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MAYOR

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STAUNTON, VA 24402

May 24, 2016

Kimberly D. Bose  
Secretary, Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, D.C. 20426

Re: Atlantic Coast Pipeline/Docket Nos. CP15-554-000 and CP15-554-001

Dear Secretary Bose:

I write on behalf of the City Council of the City of Staunton, Virginia, concerning the Atlantic Coast Pipeline. City Council has received a copy of a letter dated April 20, 2016, from Carolyn W. Bragg, Chair of the Board of Supervisors of Augusta County, Virginia, to Commissioner Cheryl LaFleur (a copy of which is enclosed), concerning the project.

City Council strongly endorses the positions articulated by Ms. Bragg in her letter, including her criticism of Dominion Virginia Power's failure to propose a legitimate southern route for the pipeline. We further express support of our neighbors in Augusta County and their efforts to protect portions of the county—including public water sources such as Gardner Spring, which serves the City of Staunton—from the environmental impacts of the GWNF 6 Route Modification.

We ask that the Federal Energy Regulatory Commission and the U.S. Forest Service give serious and full consideration to the comments made on behalf of the Board of Supervisors of Augusta County, Virginia.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn W. Dull".

Carolyn W. Dull  
Mayor

Enclosure

Kimberly D. Bose  
Secretary, Federal Energy Regulatory Commission  
May 24, 2016  
Page 2

cc: Carolyn S. Bragg  
Chair, Augusta County Board of Supervisors

Timothy K. Fitzgerald  
Augusta County Administrator

Members of Staunton City Council

Stephen F. Owen  
Staunton City Manager

**COUNTY OF AUGUSTA, VA.**

**BOARD OF SUPERVISORS**

MARSHALL W. PATTIE  
North River

GERALD W. GARBER  
Middle River

TRACY C. PYLES, JR.  
Pastures

TERRY L. KELLEY, JR.  
Beverley Manor

WENDELL L. COLEMAN  
Wayne

MICHAEL L. SHULL  
Riverheads

CAROLYN S. BRAGG  
South River



**TIMOTHY K. FITZGERALD – COUNTY ADMINISTRATOR**

**AUGUSTA COUNTY GOVERNMENT CENTER**

P.O. BOX 590, VERONA, VA 24482-0590

(540) 245-5610 FAX (540) 245-5621

coadmin@co.augusta.va.us

April 12, 2016

Cheryl LaFleur  
Chairman  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

Dear Chairman LaFleur:

Ref. # Docket No. CP15-554-000 and CP15-554-001

On behalf of the Augusta County Board of Supervisors, I respectfully submit these comments to the Federal Energy Regulatory Commission (FERC) on Atlantic Coast Pipeline's proposed Amendment to its Application for a Certificate of Public Convenience and Necessity. Specifically, we are writing to voice our concerns over the major route alternative (GWNF 6) to the project (Docket No. CP15-554-000 and CP15-554-001). The Atlantic Coast Pipeline proposed to be installed through Augusta County continues to be a significant issue sparking a number of concerns for citizens and county leaders. The GWNF 6 Alternative has raised additional concerns about the process being undertaken to permit the pipeline, but also with the impacts of the pipeline itself. The Board of Supervisors has made you aware of many of their concerns in comments dated March 30, 2015. We appreciate the opportunity to provide input into the environmental review process of the GWNF 6 Alternative and look forward to continued involvement in the process. Section 56-49.01 of the Code of Virginia, provides for the right of natural gas companies to enter private property for the purpose of surveying for its proposed route as may be necessary to satisfy any regulatory requirements and for the selection of the most advantageous location or route for the pipeline. We believe that the Code section places an affirmative obligation on the part of Atlantic Coast Pipeline to find the most advantageous route. We are concerned that the most recent alternative route is not the most advantageous route.

We would like to take this opportunity to raise concerns specific to the GWNF 6 Alternative. The Board understands that the George Washington and Monongahela National Forests requested a reroute to protect the Cow Knob Salamander. While FERC had requested a "southern" route, Atlantic Coast Pipeline is proposing a route that goes south through Highland and Bath Counties, Virginia and then abruptly turns north once more running approximately 20 miles to rejoin the original route along Route 250 in western Augusta County. Map 1 depicts the GWNF 6 Alternative in sharp contrast to the southern route proposed as part of Figure 10.8.1-2 from Resource Report 10 filed by Atlantic Coast Pipeline as part of their review process. This proposed route runs in the opposite direction of its destination in North Carolina. The impact of this proposed reroute was an increase from 141 miles in the Atlantic Coast Pipeline filed route to 170 miles using the GWNF 6 Alternative. What possible reason can Atlantic Coast Pipeline have in rejoining the original route in western Augusta County other than to speed up the permitting process? The shorter the "new route" to be considered, the faster the timeframe for approval. The Board has to question whether this is the best route or is it simply the route that can be approved the quickest.

This proposed new route has significant environmental impacts. Map 2 is a detailed map of the County showing the environmentally sensitive areas associated with the GWNF 6 Alternative pipeline route, as currently proposed by Atlantic Coast Pipeline. This route crosses the floodplain in eight different places. It also impacts lands protected with conservation easements. It runs adjacent to the Deerfield wells, our public water sources in the community. The County has begun a systematic identification of the recharge areas around each well that is a source of public water and establishing Source Water Protection Areas for the recharge areas. While the delineation study is not yet complete for the Deerfield wells, it is expected that portions of the pipeline route will be in a Source Water Protection Area 2 in the future. A previous letter from the Augusta County Service Authority indicated to you, that natural gas pipelines are not permitted in areas that are zoned in a source water protection area overlay district. For that reason, we ask that FERC consider the detrimental effect the proposed pipeline will have on our efforts to protect the source of our safe drinking water.

Outside the Deerfield community, residents depend on private wells for their water supply. Construction of the pipeline along the proposed Alternative route increases the probability of negative impacts to their water systems. Augusta County continues to be concerned about the short-term and long-term impacts to the private water supplies to these residents.

The GWNF 6 Alternative route also has a significant impact on the Deerfield Valley community. This small community enjoys pristine views of the Alleghany Mountains and is made up of acres of productive farmland and recreational camps. The Alternative route impacts a significant number of properties in the Deerfield Valley, including ones with conservation easements on the property. The proposed route will have an impact on this rural part of the County.

The County is also concerned about the process being undertaken to permit this alternative. The residents in this area had no opportunity to voice their concerns to FERC directly like the property owners along the original pipeline route had, other than to quickly provide written comments. There have been no FERC public hearings held as part of this process and yet about 20-25% more land has been impacted. From the outside looking in, it would appear that the need of the United States Forest Service for a reroute and Atlantic Coast Pipeline's desire for quick approval have taken precedence over the rights of private property owners to participate in this process. We would encourage FERC to hold public meetings in the impacted counties of the reroute to allow these citizens the opportunity to voice their opinions, both pro and con.

Finally, the question has to be asked is the GWNF 6 Alternative even what was asked for by FERC? The USFS asked Atlantic Coast Pipeline to protect the habitat of the Cow Knob Salamander. FERC asked for a southern route. Atlantic Coast Pipeline submitted a route that simply got around the salamander habitat and quickly rejoined the original route. They didn't really even consider a southern route. The Augusta County Board of Supervisors does not believe that the requirements of FERC to study a southern route have been met. Is a southern route possible? Augusta County would suggest that there are multiple southern routes possible. Included in our comments is Map 3 showing only one such route which continues the proposed GWNF 6 Alternative to the east approximately 29.5 miles before rejoining the original Atlantic Coast Pipeline filed route at Mint Springs enabling the crossing of Interstate 81 to remain in its original location. This "southern" route is approximately 15-16 miles shorter than the existing alternative. Are there other, potentially better, southern routes that would protect the Cow Knob Salamander and other equally important environmental features? Is there a route that also avoids the Appalachian Trail and Skyline Drive crossing? The Augusta County Board of Supervisors would submit yes, but Atlantic Coast Pipeline chose not to study anything other than the bare minimum to address the USFS concerns.

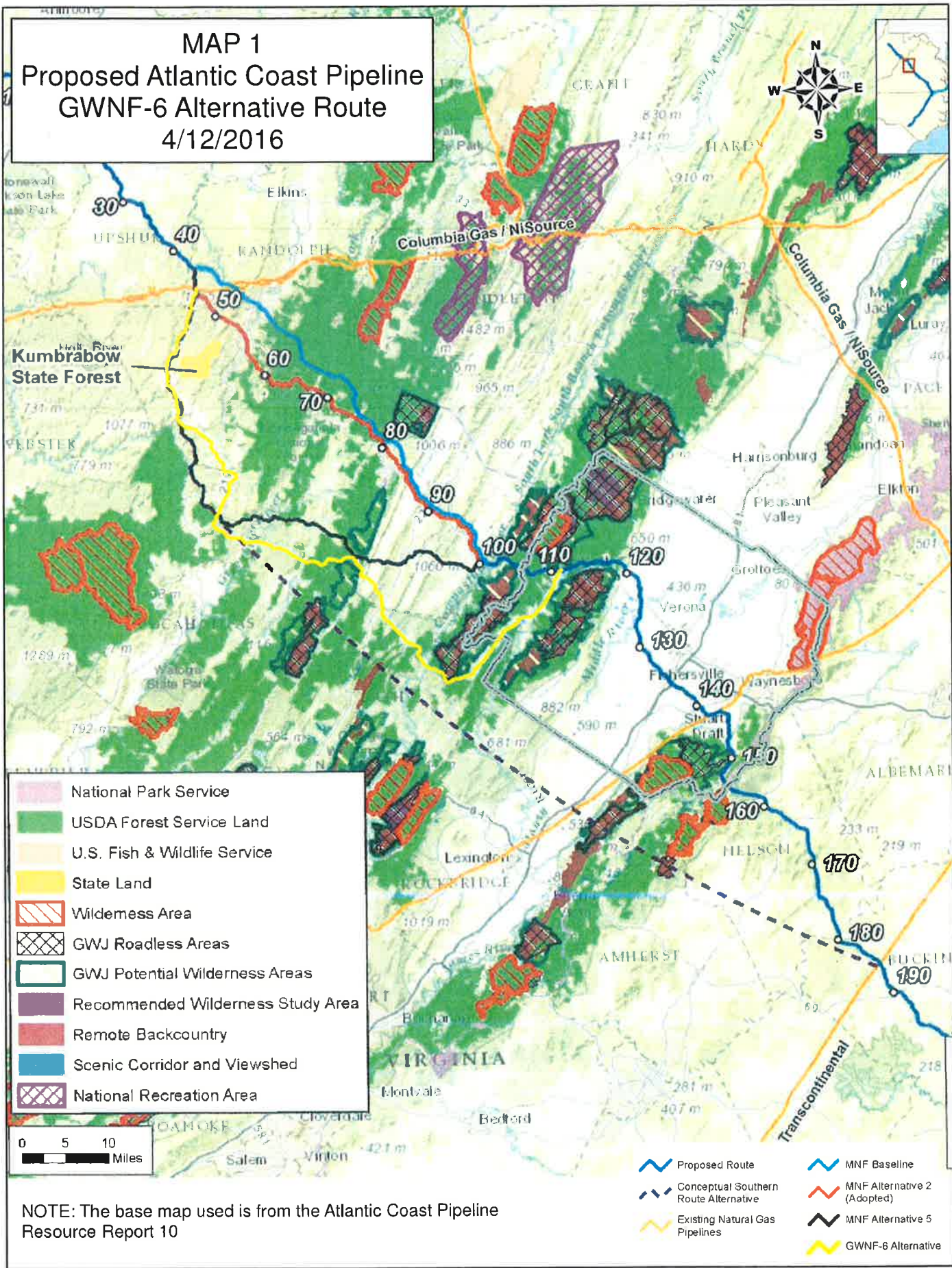
In summary, the GWNF 6 Alternative submitted addresses the concerns of the USFS, but it does not take into account other environmental impacts. The proposed route is longer and therefore more costly, it impacts more property owners, and impacts many sensitive environmental features. Rather than truly 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. We respectfully request that Atlantic Coast Pipeline not be granted approval for the GWNF 6 Alternative.

Sincerely,



Carolyn Bragg  
Chairman

**MAP 1**  
**Proposed Atlantic Coast Pipeline**  
**GWNF-6 Alternative Route**  
**4/12/2016**



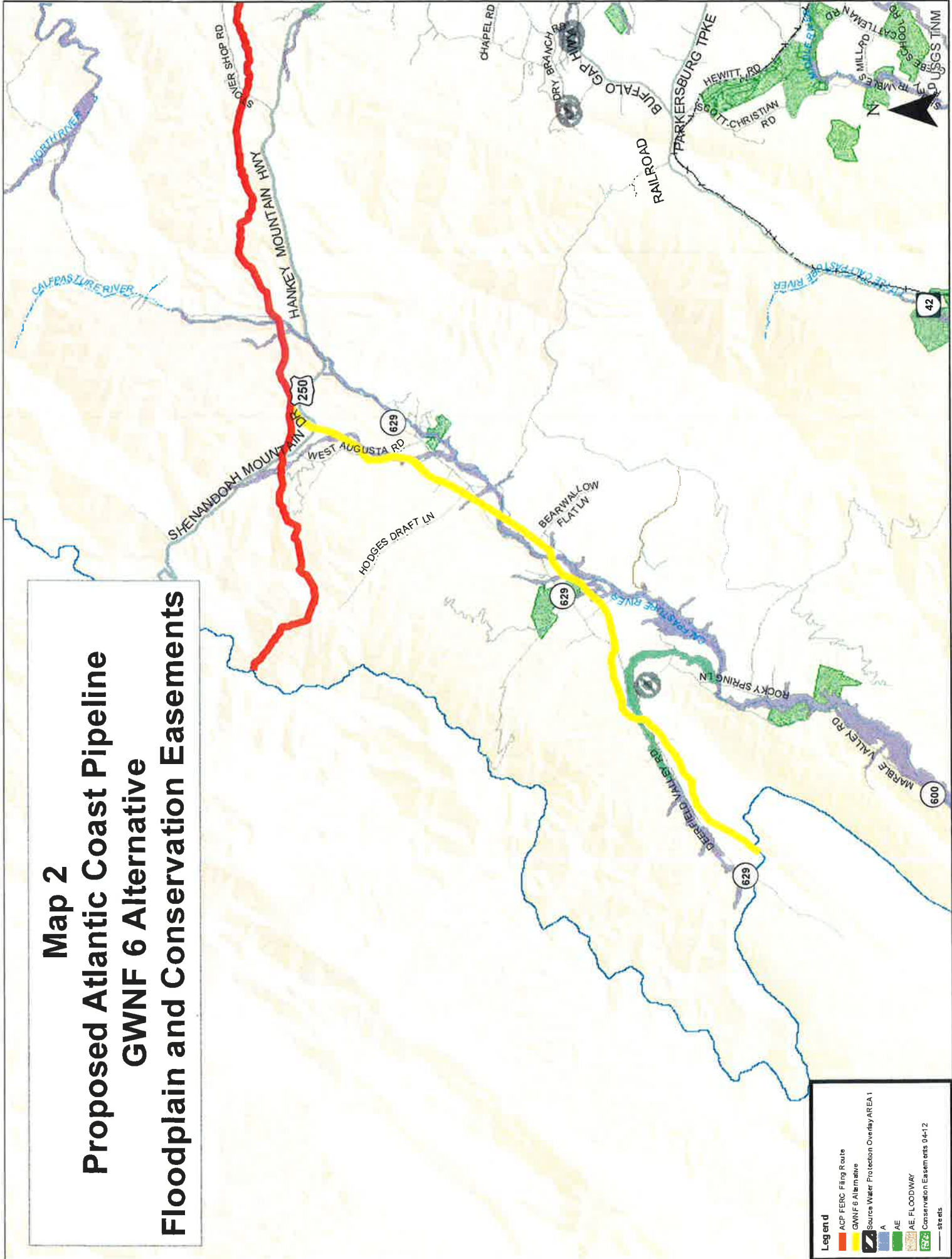
- National Park Service
- USDA Forest Service Land
- U.S. Fish & Wildlife Service
- State Land
- Wilderness Area
- GWJ Roadless Areas
- GWJ Potential Wilderness Areas
- Recommended Wilderness Study Area
- Remote Backcountry
- Scenic Corridor and Viewshed
- National Recreation Area



- Proposed Route
- Conceptual Southern Route Alternative
- Existing Natural Gas Pipelines
- MNF Baseline
- MNF Alternative 2 (Adopted)
- MNF Alternative 5
- GWNF-6 Alternative

NOTE: The base map used is from the Atlantic Coast Pipeline Resource Report 10

# Map 2 Proposed Atlantic Coast Pipeline GWNF 6 Alternative Floodplain and Conservation Easements

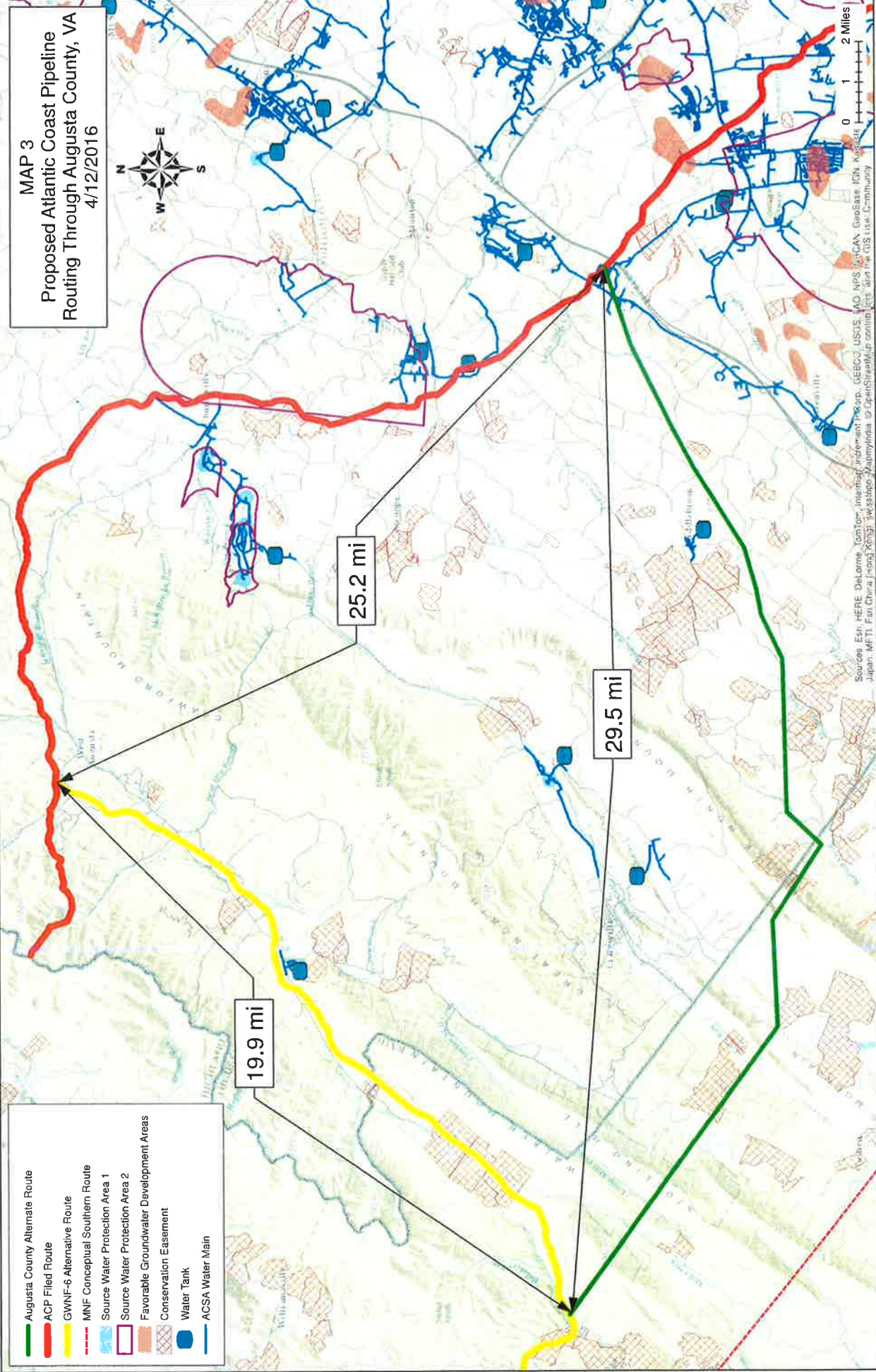
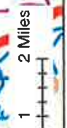


**Legend**

- ACP FERC Filing Route
- GWNF 6 Alternative
- Source Water Protection Overlay AREA 1
- AE FLOODWAY
- Conservation Easements 04-12
- streets



**MAP 3**  
**Proposed Atlantic Coast Pipeline**  
**Routing Through Augusta County, VA**  
**4/12/2016**



- Augusta County Alternate Route
- ACP Filed Route
- GWNF-6 Alternative Route
- MNF Conceptual Southern Route
- - - Source Water Protection Area 1
- - - Source Water Protection Area 2
- ▨ Favorable Groundwater Development Areas
- ▨ Conservation Easement
- Water Tank
- ACSA Water Main

Source: Esri, HERE, DeLorme, TomTom, Intermap, independent data, GEBCO, USGS, FAO, NPS, NRCAN, GeoSource IGN, Kantam, Japan, MFTI, Esri, China (Jiaxing), Swisstopo, Mapbox, and the GIS User Community