

April 6, 2017

Richard A. Lambert

Highland County Cave Survey

P. O. Box 151

Monterey, VA 24465

Nathaniel J. Davis, Sr., Deputy Secretary

Federal Energy Regulatory Commission

888 First Street NE. Room 1A

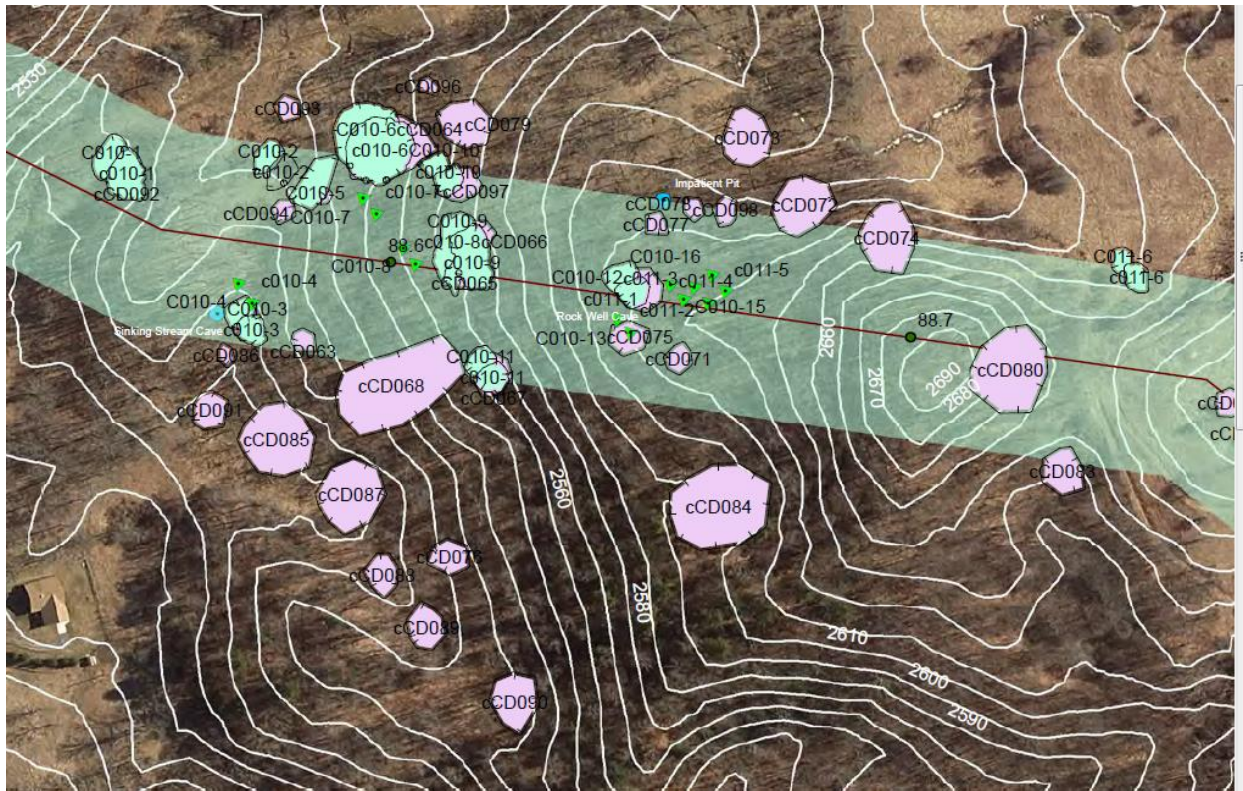
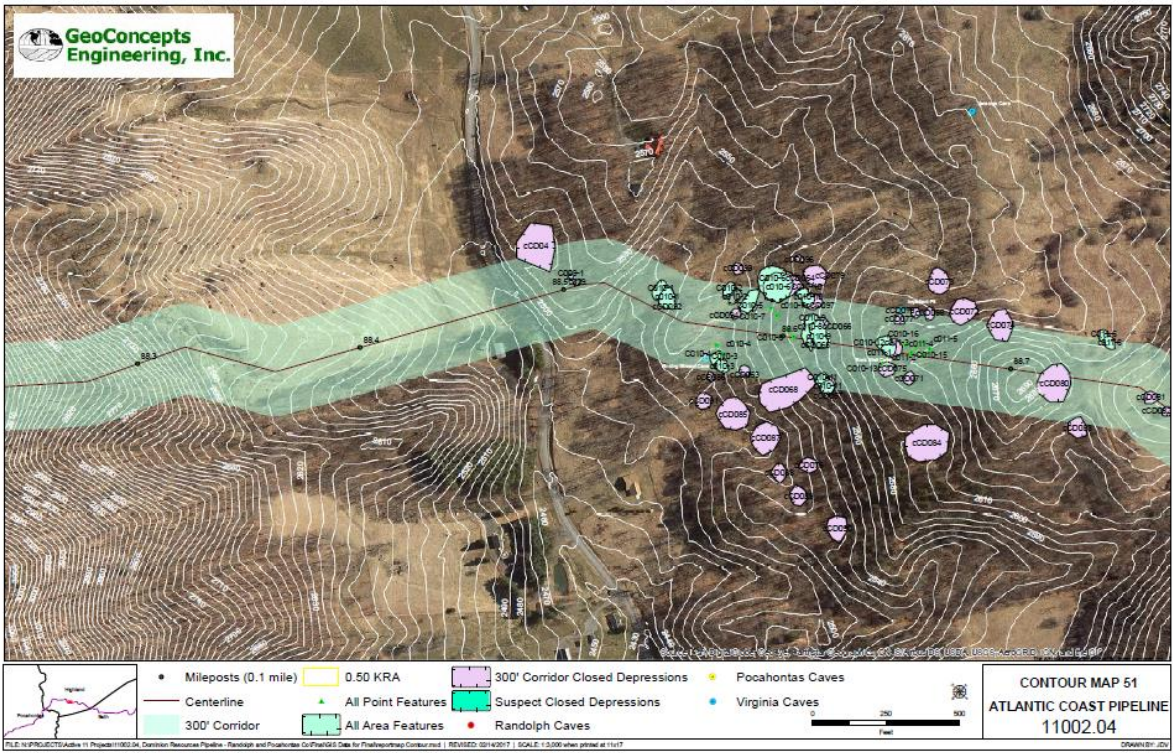
Washington, DC 20426

Mr. Davis,

The Highland County Cave Survey (HCCS) would like to direct your attention to the Atlantic Coast Pipeline Contour Map 51 and to the eastern section of that map (reprinted below).

This map shows the proposed pipeline corridor in relationship to the karst features in Valley Center, Highland County, Virginia (Mile Posts 88.6 and 88.7). In the Highland County Cave Survey's submission to FERC on June 3, 2016 we pointed out the dangers of the pipeline ROW going through this cluster of karst features. Dominion's own contractor, GeoConcepts Engineering, Inc., labelled this cluster as "High Risk". In the DEIS, FERC repeated that this cluster is "High Risk". Yet the pipeline ROW remains unchanged.

This map shows the ACP ROW going through karst features (sinkholes). This is a violation of the proposed Best Management Practices in the January 20, 2017 Karst Terrain Assessment Construction, Monitoring and Mitigation Plan prepared by GeoConcepts Engineering, Inc., page 16, Measures to Avoid Impact to the Karst Aquifer and Environment, 2.f., which states: "No activity of any kind shall be allowed within the parapet of a sinkhole or within a 25-ft buffer around the parapet, which should remain in an undisturbed, natural state. The sinkhole and the 25-ft parapet buffer should be delineated using temporary fencing."



The above section of Contour Map 51 shows the proposed pipeline ROW going through the parapet of four large sinkholes and through several all point features (small karst features). The proximity of the karst features to each other will not allow enough room for the work space to be narrowed to squeeze the pipeline between the karst features and still maintain the 25 ft. parapet buffer.

Dominion is not listening to the HCCS, they are not listening to FERC, they are not listening to their own karst contractor, and they are not following the proposed Best Management Practices they claim they will follow in constructing this proposed pipeline. This demonstrates a "business as usual" attitude which shows a high disregard for the complex, interconnected karst systems in Valley Center, the un-sampled underground biological community these karst features support, and the families which depend on the ground water these karst features recharge.

Contour Map 51 is an example of Dominions inexperience in building on karst and why Dominion should not be allowed to build a pipeline through karst. This route is a prescription for a disaster which Dominion will not be able to clean up. This regulatory process must stop until the proposed ROW for the ACP is moved away from this "High Risk" cluster of karst features in Valley Center, Highland County, Virginia and the HCCS and others have an opportunity to examine and comment on the new route.

Sincerely,

Richard A. Lambert

Database Manager

Highland County Cave Survey

Document Content(s)

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