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16-055

April 27, 2016

Martha Little
Deputy Director, Virginia Outdoors Foundation
600 East Main Street, Suite 402
Richmond, VA 23219

Dear Ms. Little:

The Augusta County Board of Supervisors was recently made aware of Atlantic Coast Pipeline's desire to construct the proposed pipeline through a Virginia Outdoors Foundation (VOF) easement located on the Augusta County line. We appreciate this opportunity to provide comments to VOF on the proposed conversion/diversion of the easement. This easement is more specifically known as the Berry Easement on Tax Map 40, Parcel 40 in Augusta County covering 64.4 acres. The remaining 48.97 acres of the Berry easement is located in Bath County. We understand that this is just one of many easements that is crossed by the proposed GWNF 6 Alternative Route for the Atlantic Coast Pipeline. You specifically asked Augusta County if the proposed conversion or diversion is in accordance with the Comprehensive Plan and essential to the orderly development and growth of the county. Augusta County wishes to go on record with a resounding no. We will briefly outline the reasons for the determination.

First, Augusta County finds that the conversion/diversion of this easement is not in accordance with the Comprehensive Plan. The Comprehensive Plan divides the county into four policy areas. The Urban Service Areas and Community Development Areas are the county's growth areas where development is expected and encouraged. Rural Conservation and Agricultural Conservation Areas are expected to remain predominantly rural in character and without the public services necessary to support development. Augusta County recently completed a review and update of the Comprehensive Plan which was adopted August 26, 2015. The Berry property remains in one of the county's Agricultural Conservation Areas. Agricultural Conservation Areas are planned to remain mainly in agricultural and forestal uses. Any development taking place in these areas would be expected "to be sensitive to the context of the surrounding agricultural areas as well as the surrounding natural features." The construction of the pipeline through this area certainly doesn't meet that objective.

The Comprehensive Plan supports the placement of easements in the county's Rural Conservation and Agricultural Conservation Areas. In fact, this is one of the county's strategies for protecting the character of these areas. There is no provision in the Comprehensive Plan for conversion/diversion of easements.

Augusta County is committed to protecting the natural resources in the county. Specifically, the Comprehensive Plan calls for the "protection of the fundamental integrity of the county's natural environmental systems." Specific objectives include protecting the "water, air, natural systems, and water supplies of Augusta County"; the "natural and scenic beauty of the county's mountains and natural landscapes"; and protecting the "county's forests and special and distinctive habitats". The Plan also discourages new development along ridgelines. All of these objectives are threatened by the conversion/diversion of this easement.

The easement was placed on this property by the Virginia Outdoors Foundation due in part to its location "within two watersheds draining to the Chesapeake Bay watershed." Protection of this land helps meet the goals of the Chesapeake Bay agreement. Approximately half of this property has been classified as "high priority conservation area" by the Virginia Department of Forestry and approximately half has also been designated "Very High Ecological Integrity" by the Department of Conservation and Recreation. Without the easement, this land is at risk. This easement is also visible from the "Jerk 'Em Tight" Hunter Access Trail which provides access to the George Washington National Forest. Conversion/diversion of the easement will allow development on this lot which could impact the viewshed of the traveling public from this road.

The second question asked by the Virginia Outdoors Foundation is if the conversion/diversion is essential to the development of the locality. Augusta County finds that the proposed pipeline reroute through the Deerfield Valley is not essential to the orderly development and growth of the county. The Comprehensive Plan calls for this area to remain rural in nature and there is no compelling reason for a gas transmission line to run through this area. The pipeline will not facilitate the orderly development of the community and, in fact, will hurt it. This small community enjoys pristine views of the Alleghany Mountains and is made up of acres of productive farmland and recreational camps. The easement was placed on the Berry property to protect the critical natural resource features and viewshed of the area. There is no compelling reason to allow the Atlantic Coast Pipeline to build through this area.

Augusta County has gone on record with the Federal Energy Regulatory Commission (FERC) as being opposed to this reroute. FERC asked for a southern route. Atlantic Coast Pipeline submitted a route that simply got around the salamander habitat that the George Washington National Forest wanted preserved and quickly rejoined the original

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route. Atlantic Coast Pipeline didn't really even consider a southern route. The proposed route is longer and therefore more costly, it impacts more property owners, and it impacts many sensitive environmental features. Rather than truly studying an alternative to the route originally proposed, as required by FERC, Atlantic Coast Pipeline addressed the concern of the USFS and then quickly rejoined the original route regardless of the environmental impacts of that choice. One of the significant environmental impacts of the reroutes is the impact on existing conservation easements.

We respectfully request the Virginia Outdoors Foundation not grant approval for the Berry conservation easement conversion/diversion as requested by Atlantic Coast Pipeline. If you have any questions about the Board of Supervisors' findings on this matter, please feel free to contact me.

Sincerely,



Carolyn Bragg
Chair
Augusta County Board of Supervisors