

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

April 5, 2017

Re: Atlantic Coast Pipeline Docket Number CP15-554-000

Dear Ms. Bose,

Preservation Piedmont, a 501(c)3 organization located in Charlottesville, Virginia and whose mission is to preserve and advocate for historic resources in Central Virginia, is writing to encourage FERC and the Atlantic Coast Pipeline (ACP) to

- make every attempt to reroute the pipeline so that it does not impact the rural historic districts in Virginia,
- reconsider the location of the compressor station proposed to be located in the Union Hill/Woods Corner area that is currently under review as an eligible district for the National Register of Historic Places because we believe that there are alternative locations that Dominion has not identified and explored to avoid adverse harmful effects on this significant area of concentrations of African American historic resources, and
- respond to concerns about impacts to the scenic vistas, viewsheds, and the associated heritage tourism industry during and after the pipeline's construction.

Significance. The Union Hill/Woods Corner is a rural community, the majority of whom are descendants of formerly enslaved people, who established their own rural, agricultural community in this area and developed churches, schools, dwellings, stores, family burial sites and cemeteries set amongst their family-owned farms, orchards and ranches. These types of resources are significant but heretofore have been under-represented in Virginia's historic surveys and National Register nominations. Today, there is growing interest and awareness of the importance of such resources and their ability to provide invaluable information about rural communities where the ancestors of current property owners and residents were once enslaved.

Our statewide historic preservation organization Preservation Virginia consistently has named such resources to its annual most endangered list, and is undertaking significant initiatives to document and preserve such resources for future generations.

DEIS. FERC's Draft Environmental Impact Statement (DEIS) ignores the proposed Union Hill/Woods Corner Historic District, and to date has not included cultural resource information about this area. In fact, there are no reports with information on the archaeological or architectural survey results for most of Buckingham County.

Research and fieldwork is needed for the area of the compressor station site in the Union Hill/Woods Corner Historic District, including the survey and research of extant buildings, archaeological sites, cemeteries, transportation routes and viewsheds within the larger cultural landscape. There are quite a large number of cemeteries within and in close proximity to the Union

Hill/Woods Corner Rural Historic District that need to be documented and avoided (reference Charles White's publications and the map of African-American cemeteries in the area).

Omissions. The DEIS acknowledges that a number of known historic sites in area of potential effect have not been adequately investigated. All site investigations need to be completed and the reports submitted before full comments can be made on the DEIS.

We understand that additional reports on the natural and cultural resources potentially impacted by the ACP have been completed but were not included in the DEIS. All of these additional reports need to be submitted as an addendum or as a new DEIS before full comments can be made on the DEIS.

Additional Points

Yogaville. Yogaville is not included in the environmental review process and the impacts on the Yogaville Historic District's historic, scenic, and natural resources have not been considered in the DEIS. We request that FERC investigate the effects of flooding and erosion near the pipeline under the James River on SAYVA's James River floodplain where the LOTUS temple stands.

Seismic Planning. We request FERC create a plan to ensure structures in Buckingham County are seismically-sound buildings in a county with over 125 years of recorded earthquakes (as the U.S. Forest Service responded to FERC).

I hope that our voice will be heard and urge FERC to take the necessary steps to consider historic resources through project planning and reviews that acknowledge and avoid effects on significant historic resources.

Very truly yours,

Emma Earnst
President, Preservation Piedmont

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