan components. The linear nature of utility infrastructure like pipelines make it difficult for proposals to be consistent with all of the components of a Forest Plan. The FS strives to achieve the intent of LRMP standards through project design features or mitigation measures. If a project requires amendments to the LRMPs, as is the case here, then those amendments are part of the analysis and decision-making processes for evaluating the project.
- LO146-21 | FS response: The FS no longer proposes a change in land allocation to Rx5C-Designated Utility Corridors.
- LO146-22 | FS response: The FS no longer proposes a change in land allocation to Rx5C-Designated Utility Corridors.

Z-3361

LANDOWNERS COMMENTS

LO146 – Peggy Quarles (cont'd)

20170406-5412_FERC_PDF (Unofficial) 4/6/2017 2:24:21 PM

Quarles Comments on ACP DEIS
April 6, 2017
Page 7

unresponsive to the information needs of the stakeholders involved, including FERC and cooperating agencies. The original route and the latest alternatives were committed to without prior environmental analysis or an awareness of the land use status underlying the route (such as cave systems designated as National Natural Landmarks and conservation easements). For both the original and current routes, Dominion did not observe or recognize the requirements of the Land and Resource Management Plans for our National Forests. Finally, their repeated request for expedited review and approval of their application is an insult to the many people who will be harmed by this project and the agencies that are committed to their responsibility to conduct a thorough and fair review.

I am submitting comments in hopes that you will reflect as well on the huge challenges that our country faces to move our energy supply from a carbon based system to renewable energy sources. I believe that with forward looking leadership your Agency can help us make that move. The ACP is an opportunity to get it right. And I fear that allowing the project to move forward in its current path will result in the worst -- long term and irreversible environmental damage, a potential catastrophe involving slippage and unpredictable weather events, further loss of confidence in our federal system of environmental protections, and the erosion of property rights which are at the core of the American belief system. There is no room for sympathy for Dominion in this process. They have chosen to ignore the full consequences of this project proposal in hope of guaranteed profits.

Sincerely,



Peggy Quarles

cc: Kevin Bowman, FERC Project Manager
Clyde Thompson, Supervisor, Monongahela National Forest
Jennifer Adams, US Forest Service

Z-3362

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

**United States of America
before the
Federal Energy Regulatory Commission**

Atlantic Coast Pipeline, LLC
Dominion Transmission, Inc.

Docket Nos. CP15-554-000
CP15-554-001
CP15-555-000

**The Draft Environmental Impact Statement for the
Proposed Atlantic Coast Pipeline and Supply Header Project
EIS-0274D**

**Comments by Louis and Yvette Ravina
Regarding Forest Service Impacts**



Z-3363

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

TABLE OF CONTENTS

| | |
|--|---|
| I. OUR STATUS AS INTERVENORS..... | 1 |
| A. Our Comments in Perspective..... | 1 |
| B. We Object to the Route of the ACP through the National Forests..... | 1 |
| C. Organizations Whose Comments We Adopt and Support..... | 2 |
| II. THE RESPONSIBILITIES OF THE FOREST SERVICE..... | 3 |
| A. Forest Plans..... | 3 |
| B. Utility Provisions in the Forest Plans..... | 3 |
| III. SUMMARY STATEMENT..... | 4 |
| IV. DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT..... | 6 |
| A. The Evaluation of Need and of Alternatives in the DEIS is Flawed..... | 6 |
| 1. One Third of the “Need” for this Project is Already Met..... | 6 |
| 2. There are Alternative Sources of Supply..... | 7 |
| a) Atlantic Sunrise Pipeline – No Crossing of a National Forest..... | 8 |
| b) WB Xpress Pipeline – Using Existing Forest Utility Corridors..... | 8 |
| c) Atlantic Coast Pipeline - the Least Flexible Alternative..... | 8 |
| B. There is No Need for the Atlantic Coast Pipeline because the Marcellus Take-Away Capacity is Being “Overpiped”..... | 9 |

Z-3364

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

| | |
|--|----|
| C. The Forest Plans Must Be Compromised if the ACP is Approved..... | 10 |
| D. Forest Fragmentation Effects..... | 10 |
| E. Degradation of Pristine Streams..... | 11 |
| F. High Hazard Areas..... | 12 |
| 1. The “BIC Team” and “SAIPR” are More Hope than Reality..... | 12 |
| 2. Steep Slopes in Nelson County – a Case Study..... | 12 |
| 3. Photos from the Blackburn Report..... | 14 |
| 4. The Nelson County Report Casts Doubt on the Veracity of All Reports Addressing Steep Slopes Submitted by Atlantic..... | 14 |
| G. Crossing the Appalachian Trail – An Atlantic Maybe..... | 15 |
| H. Reliance on Environmental Inspectors is Unrealistic..... | 16 |
| I. The DEIS Assumes that Atlantic & DTI Will Comply with All Requirements and All Mitigation Practices..... | 16 |
| 1. Dominion’s Disregard During Pipeline Construction..... | 17 |
| 2. Pipeline Contractors Taking Short Cuts..... | 17 |
| J. The DEIS Does Not Weigh the Real Dangers Inherent in Karst Areas..... | 18 |
| 1. The Danger of Blasting in Karst Areas..... | 18 |
| 2. The Danger of Any Construction in Karst Areas..... | 19 |
| J. In Closing..... | 20 |

Z-3365

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

I. OUR STATUS AS INTERVENORS

A. Our Comments in Perspective

We are both registered as intervenors with the Federal Energy Regulatory Commission (the "Commission" or "FERC") in this proceeding. On March 31, 2017 we filed comments with the Commission on the Draft Environmental Impact Statement ("DEIS"), but did not address the impacts to be considered by the Forest Service in any detail.

These comments are an addendum to our original comments. They specifically address those portions of the DEIS that concern the National Forests, along with the Appalachian Trail and the Blue Ridge Pkwy.

We have serious objections to the National Forest portion of the proposed project that has been submitted for approval by Atlantic Coast Pipeline, LLC ("Atlantic") and Dominion Transmission, Inc. ("DTI").

We have no doubt that the National Forest Service takes their obligations as stewards of our national treasures very seriously.

B. We Object to the Route of the ACP through the National Forests

LO147-1 | The proposed Atlantic Coast Pipeline (ACP) would cut through the heart of the most valuable National Forests east of the Mississippi River. And for no valid reason.

As time has gone by it has become more and more apparent that the route selected by Atlantic and DTI did not take into account anything but getting from point A to point B, regardless of the construction or environmental costs. They have no need to limit construction costs because Atlantic and DTI have a guaranteed rate of return of 15%; the more they spend the more they earn. And, there is no need to

LO147-1 Comment noted.

Z-33366

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-1
(cont'd) | limit environmental costs because Atlantic and DTI do not pay them. They are paid for by “We, the People ...”

C. Organizations Whose Comments We Adopt and Support

There are many organizations opposing the Atlantic Coast Pipeline. In fact the number of organizations and the absolute detail that they have developed to support their positions leaves us in awe of their capabilities and dedication.

We are particularly thankful to the Dominion Pipeline Monitoring Coalition. We would not understand the truly adverse impacts on the National Forests without the story maps that they prepared.

We therefore support and adopt by reference those comments submitted by the following organizations: the Southern Environmental Law Center, Appalachian Mountain Advocates, Friends of Nelson, Wild Virginia, the Dominion Pipeline Monitoring Coalition, the Sierra Club, the Augusta County Alliance, the Allegheny – Blue Ridge Alliance, and Friends of the Central Shenandoah.

Z-33367

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

II. THE RESPONSIBILITIES OF THE FOREST SERVICE

A. Forest Plans

LO147-2 | Fortunately, the Forest Service has management plans for the George Washington National Forest (GWNF) and the Monongahela National Forest (MNF). These were created at great expense and with considerable public input. The conditions listed in these plans cannot be simply revoked or watered down by the Commission and by Atlantic and DTI simply in the name of expediency.

B. Utility Provisions in the Forest Plans

Both Forest Plans take into account the need to provide space for energy development, communication, water development, and utility corridors – as long as they meet public needs and are consistent with other Forest resources and management plans.

With this in mind the Forest Plans include designated utility corridors to enable an orderly crossing of the National Forests. An applicant for a new corridor must first demonstrate the public good that will be satisfied. Then, they must also show that they have seriously considered alternative routes off the National Forest, and must also show that existing utility corridors in the National Forest will not meet their needs.

Atlantic, DTI and the Commission have not taken these requirements seriously and have needlessly endangered these two National Forests.

LO147-2 FS response: See the response to comment LO146-20. Section 3 of the final EIS discusses alternative routes of Atlantic's proposed corridor for ACP, some of which included evaluation of co-locating in existing or proposed utility corridors.

Z-3368

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

III. SUMMARY STATEMENT

It is disturbing that the Draft Environmental Impact Statement does not come close to understanding the stewardship responsibilities of the Forest Service.

The DEIS is essentially a whitewash – prepared to look impressive, and to appear to conform to the Commission's written policy, as well as to the requirements of the National Environmental Policy Act, and with supposedly acceptable corruption of the Forest Plans. It only does so by evading or ignoring the true facts.

The DEIS treats all of the resource reports and statements of need submitted on behalf of Atlantic and DTI as the gospel truth, while ignoring or dismissing out of hand the carefully prepared arguments and documents submitted by the opponents to this project as not worthy of any consideration. This "thumb on the scale" method allows the DEIS to approve the project, seemingly without reservation. Yet, anyone with a drop of intelligence and common sense can easily see through the smoke and mirrors, and will know this is unjust.

The end result, if unchecked, will be for the Commission to hand the club of eminent domain to a for profit corporation with no real public benefit involved and plenty of adverse impacts:

LO147-3

1. The DEIS allows the National Forests to be treated as a resource to be exploited for private gain instead of a treasure that must be defended at all costs. There was no serious attempt to find alternative routes for the pipeline. It was just preferred by Atlantic and DTI, and that was that. Yet the adverse consequences are nothing less than severe.
2. There is no need for this particular pipeline and route. First, Atlantic inflated its overall need by 50%. Then, to tilt the table even further, it based those needs on captive affiliates, and not the free market.

LO147-3 See the responses to comments LO147-4 through LO147-14.

Z-33369

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-3
(cont'd)

3. There are alternative pipeline infrastructure projects which have lower costs, and fewer adverse impacts. In addition, they do not require a new utility corridor in the National Forests. In fact, infrastructure already exists to provide natural gas for power plants scheduled for operation in Virginia.
4. The logical start point to satisfy any natural gas needs in North Carolina is from Southside Virginia thus avoiding those areas on the ACP route, including the National Forests, that are most at risk for adverse impacts.
5. The DEIS is clear that the Forest Service must compromise its Forest Plans in order to approve the project.
6. Forest fragmentation is a given if the project is approved. The result will be negative effects on flora and fauna including creating a pathway for invasive species which can crowd out native plants.
7. There is no doubt that pipeline construction will negatively impact the many pristine streams that it crosses. The only solution in the DEIS seems to be for the Forest Service to accept the degradation.
8. Steep slopes will be an ever present problem if this pipeline is approved. Yet the DEIS assumes that somehow, steep slopes can be dealt with in an environmentally responsible manner. Supposedly the "BIC Team" and the "SAIPR" will magically cancel the laws of nature.
9. Dominion Resources via its many affiliates has clearly demonstrated its lack of respect for the environment. There is no reason to trust them.
10. Finally, the DEIS assumes that the karst geology can be managed and adverse effects mitigated. No proof is supplied.
11. We are confident that the Forest Service will continue to honor its commitment to our treasured resources.

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

IV. DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

A. The Evaluation of Need and of Alternatives in the DEIS is Flawed

LO147-4

A key requirement in obtaining approval for a pipeline crossing National Forest land is that the pipeline must meet public needs and it cannot be accommodated off the National Forest. The proposed ACP project fails both of these prerequisites, and must be rejected for this reason alone. There are other pipeline projects that fulfill the same need and they use existing utility corridors.

We are deeply thankful for the education about pipeline infrastructure and natural gas pricing that Thomas Hadwin has shared with the many organizations that are involved with opposing this project, as well as with the Commission. The comments that follow are a very brief synopsis of what he has documented in detail. We urge the Forest Service and the Commission to carefully consider his contributions to this process.

1. One Third of the “Need” for this Project is Already Met

The primary purpose claimed by Atlantic for this project is to transport gas for use in new power plants and for use in power plants where coal is being replaced by natural gas because of the environmental and cost advantages. Residential and commercial needs in Virginia and North Carolina are only growing by about 0.1% per year and are already adequately served. The main section is a 42” diameter pipeline which is rated at 1.5 Bcf/d (billion cubic feet per day).

In their description of the project the applicants note that it will supply gas to two new natural gas power plants in Southside Virginia. One is the recently completed Brunswick County Power Station, and the other is the Greenville

LO147-4 See the response to comments LO146-19 and LO114-2.

Z-3371

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-4
(cont'd)

County Power Station which began construction last year. Yet both of these facilities, which require about 0.25 Bcf/d of natural gas each (0.5 Bcf/d total), will actually be supplied with gas from pipelines owned by Transcontinental Gas Pipeline Company ("Transco"). In other words, fully one third of the stated need for pipeline capacity is a "red herring". In fact, there is no new immediate unsatisfied demand involved in Virginia. Therefore the "bar" regarding the balance between benefits and impacts must be raised, with more weight given to adverse impacts.

There may be a need for additional pipeline capacity in North Carolina, but the logical connection point for that is the Transco pipeline in Southside Virginia.

In other words, there is just no need for the most risk prone 300 mile portion of the proposed project which crosses the National Forests. It passes through areas that involve serious adverse environmental impacts which cannot be completely mitigated even by the most responsible construction techniques. Nature will not allow it.

2. There are Alternative Sources of Supply

LO147-5

The Atlantic Coast pipeline is one of several projects which propose to move natural gas from the Marcellus shale oil fields to markets in the Southeast. Because of this, there is the real possibility of overbuilding.

Any pipeline which requires the Forest Service to compromise its Forest Plans, and to sanctify adverse impacts, should be the last to be considered and the first to be rejected.

LO147-5 See the response to comments LO114-3 and LO114-4.

Z-3372

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-5
(cont'd)

a) Atlantic Sunrise Pipeline – No Crossing of a National Forest

This is a Transco project. Transco's system is the largest in the country and they have an advantage since they can supply gas from both the Gulf Coast and from the Marcellus production areas. This pipeline will connect to the highest production areas in the Marcellus, and proceeds about 180 miles while connecting to multiple Transco pipelines.

b) WB Xpress Pipeline – Using Existing Forest Utility Corridors

Columbia Gas is proposing to upgrade an east-west pipeline to boost capacity. The project only involves less than 30 miles of pipeline, mostly as replacement pipe, and a compressor station upgrade.

c) Atlantic Coast Pipeline - the Least Flexible Alternative

The Atlantic Coast Pipeline is limited to carrying gas solely from the Marcellus production area. Natural gas needs will be better served if the Commission does not approve either of these projects. The alternative, of using the statewide network of the Transco and Columbia Gas pipelines can satisfy that need with other advantages as well. Transco's Sunrise project and Columbia's WB Xpress project carry a greater combined volume of gas at less cost and with less right-of-way required. In addition, their networks offer the advantage of selecting gas from either the Gulf Coast production areas or the Marcellus production area – whichever is cheaper.

Most importantly – the other projects do not require the Forest Service to needlessly degrade the National Forests.

Z-3373

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

B. There is No Need for the Atlantic Coast Pipeline because the Marcellus Take-Away Capacity is Being “Overpiped”

LO147-6

The figure below is from an article in Bloomberg New Energy Finance¹. The black line represents expected production and the colored bars represent the planned pipeline capacity in Bcf/d.

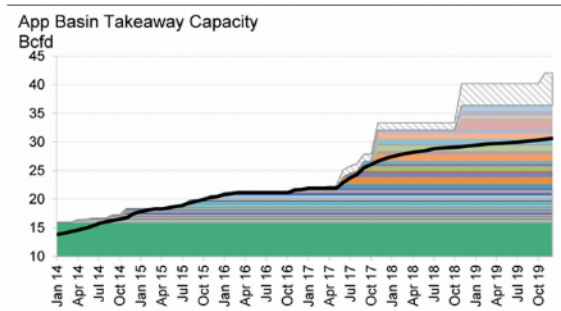


Figure 1 - Planned Northeast Pipeline Capacity versus Production Outlook

It would be wise for the Commission to take to heart the comments² that outgoing Commissioner Norman Bay made in February of this year, regarding the Commissions review process. He offered the following advice to those that follow him:

It is in the public interest to foster pipeline capacity but also to insure that the entire industry remains a healthy one, not subject to costly boom-and-bust cycles. Pipelines are capital intensive and long-lived projects. It is inefficient to build pipelines that may not be needed over the long term and that become stranded assets.

¹ Bloomberg New Energy Finance *US Gas Insight: Mid-Stream Madness*, by Joanna Wu, March 2016.

² Federal Energy Regulatory Commission Docket No. CP15-115-000 (February 3, 2017)

LO147-6 See the response to comment CO46-1.

Z-3374

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-6 (cont'd) | Commissioner Bay's advice is certainly confirmed by looking at the takeaway over capacity being planned for the Marcellus/Utica "play".

C. The Forest Plans Must Be Compromised if the ACP is Approved

LO147-7 | The DEIS makes it clear that the Forest Service will have to modify its Forest Plan for the George Washington National Forest if the pipeline is approved. By modification we mean of course allowing adverse environmental effects. These include compromising regulations regarding: (a) retaining soil; (b) protecting water quality; (c) harvesting old growth timber; (d) crossing the Appalachian Trail; (e) constructing roads in a Scenic River Corridor, and (f) maintaining scenic Integrity.

This would be grudgingly acceptable if there was a real public need, and then only if there was no other option where the pipeline could be accommodated off the National Forest. This is simply not the case.

D. Forest Fragmentation Effects

LO147-8 | The ACP would create a permanent linear opening through some of the largest tracts of unfragmented forest in the eastern United States. There will be a core loss of 2400 acres between construction corridors and access roads. It is not just the construction corridor that is a worry. Loss of core forest extends almost 300 feet on either side of the corridor. According to the DEIS, forest fragmentation is one effect of the ACP that cannot be mitigated.

According to the Virginia Department of Conservation and recreation:

One of the greatest threats to our forests is not wildfires, insects, or diseases, but the conversion of forest lands to other uses... Forest fragmentation is on the rise... It threatens those wildlife species needing a sizeable habitat free of constant disturbance and human competition. Fragmentation also threatens the vitality of Virginia's natural landscape—the backbone of the tourism industry.

LO147-7 FS response: See response to comment LO146-20. Section 4.8 discusses the modifications to the Forest Plan standards that would be needed if the ACP project is approved.

LO147-8 Comment noted.

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-8
(cont'd)

And the Dominion Pipeline Monitoring Coalition adds:

The Southern Appalachians have been identified as one of six biodiversity hotspots in the United States by The Nature Conservancy. Biodiversity is particularly high in the mostly unfragmented forests on the Monongahela and George Washington & Jefferson National Forests and on undeveloped private lands. The ACP would bisect this biodiversity hotspot, leaving a permanent 75-foot wide corridor.

They go on to explain in more detail:

When forests are fragmented by pipelines, roads and other human disturbances, edges are created with a whole host of negative effects on native flora and fauna. Edge-dwelling species like Raccoon, Opossum, Red fox, Striped skunk, American crow and Blue jay move in and prey on the nests of interior forest songbirds. Harmful edge effects can extend 100 meters into interior forest.

Forest fragmentation creates a pathway for non-native invasive plants, like kudzu, garlic mustard, and ailanthus. Encroachment by invasives can have a devastating effect on interior forests that so many species depend on. Invasives crowd out and outcompete native plants and alter habitat that interior forest animals require.

Is it worth allowing this for no valid public purpose? We doubt it.

E. Degradation of Pristine Streams

LO147-9

The Atlantic Coast Pipeline and its access roads will cross almost sixty pristine mountain streams. This includes over twenty five trout streams which will be affected by construction siltation.

Is it worth allowing this for no valid public purpose? We doubt it.

LO147-9 Comment noted.

Z-3376

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

F. High Hazard Areas

LO147-10 | The DEIS includes this worrisome statement:

.... the ACP route through the GWNF crosses 9.3 miles of lands with high incidence of and high susceptibility to landslides and 6.6 miles of lands with a moderate incidence of and high susceptibility to landslides. ACP crosses 4.4 miles of slopes ranging from 20 to 35 percent and 9.4 miles of slopes greater than 35 percent through the GWNF.

Why is this problem not given great weight in the DEIS against project approval?

What makes anyone believe they can mitigate such hazardous construction terrain?

1. The “BIC Team” and “SAIPR” are More Hope than Reality

The DEIS refers to Atlantic/DTI designating a Best in Class Steep Slope Management Team (“BIC Team”) and also a Slip Avoidance, Identification, Prevention, and Remediation — Policy and Procedure (“SAIPR”) which are supposed to magically solve every steep slope problem no matter how steep or how bad the condition. This truly seems more like advertising than engineering. The DEIS does not in any way evaluate the effectiveness of the BIC Team or the SAIPR. The Commission appears to simply assume that plans will be developed by Atlantic and DTI that will prevent adverse environmental impacts. But the most responsible way to deal with steep slopes is simply to avoid them, and find a better route with fewer adverse impacts.

2. Steep Slopes in Nelson County – a Case Study

Friends of Nelson has been particularly concerned about the impacts of the proposed pipeline on the steep slopes which are prevalent in Nelson County. They engaged Blackburn Consulting Services (“Blackburn”) to review, assess,

LO147-10 See the response to comment CO90-04.

Z-3377

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-10
(cont'd)

and comment on information submitted to the Commission on behalf of Atlantic.

Their report³ (the “Blackburn Report”) examined the information that Atlantic used to determine the pipeline route, soil types along that route, slope stability, and erodibility.

They then developed their own predictions to identify landforms where soil has collected over time in geographic depressions, having been moved there either by gravity or water. Known as concave/colluvial landforms, these are known to be sites that are at high risk of debris flows/landslides when associated with steep slopes and a storm event. Blackburn mapped the area using a predictive model which they had previously developed for Loudoun County, Virginia, in conjunction with the United States Geological Survey. They also mapped areas of shallow rocky soils which were also susceptible to debris flows and which would require blasting.

The map produced by Blackburn’s model was then checked for accuracy by overlaying it with a USGS map of all known debris flows in the area. These two maps matched up well, confirming the validity of their predictive map. They then did a field check at a few sites to further confirm the validity of their work.

The Blackburn Report concludes that the potential for debris flows in the very steep mountainous portions of Nelson County are underestimated by the reports submitted to the Commission on behalf of Atlantic.

³ Analysis and Field Verification of Soil and Geologic Concerns with the Atlantic Coast Pipeline (ACP) in Nelson County, VA – March 2017

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-10
(cont'd)

3. Photos from the Blackburn Report

These photographs illustrate quite graphically that attention to the real dangers of steep slopes is not academic; it is serious. Note the scale referenced to the person in each photograph.



Debris Flow



Depositional Fan

4. The Nelson County Report Casts Doubt on the Veracity of All Reports Addressing Steep Slopes Submitted by Atlantic

The situation in Nelson County is definitely not unique. It has only come to light because the citizens of Nelson County decided that they needed to document, from a geologists viewpoint, what they all knew from their own experience. The Blackburn Reports clearly states that:

Although Dominion was using the best information publicly available at the time, the referenced materials were created more for regional interpretation and were never intended to be used for the siting of major infrastructure.

The soil maps published in the Web Soil Survey were created at a scale that lacks sufficient detail to discern the vulnerable land forms that must be identified and either avoided or adequately

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-10
(cont'd)

mitigated, if possible, to insure the safety of the pipeline as well as protect the surrounding slopes, waterways and residents from a potentially catastrophic failure.

In other words – Atlantic may have had the best of intentions, but their methodology is completely invalid. The entire steep slopes analysis must be done over, but with a refined methodology.

G. Crossing the Appalachian Trail – An Atlantic Maybe

Atlantic has proposed that it will cross underneath the Appalachian Trail using almost a mile long tunnel created with Horizontal Directional Drilling. They are not confident at all that this will work and in fact there is a substantial risk of failure. If they do fail, then they propose to fall back on open trenching with Direct Pipe Installation which also involves risk of failure. If both of these fail then there is no doubt that Atlantic will push for an open cut crossing of the Appalachian Trail.

LO147-11

Installation via Horizontal Directional Drilling with Direct Pipe Installation as a fall back will impact a number of streams for an extended period (a year or more) on these streams. The DEIS fails to evaluate this impact.

LO147-11 See the response to comment CO66-39.

Z-33380

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

H. Reliance on Environmental Inspectors is Unrealistic

LO147-12 | In the DEIS the Commission relies on a position referred to as an Environmental Inspector (“EI”) to ensure that the contractors installing the pipeline adhere to the construction and mitigation procedures required by: the Commission; the state agencies; the federal agencies; the Atlantic application, and landowner easement requirements. According to the DEIS the Environmental Inspector is supposed to have the authority to stop the work and order corrections if any of the above-mentioned procedures are violated by the installing contractor.

This all sounds wonderful on the surface, but we doubt it will actually happen in practice. The description of their duties means that they need to be completely familiar with a plethora of environmental regulations and construction techniques. This requires a broad background, yet the DEIS makes no mention at all of the qualifications that will be required of an Environmental Inspector.

We seriously doubt that an Environmental Inspector, beholden to Atlantic for his salary, will be able to resist the pressures at Atlantic from “above” which will surely be pushing for project completion.

I. The DEIS Assumes that Atlantic & DTI Will Comply with All Requirements and All Mitigation Practices.

LO147-13 | What evidence does the Commission and the Forest Service have that Atlantic and DTI will adhere to all of the requirements and mitigation practices imposed by the DEIS? What follows are some examples that are deeply disturbing.

LO147-12 | As discussed in section 2.5.2, the FERC staff acknowledges that the role of Atlantic’s and DETI’s EIs is to ensure ACP and SHP are constructed in accordance with the requirements imposed by FERC and other regulatory agencies. However, the EI’s role should not be mistaken for FERC abdicating its inspection authority to Atlantic and DETI. The purpose of the EI is to ensure applicants are cognizant of and taking matters of compliance seriously, and to provide immediate correction when necessary. To further ensure ACP and SHP are constructed in compliance with the FERC’s and other regulatory agencies’ requirements, FERC would conduct its own independent monitoring and inspection of the projects as discussed in section 2.5.3.

FS response: The FS Authorized Officer (AO) would be responsible for overall environmental compliance for the project on NFS lands. The AO would manage the Field Compliance/Monitoring Officers and have stop work authority on all NFS lands.

LO147-13 | FS response: Section 3-Environmental Compliance of the COM Plan includes the FS’ environmental compliance roles and responsibilities for monitoring.

Z-3381

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-13
(cont'd)

1. Dominion's Disregard During Pipeline Construction

Dominion's lack of care in installing much smaller pipelines in West Virginia indicates that they usually trample on the environment rather than respect it. In 2015, Dominion Transmission was fined by the West Virginia Department of Health for violations. During a 16-month period, Department of Health inspectors reported sixteen incidents of sediment pollution; one incident of pollution with crude oil and produced water; and one incident of pollution by produced water. The violations impacted a total of seventeen streams. The Department of Health pointed out that Dominion was not forthcoming (i.e. they stonewalled) about the incidents. In response to this reprimand, Dominion Energy Communications Director Jim Norvelle made a statement that was the corporate equivalent of "the dog ate my homework".

2. Pipeline Contractors Taking Short Cuts

In 2013 Public Citizen issued a report⁴ documenting shoddy construction practices in connection with the southern portion of the Keystone XL Pipeline. The title page, which summarizes their results is instructive:

This report presents evidence documenting numerous construction problems and apparent code violations that raise questions not only about the chances of a spill on the southern segment of the Keystone XL pipeline, but also about the quality of TransCanada's construction and in-house inspection system, as well as the ability of the federal government to oversee the process.

Problems included: peeled field patches; sags or bends in the pipes; dents; improper pipe support; improper back filling; and failure to separate topsoil from underlying substrate.

⁴TransCanada's Keystone XL Southern Segment: Construction Problems Raise Questions About the Integrity of the Pipeline, November 2013.

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-13
(cont'd)

The rush to install pipelines from the Marcellus formation leaves very little doubt that the same problems will arise, including the lack of careful oversight by the various federal agencies, among them the understaffed Pipeline and Hazardous Materials Safety Administration.

J. The DEIS Does Not Weigh the Real Dangers Inherent in Karst Areas

LO147-14

1. The Danger of Blasting in Karst Areas

Section 4.1.2.2 of the DEIS discusses Shallow Bedrock and Blasting. In that section it discusses some of the impacts of blasting:

Blasting of bedrock, particularly karst bedrock, could create fractures in the rock, temporarily affecting local groundwater flow patterns and groundwater yield of nearby wells and springs around the blast site, and affecting their water quality by a temporary increase in turbidity levels shortly after blasting.

No evidence at all is supplied or referred to in the DEIS which demonstrates that the impacts from blasting in karst are always temporary. And, in fact, the following information from the Virginia Cave Board⁵ completely contradicts that statement in the DEIS:

Water in karst aquifers primarily moves along solution channels; therefore, flow is highly dependent upon the direction and characteristics of these conduits. This is also true for fracture flow aquifers in non-karst settings. The impact from blasting can alter and disrupt these solution channels, thereby causing the water to flow along different conduits. This creates situations in which the water flows in different directions, or that water quality and quantity is altered. If these water quality or hydrologic changes occur, it is highly improbable that the previous groundwater conditions can be restored.

Blasting may affect localized depth to groundwater, recharge characteristics and water quality. Many of these potential effects are similar for karst versus non-karst settings. It should however

⁵ Letter from Virginia Department of Conservation and Recreation to Federal Energy Regulatory Commission (April 17, 2015) Re: Atlantic Coast Pipeline, VIRGINIA CAVE BOARD COMMENTS AND RECOMMENDATIONS ON THE PROPOSED DOMINION ATLANTIC COAST GAS PIPELINE

LO147-14 Details describing the precautionary measures to be taken during pipeline construction blasting are discussed in EIS section 4.1.2.2 and also in Atlantic's and DETI's Blasting Plan. Potential impacts, and measures to reduce impacts, on groundwater are discussed in section 4.3.1.

Z-3383

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-14
(cont'd)

be noted that since karst groundwater flow is highly dependent upon localized structural characteristics, any disturbance, such as blasting, that can affect localized structural characteristics have therefore a greater chance of altering groundwater flow in surficial karst aquifers. If these impacts do not directly affect deeper wells, they may still affect the well's recharge characteristics.

In addition, the Virginia Cave Board⁶ discusses groundwater contamination that may occur due to blasting:

Depending upon the explosive charge used, blasting can release a wide variety of soluble chemicals, such as nitrates, nitrites, perchlorates, and semi-volatile organic compounds, to name a few. These products can enter the local surface waters or groundwater and therefore contribute to water pollution. Other potential complications with blasting include the incomplete combustion of explosive material, improper selection of explosive product, the "leaking" of chemical charges into surrounding cracks and fractures prior to detonation, increased turbidity within wells and karst conduits, geochemical reactions caused by the exposure of fresh geologic surfaces, airborne gas and particles, and improper transportation and storage. These all can be minimized by a properly written and implemented blasting plan.

2. The Danger of Any Construction in Karst Areas

Section 4.1.2.3 of the DEIS covers Karst Geology. On page 4-8 several sentences in the third paragraph give a serious appraisal of the dangers of constructing in Karst areas. Here are some examples:

The most prominent type of karst features in the ACP area are sinkholes, which comprise the greatest potential geohazard risk to any type of construction in karst terrain.

Potential impacts from sinkholes include property damage and injury from sinkhole collapse; and contamination of water resources

The Virginia Cave Board⁷ also stated that with regard to construction of pipelines in karst using trenching methods:

⁶ *Id.*

⁷ *Id.*

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

LO147-14
(cont'd)

It should be noted that just because a trench did not intersect any existing conduits, does not mean that the karst's groundwater flow characteristics have not been altered. While trenching has the potential to create less impact to natural water flow through karst systems than blasting, trenching still can create karst impacts and these are not easily predicted. Ground disturbance of any kind in karst terrain can lead to complications, and trenching involves a lot of ground disturbance.

Later on in this section and also in Section 4.3.1.7 we are assured that somehow by the "magic" of mitigation everything will turn out all right in the end. This is not realistic, especially when each mitigation measure somehow includes the Catch-22 of it only being used "if possible". That is not very reassuring; in fact it is not acceptable.

To us, the most obvious and practical form of mitigation would have been to avoid sinkholes. Yet it doesn't seem as if Atlantic tried to do this at all.⁸

J. In Closing

We are aware that Atlantic and DTI have failed to supply enough information to adequately address all Forest Service concerns and requirements. We are confident that the Forest Service will continue to honor their commitment to protect and preserve our natural resources by requiring all documentation to be submitted prior to the Forest Service making any decisions.

Such a decision, to allow a new utility corridor and to allow adverse impacts within the National Forests, is irrevocable, and will have everlasting consequences. It cannot be made hastily. In fact, the Forest Service has consistently demonstrated that nothing less than a careful and thorough analysis based upon complete information is their standard. That is good for the environment, and good for the economy.

⁸ For example, the pipeline is routed dangerously close to two mapped sinkholes on our farm.

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

Z-3386

LANDOWNERS COMMENTS

LO147 – Louis and Yvette Ravina (cont'd)

20170406-5505 FERC PDF (Unofficial) 4/6/2017 3:10:38 PM

April 6, 2017

Respectfully submitted,

/s/ Louis A. Ravina
Intervenor F308589
3383 Churchville Ave
Staunton VA 24401
310-710-8425
LouisARavina@gmail.com

/s/ Yvette J. Ravina
Intervenor F308600
3383 Churchville Ave
Staunton VA 24401
310-617-7198
YvetteJRavina@gmail.com

cc:

Joby P. Timm
Forest Supervisor
George Washington and Jefferson National Forests
United States Forest Service
5162 Valleypointe Parkway
Roanoke, VA 24019
JTimm@fs.fed.us

Thomas Tidwell
Forest Service Chief
Ttidwell@fs.fed.us

Kathleen Atkinson
Regional Forester
KAtkinson@fs.fed.us

Tony Tooke
Regional Forester
TTooke@fs.fed.us

LANDOWNERS COMMENTS

LO148 – Roberta Koontz

20170407-5091 FERC PDF (Unofficial) 4/6/2017 7:20:02 PM

To: Kimberly Bose, FERC From: Roberta K Koontz
Date: 4/6/17 Reference: CP115-554-000

Subject: DEIS does not address any efforts by Dominion to protect rare and very historic heritage trees found in private forests threatened by the ACP. Large trees, orchard trees and wild fruit trees important to wildlife will also be thoughtlessly destroyed by Dominion.

Dear Ms. Bose,

LO148-1

In an early version of the route of the ACP & an access road across our historic 1000-acre property, Dominion destroyed our two orchards with over 150 fruit trees. There were many other options for routing the ACP but Dominion chose to destroy our two wonderful orchards. We have worked for years to have wonderful fruit and share it with our friends and the wildlife. We have spent considerable resources on the orchards. Every year we invite friends, their family and dogs to come over and pick apples. It is a joy for them and for us.

The current path of the ACP across our property is probably over 1.5 miles in length. This path still threatens one orchard and runs quite close to the other orchard. So many wonderful trees will be destroyed by the ACP. We planted 1000s of trees on the property for wildlife habitats. Most did not survive so every mature tree is precious to us. Hardwoods are more scarce than ever in our Virginia forests and on farms.

I know there are magnificent trees (400 - 500 years old) in the forests along the ACP that will be destroyed by Dominion. We used to have such trees on our farm but there were destroyed about 20 years ago, illegally lumbered by a greedy farm manager according to what we were told. Once these trees are gone, there will not be any for another 400 years or more. And with more & more destruction of farm land and forests, they may never be any again. Like the giant sequoias in California.

I know of some magnificent trees on property owned by William & Lynn Limpert of Little Valley in Bath County, Virginia. These trees are in the path of the ACP and will be destroyed. Perhaps the children of Virginia will never see trees such as these again. Our trees are important resources to us and part of the beauty in our environment. Please look at the photos I am attaching of Bill & Lynn with their 500 year-old sugar maple that is over 12 feet in circumference. How can greed be allowed to kill these trees that has managed to survive with such beauty.

Why is Dominion allowed to chose only what is the easiest for them with no regard for the wishes of the landowners. And no regard for the destruction of valuable assets. We hired an attorney for almost 11 months to try and obtain a compromise from Dominion that moved an access road away from the center and heart of our farm. Dominion simply refused to do anything until we ran out of money for an attorney. Dominion is uncompromising and does not care about saving anything from destruction with the ACP.

There should be some guidelines written regarding Dominion's uncontrolled and unbridled destruction of private property. Dominion is all powerful and can destroy anything at will. And REMEMBER, all of this is private property. It does not belong to Dominion, FERC or the government agencies who support the destruction by Dominion.

LO148-1

Comments noted. Section 4.4.2 has been updated to include a discussion of old growth forests; however, note that public datasets delineating old growth communities are not currently available for the ACP and SHP project areas; therefore, a desktop analysis was conducted. Atlantic and DETI have indicated that they would conduct timber cruises where requested by the landowner prior to construction. As described in the Timber Removal Plan (see table 2.3.1-1), Atlantic has also committed to avoid large snags or large diameter trees on the edge of the construction right-of-way where practicable. These trees would be flagged prior to clearing. Further discussion on impacts to specialty crops and orchards, forested land and timber, and residences, including from a monetary perspective, are described in section 4.8.

Z-3388

LANDOWNERS COMMENTS

LO148 – Roberta Koontz (cont'd)

20170407-5091 FERC PDF (Unofficial) 4/6/2017 7:20:02 PM

LO148-1
(cont'd)

However, the DEIS does not specify what all is going to be destroyed. I think this should be part of the EIS. If Dominion is going to destroy something, this should be stated and assessed in the EIS. What is the value to the owners of what will be destroyed by the ACP. Dominion's claim that the ACP will not affect property values is absurd. The EIS should cover the destruction and loss of assets caused by the ACP.

Regards,
Roberta K Koontz
The Wilderness - Bath County
wildernessfarm@mgwnet.com



Z-3389

LANDOWNERS COMMENTS

LO149 – Dawn Averitt

20170407-5108 FERC PDF (Unofficial) 4/6/2017 11:11:27 PM

DAWN AVERITT
330 GRACE GLEN NELLYSFORD, VIRGINIA 434.466.4340
DAWNAVERITT@GMAIL.COM

April 5, 2017

Nathaniel Davis, Sr.
Deputy Secretary of the Federal Energy Regulatory Commission
888 First Street Northeast, Room 1A
Washington, DC 20426

In the matter of the Atlantic Coast Pipeline
Docket Nos. CP15-554-001, CP15-554-000, CP15-555-000 FERC/EIS-0274D

Comment in Response to the Draft Environmental Impact Statement Released by FERC regarding the Atlantic Coast Pipeline

I am a homeowner in Nellysford, Virginia. My home and family property is in the Rockfish Valley, nestled among beautiful mountains and directly in the path of the proposed Atlantic Coast Pipeline. The proposed pipeline passes within about 500 feet of my home, putting it in the "blast zone". My comments on the Draft Environmental Impact Statement are as follows:

The DEIS fails to determine the need for the ACP.

LO149-1 | It is FERC's responsibility to verify that this project, and all pipeline projects which might use eminent domain must both serve the public convenience and meet a public necessity. The DEIS does not convincingly make the case that this pipeline is needed to do either. The gas from this pipeline is being purchased by an affiliate entity to the companies that are building the pipeline, and need for this gas has not been demonstrated. FERC did not rigorously explore or objectively evaluate reasonable alternatives. For a pipeline that is 87.4% on private land, much of which is owned by people, like me, who do not wish to have it built, this is unacceptable. Which "public" is the pipeline, which is being proposed out of no clear necessity, serving? It appears to me that it serves only the shareholders of the companies involved. In fact, Dominion failed to include the relevant financial information on the need for the ACP. Because an affiliate is contracted to buy the proposed gas, Dominion should bear a higher level of scrutiny when demonstrating need, but FERC had not help them to this standard. Increasing shareholder value is not sufficient cause to forfeit my land.

LO149-1 See the response to comment CO46-1.

Z-3390

LANDOWNERS COMMENTS

LO149 – Dawn Averitt (cont'd)

20170407-5108 FERC PDF (Unofficial) 4/6/2017 11:11:27 PM

The DEIS fails to include critical environmental analysis necessary to determine the real environmental impacts of the pipeline.

LO149-2 The ACP's proposed route runs through very unstable terrain. As a property owner whose land includes one of the ridges that Dominion proposes to build along, I can tell you that our soils are unstable, especially along the ridges and steep hillsides. The DEIS fails to detail the great many environmental concerns that this brings up.

For example, the DEIS does mentions that "Atlantic and DTI will develop and implement other additional site-specific measures, where warranted, to address land movement, surface erosion, backfill erosion, general soil stability when backfilling the trench and restoring the rights-of-way in steep slope areas." But these site-specific measures are never described. This means they were not reviewed by FERC. Further, FERC implies that instead of reviewing how Dominion will mitigate the environmental impacts of construction, it will instead allow Dominion to complete these plans after the EIS but prior to construction. That means that FERC will approve the Environmental Impact Statement before it knows what the environmental impacts actually are and before it knows what Dominion plans to do about them. **This is unacceptable.**

This is one of many examples where Dominion used vague generalizations to address specific concerns. The mention of future plans to address the many environmental concerns brought up by the ACP does not mean they are adequately addressed! Dominion is blatantly shirking its responsibility and FERC is allowing them to do so.

I moved to the Rockfish Valley because, in large part, of its natural beauty and resources. I see no assurance in the DEIS that those valuable assets, on which a thriving local economy has been built, are being protected or even considered.

The DEIS does not adequately assess safety concerns.

LO149-3 As someone who is being asked to accept putting her children to bed within 500 feet of the ACP, well within the blast zone, I find that the DEIS is woefully inadequate in addressing safety concerns. FERC's analysis of safety concerns is totally simplistic. For example, I am insulted that measures like "direct mailings" to fire and public safety officials is the plan. Seriously? Our local fire and rescue personnel are wonderful but they are not trained, nor do they have the equipment to handle a pipeline disaster in our county. I see no indication that Dominion will help them. This is not an urban pipeline protected by well-established utility rights of way, encased in protective hardscape and operated in an environment where a great deal of local

LO149-2 We note that the commentor's quote is from Atlantic's Restoration and Rehabilitation Plan. Section 4.1.4 of the EIS provides our analysis of issues related to slope stability and measures to reduce impacts. See also the response to comment LO146-15.

LO149-3 See the responses to comments LO22-5 and LO62-6.

LANDOWNERS COMMENTS

LO149 – Dawn Averitt (cont'd)

20170407-5108 FERC PDF (Unofficial) 4/6/2017 11:11:27 PM

LO149-3 (cont'd) | knowledge and law prevents the kinds of mishaps which might happen in a rural county with few zoning, building or operational constraints. This pipeline will be laid in unstable soils where people regularly operate the kind of equipment that might damage a pipeline and cause a problem.

FERC seems to minimize the very real risks that this pipeline will introduce to those that live around it. It establishes no requirements for public notification which seems insane to the great many people who will be living and working along it. For this reason alone, the DEIS is inadequate.

The DEIS fails to properly address the impacts of the proposed pipeline on groundwater resources and safety of well users like my family. The DEIS does not address water quality impacts from the proposed ACP or provide any information on mitigation.

LO149-4 | My well is less than 200 feet from the proposed pipeline. It is difficult to imagine that blasting with dynamite will not impact my well, my home or the fragile watershed it is built across. Further, in the future, how will I know if chemical effluents used to clean and lubricate the pipeline have leached into the water? Will I have to wait until my children have rashes or my pets are serving as guinea pigs before my concerns are addressed? The DEIS gives me no assurance that my children and I will be protected.

The DEIS does not adequately address economic impacts from the proposed pipeline.

LO149-5 | This is a property in which I have lovingly invested my savings, with the intention of leaving it to my three daughters. It was intended to be an asset for my family, but no reasonable person will buy a property that a 42" natural gas pipeline runs through, and no responsible parent can go to bed knowing that you have just tucked your children into bed within a blast zone. My investment will be rendered worthless if this pipeline is installed. In addition to the presence of the pipeline, access to it will also adversely affect my property value. Dominion has proposed that my road, a gravel, private road, will be used to access a pump valve on adjacent property via a field on my property. It might come as a surprise to Dominion, but I have other plans for the field in front of my house, a field which I own. It is not intended to be an access road. It is not clear what this access will be for, how often it will occur and for what purpose. How could this not affect the value of my property?! It will have a major impact on my home and my land, and on the future value of both.

How is FERC ensuring that this project is in the public interest and that the value of my family's land is being sacrificed to benefit the public good and not the private shareholder? The answer

LO149-4 See the response to comment LO147-14.

LO149-5 We disagree that the impacts on property values were not adequately addressed in the EIS. See section 4.9.7. This section provides an overview of existing studies on this issue and discusses potential project-related impacts. Based on FERC staff's research, our analysis found no conclusive evidence indicating that natural gas pipeline easements or compressor stations generally have a significant negative impact on property values, although this is not to say that any one property may or may not experience an impact on property value for either the short or long term.

Z-3392

LANDOWNERS COMMENTS

LO149 – Dawn Averitt (cont'd)

20170407-5108 FERC PDF (Unofficial) 4/6/2017 11:11:27 PM

LO149-5
(cont'd)

appears to be that they are not, at all. I see no evidence that FERC is basing its assessment of economic impacts on the economic realities in the counties through which the pipeline will pass. I see no evidence that FERC has read or considered the great many comments that have been submitted to date that make the case for these economic realities.

Speaking for myself, I can tell you that the pipeline significantly impacts the value of my property, damaging my investment. Imagine, if you will, that you, whoever is reading this, have invested in a carefully crafted custom home on 73 pristine acres. You paid attention to every detail and sunk your savings into a home that would serve as a family base but that would also be a reasonable investment for the future. There is no possible way that having a 150 foot wide clear cut in the pristine woods 75 feet from your yard with a 42 inch gas pipeline buried there will have no impact on the value of your investment. But that seems to be the argument that Dominion and the DEIS are making. This is woefully inadequate. I am frantic at the thought of what this pipeline will do to the value of our home and land I intended to leave to my daughters. The real estate market has ground to a halt in the face of the pipeline and the fragile but growing economy of Nellysford, based on scenic beauty, artisanal food production, sustainable agriculture and tourism, is in great jeopardy because of this project. And FERC seems to not care that the very "public" (who they are obligated to consider in deciding to approve a project) are being negatively impacted.

Signed:

Dawn E. Averitt
330 Grace Glen
Nellysford, Virginia

LANDOWNERS COMMENTS

LO150 – Frank H. Reichell, III (cont'd)

Frank H Reichel, III, Millboro, VA.
Frank H. Reichel III and Suzanne S Reichel
1301 Manakin Road
Manakin-Sabot, VA 23103

April 10, 2017

Nathaniel J. Davis, Sr.
Deputy Secretary, FERC
888 First Street NE, Room 1A
Washington, DC 20426

Forest Service Chief, Thomas Tidwell, ttidwell@fs.fed.us
Regional Forester, Kathleen Atkinson, katkinson@fs.fed.us
Regional Forester, Tony Tooke ttooke@fs.fed.us

RE: COMMENT on Atlantic Coast Pipeline – Action to Support our National Forests

Dear Secretary Davis, Mr. Tidwell, Ms. Atkinson, and Mr. Tooke,

LO150-1 | We write today to urge the Forest Service to uphold its Land and Resource Management Plans for the George Washington National Forest ("GWNF") and Monongahela National Forest ("MNF") and to deny a Special Use Permit ("SUP") to Atlantic Coast Pipeline, LLC ("Applicant") for crossings of National Forest lands. We strongly object to amendments of the Land and Resource Management Plans that would allow the Atlantic Coast Pipeline ("ACP") to be built across miles of National Forest lands.

LO150-2 | We also write to support the U.S. Forest Service's commitment to its requirements for a careful, thorough review of the ACP application which may not be as expeditious as the Applicant desires. We urge the Forest Service to stand strong in its mission in spite of the enormous political pressure coming against it from Dominion and its ACP partners. Politicians come and go, but the public is depending on the U.S. Forest Service to protect our national lands for future generations.

The members of the United States Forest Service have served as heroes to the American public for decades. They are viewed as custodians of our most treasured national lands and champions of the common good. We commend the Forest Service for taking action to prevent the destruction of endangered species in Highland County, VA by denying the ACP a permit to build through National Forest Lands last year.

Although some of the particular circumstances have changed, the subsequent rerouting of the ACP through Bath County brings just as many harmful consequences to the GWNF. The Draft Environmental Impact Statement ("DEIS") issued by the Federal Energy Regulatory Commission ("FERC") in December 2016 does not adequately address important environmental concerns. There are many areas of missing information, misleading data, and incomplete analyses of critical environmental issues. We believe that this DEIS violates the letter and spirit of the National Environmental Policy Act ("NEPA").

LO150-1 See the responses to comments CO5-1, PM04-27, and LO146-20.

LO150-2 See the responses to comments CO5-1, PM04-27, and LO146-20.

Z-3394

LANDOWNERS COMMENTS

LO150 – Frank H. Reichell, III (cont'd)

LO150-2
(cont'd)

We own a 71-acre horse farm on a sliver of land in Millboro, Virginia, surrounded by GWNF lands, at the southern end of the Deerfield Valley. We have beautiful views of Walker Mountain which is unmarred by development or industrialization. The staggering amount of deforestation, disruption of sensitive springs, streams and rivers, bulldozing and blasting through rocky and karst terrain, danger to wildlife and habitats, forest fragmentation, pollution, sedimentation, loss of biodiversity and other environmental impacts of the proposed ACP would destroy this part of the world forever. This area is one of the last of its kind in the eastern United States. It must not become a sacrifice zone for corporate greed.

The economy and property values of these mountain counties depend on tourism. Our son became an Eagle Scout through camping trips to the GWNF. People come from all over the world for an unspoiled wilderness experience on the Appalachian Trail and breathtaking views from the Blue Ridge Parkway. The Applicant's continued claim that no one will see the ACP because it is buried is a lie. The ACP's clear-cut right-of-way would create permanent scars up and down pristine forested mountainsides. Hundreds of miles of new access roads would further fragment the forests. The ACP would cause war-like destruction against the people and places of affected counties such as Randolph and Pocahontas in WV and Highland, Bath, Augusta, and Nelson in Virginia. In addition, the ACP would introduce an element of danger to lands previously safe. The constant threat of explosion and fire as well as methane leaks are unacceptable to those of us who love the wilderness and the health and life it gives.

We urge you to do what no one else in this process can – keep the Atlantic Coast Pipeline, LLC out of our National Forests! Future generations will look back with admiration at your courage, against the odds, at this critical hour.

Sincerely,

Frank H. Reichel III and Suzanne S. Reichel
The.reichels@comcast.net

8667 Mill Creek Road
Millboro, VA 24468

Z-3395

LANDOWNERS COMMENTS

LO151 – Carolyn Fischer

Z-3396

carolyn fischer, nellysford, VA.

- LO151-1 | I would strongly and urgently ask the US Forestry Service to deny a special use permit to the Atlantic Coast Pipeline. ~ Besides the very pressing issues of fragmenting some of the most remote and unspoiled forest with industrial pollution and construction, a changing of the Forestry standards and values invites precedence for additional industrial use in the future. I don't believe it is in the best interests of the people or the ecology of this national treasure to let the fossil fuel industry dictate how the forest will be used, now or at anytime in the future. ~
- LO151-2 | Nowhere in the DEIS is there an accounting of the amount of dirt that will be removed and what will be done with it. By some estimates, on one ridge top alone, mountaintop removal will fill 800 to 1,000 dump trucks with sub soil. Where does this soil go? Will they drive it away? What are the impacts to the forest of 1,000 dump trucks coming and going? Will they spread 1,000 dump trucks of subsoil on the forest floor? Or on the steep declines? Will this 1000 dump trucks of subsoil be stabilized? If not, what will prevent all of this dirt from washing into the streams and rivers? What is our tolerance for allowing the ACP to impact our environment and our waterways? Who is responsible for these actions? My understanding is that there will be no building inspections by a third party. The construction crew that Dominion hires will be accountable to no one, other then themselves, for any and all inspections. I believe this leaves our waterways and forests open to unlimited damage and gives the construction crew a blank check to cut and slash the forests to their convenience. ~ Why is Dominion not being required, as stated and requested by the Forest Service itself, to provide a thoroughly vetted alternative route? If the ACP were built on lower ground it would have much less impact on our natural resources. There are other more reasonable alternative routes then to choose this extreme proposal to go thru our very steep and rugged back country. There are alternative routes that would not affect our water sheds as dramatically. ~ It's been real obvious from the beginning that Dominion does not care about the costs. The ratepayers pick up the tab. If there is a catastrophic failure and fire, who will the Forestry Service bill to put the fire out? Again the people of this state will pay for all of it. Dominion has no liabilities and no obligations to the people of Virginia. We pay. They profit. I do not believe this is good forestry management to let an unconscionable industry into our wilderness. ~ PLEASE DENY A SPECIAL USE PERMIT FOR THE ACP ~ Sincerely, Carolyn Fischer
- LO151-3
- LO151-4
- LO151-5
- LO151-6

- LO151-1 | FS response: The comment is noted.
- LO151-2 | See EIS section 4.1.6 for discussion regarding the handling of spoils on steep slopes on NFS lands. Section 4.2.3 has been revised to discuss disposal of excess rock and spoil.
- LO151-3 | Section 4.3.2 includes our discussion of impacts on surface waters, and measures to reduce impacts during construction.
- LO151-4 | This is not accurate. As discussed in section 2.5.2 of the EIS, the role of Atlantic's and DETI's EIs is to ensure ACP and SHP are constructed in accordance with the requirements imposed by FERC and other regulatory agencies. However, the EIs' role should not be mistaken for FERC abdicating its inspection authority to Atlantic and DETI. The purpose of the EI is to ensure applicants are cognizant of and taking matters of compliance seriously. Therefore, to ensure ACP and SHP would be constructed in compliance with the FERC's and other regulatory agencies' requirements, FERC would conduct its own independent monitoring and inspection of the projects as discussed in section 2.5.3.
- LO151-5 | Section 3 includes our analysis of alternatives to the projects, including major route alternatives and route variations.
- LO151-6 | The topic of financial liability is outside the scope of this EIS and is more properly addressed in legal forums.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow



UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Atlantic Coast Pipeline, LLC

Docket No. CP15-554-000

**COMMENTS OF DAVID AND NANCY SCHWIESOW
ON IMPACT OF THE PROPOSED ROUTE ON THE
NEIGHBORHOOD OF FORTUNE'S POINT
AND SURROUNDING AREA
AND ALTERNATE ROUTES**

Pursuant to the Supplemental Notice of Intent to Prepare an Environmental Impact Statement issued by the Federal Energy Regulatory Commission ("FERC" or the "Commission") on May 3, 2016, David and Nancy Schwiesow (the "Schwiesows") hereby provide their joint comments on the Applicants' proposed new route. On October 20, 2015, David Schwiesow timely filed a Motion to Intervene in this Docket Number CP15-554-000.

The Commission's Certificate Policy Statement encourages applicants to minimize adverse impacts on landowners and surrounding communities and states that projects will not be found in the public interest if unmitigated adverse impacts, including those on landowners and surrounding communities, exceed the project's benefits. The Schwiesows retired to the small community of Fortune's Point in Nelson County, Virginia over four years ago, and we plan to live here for the next 30 years. The Proposed Route of the Atlantic Coast Pipeline that is currently advocated by Atlantic Coast Pipeline, LLC ("ACP") and Dominion Transmission, Inc. (collectively "Dominion") will destroy Fortune's Point. We did not think that Dominion was in the business of destroying communities, but they have shown no concern for the community of Fortune's Point since we detailed our legitimate concerns beginning in a letter to Dominion on March 10, 2015, and in a filing with the Commission on the same date. See Attachments 1 and

Z-3397

LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

Z-3398

2. Over 15 months later, Dominion has made no effort to even respond to these issues and has not modified the Proposed Route to avoid Fortune's Point.

I. General Impact on Fortune's Point

Fortune's Point is at the end of Fortune's Ridge Road in Wintergreen. To locate it on Dominion's map of the Proposed Route, go to the point where the route passes in front of the sole entrance and exit to Wintergreen Resort, then go up the very steep side of Piney Mountain, and take a look at the meadow area where Dominion proposes to put the Pipeline as it crosses the very top of Piney Mountain. That is the small, six-property residential community of Fortune's Point. Dominion's proposed path goes across Lot 1, rendering it unbuildable, and then directly across Lot 2 (the nice meadow area), which also makes that lot unbuildable. Dominion then crosses over onto Lot 5 (the lake lot), where a large addition to their home was completed this year. And then, to add insult to injury, Dominion comes straight across our neighbor's lot (Lot 4), within 100 feet of our neighbor's exceptional house. The Schwiesows own Lot 3, and have a very substantial investment in their main house, guest house and land. Dominion thus has managed to find the most expensive small community in Nelson County, with a total of six very valuable properties, and to put the pipeline right through 4 of the 6 lots, and substantially devalue the other 2 lots. The damage to these properties will be in the \$2-\$3 million range, or more. And, most important, Dominion will destroy our community. A map of Fortune's Point and the approximate location of the Proposed Route on the 6 lots is included as Attachment 3.

LO152-1

In destroying our community, Dominion will be destroying a significant historical property. Fortune's Point derives its name from the Fortune family, which has been a prominent family in Nelson County for decades. The property that comprises Fortune's Point was a farm

LO152-1 Comment noted.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3399

LO152-1
(cont'd)

owned by John Fortune dating back to at least the very early 1800's. John Fortune was a member of the Nelson County contingent that fought for our country's freedom in the Revolutionary War. The property was known as Meadow Rock for many years. According to our local lawyer, Sam Eggleston, if you trace back many of the deeds for land in Nelson County to the 1800's, they begin with the words: "Start at Meadow Rock, and then go . . . "The Fortune Farm was a way station for settlers who crossed over the Blue Ridge Mountains. The settlers came up what is now Spruce Creek Road, crossed onto the Fortune Farm, continued along the ridge that is now Fortunes Ridge Drive, turned down Pond (Whistler's) Hollow (what is today Wintergreen Drive) and then turned up Reed's Gap Road (what is now Route 664). Spruce Creek Road was washed out at the top by Hurricane Camille, but the vestiges of the historic road remain today. Dating back to earlier times, this area was frequented by the Monocan Tribe, and it is likely that they utilized this flatter area as a camp site.

II. Specific Impact of Construction Activity on Fortune's Point

LO152-2

In addition to the general impact of the Pipeline on the Fortune's Point community, Dominion's filing on April 15, 2016 contained substantial additional information about the significant adverse impact that Dominion's construction activities will have on Fortune's Point. We believe that there will be massive construction activity at Fortune's Point, and we request that FERC direct Dominion to provide details as to what that construction activity will consist of, the length of time that the construction activity will occur, and what steps, if any, Dominion will take to minimize the damage to the Schwiesows, who are full-time residents of Fortune's Point, and the other property owners at Fortune's Point.

LO152-2 Section 4.8.8.2 discusses the Fortune's Point neighborhood. Also see the response to comment LO83-2.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-2
(cont'd)

Dominion has placed Fortune's Point directly in the bullseye of its construction activities at Wintergreen. The Proposed Route includes a 2,100 foot long path from the entrance to Wintergreen Resort up the very steep side of Piney Mountain directly to the first property in Fortune's Point. This portion of the route includes a minimum 125-foot wide clear cut of all trees, rhododendrum, mountain laurel and other bushes and plants. We calculate that approximately 7,000 trees will be destroyed. In addition, a trench that is a minimum of 7 feet deep will be dug to place the Pipeline. This phase of the construction requires a huge amount of construction equipment for the clear cutting and trenching work. Then, all of the trees, bushes, plants, rock, dirt and other debris from this massive construction activity must be carried to either Fortune's Point or the entrance to the Resort and then disposed of using dump trucks, logging trucks and other construction vehicles. In addition, the Proposed Route then runs the Pipeline across at least four of the properties at Fortune's Point, including three that have residences. The fundamental question is how severely Dominion's construction activities will impact the Fortune's Point community.

In its April 15, 2016 filing, Dominion showed, for the first time, four Additional Temporary Work Spaces at Fortune's Point. It also showed, for the first time, that it will use Wintergreen Drive, Fortunes Ridge Drive and Fortune's Point Lane, which is the only road in Fortune's Point, as "access roads" to connect its construction activities between the entrance to Wintergreen Resort and Fortune's Point. See Attachment 4. Since this information has just come to light, the Schwiesows have the following questions:

- Where specifically will those work spaces be located and what size will they be?
- What activities will be carried on in those work spaces?

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-2
(cont'd)

- Will the work spaces house dump trucks, logging trucks, winch and other construction machinery?
- Will cut trees, tree stumps and brush and the rock and other debris from the 7' deep trench be hauled through Fortune's Point?
- Will pipe and other construction materials be stored at Fortune's Point?
- Will the debris, construction materials and explosives (see below) be hauled up and down Wintergreen Drive, Fortunes Ridge Drive (which has approximately 40 residences on it) and Fortune's Point Lane?
- How will the noise and other disruption from these construction activities be mitigated?

From Fortune's Point, Dominion will continue east in the direction of Bryant's Mountain, and they will have the same construction activity - clear cut a minimum path of 125' and dig a trench that is a minimum of 7' deep in which to put the Pipeline. All of this construction activity will be in view of many Wintergreen houses, including nearly all of the South-facing houses on Black Rock Circle. Dominion shows no additional work spaces from Fortune's Point (which is at approximately Milepost 159.5) until approximately 162.5. A huge volume of cut trees, brush and the rock and other debris from the 7' deep trench will result from this construction activity. The following questions about this construction activity must be answered:

- How will Dominion dispose of the debris?

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-2
(cont'd)

- Where will Dominion take the debris? Will Dominion take the debris back to Fortune's Point and down Fortune Ridge Drive and Wintergreen Drive to the Wintergreen Resort entrance?
- How long will the construction activity on this portion of the Proposed Route last?
- What other construction activity will Dominion have that will affect Fortune's Point and the Wintergreen area?

III. Significant Safety Issues

LO152-3

The Proposed Route should be rejected in favor of a more responsible alternate route due to the catastrophic risk it creates for loss of life and property destruction at Fortune's Point and Wintergreen Resort. The Proposed Route is slated to come across the sole entrance and exit to the Mountain portion of Wintergreen Resort. There is only one road entering the Mountain portion of the Resort – Wintergreen Drive – this is also the only road that can be used to exit Fortune's Point and the Resort. Since there is only a single point of access and escape, a pipeline explosion or rupture near the entrance to Wintergreen could have catastrophic consequences, with thousands of people trapped while the resulting forest and brush fire roars up the Mountain. On the busier weekends at the Resort, the population on the Mountain exceeds 10,000 persons. There are hundreds of houses, condos, restaurants, golf and other Resort structures.

The Schwiesows are permanent residents on the Mountain, at Fortune's Point, and we have frequently experienced sustained winds of 50, 60 and 70 MPH here. Within the last year, the weather station at the top of the Mountain has recorded wind gusts of over 100 MPH on several occasions. The fire risk on the Mountain often is rated as "high." And the Pipeline

LO152-3 See the responses to comments CO48-2 and LO22-5.

Z-3402

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-3
(cont'd)

would be built through the side of a steep mountain and then turn back up the side of another steep mountain at the entrance to Wintergreen, mountains which have experienced earthquakes and landslides in the past. All these factors increase the risk of a failure in the Pipeline.

According to the Gas Research Institute, the proposed Pipeline, which is a high pressure 42-inch natural gas pipeline under a pressure between 1,200 and 1,400 PSI, will have a Blast Radius of just over 1,100 feet and an Evacuation Zone of 3,300 feet on both sides of the Pipeline Path. If the pipeline explodes or ruptures, the results will be catastrophic. The Wintergreen Police Department building (which contains the back-up 911 communications center for all of Nelson County), the attached Gatehouse and the Wintergreen Property Owners Association headquarters will be destroyed immediately. And the forest and brush fire will begin rushing up the side of the Mountain, making an escape down Wintergreen Drive impossible. All of this led Curtis Sheets, the Chief of Wintergreen Fire and Rescue, to inform FERC in a letter dated March 21, 2015 that "our community has only one way out. Ironically, the alternate route of the pipeline which crosses the Parkway at Route 664 will block our existing exit in the event of a pipeline explosion. Why would any agency which has the power to alter the route and/or existence of the pipeline endorse placing thousands of citizens at risk?"

FERC has recognized this significant safety issue, and, on December 4, 2015, in Data Request 168, FERC stated to Dominion that: "Title 49 CFR Part 192 requires a pipeline operator to establish a written emergency plan that includes procedures to minimize the hazards in a natural gas pipeline emergency. Detail the measures that Atlantic would include in its emergency plan to account for ingress and egress at the Wintergreen Resort in the case of a natural gas pipeline emergency." Nevertheless, over 15 months after Chief Sheets raised the issue, in Section 11.2.4, Emergency Response Plan, of Resource Report 11 - Reliability and Safety, which

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-3
(cont'd)

Dominion filed on April 15, 2016, Dominion provided no information as to how it would attempt to resolve the serious safety issues at Wintergreen , stating only that “DTI previously committed to updating its Emergency Response Plan (ERP) to incorporate the proposed Projects based on feedback from local emergency service providers (e.g., police, fire, medical, and emergency response). DTI will file the updated ERP prior to construction.” Dominion’s cavalier refusal to promptly address this serious safety issue is completely unacceptable. Dominion has not addressed the issue because it can’t. There is no acceptable emergency response plan that would adequately respond to the potentially devastating consequences of a leak or explosion at the sole entrance and exit to Wintergreen Resort. Dominion clearly is hoping that this serious issue will be lost in the multitude of issues that must be addressed when FERC approves the Pipeline and construction begins immediately.

This safety risk has special significance for Fortune’s Point. All of the homes at Fortune’s Point are within the 1,100 foot Blast Radius for the Pipeline, which means that every home in Fortune’s Point, and all of their occupants, will be destroyed if an explosion of the Pipeline occurs on or near Fortune’s Point. Yet, when we have raised this safety concern with Dominion, they have dismissed it. Their response is that natural gas pipelines have an excellent safety record, so we should not be concerned. The problem is that natural gas pipelines do rupture and explode, and the impact of such an event at the entrance to Wintergreen Resort or at Fortune’s Point would be devastating. In fact, statistics reported by the U.S. Pipeline and Hazardous Materials Safety Administration, Pipeline Safety Trust show that natural gas pipelines that were constructed since 2010 are failing at a rate four times the average failure rate for previously constructed pipelines. As just a few examples of actual natural gas pipeline explosions:

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-3
(cont'd)

☞ On April 9, 2015, California regulators imposed the largest penalty for a U.S. natural-gas utility ever, ordering PG&E Corp. to pay \$1.6 billion for failures that led to a deadly 2010 natural gas pipeline explosion in a San Francisco suburb. Simple human error - a faulty weld on the pipeline - caused an explosion and fire rupture that killed eight people and destroyed 38 homes. For details, see this link: <http://www.bloomberg.com/news/articles/2015-04-09/pg-e-ordered-to-pay-record-1-6-billion-for-deadly-gas-blast>.

☞ On April 29, 2016, an explosion of a 30 inch natural gas pipeline (much smaller than the 42 inch pipeline that Dominion is proposing to put at the entrance to Wintergreen) in the rural area of Salem Township, Pennsylvania sparked a fire with huge flames, burning and critically injuring one man, destroying his home, and melting the siding on homes more than a mile away. The fire also caused damage to nearby utilities and prompted evacuations for a quarter of a mile in the immediate area. Fire Chief Bob Rosatti said, "It looked like you were looking down into hell. As far across my windshield as I could see was just a massive fireball." The pipeline was owned by Spectra Energy, which had earlier certified to its safety. For details, see these links: "[Looking down into hell: Man seriously burned despite living 500 yards from explosion](#)," and "[Over the site of the pipeline explosion 'looks like a battlefield'](#)".

☞ On April 18, 2015, workers struck a 12-in natural gas pipeline near Fresno, California. The resulting explosion sent up a massive 200-foot fireball. Eleven people were injured, three critically. Again, it resulted from simple human error.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3406

LO152-3
(cont'd)

For details, see this link: <http://www.kcra.com/news/chp-large-fire-shuts-down-hwy-99-near-fresno/32430206>.

⚠️ The following video shows a recent pipeline explosion in West Virginia:

<http://thinkprogress.org/climate/2015/01/27/3615805/west-virginia-gas-pipeline-explosion/> - "marking the fourth major mishap at a U.S. pipeline this month."

⚠️ As one final example (though many other examples are available), this is NBC

Nightly News reporting on a massive firestorm resulting from a gas pipeline explosion around Sissonville, West Virginia:

<https://www.youtube.com/watch?v=cobS8bXP6Vc>

To take this risk at the entrance to Wintergreen Resort is unthinkable. The Proposed Route must be modified to eliminate this risk.

IV. Alternate Routes

LO152-4

Possibly the most important point, is that all of the adverse impacts to Fortune's Point and the surrounding Wintergreen area that are identified above can be completely eliminated by changing the Proposed Route to any of the four alternate routes that Friends of Wintergreen, Inc. has identified. On May 14, 2016, Friends of Wintergreen, Inc. submitted to the Commission a detailed 128-page analysis of four alternate routes for the Pipeline that were developed with thorough input from Integral Consulting Inc., a national environmental consulting firm, and Tide Water Integrity Services, LLC, an engineering consulting firm led by Bryan Melan, P.E., an engineer with 39 years' experience in pipeline construction. This submission followed two earlier submissions by Friends of Wintergreen, a 43-page submission on October 23, 2015 and a

LO152-4 We have analyzed the routes and as outlined in section 3; we do not find them preferable to the proposed route.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

LO152-4
(cont'd)

33-page submission on December 29, 2015. In these submissions, Friends of Wintergreen has increasingly refined its proof that Dominion's Proposed Route for the Pipeline will cause significant adverse environmental, safety and economic impacts in the Wintergreen area, including at Fortune's Point. Friends of Wintergreen also has provided a thoughtful, detailed analysis of four alternate routes, each of which will avoid the substantial adverse impacts the Pipeline would have on the Wintergreen area, including at Fortune's Point, and all of which are environmentally preferable to Dominion's Proposed Route. The Schwiesows request that the Commission require Dominion to fully and honestly evaluate these four alternate routes, and other alternate routes that have been proposed by third parties, and modify the Proposed Route to incorporate one of these alternate routes.

Dated: June 2, 2016

Respectfully submitted,

/s/David R. Schwiesow
David R. Schwiesow

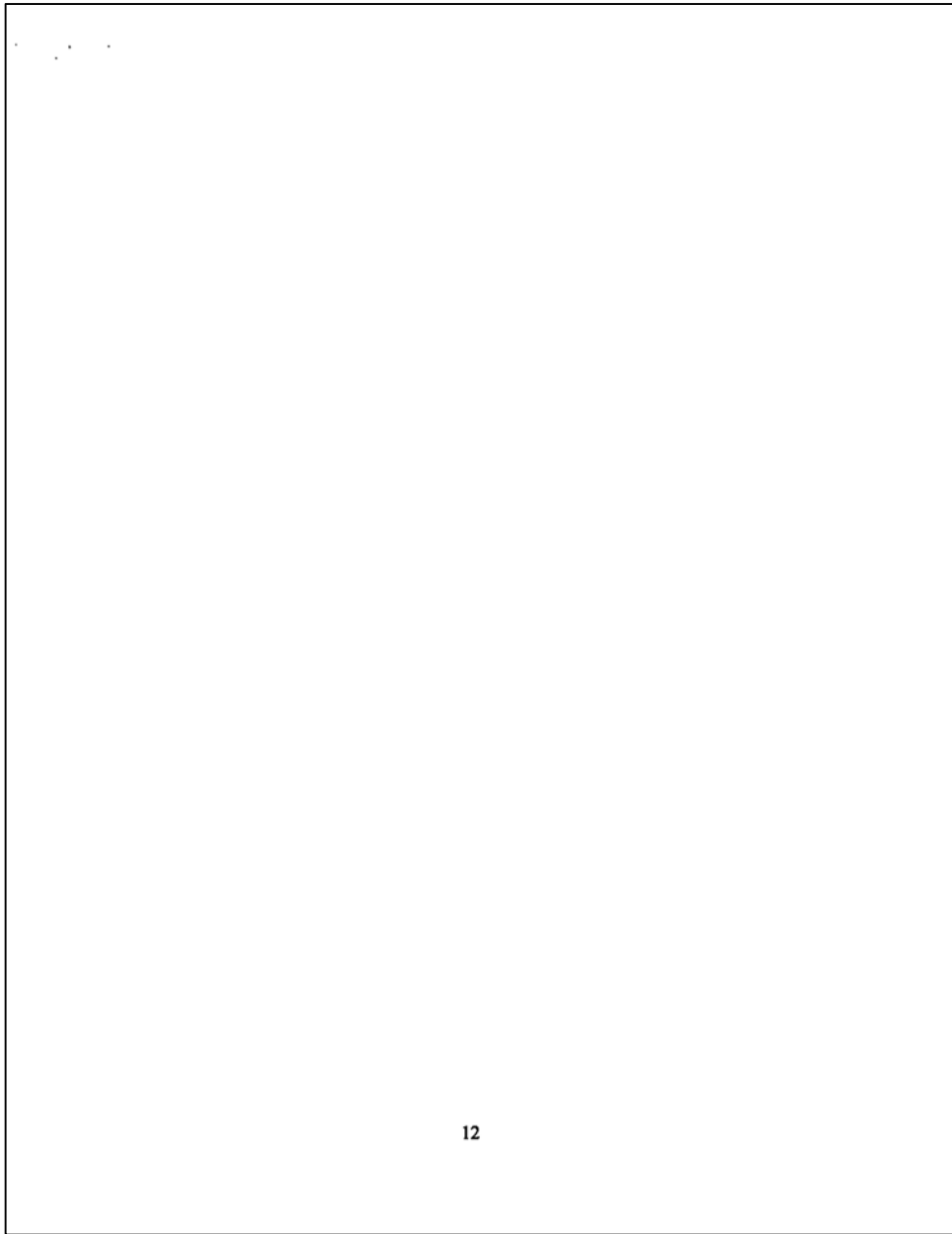
/s/Nancy L. Schwiesow
Nancy L. Schwiesow

Mailing Address:
RR 1 Box 596
Roseland, VA 22967

Physical Address:
178 Fortune's Point Lane
Fortune's Point
Wintergreen, VA 22958

LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

Z-3408



LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Fortune's Point, Wintergreen, VA this 2nd day of June, 2016.

/s/David R. Schwiesow
David R. Schwiesow

Error! Unknown document property name.

Z-3409

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

ATTACHMENT 1

March 10, 2015

RR 1 Box 596
Roseland, Virginia 22967

Dominion ACP
Atlantic Post Pipeline
Dominion Energy
120 Tredegar Street
Richmond, VA 23219

Re: Destroying Fortune's Point
Historic Issues
AT South Alternate Route

Ladies and Gentlemen:

The purpose of this letter is to offer our initial thoughts on a matter of great importance to us. We will provide additional details at a later point.

I am David Schwiesow. After 40 years as a corporate lawyer, I retired as Senior Vice President and General Counsel of Deltek, Inc. Deltek, Inc. was a Nasdaq-listed software company that was sold in 2012 for \$1.1 billion. My wife, Nancy, is a realtor. For over 30 years, she was associated with Long & Foster. Of 15,000 realtors at Long & Foster, Nancy is one of approximately 200 realtors who are enshrined in their Hall of Fame. Nancy and I retired to the small community of Fortune's Point over two years ago, and we plan to live here for the next 30 years.

The AT South Alternate route would destroy Fortune's Point. We did not think that Dominion was in the business of destroying communities. Neither we nor our neighbors here will allow that to happen. And destroying Fortune's Point will destroy an important historic property in Nelson County and the Commonwealth of Virginia.

Fortune's Point is at the end of Fortune's Ridge Road in Wintergreen. To locate it on your map, just go to the point where the route passes in front of the Gatehouse at the entrance to Wintergreen, go up the side of the mountain, and take a look at the nice meadow area where you propose to put the pipeline as it crosses the mountain. That is Fortune's Point. Your proposed path goes across Lot 1, rendering it unbuildable, and then directly across Lot 2 (the nice meadow area), which also makes that lot unbuildable. You then cross over onto Lot 5 (the lake lot), where a large addition to their home is under construction. And then, to add insult to injury, you come straight across our neighbor's lot (Lot 4), within 100 feet of our neighbor's house (the most expensive house in Fortune's Point). Lot 4 is owned by Jon Ansell and Pam Farnham. Jon and Pam are Richmond residents. Jon is the former CEO and Chairman of Allianz Global Assistance, and he now is CEO of Fusion Company – both Richmond-based companies. Nancy and I own Lot 3, and we have over \$2 million invested in our main house, guest house and land. You thus have managed to find the most expensive small community in Nelson County, with a total of six very valuable properties, and to put the pipeline right through 4 of the 6 lots, and

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

substantially devalue the other 2 lots. The damages will be in the \$2-\$3 million range, or more. And, most important, you will destroy our community.

In destroying our community, you will be destroying a significant historical property. Fortune's Point derives its name from the Fortune family, which has been a prominent family in Nelson County for decades. The property that comprises Fortune's Point was a farm owned by John Fortune dating back to at least the 1800s, and probably the 1700s. We know that the property was known as Meadow Rock for many years. According to our local lawyer, Sam Eggleston, if you trace back many of the deeds for land in Nelson County to the 1700s, they begin with the words: "Start at Meadow Rock, and then go . . ."

The Fortune Farm was a way station for settlers who crossed over the Blue Ridge Mountains. The settlers came up what is now Spruce Creek Road, crossed onto the Fortune Farm, continued along the ridge that is now Fortunes Ridge Drive, turned down Pond (Whistler's) Hollow (what is today Wintergreen Drive) and then turned up Reid's Gap Road (what is now Route 664). Spruce Creek Road was washed out at the top by Hurricane Camille, but the vestiges of the historic road remain today. Dating back to earlier times, this area was frequented by the Monacan Tribe, and it is likely that they utilized this flatter area as a camp site. We are continuing to learn about the history of Fortune's Point, and we will provide additional information as it becomes available.

As you would expect, the six property owners at Fortune's Point are united in their opposition to putting the pipeline through their community. All property owners have denied Dominion the right to enter on or survey their properties.

Our property consists of Parcel Number 19 2 3, Nelson County, Virginia, Landowner Tract 08-001-8011.

Thank you for your time and attention to this matter. Please include this letter in the official record for FERC Docket Number PF15-6-000. Should you, for any reason, not understand this letter, you may contact us at RR 1 Box 596, Roseland, Virginia 22967.

Sincerely,

David R. Schwiesow

Nancy L. Schwiesow

ATTACHMENT 2

Z-3411

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

**SUBMISSION TO
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

**ATLANTIC COAST PIPELINE PROJECT
DOCKET NUMBERS:
PF 15-5-000
PF 15-6-000**

**ENVIRONMENTAL IMPACT STATEMENT –
DESTRUCTION OF FORTUNE'S POINT COMMUNITY
AND
HISTORIC STATUS OF FORTUNE'S POINT**

SUBMITTED BY:

**DAVID SCHWIESOW
NANCY SCHWIESOW
PARCEL NUMBER 19 2 3
NELSON COUNTY, VIRGINIA
LANDOWNER TRACT 08-001-B011
178 FORTUNE'S POINT LANE
RR 1 BOX 596
ROSELAND, VIRGINIA 22967**

March 18, 2015

March 18, 2015

Z-3412

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3413

Ladies and Gentlemen:

My name is David Schwiesow. My wife, Nancy, and I are full-time residents of Nelson County. We have owned real estate in Nelson County for over 25 years, and we had always planned to retire here. We did retire here nearly three years ago to Fortune's Point, a small, six-parcel community on top of Piney Mountain. One of the pillars at the entrance to our property has a plaque that says "Fortunate." We do feel very fortunate to have found a property of amazing natural beauty, very peaceful and quiet, tucked away at the end of a short back road – Fortune's Point Lane. The property that comprises Fortune's Point was a farm owned by John Fortune dating back to at least the 1800's, and probably the 1700's. The Fortune Farm was a way station for settlers who crossed over the Blue Ridge Mountains. It was accessed by Spruce Creek Road, which was washed out at the top by Hurricane Camille. The flatter sections of the property may well have been frequented by the Monocan Tribe.

Three weeks ago, we were stunned when Dominion announced that they had developed an alternate route for their pipeline – the Appalachian Trail South Alternate. This route would cut directly through our small neighborhood, crossing through four of the six properties, substantially devaluing the other two properties, and destroying our community. So we have an important environmental impact issue to raise – the AT South Alternate will destroy our neighborhood, a neighborhood that is of historic significance. The proposed path goes across Lot 1, rendering it unbuildable, and then directly across Lot 2, which also makes that lot unbuildable. The path then will cut a 125' or more clear-cut path through Lot 5, where a large addition to their home is nearing completion. It will then proceed to cut the same path through Lot 4, coming within 100 feet of our neighbors' beautiful home.

What is a 125' clear cut path? Yesterday, I was on I-64, and I got off at the exit for the Blue Ridge Parkway. I took a tape measure, and going under the overpass for I-64, I measured it. The width of all of I-64, including the median strip, was 130'. So Dominion wants to put an Interstate-sized superhighway

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

through the middle of Fortune's Point. How could that not destroy a small, six-property community? And in the process cause what we estimate to be \$2-\$3 million in damages.

Nancy and I support a U.S. energy policy that strives for energy independence, but we believe that there are existing utility easements and other public rights-of-way that could accommodate the proposed pipeline. Dominion should be required to fully evaluate those alternate routes to find an acceptable route that does not destroy Fortune's Point, or any other neighborhood or individual property.

For additional detail regarding the two issues I have discussed above, please see Attachment A to these comments. Also, we note that all six property owners at Fortune's Point are united in their opposition to putting the pipeline through their community. All property owners have denied Dominion the right to enter on or survey their properties. We may be reached at schwiesow@verizon.net or 434-325-7001.

Respectfully submitted,

David Schwiesow

Nancy Schwiesow

Z-3414

LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

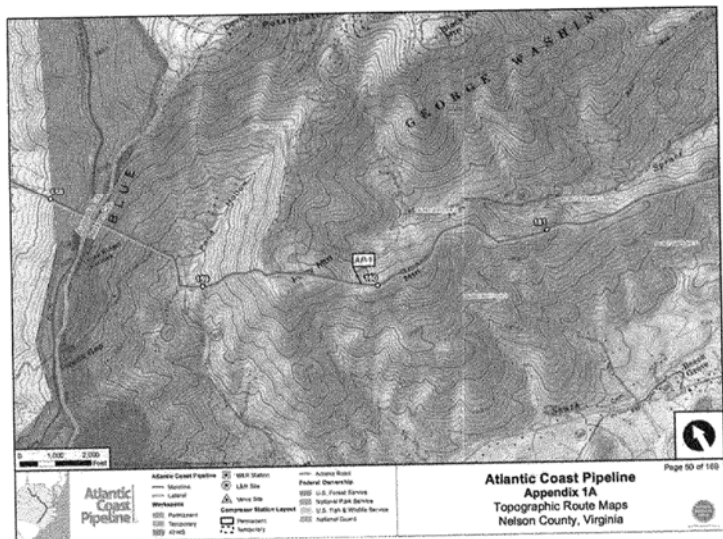
Z-3415

ATTACHMENT 4

LANDOWNERS COMMENTS

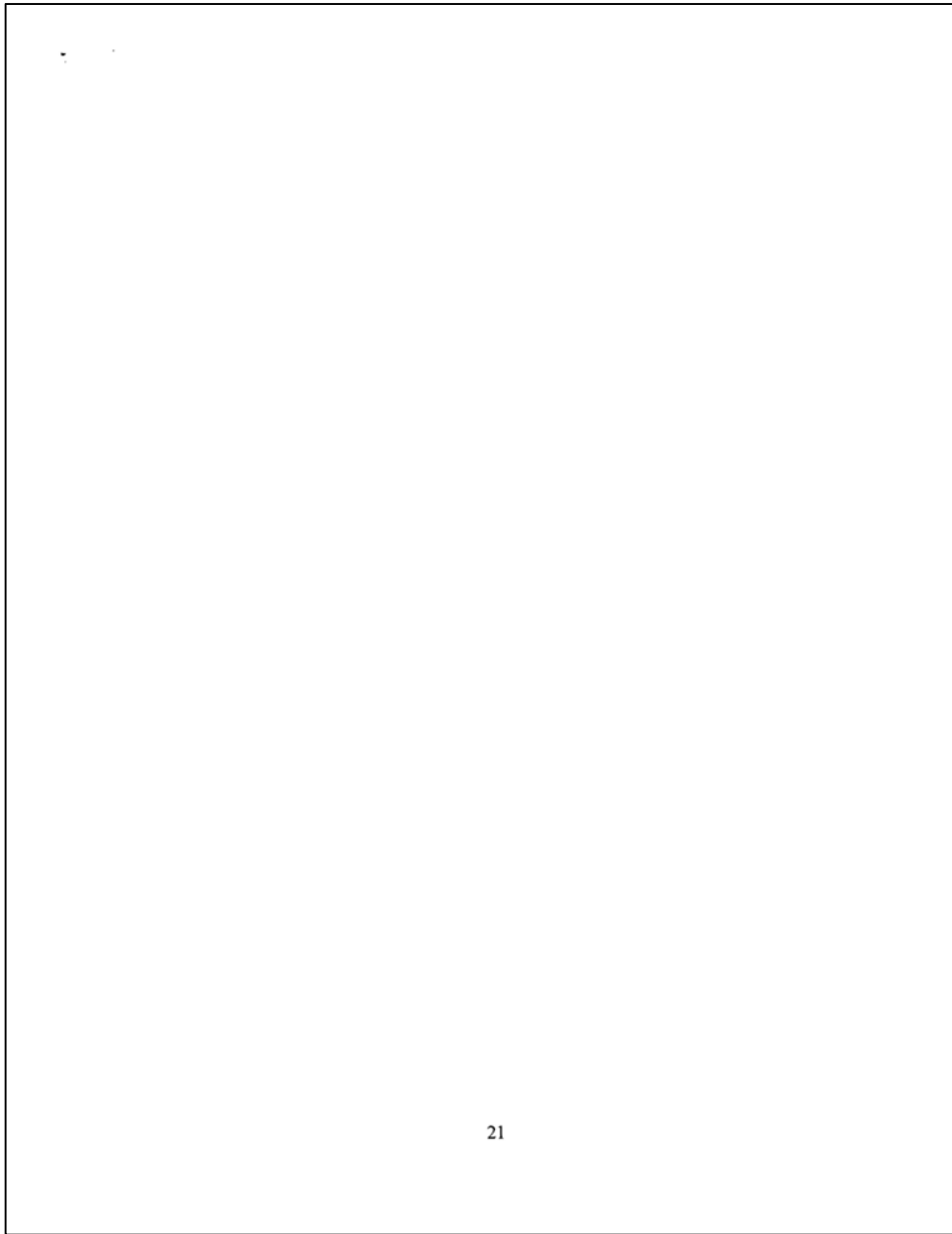
LO152 – David and Nancy Schwiesow (cont'd)

Z-3416



LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

Z-3417



LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

*Jon
Ansel*

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Atlantic Coast Pipeline, LLC

Docket No. CP15-554-000

MOTION TO INTERVENE AND PROTEST
BY PAMELA FARNHAM

BACKGROUND

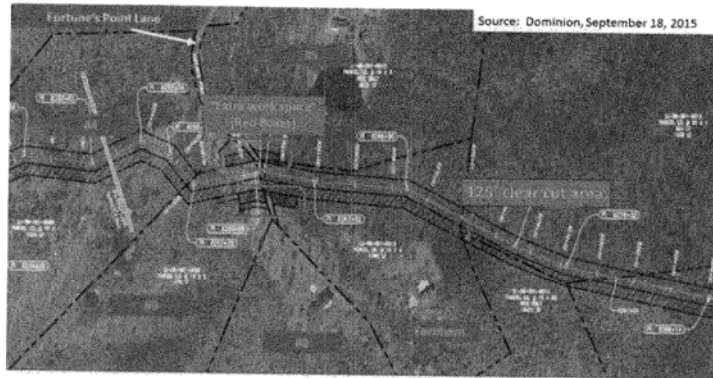
My husband and I reside in a residential development of six properties, called Fortunes' Point (see picture.) This community is located immediately adjacent to the Wintergreen Resort on the mountain, near Milepost 159.5 and is, for all practical purposes, part of the resort. The landowners in this community pay annual assessments to Wintergreen Property Owners Association. These properties can be accessed in one way: via the Wintergreen Resort main entrance, onto Wintergreen Drive, across Fortune's Ridge Drive, to eventually enter the community at Fortune's Point Lane, a single lane, private road collectively owned by the six property owners.

On our property, 159 Fortune's Point Lane, the pipeline clearing would be located approximately 300 feet from our house, in an area planned area for future outbuildings. It would bisect our property by entering at our front entrance and crossing our entire front section, effectively rendering ¼ of our available acreage unusable. Additionally, two or more yellow pipeline "warning" posts would straddle our driveway and property entranceway.

Z-3418

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)



MOTION TO INTERVENE AND STATEMENT OF INTEREST

Pamela Farnham moves to intervene in the above-captioned proceeding pursuant to Rule 214 of the Commission's Rules of Practice and Procedure. Because the current route of the ACP will go through their property, their neighborhood community, and the Wintergreen Resort area, it will cause adverse economic, safety and environmental consequences, Farnham has a direct interest in this proceeding that is not adequately represented by any other party to this proceeding.

PROTESTS

Farnham and her husband wish to communicate to FERC five areas of concern regards the ACP relative to their property, their neighborhood, Fortune's Point, and their larger community, Wintergreen Resort and Nelson County. These are summarized below:

Z-3419

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3420

A. Fortunes' Point

The ACP as proposed would also completely bisect the Fortune's Point neighborhood, six properties which are located at the top of Piney Mountain. The ACP will use at least four of the six properties, including ours, and the community's common private road, Fortune's Point Lane.

This community is inaccurately characterized in Dominion's RR 8 as follows:

"The proposed ACP pipeline route avoids the Wintergreen Resort in Nelson County, Virginia, crossing only one private road, Fortune's Ridge Drive (note: it is Fortunes Point Lane), associated with the resort approximately at MP 159.5 of the proposed AP-1 mainline route. The road is located at the southern end of the resort, leading to a dead end. Due to the proximity of the pipeline crossing, no effects to resort visitors are anticipated at this cross.

The ACP proposed location will effectively destroy the Fortune's Point development, render at least one and likely two properties completely unbuildable, and substantially devalue the remaining properties, including ours.

Additionally, Fortune's Point is also located at the headwaters for Spruce Creek, which serves two state-designated globally significant and unique wetlands immediately downstream, and the South Fork of the Rockfish River. A pipeline in this location will put these assets at risk. Moreover, pipeline development on the steep slopes that lead to Fortune's Point undoubtedly will have a permanent impact on these streams from erosion and subsequent downstream sediment deposits.

B. Property Values

Ninety-four percent of the ACP 564 mile pipeline route will utilize private property. Atlantic also claims property values will not be impacted. This is clearly untrue, as property values are already being affected.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Further, we have been told by real estate professionals that our property's value could drop by as much as 50% or more based on the pipeline current location for many of the reasons stated below. Furthermore, property values and the sustainability of the Fortune's Point community is directly tied to the financial health, sustainability and growth of the Wintergreen Resort itself and its community of 3,700 residences. The Wintergreen Resort and its homeowner's association, the Wintergreen Property Owners Association, have separately expressed critical concerns about the current ACP route as it applies to their businesses and resident. For instance the Wintergreen Resort has declared it will not construct, or substantially delay, a new hotel with additional jobs, if the pipeline route is constructed as proposed. This, in turn, will have a direct impact on \$1.4 billion in current home values at the Resort.

Atlantic claims that property values will not decline, citing four real estate property value "studies" (Diskin et. al - 2011; PGP Valuation Inc. -2011; EcoWest - 2008; Hansen et. al.- 2008) that demonstrates that pipelines have no real impact on property values. We believe this claim is untrue, particularly in the case of the Wintergreen Resort area. .

Property Values and Mortgages

- After reviewing several studies, the FERC reports most recently in October 2014, that there is no consistent information suggesting that the presence of a natural gas pipeline easement would decrease property values.
 - Diskin et. al., 2011 (Arizona)
 - PGP Valuation, Inc., 2008 (Palomar Gas Transmission)
 - EcoWest, 2008 (Oregon LNG Project)
 - Hansen et. al., 2006 (Washington State)
- Because property values would not be affected, appraisal values would not be affected and therefore ability to obtain a mortgage would not be affected.

Z-3421

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Upon closer examination, however, each of these studies and its conclusions are either flawed in its methodology or does not confirm Dominion's claims. Furthermore, all are not germane to properties situated in an eco-sensitive, resort, vacation home community such as Wintergreen.

For example, the Diskin study, which was based on Arizona suburban properties, plainly concluded that "the results of this study...to all geographic regions, is not warranted." Another "study", by PGP Valuation Inc., utilized a sample of only 18 properties to draw sweeping conclusions that favored the pipeline company that commissioned the study. The two other "studies" have other limitations. Moreover, none of these studies is applicable to property values in an eco-sensitive resort community that is mostly comprised of vacation homes. The Wintergreen area real estate community has already shared comments, stories of lost or cancelled purchase contracts, etc. because of the pending pipeline location, as prospective buyers to this Blue Ridge Mountain vacation community do not want to purchase property on or near a pipeline. (Ref: http://www.roanoke.com/news/virginia/atlantic-coast-pipeline-already-affecting-nelson-county-property-values/article_9a9f2b7f-33f6-554a-95a7-e4f68553bbb6.html.)

By granting Atlantic the power of eminent domain over 94% of its route, FERC would grant inordinate leverage to a private company to take private land. It is not that Atlantic cannot afford to pay market prices, as it is projecting an annual operating profit from the ACP of \$220 million per year for each of the next twenty years (a 35% operating profit.) However, unwilling sellers who might face a significant loss in market value, have limited tools and ability to protect their own property and financial interests, especially with respect to a loss in value. We therefore recommend if this pipeline is approved, any future taking include a provision that ensures property

Z-3422

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

owners are fully compensated for the taking of land plus the full economic loss resulting from the pipeline easement.

C. Other Direct Impacts on Our Property

On our property, the pipeline would be located property within some 300 feet from our house, in an area planned area for future outbuildings. In addition to safety concerns referenced below, there are several additional concerns regards the placement of a pipeline on our property

- It would bisect our property by entering at our front entrance and crossing our entire front section, effectively rendering ¼ of our available acreage unusable.
- Yellow pipeline “warning” posts would straddle our driveway and property entranceway, emphatically reminding us and visitors of the pipeline’s presence with every entrance and exit to the property.
- The pipeline’s position on our property will limit our ability to build additional structures on the property, as we had planned, further degrading its value
- Our house is heated and cooled by a geothermal system, the only one on the mountain at Wintergreen. The four wells associated with this system could be corrupted or degraded with the pipeline. Furthermore, we intended to install a solar electric system to make the house largely energy independent, but it’s now a project that is incongruent with a pipeline traversing the front yard.
- The pipeline could negatively impact our septic drain fields, which are situated near the planned pipeline location.
- The 125 foot clear cut construction area on our property would destroy a major sweep of mature mountain laurel and woodland. This will result in the invasion of foreign species along the entire length and width of this clear cut.

Z-3423

LANDOWNERS COMMENTS

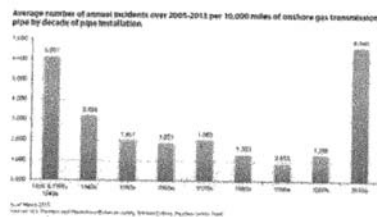
LO152 – David and Nancy Schwiesow (cont'd)

D. Safety

Even though we understand pipelines are safer than other modes of transporting energy materials, we are still very concerned living within feet of this proposed 42 inch, compressed natural gas pipeline for several reasons:

- Based on an extrapolation of recent data published by the US Hazardous Materials Safety Administration, Pipeline Safety Trust, seven and one-half “incidents”, a non-trivial number, are projected for the ACP over the next twenty years. See graph.

Expected # of ACP Pipeline “Incidents” Over 20 Years: 7.5



- Ruptures from 42 inch pipelines, with a 1,100 foot blast radius, coupled with the well documented risk of forest fires in our area of Virginia, is a very real concern. First-responder resources are inadequate to handle an event of this magnitude.
- Our house was damaged from the August 2011 Mineral VA earthquake, which was centered 80 miles from our location. Atlantic should avoid placing pipelines in populated residential areas, as required by FERC.

Z-3424

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

- The ACP will cross our only entrance and exit to our house and property, and the only entrance and exit to our Fortune's Point community.

E. Colocation

Atlantic is using only 6% of its 564 mile route on existing right-of-ways. This level is among the lowest in the pipeline industry, where the average for long pipelines in recent years is over 50%. More colocation will lower fragmentation, a very special concern in our area. We believe Atlantic's low colocation rate is selfish and irresponsible and we urge FERC to remedy it by compelling Dominion to sensibly use more colocation. Furthermore, we urge FERC to employ a PEIS for the four pipelines that have, or are, developing large pipeline greenfield operations in the region.

F. Regional Issues

Finally, we believe that the location of the ACP will also have major impacts on the Nelson County as a whole beyond that which has already been written, including:

- Impairing new eco-tourism development and job growth, especially at Wintergreen and the Nelson 151 area.
- Compromising the Blue Ridge Parkway, the Appalachian Trail, Wintergreen communities, and GWNF that provide outstanding scenic, ecological and recreational values and are national treasures.

Thank you for your consideration.

Z-3425

LANDOWNERS COMMENTS
LO152 – David and Nancy Schwiesow (cont'd)

Pamela Farnham
8208 Kimbershell Place
Richmond VA 23229

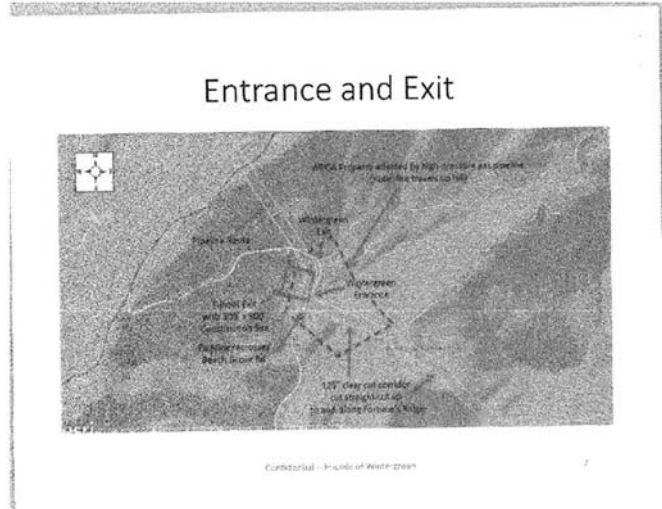
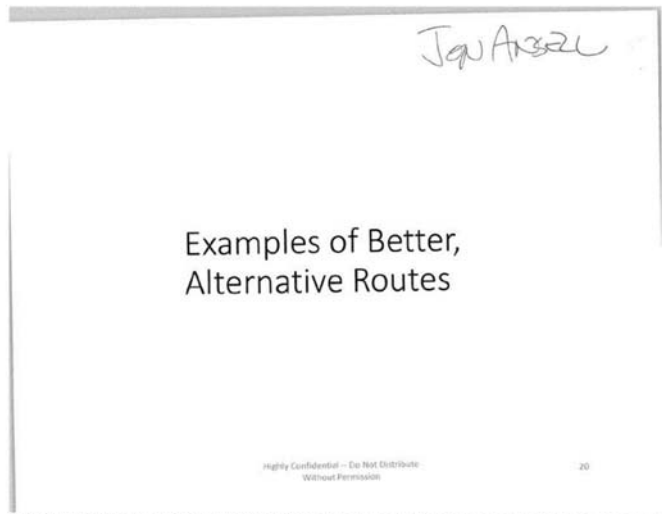
Wintergreen Address:
159 Fortunes Point Lane
Roseland, VA 22967

Z-3426

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3427



LANDOWNERS COMMENTS

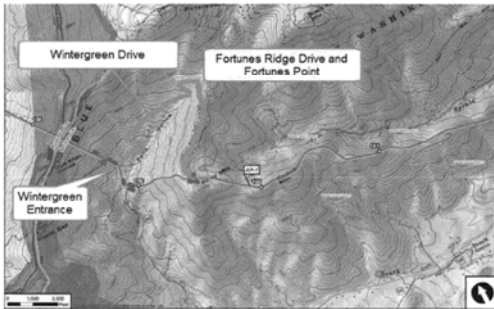
LO152 – David and Nancy Schwiesow (cont'd)

Z-3428

Major Construction Activities
At Wintergreen Entrance/Exit



Wintergreen Roads Will Be Used For
Construction Access



LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3429

Economic and Jobs Impact

Loss of \$75 M in Tourism Investment; 250+ New Jobs

Wintergreen Hotel

- Four star hotel
- Cost \$35 - \$40 million
- 150 rooms
- 150 new tourism jobs

~20% Downturn in Business During Construction

Spruce Creek Resort and Market

- Upscale resort and public market
- \$35 million+, 100 acre project
- 100 new tourism jobs

20% Reduction in Property Values (45% of Tax Base)

Versus 39 permanent ACP jobs, none in Nelson, when ACP is completed.
More than 58% of Nelson's school aged children receive subsidized meals.

Confidential - Friends of Wintergreen 9

Property Values Are Already Down

% Change in Property Values After Pipeline Announcement

Wintergreen: -10%

| Property Type | % Change |
|---------------|----------|
| Mountain | -10.9% |
| Valley | -6.5% |
| Condo | -10.1% |
| Land | -16.2% |

Other VA: +5%

| Area | % Change |
|----------|----------|
| Virginia | 2.4% |
| C'Ville | 5.4% |
| Norfolk | 4.3% |
| Richmond | 5.0% |
| Staunton | 1.5% |

Comparisons: Homes at price per sq. foot; Land at price per acre.
Wintergreen sales: over 15 months: Before = 6/13 - 3/14 - After = 6/15 - 3/16 (Source: local realtors)
Sales from Other VA Areas: Over past twelve months (Source: Zillow and Redfin).

10

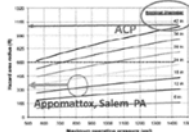
LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3430

Safety

- Wintergreen's only entrance and exit
- Up to 10,000+ people
- Blast radius of 1/5 of a mile in all directions
- High risk of forest fires
- 8 "incidents" over 20 years



Environmental

USFS to FERC, October 25 2016

The route for the ACP would cross some very challenging terrain:

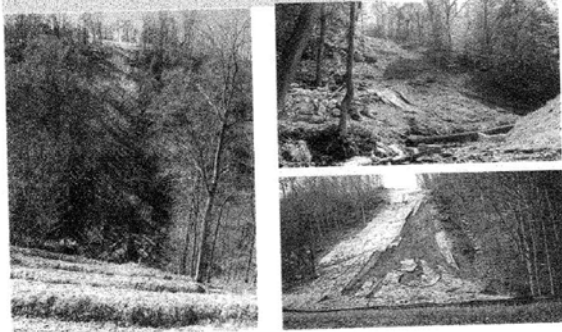
- steep slopes
- headwater streams
- geologic formations with high slippage potential
- highly erodible soils
- high-value natural resources downslope of high hazard areas.
- exacerbated by high annual rates of precipitation and extreme precipitation events.

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)


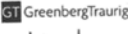




Z-3431

"Similar hazards on other smaller pipeline projects in the central Appalachians have led to slope failures, erosion and sedimentation incidents, and damage to aquatic resources." -- USFS, October 25, 2016



Oct 2014 West Virginia Consent Order Against Dominion

Our Experts

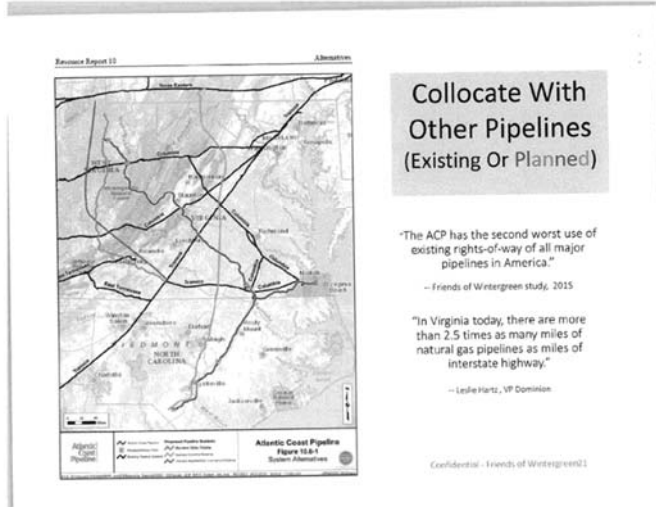
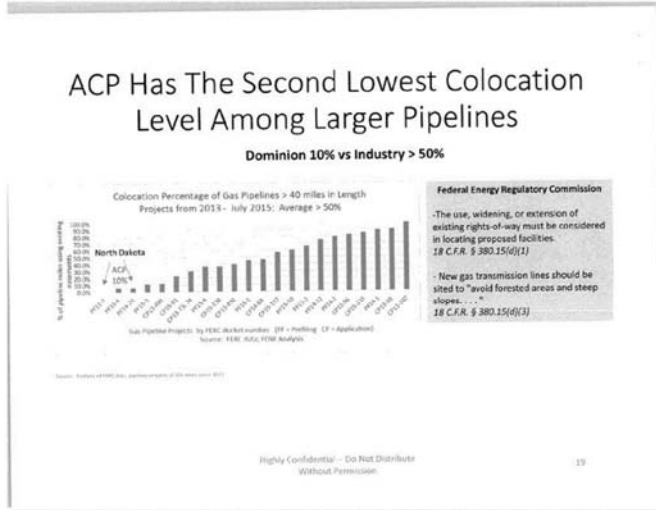
| | | |
|--|--|--|
| <p>Legal Greenberg Traurig (Washington, DC)</p> |   |  |
| <p>Environmental Integral Consulting, Inc. (Seattle, WA)</p> |  | |
| <p>Pipeline Engineering Tidewater Integrity Services, LLC (Houston)</p> |   | |

Confidential - Friends of Wintergreen

LANDOWNERS COMMENTS

LO152 – David and Nancy Schwiesow (cont'd)

Z-3432



LANDOWNERS COMMENTS

LO153 – Elaine Gardner Ollis

Elaine Gardner Ollis, Oak Ridge, NC.
Elaine Gardner Ollis
P. O. Box 164
Oak Ridge, NC 27310
April 6, 2017

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NC, Room 1A
Washington, D. C. 20426

Dear Ms. Bose:

As a property owner in West Virginia, whose land borders and is in sight of the proposed Atlantic Coast Pipeline, I am requesting that you do not approve the application to build this pipeline.

LO153-1

I have written to you in the past but, today, I would like to address the topic of the mountainous terrain of the most pristine areas of West Virginia and Virginia. Who and how will this pipeline be maintained? The pipeline will be in regions that have very steep and isolated areas. Emergency staff in those areas have limited resources to quickly repair weather-related problems or even a natural gas line leak.

In November of 1985, due to the heavy rain from Hurricane Juan many counties were flooded in West Virginia and Virginia. In addition to the high death toll and property damage, large rocks and boulders, were moved by these floods. If another devastating weather-related occurrence would happen during construction of a pipeline who will pay for the repair? I don't believe West Virginia has the financial or human resources to clean up another mess. While there may be a few individuals to financially benefit for the short-term, the region will be permanently ruined.

As I have traveled through White Sulphur Springs, West Virginia and other nearby areas in Virginia, there still has not been a full recovery from the flooding in 2016. It is impossible for me to comprehend that Duke Energy will be available at a moment's notice to fix the mudslides or other damage that could be caused by any heavy rain. Duke Energy's reputation for slow clean-up on coal ash is frequently in the news in North Carolina. I hope that each person that is involved with making the decision about the Atlantic Coast Pipeline spends the time to read the available information.

Many of my ancestors traveled through and lived, sustainably, in these affected West Virginia and Virginia mountains, please, do not ruin the area for short-term economic ideas and fantasies. There are plenty of pipelines already, surely, the gas in West Virginia does not need to be transported to the coastal region of North Carolina and on to South Carolina and possibly shipped to other countries.

Thank you for your time, interest and involvement. I, greatly, appreciate it.

Sincerely,
Elaine G. Ollis

LO153-1 See the response to comment LO62-6.

Z-3433

LANDOWNERS

LO154 – William Wright

Z-3434

**Comments made at FERC Session on the Atlantic Coast Pipeline (ACP) DEIS
Nelson County – February 22, 2017
William A. Wright
1315 Dutch Creek Lane
Shipman, VA 22971**

My name is William A. Wright, I have been a member of the Nelson County Agricultural and Forestal District (AFD) Advisory Committee for 14 years. The committee advises the County in creating, reviewing, modifying, continuing or terminating AFDs within the County and renders expert advice as to the nature of farming, forestry and agricultural and forestal resources within the districts and their relation to the entire county.

LO154-1

Nelson County has four AFDs, but now finds the oldest, the Dutch Creek AFD, encroached upon by the proposed ACP. I submit that FERC's conclusion in the DEIS that this intrusion by the epitome of industrial artifacts "would not result in a significant or adverse effect on agricultural and forestal lands enrolled as a Virginia Agricultural and Forestal District" is unfounded and unsubstantiated by any analysis.

In its DEIS, FERC accurately quotes The Code of Virginia's Agricultural and Forestal Districts Act in stating that it is the "policy of the Commonwealth to conserve and protect and to encourage the development and improvement of the Commonwealth's agricultural and forestal lands for the production of food and other agricultural and forestal products. It is also the policy of the Commonwealth to conserve and protect agricultural and forestal lands as valued natural and ecological resources which provide essential open spaces for clean air sheds, watershed protection, wildlife habitat, as well as for aesthetic purpose." But, the DEIS omits the stated purpose of "providing a means for a mutual undertaking by landowners and localities to protect and enhance agricultural and forestal land as a viable segment of the Commonwealth's economy and as an economic and environmental resource of major importance."

The DEIS correctly notes that in return for establishing such a district, the County and the Commonwealth agree to not make infrastructure investments. Then, after a only brief, irrelevant discourse on taxation, FERC concludes, that a 42" diameter pipe carrying up to 1.5 million dekatherms per day of natural gas under high pressure is not a more intensive use of the land than at present and purports that it would "be of an equivalent or lower intensity" than growing timber and grazing cows.

The specific property to be effected (between AP-1 MPs 173.1 and 173.6) was enthusiastically included into the Dutch Creek AFD in 2003 because of its long history of agricultural and timber production -- now occupied by the seventh generation of the same family--and its value to water quality as the valley in which it is located is the headwaters of Falls Creek -- a bold stream that flows into Dutch Creek, thence to the Rockfish and James Rivers to the Chesapeake Bay.

FERC has failed to consult with local government or any local parties. It makes no of mention of air or water quality, takes no notice of what will become a fragmented forest,

LO154-1

As discussed in section 4.8.1.1, the landowner may choose to cultivate the land as agricultural land, which is in line with the stated policy to encourage the development of such lands for the production of food and other products. An underground natural gas pipeline would not preclude the use of the land for most agricultural purposes.

Also see the response to comment LO140-6.

LANDOWNERS

LO154 – William Wright (cont'd)

LO154-1
(cont'd)

exacerbated by the creation of two access roads. There is a claim that the timber taken from the nearly half mile length of forest removed for construction will be paid for, but what will the next seven generations receive for the land now vacant in perpetuity? FERC seems to disregard entirely the Commonwealth's goals in the creation of AFDs and presumes that any objection can be overcome by assuring all that the pipe is "under the ground" as if what is under the ground, on top of it or flowing through it--whether flora, fauna or water resources is not what the Agricultural and Forestal Districts are all about.

Z-3435

LANDOWNERS

LO155 – Karl and S. Elise Barry

20170103-5063 FERC PDF (Unofficial) 1/3/2017 9:28:04 AM

December 29, 2016

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Docket #CP15-554-000 Atlantic Coast Pipeline

Dear Secretary Bose,

We are writing to object to the ACP pipeline, its route through Slatyfork, Pocahontas County, West Virginia, and its route through our property there.

The Pipeline

LO155-1 We understand that an independent study shows there is enough existing gas supply in Virginia and the Carolinas to meet consumer demand through 2030; and that the Atlantic Coast Pipeline is one of six major pipelines proposed for the same region of West Virginia and Virginia, where experts warn the gas industry is overbuilding pipeline infrastructure.

We don't have the resources, like deep-pocketed ACP/Dominion, to mobilize hundreds of people, possibly including ACP employees, to send prepaid, pre-written postcards to stuff the FERC mailbox for our cause. We have to rely on the justice and common sense of FERC to weigh the time, effort, and difficulty of writing objection letters and thus the strength of the opposition, vs. the efforts of support voiced with ACP provided ease and funding.

LO155-2 We agree with another objector that the argument that pipelines equal jobs is not well-based as they are mostly "temporary construction jobs and their spinoffs, also temporary. Temporary jobs do not equal 'immeasurable economic benefits' or 'stable jobs to pay the mortgage' Businesses require themselves to do cost-benefit analyses before large expenditures and that's what governments should do and that is what should be done here.

LO155-3 Natural gas pipelines do not automatically mean consumer savings and natural gas pipelines are not
LO155-4 sufficiently safe. We think there had been enough news lately to demonstrate this is truth.

We've read about the apparently unheard pleas to ACP/Dominion to reroute from places like Wintergreen, South Rockfish Valley, and like areas. So, we feel certain there is no point to talk to them. And based on our having viewed repeated requests of agencies for further information from ACP, with negative criticism of the ACP/Dominion work that has supposedly been done, it's clear that they are not doing due diligence.

Slatyfork

LO155-5 Slatyfork is a very small, beautiful, unincorporated town. There aren't enough people in its population to
LO155-6 launch an objection to this grievance to their land. This makes them an easy target for deep-pocketed corporations to take advantage of. In addition to the destruction of the beauty of any natural landscape that a pipeline always brings, there are dangers inherent in the local terrain, and its mountain sides. A Slatyfork citizen wrote FERC with concerns about springs and caves in the same area. We share concern and consternation about all aspects of the negative results of a pipeline assault on this special area.

LO155-1 See the response to comment CO46-1.

LO155-2 We disagree that the assessment of impacts on local economies was inadequate. See section 4.9.8 of the EIS. Impacts are based on direct project-related estimates developed by the project proponents regarding employment and spending. Construction of ACP would have a beneficial, short-term impact on employment, local goods and service providers, and state governments in the form of sales tax revenues. Additionally, payroll taxes would be collected from workers employed on ACP, resulting in additional beneficial, short-term effects. In the short-term, the projects would create economic stimulus to the affected areas via payroll and materials expenditures and sales taxes. Atlantic and DETI would purchase goods, materials, and services locally when possible. Workers on both projects would also most likely spend a portion of their pay in local communities on items such as housing, food, automobile expenses, entertainment, and miscellaneous other items. During operations, local communities in the project area would benefit from the annual property taxes that would be paid by Atlantic and DETI over the life of the projects. Any individual business, however, may experience a temporary reduction of revenue. Potential impacts on local businesses would be reduced to the extent possible by proposed mitigations related to construction noise and traffic.

Potential adverse impacts on environment resources are not quantified in monetary terms in the EIS, but are discussed and evaluated in detail in their respective sections.

LO155-3 See the responses to comments CO46-1 and CO85-7.

LO155-4 Comment noted. See the response to comment LO22-5.

LO155-5 Sections 4.1 and 4.12 discuss potential impacts related to geology and reliability and safety, respectively.

LO155-6 Sections 4.1 and 4.3.1 discuss geological resources and groundwater resources, respectively.

Z-3436

LANDOWNERS

LO155 – Karl and S. Elise Barry (cont'd)

20170103-5063 FERC PDF (Unofficial) 1/3/2017 9:28:04 AM

LO155-7 | Our property is very near the nationally recognized resort area of Snowshoe Mountain, with its top elevation of 4848'. Snowshoe is a well-known for skiing, mountain biking, golfing, and other recreational sports. The pipeline would scar the view from it. The result will be tourism revenue loss, decreased property values, and a less desirability to attract people to live here. At the end of this letter, we've attached a view of nearby Snowshoe Mountain from a downslope edge of our property. We also attached a photo of a long view from Snowshoe Mountain of this valley and its lower mountains, including ours. An arrow points to approximately where the pipeline will go on our property.

Our Property (05-001-E090 on the ACP Project Map)

LO155-8 | We are an older, retired, fixed-income couple who have 27.22 hillside acres, with extraordinary rural views, in Slatyfork. The pipeline is mapped to be built 850 feet across the mountain on the top of our land. We bought this property in 1991. We've paid taxes for it every year since with the intent to build a retirement home there, or to resale it as an investment. The pipeline will devalue this unusual lime stone outcrop hill habitat to nearly nothing, cutting through its wooded top, upslope of our natural spring and homestead spot. There is one flat area mid-slope where a home can be built. We signed a covenant that mandates that only one home can be built on the property. We would never want to live down slope from a pipeline. We are certain that no one else would choose to do it either, at the very least for safety and esthetic reasons. The pipeline would render our property essentially worthless. The ACP has offered less than a third of what an unsolicited buyer offered us 15 years ago. Will we have to take their severely inadequate offer or chance a total loss by way of a taking by eminent domain? The thought is quite devastating. We've come to understand that despite this severe injury to our land, we would be responsible for the all the taxes, and would actually be expected to perform, for that wealthy company, the maintenance easement mowing, and cutting of trees that we would rather keep on our land. We currently do not pay for that kind of maintenance for ourselves.

LO155-9 | Because, we believe, there is bedrock near the surface, we can expect blasting on our property. There are studies referenced in a Dominion Pipeline Monitoring Coalition report that document "slope failures or high risk of failure from construction of pipelines and other steep slope disturbances that change runoff or groundwater flow patterns and overload slopes with excavated soil and rock." The report concludes "that mitigation efforts by Dominion to avoid slope failures will be difficult or impossible to accomplish in steep mountain areas along the ACP pipeline route." That our land has a natural spring on it could prove to be an aggravating factor for slope failure to occur. We don't think that our water quality there could remain unaffected.

We've attached a picture, at the end of this letter, of our property looking up from about a third of the way from the bottom of the hill to give a sense of the sharp angle of the slope that the pipeline would be above.

In Summary

LO155-10 | We respectfully request that this pipeline not be built, or if it cannot be stopped given the coming political climate, that FERC at least, as another objector said, make ACP/Dominion either re-route (the preferred course for most) or give fair recompense to people's lives and dreams, and beautiful lands they are destroying. They will be profiting for decades to come. The folks and habitats they damage won't recover. We agree with another FERC correspondent who said 'Eminent domain in this case is simply land theft – shifting our private land, investments and hard earned savings from our properties directly to Dominion's balance sheet.'

LO155-11

LO155-7 | Section 4.8.8 discusses the impacts on visual resources resulting from construction and operation of the project.

LO155-8 | As discussed in section 4.8.2, pipeline operators must obtain easements from landowners and land-managing agencies to construct and operate natural gas facilities, or acquire the land on which the facilities would be located. As such, Atlantic and DETI would need to acquire long-term easements from the landowner and/or land-managing agency to construct and operate the new project facilities. These negotiations are between the landowner and/or land-managing agency and Atlantic Coast and DETI, and are not subject to review by the FERC. Landowners have the opportunity to request that site-specific factors and/or development plans for their property be considered during easement negotiations, and that specific measures be taken into account.

LO155-9 | Section 4.1.2 and 4.3.1.7 discuss potential impacts of blasting on geological resources and groundwater resources, respectively.

LO155-10 | Comment noted.

LO155-11 | Comment noted.

Z-3437

LANDOWNERS

LO155 – Karl and S. Elise Barry (cont'd)

20170103-5063 FERC PDF (Unofficial) 1/3/2017 9:28:04 AM

Some quotes from other Correspondents that fit our situation

We agree with another gentleman who wrote to quote this act and apply it to his area.

LO155-12

“The Natural Gas Act 18 C.F.R. 380.15

(a) The siting and construction of natural gas facilities shall be undertaken in a way that avoids or minimizes effects on scenic, historic, wildlife, and recreational values....This law is very specific, and is not watered down with “escape clause” phrases that are found in the regulations and particularly in Dominion filings to FERC. Phrases such as “where possible,” “except if impractical”, and “when feasible” are not included in this section of this law. It is solid, clear, and not open to manipulative interpretation. Any effect on scenic, historic, wildlife, and recreational facilities is included. “Minimize” is defined in the dictionary as reducing to the lowest amount possible, and not just reducing marginally. So if these values are involved the pipeline must avoid them or reduce as much as possible. Our property is very scenic, both in long distance views, and shorter distance views over and through the...forest. These views give an uplifting example of nature’s beauty. The pipeline would destroy this scenic beauty, in both long distance and short distance views...Besides the pipeline, permanent wide, heavy industrial access roads would also crisscross our mountains. There would be as many miles of access roads as miles of pipeline. Our scenic area promotes tourism. Tourism is the lifeblood of our economy...

(3) Rights-of-way should avoid forested areas and steep slopes where practical.

(8) Long foreground views of cleared rights-of-way that are visible from areas of public view should be avoided.

(9) Where practical, rights-of-way should avoid crossing hills and other high points at their crests where the crossing is in a forested area and the resulting notch is clearly visible in the foreground from areas of public view...invasive plants will be a big problem in areas cleared for the pipeline and access roads. Chemical control of vegetation poses a serious threat to private drinking water supplies.”

LO155-13

In its October 24 letter, the Forest Service noted that the Pipeline:

“would cross some very challenging terrain in the central Appalachians. Potentially difficult situations include steep slopes, presence of headwater streams, geologic formations with high slippage potential, highly erodible soils, and the presence of high-value natural resources downslope of high hazard areas. These hazards are exacerbated by high annual rates of precipitation and the potential for extreme precipitation events.”

The Forest Service added that “similar hazards on other smaller pipeline projects in the central Appalachians have led to slope failures, erosion and sedimentation incidents, and damage to aquatic resources. Therefore, the Forest Service (FS) is concerned that crossing such challenging terrain with a much larger pipeline could present a high risk of failures that lead to resource damage.”

The Forest Service noted that “both the George Washington and Monongahela National Forests contain Forest Plan standards that limit activities in areas that are at high risk for slope and soil instability. To facilitate the acceptance of ACP’s Special Use Permit application for further processing, the Forests need to be able to determine that the project is consistent or can be made consistent with this Forest Plan direction.”

LO155-12 The EIS and our analysis is consistent with the Natural Gas Act.

LO155-13 FS response: The comment is noted. The effects analysis of pipeline construction on NFS lands is discussed in section 4.1.6 of the EIS. Additional information on how Atlantic would construct the pipeline on steep slopes can be found in the COM Plan (appendix G).

Z-3438

LANDOWNERS

LO155 – Karl and S. Elise Barry (cont'd)

20170103-5063 FERC EDF (Unofficial) 1/3/2017 9:28:04 AM

We agree with this excerpt from the letter of another gentleman from nearby Cass, WV.

LO155-14 "I wish to request that the Federal Energy Regulatory Commission review the findings of an independent study titled, Are the Atlantic Coast Pipeline and the Mountain Valley Pipeline Necessary? An examination of the need for additional pipeline capacity into Virginia and Carolinas, prepared for Southern Environmental Law Center and Appalachian Mountain Advocates, September 12, 2016. Authors of the study are, Rachel Wilson, Spencer Fields, Patrick Knight, Ed McGee, Wendy Ong, Nidhi R. Santen, PhD, Thomas Vitolo, PhD, and Elizabeth A. Stanton, PhD, all of Synapse Energy Economics Energy, Inc., Cambridge, Massachusetts.

This report concludes that the developers of the Atlantic Coast Pipeline (ACP) fail to compare the region's existing natural gas supply capacity to its expected future peak demand for natural gas. Further, the report finds that due to existing pipeline capacity, existing natural gas storage, the expected reversal of the direction of flow on the existing Transco pipeline, and expected upgrade of an existing Columbia pipeline, the supply capacity of the Virginia-Carolinas region's existing natural gas infrastructure is more than sufficient to meet expected future peak demand. This suggests that the need for the ACP is strongly questionable. It is FERC's responsibility to show that construction of the ACP is in the public interest. This study casts a great deal of doubt on the substantiation for this need. The study further suggests that the ACP stands to provide more for the interests of its investors than for those of the rate payers that will fund it.

Given the huge environmental costs, and costs to landowners in West Virginia and Virginia that the ACP will impact, and the use of eminent domain for private gain, FERC must use its authority to deny approval for this pipeline, and must instead provide for the alternatives of using existing infrastructure to supply gas to the Carolinas and Virginia."

Respectfully submitted,

Karl and S. Elise Barry
45 Keep Avenue
Paxton, MA 01612



LO155-14 See the response to comment CO46-1.

Z-3439

LANDOWNERS

LO155 – Karl and S. Elise Barry (cont'd)

20170103-5063 PERC EDF (Unofficial) 1/3/2017 9:28:04 AM

Picture from about 1/3 of the way up from the base of our property hill to illustrate the grade.



Z-3440

Landowners Comments

LANDOWNERS

LO155 – Karl and S. Elise Barry (cont'd)

20170103-5063 PERC EDF (Unofficial) 1/3/2017 9:28:04 AM

View of nearby Snowshoe Mountain, which reaches 4848', from a downslope edge of the property.



Z-3441

LANDOWNERS

LO155 – Karl and S. Elise Barry (cont'd)

20170103-5063 PERC EDF (Unofficial) 1/3/2017 9:28:04 AM

A long view from Snowshoe Mountain of this valley and its lower mountains, including ours. An arrow points to approximately where the pipeline will go on our property.



Z-3442

LANDOWNERS
LO156 – Jeanette B. Robinson

20170117-0040 FERC PDF (Unofficial) 01/17/2017

Jeanette B. Robinson
909 Little Valley Road
Warm Springs, VA 24484
540-839-5706

FILED
SECRETARY OF THE
DEPARTMENT OF
ENERGY
2017 JAN 17 P 3:19

January 9, 2017

Ms. Bobbie Cabibbo
Virginia Outdoors Foundation
39 Garrett St., Suite 200
Warrenton, VA 20186

ORIGINAL
FEDERAL ENERGY
REGULATORY COMMISSION

Re: Dominion's request for conversion of easements under 10.1-1704 statute

Dear Ms. Cabibbo:

LO156-1

I am again writing to ask the Virginia Outdoors Foundation Board of Trustees to deny Dominion's request to convert easement properties under the 1704 process. As an easement holder in Bath County (BAT-03350/02202), I believe a decision in favor of Dominion would forever undermine VOF's ability to carry out its core mission.

As a citizen concerned with land use and development as well as our natural resources, I have worked with Bath County officials to craft comprehensive plans since 1995. It is clear to me, as well as the Bath County Planning Commission, that the ACP is in direct conflict with our current plan. The unambiguous language of statute 1704, stating that any conversion must be in compliance with local comprehensive plans, gives VOF the right and obligation to vote "no".

This is obviously a complicated issue, with forces of both state and federal governments at play. I think, however, that the decision for most current and future easement holders boils down to an issue of trust. VOF asks landowners to put specific restrictions on their properties regarding development in exchange for an easement document that will supposedly carry into the future, protecting the properties in accordance with goals agreed to by both VOF and landowners. The promises of protection into the future will be totally meaningless if corporations with deep pockets are allowed to extinguish easement rights through a perversion of the 1704 process.

None of us knows the future in regard to the ACP, but a vote for conversion will certainly cripple the VOF in its efforts to protect land in Virginia. Our farm, comprising more than 500 acres, has been in my family since 1792. We put 200 of these acres under easement with the implicit promise that VOF would stand with us, helping protect our farm, whatever the future might bring. How could we or anyone else consider putting more land under easement with an organization not willing to at least try to live up to its obligations.

Sincerely,

Jeanette B. Robinson
Jeanette B. Robinson

Cc: Attorney General Mark R. Herring
Ms. Kimberly Bose, Secty., FERC ✓
Gov. Terry McAuliffe
Congressman Bob Goodlatte (email)

Sen. Creigh Deeds (email)
Del. Ben Cline (email)
Mr. John Cowden, Chair, Bath Co.
Planning Commission

*Docket Nos. CP 15-554-000
CP 15-554-001*

IND156-1 See the response to comment CO10-3.

Z-3443

LANDOWNERS

LO157 – Dick Averitt

20170130-5346 FERC PDF (Unofficial) 1/30/2017 4:38:01 PM

Dear Commissioner Bose,

LO157-1 I realize that economic issues are not the chartered concern of FERC, but now that FERC has released its EIS favoring the current proposed route of Dominion's ACP, I feel it important to restate that the current path of the pipeline will destroy two proposed new commercial developments in the Rockfish Valley and on Wintergreen, and result in the loss of tens of millions of dollars of new annual revenue to Nelson County and the loss of over 250 permanent new jobs.

Specifically, just the threat of the pipeline has caused a halt in the plans of Pacific Resorts Group, new operator of Wintergreen Resorts, to invest \$35 to \$40 million in building a new hotel and conference center. Their plan included making further improvements to property owners' amenities to reinvigorate the sale of building lots and rejuvenate the attractiveness of the resort to existing and prospective property investors.

Wintergreen Resort is currently the largest employer and the most significant taxpayer in Nelson County. The new developments would produce another 150 permanent jobs and substantially increase tax revenues to Nelson County.

The Spruce Creek Resort and Market, a planned and permitted \$30 million 100 acre resort on Highway 151 across from the nationally acclaimed Bold Rock Cider, will create a minimum of 100 new permanent jobs and turn a 100 acre wooded mountainside into another important contributor of entirely new tax revenues to the county. The impact of these losses is difficult to overstate.

This is in addition to many other businesses that will be destroyed (such as the Fenton Inn) and severely impacted (Bold Rock Cider) by the approved course of the ACP through a growing and increasingly important commercial part of Nelson County.

LO157-2 This is not to ignore that the current path of the ACP will cause great environmental damage, destruction of unique cultural and historical sites, and human tragedies that will eclipse the economic losses described above, and they are paramount.

LO157-3 On a personal note, this 42" high pressure natural gas pipeline is planned to lay within 250 yards of the home that my son and daughter-in-law, my partners in the Spruce Creek Resort and Market, built for their young family. They will have to leave and will try to sell this hazarded house for whatever they can get. (Would you buy it, and put your grandchildren to bed at night, knowing that an explosion in the nearby 42" high pressure natural gas pipeline would incinerate them while they slept?)

The home my wife and I built on our family homestead will fall in the evacuation zone, which is defined as giving us mere minutes to flee to avoid the risk of being burned to death. Likewise, we will have to leave and relocate.

Our losses would be personal, not unlike those of many others. The environmental, cultural, and historic damages that the ACP will inflict on Rockfish Valley are tragic and universal. But the economic loss of 250 new permanent jobs and the loss of tens of millions of dollars of new direct revenue to

LO157-1 Sections 4.9.5 and 4.9.8 included our discussion of potential impacts on the Wintergreen Resort and Spruce Creek Resort development. We acknowledge that businesses may be directly and indirectly impacted by the projects; however, construction activities would be short-term and localized. Potential impacts on local businesses would be reduced to the extent possible by proposed mitigations related to construction noise and traffic.

LO157-2 See the response to comment LO18-1.

LO157-3 Comment noted. See the response to comment LO22-5.

Z-3444

LANDOWNERS COMMENTS

LO157 – Dick Averitt (cont'd)

20170130-5346 FERC PDF (Unofficial) 1/30/2017 4:38:01 PM

Nelson County are unique to the current course of this pipeline and can easily, should be and certainly must be avoided.

Very Respectfully,

Dick Averitt

Richard Garland Averitt III

Partner, Spruce Creek Resort and Market

Former CEO, Raymond James Financial Services, Inc.

Colonel, United States Marine Corps Reserve, retired

Z-3445

LANDOWNERS COMMENTS

LO158 – Jill Averitt

20170206-5023 FERC PDF (Unofficial) 2/3/2017 7:10:12 PM

Jill Averitt
88 Grace Glen, Nellysford, VA 22958

02-02-17

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission (FERC)
888 1st St. NE, Room 1A
Washington, DC 20426
Re: Atlantic Coast Pipeline, LLC (Docket #CP15-554-000)

Dear Ms. Bose,

LO158-1

We will not stand for this sloppy, inaccurate, incomplete Draft Environmental Impact Statement that FERC has provided. Many organizations have worked tirelessly to create awareness and hire independent consultants to do the job Dominion has failed to do.

Now they have failed again to provide adequate evidence in their application and FERC has failed to force them to address the innumerable issues that are still unanswered.

Dominion wants to “deal with issues during the construction as they come up” because this gives them the ability to ask for forgiveness when it is too late to change the outcome. There are no solutions to some of these issues like the steep slopes, the karst terrain, the self-dealing between Dominion and its subsidiaries who are buying the gas.

LO158-2

This pipeline should not be built here! It's too dangerous, not in the public interest let alone public need and it is an abuse of the citizens of Virginia.

LO158-3

Mr. Bowman has been here. He has seen where Dominion wants to put this pipeline. Mr. Bowman, please tell them what you saw. These slopes are not made for pipelines. They will not be able to undo what they are proposing to destroy in Nelson County.

LO158-4

FERC you are supposed to work to protect and represent the interest of the citizenry, the people on this proposed route. You have heard from so many of us. We have given all of our extra time and then awareness to these issues. You are our only means of having our voices heard, and we feel like our concerns are falling on deaf ears after reading your DEIS. We will not give up demanding that you hear us. Deny ACP this Permit on April 6th until they have answered all the questions and concerns you have been asking them to address and that we deserve answers to before this permit is granted.

Gratefully,
Jill Averitt

LO158-1 See the response to comment LO146-14.

LO158-2 Comment noted. See the response to comment LO22-5.

LO158-3 Comment noted.

LO158-4 See the response to comment LO85-1.

Z-3446

LANDOWNERS COMMENTS

LO159 – Richard Averitt

20170206-5039 FERC PDF (Unofficial) 2/3/2017 7:13:20 PM

Richard Averitt IV
88 Grace Glen, Nellysford, VA 22958

02-02-17

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission (FERC)
888 1st St. NE, Room 1A
Washington, DC 20426
Re: Atlantic Coast Pipeline, LLC (Docket #CP15-554-000)

Dear Ms. Bose,

I am one of approx. 2000 affected landowners along the ACP route. I own both a development parcel slated for a much publicized \$35M boutique resort here in Nelson, across from Bold Rock, and a personal homestead both in the path of the ACP. Both the development and my family's lifelong dream of raising our kids next to one another and growing old together here in Nelson will be destroyed if Dominion is granted the power of eminent domain to build a pipeline through our properties; a pipeline that most every study demonstrates we simply don't need.

LO159-1

LO159-2

LO159-3

Virginia citizens are being victimized by a corrupt system here in Virginia. I am not against Dominion building a pipeline in general but I am wholly against them using the power of the state to steal the land and wreck the lives of families like mine along the way. Pipelines can be built using fair practices that respect landowners and property rights.

Eminent Domain should never be used to transfer wealth or property to a shareholder owned or private corporation. Eminent Domain should only ever be used to transfer rights to the state and only when no other means are possible and the Public Need is great. This pipeline might create some jobs in Hampton Roads but that side benefit is not enough reason to take property from those of us along the route and give it to Dominion for their private gain.

Did you know that Dominion will pay the average landowner \$10 per acre per year while they will gain \$40,000 or more per acre per year? Is this Fair and Just compensation under the law to take property against the will of the rightful owners and then give them less than 1/40 of 1% (0.00025%) of the value generated from that very land? Dominion has more than enough profit to negotiate with willing landowners on annual royalties or other terms they can agree on.

To be 100% clear – we will not negotiate with Dominion under any terms for our land. We will require the state to exercise eminent domain to gain access to our land. We will fight such a decision in court and we will personally obstruct access to our property. We are aligning ourselves with dozens on landowners who feel the same and hundreds of citizens who will help us resist this abuse of power.

With respect,
Richard Averitt IV

LO159-1 Sections 4.8.3 and 4.8.4 discuss impacts on residences and planned developments, respectively, resulting from construction and operation of the project.

Regarding the use of eminent domain, comment noted.

LO159-2 See the response to comment CO46-1.

LO159-3 Comment noted.

Z-3447

LANDOWNERS COMMENTS

LO160 – Jeanne B. Robinson

20170207-0027 FERC PDF (Unofficial) 02/07/2017

FILED
SECRETARY OF THE
FEDERAL ENERGY REGULATORY COMMISSION

2017 FEB 7 P 3:50

FEDERAL ENERGY
REGULATORY COMMISSION

Jeannette B. Robinson
909 Little Valley Road
Warm Springs, VA 24484
540-839-5706

January 31, 2017

Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

ORIGINAL

Re: Docket No. CP15-554

Dear Mr. Davis:

I am enclosing herewith a copy of an email sent this date to U.S. Forest Service Chief, Thomas Tidwell, and Regional Foresters, Kathleen Atkinson and Tony Tooke.

I request that this letter be included in the administrative record for the above docket number.

Respectfully submitted,

Jeannette B. Robinson
Jeannette B. Robinson

encl.

Z-3448

LANDOWNERS COMMENTS

LO160 – Jeanne B. Robinson (cont'd)

20170207-0027 FERC PDF (Unofficial) 02/07/2017



Jeannette Robinson <jbr9850@gmail.com>

ACP regulatory review process

1 message

Jeannette Robinson <jbr9850@gmail.com>

Tue, Jan 31, 2017 at 1:29 PM

To: ttidwell@fs.fed.us

Cc: katkinson@fs.fed.us, ttooke@fs.fed.us

Dear Mr. Tidwell:

First, I would like to thank you and the Forest Service for the excellent job you have been doing in your review of the Atlantic Coast Pipeline.

The fact that Dominion has chosen in the GWNF-6, one of the worst possible routes across Forest Service land, makes it imperative that the review process be thorough. Any attempt to expedite this decision would place fragile ecosystems and watersheds at risk. A pipeline of this size crossing unstable soils on steep mountainsides, presents engineering problems that must be clearly defined and solutions must be clearly laid out before any decisions can be made.

I do not believe this pipeline can be built over the GWNF-6 route without permanent damage to National Forest land, and I encourage you to deny special use permits and any changes in the Forest Service plans that would make this route possible.

Thank you for your consideration. I am sending a copy of this letter to FERC to be included in the administrative record.

Sincerely,
Jeannette & Gary Robinson
(Jeannette B. Robinson is an Intervenor in this Docket No.)
909 Little Valley Road
Warm Springs, VA 24484
540-839-5706

LO160-1

Z-3449

LO160-1 FS response: The opposition to the GWNF-6 route is noted. See also the responses to comments CO5-1 and PM4-027.

LANDOWNERS COMMENTS

LO161 – Ella Rose

FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC COAST PIPELINE AND SUPPLY HEADER PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below; or (3) electronically filed.¹

For Official Mail Filing, Send To:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

As applicable, please indicate project(s) you are commenting on:

- Atlantic Coast Pipeline: Docket No. CP15-554
- Supply Header Project: Docket No. CP15-555
- All of the above

COMMENTOR'S NAME AND MAILING ADDRESS: (Please Print)

ELLA ROSE
5732 S. James River Hwy.
Buckingham, VA 23925

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

I oppose the Atlantic Coast pipeline,
and the compressor station, because it
impacts my way of life. I am the
very closest to the compressor station.
It borders my property, it devalues
my property, it will cause a lot of
pollution, and will be very noisy in an
otherwise very quiet community. I
am worried about my safety, if there
were ever an explosion or leak at
the compressor station, or surrounding
pipeline.

¹The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at <http://www.ferc.gov> under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account".

- LO161-1 In section 4.9.7, our analysis of impacts on property values has been updated to include two studies that analyze the impacts of the presence of natural gas compressor stations on residential property values. Based on the research we have reviewed, we find no conclusive evidence indicating that natural gas compressor stations generally have a significant negative impact on property values, although this is not to say that any one property may or may not experience an impact on its value for either the short or long term.
- LO161-2 Sections 4.11.1 and 4.11.2 includes our analysis of air quality and noise, respectively.
- LO161-3 See the responses to comments LO22-5 and LO62-6.

Z-3450

LANDOWNERS COMMENTS

LO161 – Ella Rose (cont'd)

If there was an explosion, the emergency plan Dominion recommended would be inadequate. The Buckingham County Response is set up for a small rural community, and could not handle the response needed for an explosion for other industrial emergency at the Compressor Station and pipeline.

Z-3451

LANDOWNERS COMMENTS

LO161 – Kyle Nuttall

FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC COAST PIPELINE AND SUPPLY HEADER PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below; or (3) electronically filed.¹

For Official Mail Filing, Send To:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

As applicable, please indicate project(s) you are commenting on:

- Atlantic Coast Pipeline: Docket No. CP15-554
 Supply Header Project: Docket No. CP15-555
 All of the above

COMMENTOR'S NAME AND MAILING ADDRESS: (Please Print)

Kyle Nuttall
15 N. Kanawha St.
Buckhannon, WV 26201

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

LO161-1

1) I am commenting on behalf of a client. The easement will fall within 150 feet of his house. We have been working with the ACP for nearly a year to come to a reasonable agreement. The ACP seems to be dragging its feet. We are asking for significantly more money to make my client whole, but the ACP has so far refused to give much more than to any other person on the pipeline route. The burden on my client is so much more than the burden on most other landowners. ACP should be giving him more than others.

LO161-2

2) I am concerned with safety. The pipeline comes within 1000 feet of the Buckhannon-Clayton High School. It crosses

¹ The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at <http://www.ferc.gov> under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account".

LO161-1 See the response to comment PM1-51.

LO161-2 See the responses to comments LO22-5 and LO62-6.

Z-3452

LANDOWNERS COMMENTS

LO161 – Kyle Nuttall (cont'd)

LO161-2
(cont'd)

Three main roads in the county, including Corridor H. So far the TCP has not set up any training for EMS personnel. The TCP has not worked with the County to create contingency plans for leaks, explosions, or other possible disasters. The TCP preaches safety, but it's not practicing it.

Z-3453

LANDOWNERS COMMENTS

LO163 – Jeannette Robinson

STATEMENT TO FERC at DEIS MEETING in Monterey, VA on 2-28-17
Re: Docket No. CP15-554

My name is Jeannette Robinson and I am an intervenor in this proceeding. I live in Little Valley, Bath County, VA, mile marker 93 on Alt. Rte. GWNF-6 of the Atlantic Coast Pipeline.

LO163-1

As a person with a Master's degree in English and American literature, I have always considered myself to have an excellent command and understanding of language. But I recently went to the dictionary to check the definition of "regulatory", and found it to mean "to control according to a rule". Well, I would like to know what that "rule" is, because from everything that has occurred during this past year--from the moment I learned that the ACP had altered it's proposed route to travel straight across Little Valley, to this moment in time--the rule appears to be this: protecting the rights, safety and property of citizens and landowners DOES NOT matter; protecting our fragile natural ecosystems from risk—both land and water, which includes springs that have been used by families for hundreds of years—DOES NOT matter; but, multi-billion dollar corporations have the right to do anything they want to make money, and usually at the expense of citizens and landowners. And they can do this even when they delay in getting necessary information to your agency by not completing required surveys, while using the excuse that they were not allowed on peoples' land, when you, they, and we know that the courts (unfortunately) have ruled that they DO have the legal right. They have tried to get away with doing a slipshod job and thus far they have succeeded.

LO163-2

Another thing that deeply concerns me which has not been addressed or even taken seriously is the fact that my husband and I, along with several others in Little Valley south of the proposed pipeline route, would be trapped at the end of a dead-end road in the event of an explosion, with no possible means of evacuation. Dominion would say explosions are rare. I say Dominion cannot assure me that one will NEVER occur.

LO163-3

As I have repeated several times in the course of my comments and filings to you, the Helms Farm, which lies at the head of Little Valley, has been in my family for 225 years and was a land grant from Gov. Henry ("Lighthorse Harry") Lee for my ancestor's Revolutionary War service. We have protected and preserved it through many generations. When I received the first letter from Dominion on February 12, 2016, advising that our farm was

- LO163-1 See the response to comment LO146-15.
- LO163-2 See the response to comment CO48-2.
- LO163-3 See the responses to comments CO6-1 and CO46-1.

Z-3454

LANDOWNERS COMMENTS

LO163 – Jeannette Robinson (cont'd)

LO163-3
(cont'd)

on the newly proposed pipeline route, I was shocked and horrified. But as more and more information and studies came out, confirming this route to be ill-advised; that this pipeline was not even needed other than to line the pockets of Dominion shareholders; that to attempt to construct such a pipeline through such terrain would threaten the flow of springs, as well as slope stability, I was certain that the route would be changed. To attempt to build through this valley was folly! But here we are, more than 12 months later, still fighting for our land, our water, our safety, and our quality of life. And why? So that Dominion can sell themselves millions of gallons of natural gas and make billions of dollars, whether this pipeline is needed or not. Surely I am not the only one to see that there is something wrong with this picture.

This DEIS should never have been filed at this time. The data submitted by the ACP is incomplete and fails to warrant any kind of a determination as to the efficacy of this pipeline. When FERC concludes that impacts, both human and natural, will be minimized, I do not believe it for one moment. How can anyone believe what Dominion says when they have lied and knowingly omitted necessary information all along? You say that the project would result in some adverse effects but the majority of these would be avoided, minimized, or mitigated to "less-than-significant levels". I do not believe this for one moment either. Besides the fact, "less-than-significant levels" is a subjective assessment. The cutting of trees that could have stood for a hundred more years, the diversion of one underground spring that may affect a single family's access to water, not to mention a 75' permanent corridor, does not qualify as "less-than-significant" to me.

I am speaking from the heart. Dominion is speaking from their bottom line. Who will you believe?

Thank you for this opportunity to speak.

Jeannette B. Robinson
909 Little Valley Road
Warm Springs (Bolar), Bath County, VA 24484
540-839-5706

Z-3455

LANDOWNERS COMMENTS

LO164 – Gary Robinson

Z-3456

STATEMENT TO FERC at DEIS MEETING in Monterey, VA on 2-28-17
Re: Docket No. CP15-554

I have not taken enough time to prepare these comments, but I think it is appropriate since FERC has obviously not taken enough time to prepare this DEIS.

My name is Gary Robinson and I live in Little Valley, mile marker 93 on the ACP. Although FERC has acknowledged most of the tremendous environmental risks associated with the GWNF-6 route, it has done very little to ensure that the risks do not become reality.

LO164-1

In Vol. 1, pages 4-14 and 4-15 of the DEIS, FERC acknowledges the sensitive karst terrain in Little Valley and that water flows in underground conduits have been documented through dye testing. On page 4-19, FERC dismisses any problems related to severing these conduits because the average trench depth would only be 10 to 12 feet.

LO164-2

At mile marker 93, the ACP will cross under Little Valley Run and in about 100 feet cross under State Rt. 694. The streambed of Little Valley Run is 6 feet below surrounding terrain which would make the trench depth actually 16 to 18 feet as opposed to the average of 10 to 12 feet. Additional depth may well be needed at the stream crossing, making the trench even deeper and increasing the likelihood of intersecting underground conduits and adversely affecting springs and wells used by residents.

LO164-3

On page 4-14, FERC states that final location of karst features in Little Valley would be made when permission was received to conduct surveys. On 11-16-16, ACP survey crews established the center line across Little Valley Run and Rt. 694. No one from Dominion has yet arrived to map karst features. The stream and road crossings in Little Valley will require the trench depths to be much deeper than average. The threats to our water supplies need to be evaluated through additional dye testing before any final DEIS.

Thank you for this opportunity to speak.

Gary Robinson
909 Little Valley Rd., Warm Springs (Bolar), VA 24484
540-839-5706

LO164-1 Comment noted.

LO164-2 Comment noted.

LO164-3 Comment noted.

LANDOWNERS COMMENTS

LO165 – Sarah Collins-Simmons

Z-3457

FEDERAL ENERGY REGULATORY COMMISSION
ATLANTIC COAST PIPELINE AND SUPPLY HEADER PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below; or (3) electronically filed.¹

For Official Mail Filing, Send To:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

As applicable, please indicate project(s) you are commenting on:

- Atlantic Coast Pipeline: Docket No. CP15-554
- Supply Header Project: Docket No. CP15-555
- All of the above

COMMENTOR'S NAME AND MAILING ADDRESS: (Please Print)

SARAH COLLINS-SIMMONS
4910 MOUNTAIN TRK
HIGHTOWN, VA 24465

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

LO165-1

AS SOMEONE WHO GREW UP IN NELSON COUNTY, VA AND IS NOW
A RESIDENT OF MEHERRIN COUNTY, VA, I AM VERY CONCERNED FOR
THE ENVIRONMENTAL AND LASTING NEGATIVE ECONOMIC IMPACT ON
BOTH OF THESE COMMUNITIES FROM THE PROPOSED ACP PROJECT.
HIGHLAND COUNTY IS KNOWN FOR ITS KARST TOPOGRAPHY AS
ARE BATH COUNTY VA TO THE SOUTH AND POCONONTAS COUNTY, VA
TO THE WEST. I WORRY ABOUT WATER QUALITY FROM SURFACE AND
SUBSURFACE RUN-OFF IN CHESAPEAKE AND MISSISSIPPI HEADWATERS.
IN NELSON COUNTY, A COMMUNITY MADE FAMOUS BY THE IMPACT FROM
THE 1969 HURRICANE CHAMILLE, I AM VERY CONCERNED ABOUT SLOPE
STABILIZATION AS THE ACP CROSSES THE ROCK AND RED CLAY RIDGES.

LO165-2

ADDITIONALLY, PIPELINE CONSTRUCTION IS OFTEN GRANTED * CODE

¹ The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at <http://www.ferc.gov> under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account".

LO165-1 Section 4.9 discusses potential economic impacts, including beneficial impacts, of the projects. Karst geology and slope stability are discussed in sections 4.1.2.3 and 4.1.4.2, respectively. Section 4.3 includes our discussion of water resources.

LO165-2 See the response to comment LO146-15.

LANDOWNERS COMMENTS

LO165 – Sarah Collins-Simmons

Z-3458

LO165-2
(cont'd)

VARIANCES DURING CONSTRUCTION AND CONTRACT COMPANIES ARE NOT HELD TO THE SAME STANDARDS AS LOCAL CONSTRUCTION PROJECTS IN REGARDS TO OPEN SPACE ~~AT~~ TRENCH LENGTH AND SOIL AND

LO165-3

EROSION CONTROL MEASURES. IN THESE RURAL COMMUNITIES CONSTRUCTION AND EQS COMPLIANCE WILL BE BURDENSOME ON LOCAL INSPECTION OFFICIALS. FOR EXAMPLE, HIGHLAND COUNTY HAS ONE ZONING AND BUILDING OFFICIAL WITH ONLY PART-TIME OFFICE ADMINISTRATION ASSISTANCE.

LO165-4

THESE RURAL COMMUNITIES WILL NOT SEE LASTING POSITIVE ECONOMIC IMPACT BECAUSE THE POPULATIONS ARE TOO SMALL WITH TOO LITTLE INDUSTRIAL OPPORTUNITY TO SEE LOCAL USE OF THE FUEL AND NO CREATION OF PERMANENT JOBS FROM THE ACD. HOUSING TEMPORARY WORKERS WILL IMPACT THE ALREADY SCARCE HOUSING OPTIONS FOR LOCALS. ROAD DELAYS AND DETOURS WILL IMPACT LOCAL INDIVIDUALS AND THE TOURISM INDUSTRY, AN ECONOMIC DRIVER IN THESE RURAL, MOUNTAINOUS COMMUNITIES.

I ~~AM~~ APPRECIATE YOUR CONSIDERING THE CONCERNS OF LOCAL COMMUNITY MEMBERS

LO165-3 Comment noted.

LO165-4 Comment noted

LANDOWNERS COMMENTS

LO166 – Rhamonia Woodson

Rhamonia Woodson
435 Cabell Road, Wingina, VA 24599
(434) 263.6261

**Comments to FERC, 2.22.17, Nelson County High School
Atlantic Coast Pipeline, Docket Number CP15-554**

- LO166-1 | We live in the historically-rich town of Wingina. The Wingina Post Office, James River Canal, Kanawha Bridge, Montezuma, Bon Aire, Soldiers Joy, St. Hebron Baptist Church, Odd Fellows Lodge, Morse's Grocery Store, and the list goes on (including a mausoleum from the 1800's)... They are all historically significant.
- LO166-2 | Of the nine (9) residents from the Wingina area, who sent cultural attachment letters, none of them have received a response. Here are excerpts from a few of their letters. We are responding to FERC requests for comments. Is FERC reading, listening and responding to us?
- LO166-3 | Samuel Woodson: "As a landowner in the town of Wingina, Nelson County, VA; I write to inform you that the proposed Atlantic Coast Pipeline (ACP) route through our historically rich town endangers the lives of many residents, who are all 'one' family, seriously disturbs natural resources that are required for human consumption/sanitary use and violates our rights by using our roads, which ACP has not been given permission to access.
- LO166-4 | There have been a series of route adjustments in our area, and through every one, ACP has avoided addressing our concerns. As it stands now, the route borders or cuts off portions of my land. Some of these are very small parcels and by their behavior, it appears that ACP believes that if they disturb small portions of land; then, "it does not matter". Is this appropriate?
- LO166-5 | The proposed route crosses my land, Parcel No. 81.1.1. The surveyors are aware of this; because, while I have denied access, surveyors have been on my land. They have used my access road and they have parked on my land; particularly, the Woodson Store parking lot. Is it appropriate that ACP surveyors enter landowner property without permission?

The surveyors of ACP have taken liberty to park on the land of other property owners in our area without permission. The staffing hired to communicate with landowners have been rude and intimidating in their efforts to 'force' entry and gain access to Wingina landowners' properties. We are African American. Is this the reason why we are constantly targeted in every route proposal?
- LO166-6 | To add insult to injury, the proposed access roads that have recently shown up on Atlantic Coast Pipeline, Appendix 1A, Topographic Route Maps, Nelson County, VA, Page 56 of 169, cross the property lines of four (4) landowners, who have denied ACP access to survey. Is it appropriate that they be allowed to use these driveways and/or roads? What happens when we need to use the narrow, unpaved road? Do we need to find them in the woods and ask them to move their

Z-3459

- LO166-1 | Comment noted.
- LO166-2 | Comments received on the docket regarding a project are addressed in the NEPA document; in this case, the EIS for ACP and SHP.
- LO166-3 | Comment noted.

FERC and other agencies with permitting responsibilities require that certain surveys be completed for the entire pipeline route. The data collected by Atlantic and DETI are filed with the FERC and submitted to the specific resource agencies for review. As part of the permitting/consultation process, agencies review and verify that data submitted by the applicant are accurate prior to issuing their respective permits. In addition, FERC resource specialists review the information filed by Atlantic and DETI to ensure its accuracy as part of the analysis of the proposed projects.

See also response to comment LO114-21.
- LO166-4 | Regardless of the amount of land affected, the environmental impacts related to constructing and operating the project must be disclosed and addressed in the EIS. We note, however, that compensation for acquiring an easement would vary and depend on the amount of land affected and land use, as well as other factors. The FERC does not engage in monetary negotiations between the company and the landowner or land-managing agency.
- LO166-5 | Comment noted. See the response to comment LO166-3.
- LO166-6 | Atlantic must receive landowner approval and a FERC authorization (Certificate) in order to use and/or modify public and private roads, including driveways, and other areas that would be affected by construction and operation of the project. Section 4.8.1.4 discusses the impacts on land uses resulting from access road use. Section 4.9.6 discusses road use, potential impacts such as traffic management, and road repairs.

LANDOWNERS COMMENTS

LO166 – Rhamonia Woodson (cont'd)

Z-3460

**Rhamonia Woodson
435 Cabell Road, Wingina, VA 24599
(434) 263.6261**

- LO166-6 (cont'd) | **vehicles from our driveways? Where will they park? Will they park on our land, where we have denied access? Where will they stockpile their equipment and supplies? Will they use our land for staging, where we have denied access? Who will pay for road maintenance and repair of our driveways and roads? I strongly urge you to consider a more appropriate conclusion, requiring the needs of all Wingina landowners in your approval process.**
- LO166-7 | **Furthermore, several water, timber and land resources are endangered by the ACP installation of the 42-inch pipeline on the propose route, including several natural springs, used as primary water source for all residents of Wingina; springs, streams, creeks and densely wooded areas that maintain the ecosystem and habitat for wildlife; and the sanitation systems and drain fields. We need all of these resources to survive.**
- LO166-8 |
- LO166-9 |
- LO166-10 | **Please know that, in the Wingina, VA area, every landowner is related. All of my family members in Wingina are residing in the **blast zone (measurably), but more appropriately, the incineration zone.** While some residents reside within the .7 mile evacuation zone, this is heavily wooded area. So, be informed that incineration is the likely result of the exploding 42-inch pipeline proposed by ACP. Hundreds of lives are disastrously affected by this proposed route. And, if there's a family reunion in progress; then, thousands of lives are at risk. Is it appropriate that you wipe out one entire family?**
- LO166-11 | **I urge FERC to reject this project. There are too many risks to the safety and lives of residents in its path. My community will see no benefits. Why should we be asked to bear this ill-advised and unfair burden? "**
- LO166-12 | **Pauline White: In every route alternative, there has never been a change of location from my immediate area of Wingina. ACP continues to invade the livelihood of numerous families, all related by blood and/or marriage in this area. We are flanked by historic districts on both sides; because our ancestors helped to build them.**
- LO166-13 | **We barely have enough land around us to dig wells for water and supply timber for heating our homes. With the intrusion of a pipeline, we would be hard-pressed to sustain our lives in this small, overlooked community. And, some of us landowners would surely be displaced with even a fraction of our land used for this pipeline construction.**
- LO166-14 | **We have endured the man made catastrophes of war and the natural calamities of Hurricane Camille, and in this fragile state, I don't believe these areas will survive construction of a pipeline; and certainly, my families and I will not survive the incineration from its explosion. It is certain that, if they are allowed to come through, they will trample through our land, park in our driveways and disrupt our lives, daily! How long must the poor bear burdens for the rich?**

- LO166-7 | Comment noted. We have assessed construction and operational risks to these resources.
- LO166-8 | Section 4.5 discusses impacts on wildlife habitat resulting from construction and operation of ACP.
- LO166-9 | Section 4.8.1.1 discusses impacts on agricultural land, including drain tiles. Section 4.8.3 discusses impacts on residential areas resulting from construction and operation of the project, including associated facilities such as septic systems.
- LO166-10 | See the response to comment LO22-5.
- LO166-11 | See the response to comment CO46-1.
- LO166-12 | Comment noted.
- LO166-13 | Comment noted.
- LO166-14 | See the response to comment LO22-5.

LANDOWNERS COMMENTS

LO166 – Rhamonia Woodson (cont'd)

Z-3461

Rhamonia Woodson
435 Cabell Road, Wingina, VA 24599
(434) 263.6261

- LO166-15 | Hilda Rose: " ...now, we have another mountain to climb, much higher than any we've ever known in this community. Our ancestors have slaved for many, and fought many wars, for us to be here today. Now, it seems, it's our turn to climb the mountain for our family rights to own land, have a home, and live with peace and tranquility. This pipeline "...falls very close to my property line so that it's considered to be in the "blast zone." While my relatives were informed by surveyors that it's only going to be "a hundred yards away so it won't matter," the matter is of great concern for me, my family and our neighboring families. We, the people, matter."
- LO166-16 | Charlotte Woodson: "ACP will bring hundreds of construction vehicles onto our land, parking along miles of private property, disturbing day-to-day activities of VA citizens, who entrust the government to protect our constitutional rights. The pipeline will run just few yards [from my bedroom], right along my yard, where my grandchildren play. Who tells their child to go play near a gas pipeline? Why endanger more lives? "
- LO166-17 |
- LO166-18 | **FERC has ignored such reported issues raised during the scoping period.** We've had no response from ACP-DOM', acknowledging our existence and their EIS efforts totally disregarded the mausoleum. They (DOM) *really are pretending that* ...we are not there/are not important. When Gloria Woodson was asked for permission to survey, she was told by a DOM representative. "Well, even if you don't give permission to access, your land is so small, it doesn't even matter."
- LO166-19 | So, Gloria's land is really so small, that it does not matter if they don't bother to get her permission? No letter for survey request/invitation to the legal proceeding has been sent to Gloria. Incompetence is one thing; but this is blatant disregard. They are just *taking* the use of her land without acknowledgement/consideration.
- LO166-20 | The alternate route moved away from the Norwood to Wingina historic district and the land of the African America community in Union Hill, but given the historic, cultural and archeological significance of that area, just moving across a modern paved road doesn't mean that Dominion is going to avoid important Indian and African American sites. The Monacan civilization was throughout that entire area – and still, **only about 10% of what could be dug has been excavated.** Expectation that Dominion will encounter significant archeological sites.
- And – The alternate route along parts of 56 and Cabell Rd. is slated to go through other parcels of land in the African American community in that area, along with cemeteries and slave burial grounds.**
- A statistic for your consideration: In 1860, there were 6,200 slaves in Nelson County – about half of the population. Around 40% of antebellum burials were black. The largest plantations in Nelson were in the area where the alternate is routed. It's pretty evident that there are a**

- LO166-15 | See the response to comment LO22-5.
- LO166-16 | Comment noted.
- LO166-17 | See the response to comment LO22-5.
- LO166-18 | See the response to comment CO6-1.
- LO166-19 | See the response to comment LO166-4.
- LO166-20 | The section 106 process of identifying, evaluating, assessing, and mitigating effects is ongoing.

LANDOWNERS COMMENTS

LO166 – Rhamonia Woodson (cont'd)

Rhamonia Woodson
435 Cabell Road, Wingina, VA 24599
(434) 263.6261

LO166-20
(cont'd)

large number of slaves buried in that area. So, it isn't a matter of moving the route a couple of yards. Message -- It just isn't culturally sensitive to send pipeline anywhere through this area. We've worked too hard and endured too much hardship for this nation to have today's descendants be once again enslaved to this effect.

Z-3462

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

In the Matter of)
)
Atlantic Coast Pipeline, LLC) Docket No. CP15-554-000
) CP15-554-001
Dominion Transmission, Inc.) CP15-555-000

MOTION IN RESPONSE TO
DRAFT ENVIRONMENTAL IMPACT STATEMENT

As a party to this proceeding, I, Jeannette B. Robinson, respectfully submit the following concerns and requests regarding the Atlantic Coast Pipeline (milemarker 93) in Little Valley, Bath County, Virginia, and your Draft Environmental Impact Statement issued on December 30, 2016, in the above-captioned dockets.

LO167-1

1. On September 12, 2016, I submitted to the FERC a map of Little Valley showing sinkholes, springs, sinking springs, and springs currently used as household water supplies. A photo and two studies related to karst topography in Little Valley were also submitted at this time. It should be noted that GeoConcepts, the firm hired by Dominion Transmission, Inc., to address karst issues, had previously submitted a map to the FERC showing no limestone or karst features present at the location of the ACP's crossing of Little Valley. This was a totally erroneous conclusion in light of the information I submitted and the karst features that were subsequently identified by GeoConcepts own LiDAR studies. GeoConcepts was the only karst expert to deny the presence of limestone and blamed their mistake on the maps they were using. The fact that GeoConcepts used inaccurate or outdated geologic maps in their initial evaluation illustrates either a basic incompetence or an approach that is so hurried by deadlines that accurate information falls by the wayside.

LO167-2

2. I am again respectfully asking FERC to require Dominion to conduct all hydrological studies, including dye testing, to evaluate the risks to drinking water and possible adverse

- LO167-1 Section 4.1.2.3 has been updated with the most recent survey data.
- LO167-2 Section 4.7.1.13 discusses the Madison Cave isopod; the section has been updated with the most recent survey data and consultations with the FWS.

Z-3463

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson (cont'd)

Z-3464

LO167-2
(cont'd)

impacts to the subterranean aquifers present in Little Valley. These additional studies are even more critical at this time due to FERC's determination regarding the Madison Cave isopod, a species listed as threatened under the Endangered Species Act. FERC has determined that:

a) "ACP may affect and is likely to adversely affect the Madison Cave isopod." (DEIS, Vol. I, 4-230);

b) "We assume that all karst features are suitable habitat and assume presence or the subterranean obligate species described in Table S-2 in Appendix S. (DEIS, Vol. I, 4-263;

c) "Based on Atlantic's Karst Survey that was completed in 2016, the following features were identified in the ACP project area...Recently available LiDAR data indicate that a number of surface sinkholes are present in the area of Little Valley. Dye trace tests conducted in the area determined that water from sinking streams flowing in conduits can travel miles over a couple days, further indicating the degree of subterranean karst development ." (DEIS, Vol. I, 4-263).

The assumption of the presence of the Madison Cave isopod and other sensitive subterranean obligate species makes it imperative that FERC carefully consider all of the specific engineering problems associated with crossing Little Valley.

LO167-3

3. The hydrologic study conducted by professional hydrologist William K. Jones that I submitted on September 12, 2016, states there is a possibility of beheading springs when underground conduits are intersected by the ACP trench. FERC and Dominion have downplayed this possibility by citing relatively shallow average trench depth. The problem with this approach is that average depth is meaningless when site-specific requirements call for a deeper trench. I am including a photo of State Route 694 (Little Valley Road) following a flood event in July 2015, where a large portion of the road has been washed away (Appendix, Exhibit A). This is the exact point where the ACP would cross Rt. 694. There is a very distinct possibility that the ACP trench would need to be deeper than average in this narrow mountain valley that is subject to frequent and severe flooding.

4. Another problem is sediment. Slopes on both Jack and Little Mountains are extreme with some exceeding 60%. This, coupled with soil that is prone to landslide, presents a

LO167-3

We reviewed the study that expressed concern that pipeline construction could "behead" karst conduits supplying water to springs. We did not find the supporting data that would lead to this potential conclusion. See also the response to comment CO6-1.

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson (cont'd)

Z-3465

LO167-3 (cont'd) | high probability that sediment will enter the underground aquifer of Little Valley. I have included two photos of a landslide on the east side of Little Mountain that occurred during the flood event of July 2015. The first photo shows the ridgeline of Little Mountain where the ACP is planned to run for over ¼ mile before dropping straight into Little Valley (Appendix, Exhibit B). The second photo shows a down-slope view of the slide (Appendix, Exhibit C). The top of Little Mountain would have to be leveled, requiring the moving of vast quantities of earth. If this soil is not properly handled and ends up on the steep eastern slopes of Little Mountain, sedimentation could easily enter subterranean waterways, adversely affecting Madison Cave isopod habitat.

LO167-4 | 5. Another issue is Access Road 36-012-AR2. This road is actually Rt. 694 but is erroneously listed as private (DEIS, Vol. II, Table E-1, p. E-22). According to the DEIS, this road is slated for improvement and runs north from the intersection of the ACP and Rt. 694. The map of karst features I submitted on September 12, 2016, clearly shows sinkholes immediately adjacent to this road. Any widening or grading, as described in Access Road Improvements (DEIS, Vol. I, 2-25), would almost certainly introduce sediment into underground aquifers.

LO167-5 | 6. Another question is what is the exact purpose of Access Road 36-012-AR2. It runs northward approximately 1/10 of a mile from its intersection with the ACP and simply dead ends on Rt. 694. There seem to be only two scenarios that make sense:
a) There is some planned use of land at the northern terminus of this road such as excess material dump, equipment storage, etc. If this is true, this use needs to be explained and evaluated in relation to possible impact on Madison Cave isopod habitat;
b) Traffic on this road will continue northward onto Rt. 694 to its intersection with Rt. 607. If this is the case, this use also needs to be evaluated in terms of its possible effects on the Madison Cave isopod. Sinkholes and springs are present in very close proximity to Rt. 694 for its entire length and we must assume the Madison Cave isopod is also present.

LO167-4 | Comment noted.

LO167-5 | Because Atlantic has not identified the portion of Route 694 north-northeast of access road 36-012.AR2 as part of its project workspace, that indicates that portion of the road would not require alterations or improvements for use. As such, Atlantic's use of the road would be similar to other impacts related to transportation and traffic as discussed in section 4.9.6. As discussed in this section, commercial carriers need registrations to operate in each state and may need special permits for oversize and overweight vehicles, temporary trip permits within the state, or to haul hazardous materials. Atlantic and DETI would coordinate with state and local departments of transportation and land-managing agencies to obtain the required permits to operate trucks on public roads. Atlantic and DETI would also coordinate with landowners and tenants in the areas where local, private roadways may be impacted during construction.

No additional work areas have been identified by Atlantic beyond the terminus of the referenced access road. In the event any additional work areas are identified, Atlantic would be required to comply with the post-approval variance process discussed in section 2.5.5.

Section 4.7.1.13 includes our discussion of potential impacts on Madison Cave isopods.

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson (cont'd)

Z-3466

LO167-6 | 7. Since the beginning of this process, the residents of Little Valley have tried to get Dominion to accurately evaluate the impacts on our watershed. Even though Dominion has had access to the majority of properties in Little Valley since November 16, 2016, no one with karst expertise has bothered to visit. The only reason there is any awareness of karst features and possible negative impacts on our drinking water and Madison Cave isopod habitat, is because individual citizens have been willing to spend their time and money to gather information that FERC has so far refused to require Dominion to do. FERC acknowledges that in Little Valley "...water from sinking streams flowing in conduits can travel miles over a couple of days..." (DEIS, Vol. I, 4-263), but only data from springs within 500 feet of the proposed pipeline will be evaluated. The scope of karst studies that FERC is requiring Dominion to do is woefully inadequate.

LO167-7 | WHEREBY, in light of all the geohazards associated with building a pipeline of this size across Little Valley, and the subsequent unavoidable threats to household drinking water and Madison Cave isopod habitat, I am asking FERC to require Dominion to consult with the U. S. Fish & Wildlife Service to develop a karst study protocol that would accurately evaluate risks. I also ask that all karst studies be conducted and evaluated before any final EIS is released in order to determine the feasibility of building this pipeline across Little Valley.

Respectfully submitted,
/s/Jeanette B. Robinson
909 Little Valley Road
Warm Springs, VA 24484
540-839-5706
jbr9850@gmail.com

Dated: April 4, 2017

- LO167-6 | Section 4.1.2.3 of the final EIS has been revised to provide additional information filed by Atlantic and DETI after issuance of the draft EIS. As discussed in section 4.1.7, Atlantic and DETI conducted studies to characterize karst conditions, and developed project-specific plans and procedures that would minimize the potential for karst impacts that could result from constructing and operating the proposed facilities. While small, localized, and temporary impacts on karst features, water flow, and water quality could occur, the impacts would be minimized and mitigated through Atlantic's and DETI's plans. Potential impacts and mitigation on groundwater resources are discussed in section 4.3.1.7. Potential impacts on special status species are discussed in section 4.7.
- LO167-7 | Sections 4.7.1.1 through 4.7.1.4, and section 4.7.1.13 discuss potential impacts on karst, including updated consultations with the FWS regarding avoidance and conservation measures.

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson (cont'd)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Warm Springs, VA, this 4th day of April, 2017.

/s/ Jeannette B. Robinson
909 Little Valley Road
Warm Springs, VA 24484
540-839-5706
jbr9850@gmail.com

Z-3467

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson (cont'd)

APPENDIX



Exhibit A



Exhibit B

Z-3468

LANDOWNERS COMMENTS

LO167 – Jeannette B. Robinson (cont'd)



Exhibit C

Z-3469

LANDOWNERS COMMENTS

LO168 – Anna Samuels

Z-3470

Jill A Averitt, Nellysford, VA.
This is being submitted by Jill Averitt on behalf of Anna Samuels.

To FERC,

LO168-1

For a corporation to take over control of the little guys largest asset is an affront to a free society. This is putting more Financial power into an already too powerful entity at the cost of the little guy. This is what has happened to our democracy, and this is the type of greatest infringement so far. Someone must declare foul. I know there are a lot of government officials who are already used to such violations but there comes a point to put an end to these injustices. More power needs to be put in the hands of the little guy, and less into other more powerful entities. Our country was founded on this principle, and large entities taking power is illegal in our system.

Furthermore, what this particular entity bases their power on is a lot of spin with no substance. What they base their argument on should be illegal practices, fracking to obtain their dineros. Easy money for them, but according to Cradle to Grave models, no cost incurred for ruination of water supplies, chemicals put in the ground, earthquakes created by these practices, little guy property values destroyed. Their practices are not sustainable, they can't begin to ameliorate the cost to others, yet they are making a pretty penny from this practice. Only because of loopholes that as yet do not require them to include the cost of amelioration in the price of their end product. And their Spin on this is that of Energy. "We need energy independence". The way they are doing this is all about spin and marketing, including sucking in our government officials who don't appear to know any better. There are actually a lot of common sense folk out here in our country who can see the forest for the trees. Some times it takes just a little perspective. A lot of them are just too close to the issues to have this.

Don't fall for this crap they are selling. Comon!

Anna Samuels
38 Oakland Farm Lane
Shipman VA 22971
434 263 4096

LO168-1 Comment noted.

LANDOWNERS COMMENTS

LO169 – Jill Averitt

20170406-5558 FERC PDF (Unofficial) 4/6/2017 3:35:04 PM

April 6, 2017

Jill Averitt
88 Grace Glen, Nellysford VA 22958

Nathaniel J. Davis, Sr.,
Deputy Secretary Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Comment of Jill Averitt on the Draft Environmental Impact Statement for the Atlantic Coast Pipeline and Supply Header Project (Docket Nos. CP15-554-000, CP15-554-001, and CP15-555-000 FERC/EIS-0274D)

Dear Mr. Davis and Members of the Commission,

LO169-1

I am writing you today to request that the DEIS for the Atlantic Coast Pipeline be revised and that you re-set the comment period so that we have a full 90 days to review this massive document once again. The current document is deeply flawed and in this state can not be used to make an informed decision by FERC whether or not to permit this pipeline. It would be a blatant slap in the face to all of the citizens and agencies who have spent time doing due diligence during this comment period, much of which should have been done and reflected in the DEIS.

There have been plenty of comments about the inaccuracies in the DEIS from others, including our own experience with no references made to any previous filings pertaining to Spruce Creek Resort and Market. It's shameful to see this level of carelessness leaving out details about proposed projects along the pipeline, surveys and studies about karst land, and no attempt to compare the need for both the MVP and ACP to exist in the first place, just to name a few.

LO169-2

I also want to bring to your attention the way in which Dominion has engaged in communication with the citizens and the government. The rhetoric Dominion uses has been misleading causing confusion for landowners. For example, I received a flyer in the mail that was called Project Update special addition Oct. 2016 signed by Carole McCoy an authorized representative of Dominion Transmission, Inc. (see image below).

LO169-1 See the responses to comments CO6-1 and CO102-1.

LO169-2 Comment noted. FERC does not control how Atlantic and DETI presents their projects or project status to the public.

Z-3471

LANDOWNERS COMMENTS

LO169 – Jill Averitt (cont'd)

20170406-5558 FERC PDF (Unofficial) 4/6/2017 3:35:04 PM

LO169-2
(cont'd)

Z-3472

Atlantic Coast Pipeline

**Project Update
SPECIAL EDITION
October 2016**

From the Project Director

First, I'd like to thank you for your continued interest in the Atlantic Coast Pipeline project. Since we first proposed the project in September 2014, we have been committed to keeping you informed about important project developments. As the project has recently reached some important milestones, I wanted to communicate with you directly so you have the latest information about where the project stands and the next key steps on the horizon.

The environmental review of this project continues to be a thorough and exhaustive process. Since September 2014, we have evaluated more than 6,000 miles of potential routes in order to identify the best route with the least possible impact on landowners and the environment. We have participated in more than three dozen public meetings attended by thousands of individuals. We have learned a lot and we've made many important improvements to the project. Based on our extensive studies and ongoing discussions with landowners, agencies and community groups, we've made more than 300 route adjustments to avoid environmentally sensitive areas and address individual landowner requests.

In early August, the project reached an important milestone when FERC issued a Notice of Schedule, which established a timeline for the remainder of the environmental review of the project. A major step forward for the project, this schedule confirms the significant progress we've made, and it provides a clear road map for the remainder of the federal review process. **This important development also signals that the route has essentially been finalized.** While there may continue to be minor modifications, we are confident that there will be no further major adjustments that would impact the schedule laid out by FERC.

In September, we reached another significant milestone when we selected our lead construction contractor for the project. Spring Ridge Constructors, LLC (SRC) is a joint venture of four leading U.S. natural gas pipeline construction companies with more than 200 years' combined experience in building large-diameter natural gas pipelines. We selected SRC as the most qualified contractor because of its extensive experience in building large-scale, complex projects like the ACP, and also because these companies share our commitment to safety and environmental stewardship.

We firmly believe that this project must receive a comprehensive and robust environmental review, and when it comes to the safety and environmental well-being of communities there are no short cuts.

| ACTIVITY | TIMING |
|-------------------------|--------------------|
| Survey / Route Planning | May 2014 – Ongoing |
| FERC Pre-Filing Request | October 2014 |
| FERC Application | September 2015 |
| Draft EIS * | December 2016 |
| Final EIS * | June 2017 |
| FERC Certificate | Fall 2017 |
| Construction | 2017 – 2019 |
| In-Service | Late 2019 |

*Environmental Impact Statement

While the environmental review of this project has taken longer than we originally anticipated, we remain committed to safely building this project in the original 18–24 month timeframe we have always planned. Maintaining our original construction schedule ensures that all of the necessary safety and environmental protections we have developed remain in place.

Therefore, based on FERC's schedule, we have adjusted the timeframe in which we expect construction to begin and be completed, and the time period in which we expect the pipeline to go into service. While we had originally anticipated beginning construction in the fall of 2016 with an in-service date at the very end of 2018, we now expect to begin construction in the fall of 2017 with the project complete and going into service in late 2019.

Public utilities in Virginia and North Carolina are counting on the Atlantic Coast Pipeline to meet the growing energy needs of our residents and our economy. They also urgently need this project in order to achieve the ambitious carbon emission reductions required by the federal Clean Power Plan. Receiving a Notice of Schedule has brought us one step closer to meeting these urgent needs and securing the energy future of our region.

Thank you for your ongoing interest in this project. We will continue to keep you informed of future developments.

Sincerely,

Carole A. McCoy

Carole A. McCoy, Authorized Representative
Dominion Transmission, Inc.

In this glossy report she states, "This important development also signals that the route has essentially been finalized." It goes on to say that "In September, we reached another significant milestone when we selected our lead construction contractor for the project." First off, when I questioned my neighbors about this, it

LANDOWNERS COMMENTS

LO169 – Jill Averitt (cont'd)

20170406-5558 FERC PDF (Unofficial) 4/6/2017 3:35:04 PM

- LO169-2 (cont'd) appeared that only landowners in our area received this notice. My heart sank when I read this and I know about this process. It quickly turned into anger as I remembered that they DO NOT have a permit from FERC and it is FERC's job to protect the citizens by making careful and clear investigations on something of this magnitude especially when it is so controversial in our state. If Dominion filed for this permit in our state I dare say they would get it. I can imagine how other landowners felt after reading this. If you don't know any better you would think it's over. Dominion got their pipeline. There is nothing more I can do. This is simply a tactic Dominion uses to get us to give up.
- LO169-3 If we had been given a list of landowners along the pipeline route we could have reached out to folks and had better communication with them when things like this came up, but we do not. We have spent countless hours trying to identify landowners to inform them of their rights. We have Dominion's route and we have gone to the courthouses trying to get information and in many cases went door to door to find people. This has been a laborious task and ever changing as Dominion changed routes, suggested new ones and adding access roads. If they thought we all would be excited about their pipeline why wouldn't they share their contact list with us? What would they have to lose by allowing us to contact landowners?
- LO169-4 Another intimidating tactic was used when a landowner received several calls from Doyle Land Services, hired by Dominion to offer to inspect foundations and test well water. The representative stated that this was done pre-construction. As if dominion has already received permits! One landowner was told that if they didn't allow these services that she would not be offered compensation if there was damage done later. She felt like this was a threat. How many landowners got a call like this and figured it was over, they HAD to give in?
- LO169-5 In a report that Ms. Leopold, President and CEO of Dominion Energy gave to the Senate, she states that Dominion has "engaged in an unprecedented level of outreach to all landowners, local governments, tribal governments, citizen organizations, and others. . ." While that might be true for this particular project the way in which they did this is very misleading. They have had two comment sessions in Nelson County where they stacked their own pro-pipeline people speaking first at the session. Ten times that amount showed up to speak against the pipeline and most weren't heard because of lack of time. In the second FERC hearing, Dominion rented out all of the available spaces in the venue making it difficult for landowner groups to find a space to meet and for others to give out information. We ultimately got a space after we made some inquiries.

- LO169-3 See the response to comment LO166-3
- LO169-4 See the response to comment PM1-51.
- LO169-5 See the response to comment CO95-1.

Z-3473

LANDOWNERS COMMENTS

LO169 – Jill Averitt (cont'd)

20170406-5558 FERC PDF (Unofficial) 4/6/2017 3:35:04 PM

LO169-6

She goes on to say, "...I am pleased to advise the Committee that on average over 90 percent of the landowners along the route have provided permission to survey their property to determine the suitability for the pipeline." Here is yet another example of Dominion using rhetoric to have you believe that they have cooperation and enthusiasm for the building of this pipeline. What Ms. Leopold failed to state was how they went about getting permission to survey.

We received letters from Dominion NOT requesting but notifying us that they will come and survey our land for their pipeline. For those landowners who knew nothing about the pipeline (out of state landowners) it appears that this was Dominion's right. At first we felt powerless. It wasn't until local groups formed and notified landowners of their rights that landowners were educated enough to say NO! Just because landowners thought they HAD to give Dominion permission to survey doesn't mean they want the pipeline through their backyard.

These are all tactics to have the landowners believe that FERC will soon grant a permit and the ACP will be built leading us to conclude there is nothing we can do. We have been one of the lucky counties where we have a lot of support from our community and are collectively spending extraordinary hours of personal time to help educate each other and make our voices heard.

I would like to restate that releasing the DEIS in its current form is unacceptable. I would like FERC, our local, regional, state and federal representatives all to know that we will not stand by and be bullied by Dominion or the people we have entrusted to represent us.

Please do right by the people.

Sincerely,
Jill Averitt

LO169-6 See the response to comment LO114-21.

Z-3474

LANDOWNERS COMMENTS

LO169 – Jill Averitt (cont'd)

Rhamonia Woodson
435 Cabell Road, Wingina, VA 24599
(434) 263.6261

LO166-20
(cont'd)

large number of slaves buried in that area. So, it isn't a matter of moving the route a couple of yards. Message -- It just isn't culturally sensitive to send pipeline anywhere through this area. We've worked too hard and endured too much hardship for this nation to have today's descendants be once again enslaved to this effect.

Z-3475

LANDOWNERS COMMENTS

LO170 – Ron McLean

Z-3476

LO170-1

James McLean, Norfolk, VA.

Dear Ms. Bose,

I am writing you again about the ACP and their somewhat unknown access roads. I am very concerned about an access road that Dominion identifies as "Proposed Access road 36-012.AR1". It is at pipeline mile post 93 in Bath County. This road happens to be my driveway. It runs parallel to the pipeline and is less than 200' away from the pipeline.

I see no reason why they have to TAKE MORE OF MY PROPERTY when they can easily use some of the other property they have already TAKEN.

The newest Construction Alignment Plans for Station 5974-6030 were just introduced and details are just coming out. There are now 2 additional "Extra Work Space" areas that are 50 feet wide adjacent to the already 125' clearing. This means that there is a 225 foot wide clearing and many more trees will be removed and Dominion still wants to use my driveway less than 200 feet from the centerline of the pipeline to access a valve site when they can easily use their original right of way to access the valve.

As a land owner I feel helpless. I have spoken with the Land Agent and he won't comment, Dominion won't comment. Who is looking out for the Land owner? The Forrest Service gets attention when they speak. FERC is our only resource for land owners. This land grab by a "for profit" company at the expense of individual landowners should not be allowed.

Respectfully,

Ron McLean

LO170-1 See response to comment LO166-6.

LANDOWNERS COMMENTS

LO171 – O. Gay Elmore, Jr.

20170224-0014 FERC PDF (Unofficial) 02/13/2017

O. GAY ELMORE, JR.

ATTORNEY AT LAW

121 SUMMERS STREET CHARLESTON, WV 25301
TELEPHONE: (304)344-2232 FACSIMILE: (304)344-1776
elmorelaw@aol.com

February 13, 2017

FILED
SECRETARY OF THE
2017 FEB 23 PM 4:25

RECORDED

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A
Washington, DC 20426

ORIGINAL

Re: Docket No.: CP 15-554-000, CP 15-554-001, and CP 15-555-000 (FERC/EIS-0274D)
Atlantic Coast Pipeline, LLC
Tract Nos.: District, Map 03-6B0023, Lewis County, West Virginia

Dear Ms. Bose:

LO171-1

On behalf of my clients, Robert E. Brincefield, Jr. and Terri Lynne Brincefield, as Trustees of the Robert E. Brincefield Trust and Terri Lynne Brincefield Trust, of 2850 NE 23rd Street, Pompano Beach, Florida 33062, I would like to request that the access road proposed by Atlantic Coast Pipeline, LLC, upon this particular property designated above, be repositioned in accordance with the enclosed diagram (map).

My clients do not generally oppose plans for the Atlantic Coast Pipeline, LLC to traverse their seven tracts or parcels of land in Lewis County, West Virginia. However, my clients strongly disagree with the planned route of the access road across their property initially proposed to them by representatives from Atlantic Coast Pipeline, LLC which is also exhibited on the enclosed diagram. Instead, my clients recommend that the proposed route be adjusted to an existing logging road upon their property; they desire this adjustment due to the fact that the road proposed by Atlantic Coast Pipeline, LLC serves as their driveway. Their proposed alternate access road will give ACP, LLC access to the exact same point in the ROW and is by no means an unreasonable request.

We respectfully encourage you to engage in a dialogue with both Atlantic Coast Pipeline, LLC, and my clients in order to address specific concerns unique to the property, and we ask that you require those involved with the Atlantic Coast Pipeline, LLC to strictly comply with development of their project in a manner fair to my clients, Robert E. Brincefield, Jr. and Terri

LO171-1 See response to comment LO166-6.

Z-3477

LANDOWNERS COMMENTS

LO171 – O. Gay Elmore, Jr.

20170224-0014 FERC PDF (Unofficial) 02/13/2017

LO171-1
(cont'd)

Lynne Brincefield, as Trustees of the Robert E. Brincefield Trust and Terri Lynne Brincefield Trust.

Respectfully, we ask that you please take the above matter into consideration. Should you have any questions, please do not hesitate to contact me at your convenience.

Very truly yours,



O. Gay Elmore, Esq.

Enclosure

Cc: Robert E. and Terri L. Brincefield
Steven T. Ury

Z-3478

LANDOWNERS COMMENTS

LO172 – Kirk Daniel Sorensen

Z-3479

LO172-1

Kirk Daniel Sorensen, Valley Head, WV.
Would it be OK if I put a T-bar ski lift on the cleared path of the pipeline on my property?
Should be a nice run.

LO172-1

A pipeline easement would prohibit certain types of uses from occurring within the permanent right-of-way that could affect the maintenance and safe operation of the pipeline, such as the construction of any permanent aboveground structures (e.g., houses, commercial buildings) or excavation activities. However, operation of the pipeline would not affect other types of land uses or other activities that do not directly disturb the pipeline or operational right-of-way. Most land uses would be allowed to revert to prior uses following construction.

LANDOWNERS COMMENTS

LO173 – Roberta Koontz

My letter is at the end of this filing.
Roberta K Koontz

Dominion Resources Services, Inc.
5000 Dominion Boulevard,
Glen Allen, VA 23060



March 24, 2017

Mr. Roger Kirchen, Director
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Ave.
Richmond, VA 23221

**Subject: Section 106 Review –Architectural Survey Report Addendum 5
Atlantic Coast Pipeline, LLC, Atlantic Coast Pipeline Project
DHR File No. 2014-0710**

Dear Mr. Kirchen:

Atlantic Coast Pipeline, LLC (Atlantic) is requesting review and comment on the enclosed addendum architectural survey report on investigations conducted for the proposed Atlantic Coast Pipeline (ACP). The Federal Energy Regulatory Commission (FERC) is the lead Federal agency for this Project. Atlantic's consultant, ERM, conducted the survey and prepared the enclosed report pursuant to the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended.

Atlantic would appreciate your comments on the attached addendum architectural survey report, and we look forward to continuing to work with you on this Project. If you have any questions regarding the enclosed report, please contact Richard B. Gangle at (804) 273-2814 or Richard.B.Gangle@dom.com, or by letter at:

Richard B. Gangle
Dominion Resources Services, Inc.
5000 Dominion Boulevard
Glen Allen, Virginia 23060

Respectfully submitted,

A handwritten signature in blue ink that reads "Robert M. Bisha".

Robert M. Bisha
Technical Advisor, Atlantic Coast Pipeline

cc: Richard Gangle (Dominion)

Enclosure: **Architectural Survey Report Addendum 4**

Z-3480

LANDOWNERS COMMENTS

LO173 – Roberta Koontz (cont'd)

My letter is at the end of this filing.
Roberta K Koontz

To: Kimberly Bose, FERC From: Roberta K Koontz Reference: CP15-554-000

Date: 4/4/17 Subject: This is the FERC filing of our protest of Dominion's Architectural Survey Report for the ACP sent to Virginia's Review & Compliance Section of the Department of Historic Resources (DHR). The survey is incomplete, misleading and erroneous. Our very historic property (The Wilderness) was excluded from the survey and is seriously endangered by the ACP. The Dominion Architectural Survey will be filed separately.

Dear Ms. Bose,

LO173-1

We just discovered a FERC filing by Dominion which included the preceding letter from Dominion which was sent to the Review & Compliance Section of DHR. This is the ONLY document we have ever seen where Dominion addresses historic properties endangered by the ACP.

I have no idea how these properties were selected for study and survey but most are clearly not historic properties. For example, there is an Augusta County property only a few miles from us on SR629 that was part of the survey (figure 007-5741 in the survey). This property is clearly not historic. It is a trailer-like rental property that was seriously damaged by renters before they could be evicted. The inclusion of this property in the Dominion study of historic properties along the ACP is absurd.

Only two properties were studied in Bath County (figures 008-5068 and 008-5069). Both properties are located on Mill Creek Road near our very historic property, The Wilderness. One is a relatively new home with several old barns in significant disrepair (008-5068). And what was described as an old outhouse. It is a nice property with nice new rock work & a new barn but clearly not historic.

The other property has a circa 1970 house and at least one outbuilding that is also modern. Also a nice property but clearly not historic.

Dominion is misleading DHR by providing this survey which appears to study properties by county in the path of the ACP. How is the DHR to know that there are other properties that are actually historic. Dominion is misleading the public, property owners of historic homes and the DHR with this sloppy and misleading information. Why survey and report on properties that are obviously not historic while excluding properties that are obviously historic.

FERC should force Dominion to comply with the National Historic Preservation Act (NHPA) and the rules & regulations overseen by the Review & Compliance Section of the DHR. This is just another example of incomplete, misleading and erroneous information provided by Dominion under the guise of meeting their obligations, etc. No information about the preservation of historic properties is mentioned in the DEIS. This survey and the DEIS are completely unacceptable with respect to preservation of historic properties seriously endangered by Dominion. Roberta K Koontz The Wilderness wildernessfarm@mgwnet.com

LO173-1 Comments noted. Section 4.10.1.1 includes our discussion of cultural resources surveys, including architectural surveys.

Z-3481

LANDOWNERS COMMENTS

LO174 – Roberta Koontz

To: Kimberly Bose, FERC From: Roberta K Koontz

Reference: CP15-554-000 Date: 4/4/17 Subject: Rusty Patched Bumble Bee

Dear Ms. Bose,

LO174-1

No study of the environment on our historic 1000-acre property has been conducted by Dominion. According to VDGIF, we have the James River Spineymussel living in Mill Creek on our property (see a previous FERC filing). Dominion knows about this and has done nothing to address the issue but keeps moving ahead with the ACP on our property. We also believe that we have the critically endangered Rusty Patched Bumble Bee in our protected habitats. Bees have seriously declined on our property in recent years. We lost all of our domestic bees in two attempts at having hives on the property. We depend on bees for pollination of our two orchards, fruit trees in animal habitats, wildflowers and native plants in animal habitats on the farm. These critically endangered bees need to be protected from the ACP on our property. Please read the following editorial from The Recorder in Bath County.

Regards, Roberta K Koontz wildernessfarm@mgwnet.com

LO174-1

Section 4.7.1.16 provides an updated discussion of the rusty patched bumble bee, including potential impacts and avoidance, mitigation, and conservation measures. We note that the ESA does not say “nothing is allowed to knowingly destroy [listed species] habitat,” only that such proposals must be consulted on with the FWS. The FWS, as a part of the section 7 consultation process, will ultimately decide whether the level of impact on a federally listed species is acceptable. In doing so, the FWS takes into account many factors, including the proposed action, a project sponsor’s proposed mitigation measures, and/or the federal agency’s additional measures to minimize impacts.

Z-3482

LANDOWNERS COMMENTS

LO174 – Roberta Koontz (cont'd)

Endangered bee may sting pipeline plan

BY JOHN BRUCE • STAFF WRITER

The critically endangered rusty patched bumble bee spends winters underground in [Highland, Bath and Augusta](#) where a gas pipeline is proposed. (Courtesy USGS Bee Inventory and Monitoring Lab)

[MONTEREY](#) — Pipeline company Dominion may be facing another hurdle to its proposed [Atlantic Coast Pipeline](#).

[Tyler Bird Paul](#) of [Highland County](#) on Tuesday informed the [Federal Energy Regulatory Commission](#) of a newly designated endangered species in the path of the proposed pipeline.

“It has come to our attention, and we wish to bring it to your attention, that the rusty-patched bumble bee has been added to the Endangered Species List as of January 11, 2017,” Paul said in her FERC website post. “You may see on the map at [xerces.org](#) that the rusty-patched bumble bee habitat is in [Virginia](#), including Bath, Augusta and Highland counties. “According to the [Endangered Species Act](#), nothing is allowed to ‘knowingly destroy their habitat.’ I wish it added to the record that construction of the Atlantic Coast Pipeline

Z-3483

LANDOWNERS COMMENTS

LO174 – Roberta Koontz (cont'd)

will no doubt be knowingly destroying the habitat of the rusty-patched bumble bee in Highland County, [Bath County](#) and [Augusta County, Virginia](#).”

The [United States Fish and Wildlife Service](#) placed the bee on the list of endangered species, making the rusty-patched bumblebee the first bee of any kind to be added to the list in the continental United States, according to Wikipedia, which explains, “Most nests that are constructed by the bee are built underground, and are commonly found in old rodent burrows.” And, they are known to build their nests underground in locations such as ditches on the side of the road, wetlands, and fields, typically 16-18 inches below the surface, composed of soft dirt. The species requires three different types of habitats for foraging, nesting, and hibernating which are



geographically close to one another, making them vulnerable to extinction. They require a temperate climate, but can withstand cold temperatures most

Z-3484

LANDOWNERS COMMENTS

LO174 – Roberta Koontz (cont'd)

species of bumblebees cannot. They have been found at elevations as high as 5,250 feet, Wikipedia says.

Forest service supported

Also this week, David Bennick, president of [Potomac Appalachian Trail Club](#)- Southern Shenandoah Valley Chapter, informed FERC the club supports the forest service “taking the time it needs to make a responsible and well informed decision on whether to issue a special use permit for the Atlantic Coast Pipeline and amend the George Washington and [Monongahela National Forest](#) management plans.

“For this large and extremely consequential project, it is imperative that the [Forest Service](#) follow the laws and regulations in place and have access to all the information it needs to make a responsible decision,” he said.

The chapter is located in the [Harrisonburg, Staunton](#) and [Waynesboro](#) area. “Our club leads hikes and maintains trails along the 16-mile route of the Atlantic Coast Pipeline through the [George Washington National Forest](#),” Bennick explained. “We typically log 1,000-2,000 hours of volunteer work on trails in the [Shenandoah Mountain](#) area of the GWNF. Our club is opposed to the proposed ACP route, and we have been active in expressing our concerns in writing and by speaking at public meetings held by FERC. When we hike, we enjoy scenic views, cascading mountain

Z-3485

LANDOWNERS COMMENTS

LO174 – Roberta Koontz (cont'd)

Z-3486

streams, wildflowers, birds, and geologic features, and we especially appreciate the large, unfragmented tracts of national forest on the [Blue Ridge Mountains](#) and Shenandoah Mountain. These tracts of wildlands offer supreme hiking experiences for the 10 million people who live within a two-hour drive of the GWNF. The ACP route cuts through some of the premier areas of the national forest for nature study and outdoor recreation. “Our [Conservation Committee](#) has reviewed the draft EIS for the ACP and have found it to be incomplete and very misleading. Some of the most essential information for a responsible decision is missing. We are very concerned that Dominion and FERC are pushing to expedite this consequential project without allowing enough time for all the agencies and other parties involved to gather and submit critical information for analysis and review. A project of this magnitude cannot be evaluated quickly.

“As one example of misinformation, please note that the draft EIS states that the pipeline will not be visible from the proposed [Shenandoah](#)

[Mountain National Scenic Area](#). Our chapter has led a hike to a scenic viewpoint on Shenandoah Mountain on [New Year’s Day](#) of 2016 and 2017. The pipeline route would bisect the viewshed ... with a permanent utility corridor. (The chapter) supports Supervisor [Clyde Thompson](#)’s Dec. 13 letter stating the Forest Service

LANDOWNERS COMMENTS

LO174 – Roberta Koontz (cont'd)

does not concur with the expedited timetable set by FERC and that more time is needed. This is not just for convenience sake. More time is required by the laws and regulations the Forest Service must follow. This pipeline is putting many fragile resources in the GWNF at risk. It is imperative that the Forest Service be given adequate time to work its way through the process carefully.

“Information, like biological surveys for sensitive species, detailed plans for high risk areas, and a more detailed engineering plan for the (horizontal drilling) through the [Blue Ridge](#) must be available before a decision is made, not after. If the Forest Service is forced to fast-track this decision without critical information, the agency will be vulnerable to objections, appeals and lawsuits. Thank you for your responsible stewardship of our national forests, and please take the time you need to assemble and review the necessary information. It is crucial that time for public participation be taken into account during this process.”

[Bill Johnson](#) of [Fredericksburg](#) told FERC he was grateful to the Forest Service “that you are taking a stand to protect both the forests and the communities along the proposed route of the Atlantic Coast Pipeline. It is appropriate that you want FERC to actually do their job and publish a complete and accurate draft EIS that addresses your and the public’s concerns. FERC’s

Z-3487

LANDOWNERS COMMENTS

LO174 – Roberta Koontz (cont'd)

allowing the applicants to defer submitting critical information until after a certificate is issued or construction is underway, leaves the Forest Service and the public without the information needed to evaluate the risks with this pipeline. FERC's actions are further proof that they never met a pipeline that they didn't like. "It is critical that the Forest Service receive all requested and needed data and plans prior to making decisions on the project so that the public knows what it is in store for, should the applications be approved. Local communities that will be affected by the pipeline strongly support your commitment to its regulatory review process.

"It is critical that you stay committed to the process and professional standards you uphold as stewards of our public lands. You are our last resort - you must take the time you need and which the law demands, to meet these standards.

"The future depends upon your actions and I hope that you rise to the occasion and do the right thing," he wrote.

Z-3488

LANDOWNERS COMMENTS

LO175 – Roberta Koontz

To: Kimberly Bose, FERC
Date: 4/5/17

From: Roberta K Koontz
Reference: CP15-554-000

Subject: Explain how any ACP construction activities will not have a negative impact on our 1000-acre farm habitat. How will our many wildlife habitats be protected. The DEIS did NOT address how insects, wildlife, reptiles, birds, marine life and any living creature will be protected from harm by Dominion during nesting periods, mating periods, birthing times, etc. How can Dominion avoid critical times (such as nesting) in the life cycle of our creatures on the farm. Has Dominion been working closely with biologists & others at VGDIF. They should be.

Dear Ms. Bose

One of our primary goals for our 1000-acre farm with two conservation easements was to provide a safe habitat for the many living creatures our farm. We also wanted to attract more and more creatures to the safety and bounty of our farm. We spent considerable monies over a period of several years to provide a safe and bountiful habitat for wildlife.

We wanted to attract species such as quail that once lived here in Virginia but vanished due to destruction of their environment. We planted special plants and crops in small acreage for the wildlife (such as corn, warm season grasses, clover and turnips).

We created habitat areas where we planted hundreds of bushes & trees recommended by the Virginia Department of Game and Inland Fisheries (VDGIF). We obtained grants for planting and to help repair water resources harmed by years of grazing cattle. We added water tanks and fencing to keep cattle and other farm animals out of our creeks, springs and ponds. We stopped having livestock and now only grow crops.

Obviously the construction of the ACP across our property will impact insects, birds, wildlife, reptiles, bats, marine life and other living creatures

LO175-1 Comments noted. Section 4.5.5 describes the general impacts and mitigation on wildlife species and their habitats. Section 4.7 discusses special status species (including ESA-listed species), consultations with federal and state agencies, survey results, impact analyses for each species potentially found in the project area, and avoidance, mitigation, and conservation measures for each species.

Z-3489

LO175-1

LANDOWNERS COMMENTS

LO175 – Roberta Koontz (cont'd)

LO175-1
(cont'd)

who depend on our habitat for their existence. In particular, care should be taken during nesting periods, mating periods, birthing times, etc. when they are especially vulnerable in their habitats.

In particular, we are very concerned about the potential devastation to our small bee population. We had domestic honey bee hives on two occasions for pollination. Both times our bees were killed for unknown reasons. Most of our bees now are bumble bees which usually nest in the ground in small colonies.

We need bees to pollinate our orchards, flowering trees, wildflowers, wild fruit trees and some agricultural fields. Pollination is crucial to our farming activities and wildlife habitats. Destruction of our bee habitats would cause serious issues with our farming operations and livelihood. Destruction of many plants and insects would also result in destruction of wildlife, birds, insects, etc. who depend on our environment for food.

The DEIS should be revised to specify what will be done by Dominion to protect our animal and creature habitats & their resources such as food & water. A comprehensive study should be conducted by Dominion to identify endangered species on the property and how they will be protected. We know that we have the James River Spineymussel living in Mill Creek. We believe that we have the Rusty Patched Bumble Bee on our farm. We could have bats and plants that are endangered. The DEIS should identify what is present in our rich environment and how species will be protected by Dominion especially those species that are endangered.

My husband (Bob Koontz), wrote to Al Bourgeois, a biologist with the Virginia Department of Game and Inland Fisheries (VDGIF), to ask about the best time for construction of the ACP with respect to protecting our wildlife. Al send him a reply that I have included in this filing.

This makes me wonder if Dominion has ever communicated with biologists & others at VDGIF. Or with recognized wildlife experts and conservation organizations. The VGDIF employees are so familiar with the environment along the proposed route of the ACP. They have worked closely as advisors with many of the land owners such as us. If Dominion has not

Z-3490

LANDOWNERS COMMENTS

LO175 – Roberta Koontz (cont'd)

LO175-1
(cont'd)

discussed environmental issues with VDGIF, they should do so now and modify the DEIS.

Please make Dominion address our issues with the DEIS and issues expressed by others because most of the issues are very relevant for us.

Regards,
Roberta K Koontz
The Wilderness - Bath County
wildernessfarm@mgwnet.com

-----Original Message-----

From: Robert Koontz [<mailto:thewildernessbc@hotmail.com>]
Sent: Monday, April 03, 2017 5:31 PM
To: Bourgeois, Al (DGIF)
Subject: Date to build a pipeline so as not to disturb birds

Al:

We have a lot of birds/animals/insects that nest on the farm. The ones that we spot and really take notice of: are the Wood Ducks, Mallards, Blue Herons, Grouse, Otters, Turkeys, Bald Eagles, Deer, Doves, Cardinals, Woodpeckers, and other birds too numerous to list. Lately, the Rusty Patched Bumble Bee has made its presence felt as we have had no luck in keeping honey bees alive on our farm. This bumble bee is really needed to pollinates our orchards.

If a pipeline has to be built, when would a good time in the year to build this pipeline across our farm so as not to disturb our birds/animals/insects?

Thanks,

Bob

Begin forwarded message:

From: "Bourgeois, Al (DGIF)" <Al.Bourgeois@dgif.virginia.gov>

Z-3491

LANDOWNERS COMMENTS

LO175 – Roberta Koontz (cont'd)

Subject: RE: Date to build a pipeline so as not to disturb birds

Date: April 4, 2017 at 9:47:57 AM EDT

To: Robert Koontz <thewildernessbc@hotmail.com>

Cc: "Bourgeois, Al (DGIF)" <Al.Bourgeois@dgif.virginia.gov>

Hi Bob -

I feel the late fall to early spring months when most wildlife species are either migrated from the area or aren't nesting or raising young would probably be the best time.

That is my professional opinion with no scientific research to back it up.

Thanks, Al

Al Bourgeois
District Wildlife Biologist
VA Dept. of Game & Inland Fisheries
Bureau of Wildlife Resources
P.O. Box 996
Verona, VA 24482
Phone: (540) 248-9381 | Cell: (540) 414-3901

Z-3492

LANDOWNERS COMMENTS

LO176 – Roberta Koontz

Z-3493

To: Kimberly Bose From: Roberta K Koontz Date: 4/4/17

Subject: The ACP is a serious hazard to landowners in its path. Apparently residents of Bath County do not matter and are not protected by law from the dangers of gas pipelines as more populated communities are protected. My husband and I & our dogs will be living in permanent danger in the blast zone with the ACP built on top of karst. How could we ever hope to sell our property for a fair price when we live in a blast zone. This is reckless and irresponsible of Dominion. An editorial from *The Recorder* is attached reporting on the dangers of living near a gas pipeline.

Dear Ms. Bose,

LO176-1 | Our historic 1797 home will be in the ACP blast zone. Dominion has options but has refused to move the ACP farther away from our home on our 1000-acre farm. Dominion is knowingly building the ACP on top of known areas of karst near our home. This is reckless and irresponsible.

We will be living in permanent danger. We have no hope of selling the property for a fair price when it is located near a gas pipeline, let alone in the blast zone. This is our financial ruin and potentially, the end of us from a gas exposure on the ACP.

Apparently the law protects areas with large populations from gas pipelines. But rural areas such as Bath County apparently are collateral damage and apparently do not deserve protection from the ACP. There is no voice speaking on our behalf in our government at all levels against this injustice.

PG&E ran a full page advertisement last week in the *Wall Street Journal*. The company was addressing a gas explosion seven years ago in California that killed 7 or 8 people and “devastated a community” (a quote from PG&E). In this ad, PG&E identified some actions they were taking to prevent another catastrophic pipeline explosion.

Why did it take PG&E seven years to identify solutions??? And the solutions were very soft like “review”. There were no hard & certain solutions like “provide automated gas detection devices”. This tells me that safety and analysis of gas explosions is not a priority for energy companies. Where is FERC in all of this? Is safety a priority for FERC? Apparently not.

I am attaching an editorial from *The Recorder* in Bath County that discusses the dangers of a living near a pipeline. West Virginia has experienced terrible

LO176-1 See the response to comment LO22-1.

LANDOWNERS COMMENTS

LO176 – Roberta Koontz (cont'd)

Z-3494

LO176-1
(cont'd)

horrors. Why does FERC allow energy companies to build pipelines so dangerously close to homes, schools, businesses, etc. in rural communities.

This permission to endanger small rural communities is also indicative of FERC allowing the targeting of less affluent communities where citizens are less able to fight the pipelines. I see this injustice as an issue and will be filing a separate document with FERC.

FERC should force Dominion to move the pipeline away from people so that they are not living in constant danger. There are several alternatives on our property for moving the ACP to the edge of our property. Or into the GW National Forest which has no permanent residents. If the ACP is for "the public good", they why not use "public land in the GWNF to build the ACP. But Dominion does not care about our safety and will not move the ACP farther away from our home.

The DEIS should be modified to address safety with specifics. How many people will be living in an ACP blast zone in each county. Why is the ACP being built on top of karst. What are the safety issues and the specific remedies. How can responders quickly arrive at a catastrophic scene. How can enough people be trained as responders in a mountainous, rural community like Bath County. What are the disaster recovery plans. Evacuation plans.

The ACP should be delayed until a comprehensive, revised DEIS can be produced that addresses the safety for people in all counties impacted by the ACP.

Regards,

Roberta K Koontz
The Wilderness - Bath County
wildernessfarm@mgwnet.com

Pipeline a hazard to landowners in its path

Editor, The Recorder,

LANDOWNERS COMMENTS

LO176 – Roberta Koontz (cont'd)

Natural gas is 95 percent methane and extremely flammable. It is a vapor, not a liquid. Methane is colorless, odorless, tasteless and nearly 100 percent combustible.

It is too expensive to add the safety odorants tert-butylthiol and mercaptan to the high speeding vapor, adding the rotten egg smell that alerts one to danger.

The rural routes for the [Atlantic Coast Pipeline](#) and the [Mountain Valley Pipeline](#) are the only routes possible because of the danger of explosions. Both pipelines are not allowed by federal law to be near highly populated areas and major highways.

Reflect: we don't matter because we live in the country?

Every 20 miles along the route, there would be a cut-off valve, automatically shut down magically by computer in [Clarksburg, W.Va.](#), when a leak was detected. Realize that this leak that is from 12 to 26 feet underground and the methane is expanding into the ground and ground water and air.

Might not be your problem, actually, for you probably won't wake up if you are within a mile of the explosion that occurred well after the initial leak. There is an eight-minute response window for methane explosions. Our local volunteer fire departments are neither trained nor have the equipment (space suits) to put out a vapor fire (foam). There has been absolutely no responsible actions planned for the safety and well being of the citizens affected along the two proposed routes.

There were six pipeline leaks in the USA in January, two in February.

Check out www.wvmatters.com for more facts and the methane-95.blogspot.com to share.

Our lives will be in permanent danger.

Underground resources endangered

Have you ever seen Pickaway Falls or Taggard Falls in [West Virginia](#)?

Probably not, as they are respectively 120 feet (eight stories) and 190 feet (12.6 stories) below Dry Branch Road in Randolph County, W.Va.

Ever swim in the Canadian River? How about Crayfish or Virgin Pool? Also not probable, as they are all deeper than 14 stories underground.

Directly above these deep flowing rivers is the exact location of the proposed methane Atlantic Coast Pipeline. [Dominion Transmission](#) plans to drill and blast through solid rock, making a trench 30 feet wide and 30 feet deep.

Z-3495

LANDOWNERS COMMENTS

LO176 – Roberta Koontz (cont'd)

The consequences of this proposed activity are severe and virtually unknown. A 42-inch methane transmission pipeline flowing full force over 4,000-foot high mountains has never done before.

It — we — are an experiment.

The rock below the proposed methane pipeline route is total karst — 100 feet of Union limestone, 70 feet of Pickaway limestone, and 45 feet of Taggard shale, totaling 225 feet, the height of a 15-story building.

What could happen deep underground if a trench is drilled and blasted into solid karst 30 feet wide and 30 feet deep?

Mingo Run is solid rock and in the direct path of the proposed route. This stream flows from the headwater Big Spring Fork, and flows then as the headwater of the Cheat Watershed, the Elk Watershed, and the Tygart Valley Watershed.

I lived one mile from Simmons-Mingo Cave on Mingo Run for five years, and I could hear boulders rolling deep beneath my home.

This is water that flows in all directions to service over 40 million people in 20 states.

West Virginia Matters believes this should be of serious concern as the results could effectually be labeled genocide.

Maps and photos are in the “Underneath the ACP - My Cave System” presentation available at www.wvmatters.com.

Lauren D. Ragland
West Virginia Matters
[Green Bank](#), W.Va.

Z-3496

LANDOWNERS COMMENTS

LO177 – Ella Rose

20170327-5065 FERC PDF (Unofficial) 3/26/2017 12:22:52 PM

LO177-1 | I live 500 feet away from the boundary line where the proposed compressor station is supposed to be build. I am worried about how this is going to affect my life, health, mental stability, and the value of my property. I retired to relocate back to my home to enjoy the peace and quiet life. All of this changed two nd a half years ago.

LO177-2 | I love nature and all of this will be taken away by frightening away the animals that I love to watch passing through my back yard. I love to watch the nights skies and universe with all of its lustrous stars. This will be obstructed by the bright lights constantly shining downward.

LO177-3 | Studies have shown that we have enough pipeline to carry all the gas that we need. I am concerned about my well water being polluted. Air pollution from the gasses will harm the environment. I am worried about my safety, if there were an explosion or leak at the compressor station or surrounding pipeline.

LO177-4 | If there was an explosion, the emergency plan Dominion recommended would be inadequate. The Buckingham County Response is set up for a small rural community and could not handle the response needed for an explosion for other industrial emergency at the compressor station or pipeline.

It's not a very good feeling to be constantly worried about what's going to happen next.

LO177-1 See the responses to comments LO18-1 and LO161-1.

LO177-2 Section 4.8.8.3 discusses potential impacts on visual resources associated with aboveground facilities.

LO177-3 See the response to comment CO46-1.

LO177-4 See the response to comment LO62-6.

Z-3497

LANDOWNERS COMMENTS

LO178 – Elizabeth M. Ballin

20170306-5040 FERC PDF (Unofficial) 3/6/2017 3:01:58 AM

Letter to FERC

Dominion plans to run its pipeline through Deerfield Valley adjacent to the George Washington National Forest and as you know beyond. It will run through acres of farmland and forest where hundreds of families have been residing for 200 years. Deerfield valley is a narrow valley with forests that run in and out of the National Forest. IT HAS NOW BEEN DETERMINED THAT MOST OF IT, IS CONSIDERED WETLAND

File List

Accession Number: 20160912-5412

Description: Supplemental Information of Elizabeth M Ballin under CP15-554. This report indicates that the path of the Atlantic Coast pipeline going through 2158 Deerfield Valley Road has been designated a WETLAND, not suitable for pipeline.

| Type | File Name | Size |
|--------------------|---|---------|
| PDF | <input type="checkbox"/> HydrogeologicReconnaissance2158 Deerfield Valley Road.PDF Wetland report. Pipeline pathway goes through Deerfield Wetlands. | 2948218 |
| FERC Generated PDF | <input type="checkbox"/> 12273475.PDF | 3012054 |

- LO178-1 **Wildlife from the National Forest does not know the dividing line between National Forest and private property** and the area is teeming with wild life of all kinds. The pipeline is scheduled to run along the valley cutting through among others the Calpasture river, a primary source whose water springs are the same for people with well water. There is huge evidence now that the water tables are threatened by these pipelines especially where there are wetlands. **In fact it is known that Pipelines are not allowed to go through wetlands.** Since Dominion has recognized that its previous route threatened the eco system in the National Forest, **it is with the same reasoning that a natural gas pipeline will threaten the eco system in Deerfield Valley** i.e. the drinking water for wildlife, cattle and humans who live there. The karst topography in that area makes it very unstable, not to mention the violent floods the area has
- LO178-2

- LO178-1 This is not accurate. Regulations do not prohibit construction of natural gas pipelines through wetlands; in fact, it is very common. Section 2.3.3.3 of the EIS discusses wetland construction techniques, and section 4.3.3 includes a discussion of potential impacts on wetlands, as well as measures that Atlantic and DETI would implement to reduce impacts.
- LO178-2 See the response to comment LO18-1.

Z-3498

LANDOWNERS COMMENTS

LO178 – Elizabeth M. Ballin

20170306-5040 FERC PDF (Unofficial) 3/6/2017 3:01:58 AM

LO178-2
(cont'd)

experienced (1985 and another one in the early 1990s): Severe damage was done from the swelling of ground water, and the raging rivers that broke through the banks. Tons and tons of river rock were dumped over acres and acres of land, tearing down trees and devastating private property. Electrical lines were down, houses swept down the rivers, roads were washed out etc. The Forestry had to redirect and secure these rivers therefore tampering with them could open up the "flood gates" again. **This is no place for a potentially volatile pipeline.** This river and others that will be affected by the pipeline, pass through the National Forest, therefore potentially impacting the waters of the National Forest.

*Please note the regulations of the Virginia State Forestry on the subject of polluting waters and damaging trees.
<http://www.dof.virginia.gov/stateforest/regs/regulations>*

The Appalachian forests have been raped in the past by logging and mining. The mountains have some of the most diverse species on the planet. It has taken years for trees to grow back and the ecosystem find its previous balance.

LO178-3

The George Washington National forest is right to protect this forest by denying the right of the pipeline, and the surrounding areas need to be protected too. There is no reason for this Pipeline to go through this new route surrounded by the George Washington Park which is known for its "natural" and preserved beauty. People who have been living in the area for 200 years have done so out of choice. They are not looking for development.

Other areas should be looked into such along highways and industrial areas that already are established and where wildlife no longer seeks refuge.

We beg FERC to take wise decisions. If money is the issue it certainly can also be put on hold until a much better solution is found where no one loses. There are just too many losses for those who have to "give way" to the pipeline and the potential of destroying an eco system that is already struggling after a long history of destruction.

Other concerns:

LO178-4

What happens when Dominion goes out of business for reasons such as Natural Gas is replaced by a more "efficient" way of providing energy. Who is responsible for the removal of the pipeline on private property and in the forests. Who is responsible for the safety of it, the leakage of residue. What happens to the right of way. Who pays for it.

If no one then would this not be could be considered a criminal act? People in the future will not doubt wonder how it could have been legally considered.

LO178-3 Section 3 includes our analysis of alternatives to ACP and SHP, including route alternatives.

LO178-4 As described in section 2.7, if at some point in the future any of the project facilities approved in this proceeding were proposed to be abandoned, Atlantic and/or DETI would have to seek specific authorization from the FERC for that action, and the public would have the opportunity to comment on the applicant's abandonment proposal.

Z-3499