

AUGUSTA COUNTY SERVICE AUTHORITY



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August 4, 2015

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

Re: Atlantic Coast Pipeline (ACP), Dominion Transmission, Inc. (DTI)
Docket #PF15-6-000 & #PF15-5-000
Comments on Resource Reports

Dear Ms. Bose,

I write to you on behalf of the Board of Directors of Augusta County Service Authority (ACSA) regarding the proposed ACP project.

ACSA is responding to public information and is not responding as a “cooperating agency”. FERC has discussed the option of ACSA being a cooperating agency, but at this time our Board has not agreed to that designation.

In review of the “Responses to Issues Raised During Scoping” dated May 12, 2015 (including the Draft Resource Reports 1 through 10), and FERC’s “Staff Comments on Draft Resource Reports 1 through 10” dated July 14, 2015, ACSA offers the following comments:

Responses to Issues Raised During Scoping

3.0 Comment Metrics (p. 5) Table 3.1: ACSA requests FERC validate the non-government organizations (NGO) support and verify that these are valid comments and not from industry-based, non-local biased organizations.

ACSA Comment (page 23) regarding avoidance of Source Water Protection Areas – Dominion responds that “to the extent possible” they will “minimize impacts” to the SWPA. These non-specific comments provide no answers to our scientifically based questions. We have requested that these highly vulnerable areas be avoided.

ACSA Comment (page 24) regarding the availability of the Lyndhurst Groundwater Protection Area Study – Dominion claims they will coordinate with us. Yet in a July 9, 2015 meeting with key Dominion staff, they claimed no knowledge of this study, and had made no attempt to request or review it.



ACSA comment (page 65) regarding potential disruption to gas and groundwater monitoring wells at the landfill – Dominion responds that this will be discussed in their future Blasting Plan, and that they will “consult” with the Authority if blasting is required near the landfill. Note that the Draft Blasting Plan submitted in July 2015 does not make any specific mention of the gas or groundwater monitoring wells at our Landfill. Our requirement is for Dominion to be responsible for any migration of gas or groundwater offsite that had not been present prior to their blasting.

Resource Report No. 1 – General Project Description

Section 1.4.1.1 Pipeline Rights of Way – ACSA supports FERC comment 10. Their request for a 75 foot permanent ROW throughout the project is unjustified.

Section 1.10 - ACSA is also concerned about the ability of DTI to expand the project as noted in FERC comment 24.

The tables on page 1-74 and page 1-75 do not list Augusta County on the list as permits needed to meet the sourcewater protection ordinance. Refer to FERC comment #47a.

Resource Report No. 2 – Water Use

ACSA supports FERC comment 41 regarding section 2.1.3 with respect to expanding distance to all wells and springs within karst areas to a minimum of 500 feet and maximum “as appropriate where significant or unique karst features are identified”, such as the Lyndhurst Wellhead Protection Area. Currently the project only lists one private well within 150 feet as shown on Table 2.1.3-2 on page 2-10 of the resource report. If expanded to 500 feet, there will be significantly more private wells and springs in the study area.

ACSA supports FERC comment 46 for section 2.1.3.3. The pipeline does cross Staunton’s Gardner Spring Sourcewater Protection Area. In addition, ACSA has not received any correspondence from DTI “regarding the crossing of sourcewater protection areas” as part of this same FERC comment.

ACSA supports FERC comments 47a-c. ACSA expects a full discussion of how the Source Water Protection Ordinance will be complied with. Crossing wellhead protection areas (WHPA) (FERC Comment 47a) is something we do not support. How adverse impacts in these areas will be prevented and/or mitigated (FERC Comment 47b) needs to be fully addressed. ACSA met in December 2014 with Dominion and they never followed up with how they planned to comply with the Sourcewater Protection Ordinance.

ACSA supports FERC comment 54 for residential as well as municipal wells. The ACSA believes that preconstruction and post-construction well testing should be part of a legally binding Construction and Blasting Plan, and include testing of production wells when and

if the pipeline is constructed. ACSA will request the right to retain our own consultant to conduct this testing work. In addition to describing how it will address damaged or impaired wells, it is imperative that Dominion demonstrate financial assurances to cover the costs incurred by ACSA due to the occurrence of damage or impairment.

ACSA supports FERC comment 56. The ACSA remains very concerned about potential blasting/construction related impacts to leachate and or landfill gas migration at the Augusta Regional Landfill that result in non-compliance with current laws and regulations.

ACSA supports FERC comment 57. The ACSA remains very concerned about the potential release of any hazardous liquids from the gas pipeline.

ACSA supports FERC comment 60. Section 2.1.6 of Resource Report 2 indicates groundwater may be used for hydrostatic testing. ACSA requests that Dominion provide answers to the questions raised by the FERC pertaining to water used for testing as described in section 2.2.7 (FERC Comment 60 parts a through f).

Resource Report No. 3 - Fish, Wildlife and Vegetation

ACSA supports FERC comments 82 and 103. How much impact will the use of herbicides and pesticides have on water quality of municipal and private wells? What types of herbicides and pesticides will be used? ACSA requests that no herbicides or pesticides be applied in the Lyndhurst SWPA.

Resource Report No. 6 – Geological Resources

ACSA questions Resource Report pages 6-10 and 6-11 that refers to 6.1 miles out of 48.4 miles of anticipated blasting in Augusta County. ACSA requests these lengths to be verified and locations identified. Are any of these miles within the Lyndhurst Wellhead Protection Area?

Resource Report 6 discusses seismic activity and faulting (Section 6.4.1). ACSA requests a discussion of the Pipeline's proximity to the Harriston Fault (located approximately 14 miles from the pipeline route) as it pertains to seismic risk. The USGS has identified this feature as a likely fault that may have been active in the recent geologic past.

ACSA supports FERC comment 138 and looks forward to review the results of the karst field assessment which has not been submitted with the draft karst plan. The ACSA believes it is imperative that karst features be fully characterized prior to the start of construction (FERC Comment 137 a through e) and that a karst monitoring and mitigation plan be developed by Dominion and approved by ACSA (and their consultants) prior to any construction activities (FERC Comment 138 a through h).

Resource Report No. 10 – Alternatives

ACSA is in support of FERC comment 211 as the baseline route minimized length of crossing the Lyndhurst WHPA and avoided many sinkholes. It is ACSA's intent though that any alternative pipeline route avoid the Lyndhurst WHPA entirely as Dominion references on page 10-77 to "avoid water recharge and water protection areas."

Karst Terrain, Assessment, Construction, Monitoring and Mitigation Plan

Page 4 describes karst in Augusta County, and refers to numerous caves, subsurface caverns, etc. It also refers to "unique type of karst in eastern Augusta County" with numerous shallow broad sinkholes indicating the presence of large karst features in the underlying bedrock. This seems to be a key argument in favor of not crossing the Lyndhurst SWPA.

ACSA reserves the right to provide additional comments on the Karst, SPCC and Blasting draft plans pending further review. Per the EGGI October 31, 2014 letter, specific requirements for pipeline development are not provided in the July 2015 Draft Plans from Dominion and ACSA expects these to be incorporated prior to permit issuance.

Sincerely,

Tracy C. Pyles, Jr. by Sheri Heflin, Board Secretary

Tracy C. Pyles, Jr.

Chairman, Augusta County Service Authority Board of Directors