

Sonja Ingram, Danville, VA.
March 29, 2017

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

RE: Atlantic Coast Pipeline DEIS: Docket #: CP15-554-000

Dear Ms. Bose:

I am writing this letter on behalf of Preservation Virginia, the nation's oldest statewide historic preservation organization. Thank you for the opportunity to comment on the draft Environmental Impact Statement (DEIS) for the Atlantic Coast Pipeline. After reviewing the draft EIS we have continuing concerns regarding the protection of Virginia's historic resources potentially impacted by the Atlantic Coast Pipeline (ACP).

It is our understanding that since the DEIS was released in December, additional reports or filings have been completed and the information in these reports is not included in the DEIS. The DEIS also acknowledges that a number of known historic sites have not been adequately researched. The absence of new information, the inadequate investigation of known sites as well as what we perceive as the lack of comprehensive surveys along parts of the pipeline, are of great concern and prevents us from be supportive of the DEIS.

In a previous letter to FERC, dated May 31st, 2016, we expressed our concern not only for singular historic sites but also for historic districts that, in the case of the ACP, are rural historic districts that represent significant landscapes in the path of the pipeline. A rural historic landscape is defined as a distinct geographical area that has been shaped by human activity and that possesses a significant concentration of historic (land use, vegetation, buildings and structures, roads) and natural features. Rural historic districts represent areas where humans and the natural environment have been inextricably linked and altered the character of an area over a long period of time, making them some of the most noteworthy areas of the state.

Of specific concern is the proposed Union Hill/Woods Corner Rural Historic District in Buckingham County, Virginia, currently under review by the Department of Historic Resources. This area is slated for the only compressor station to be built in Virginia as part of the ACP. The DEIS makes no mention of the proposed Union Hill/Woods Corner Historic District, despite the fact that Preservation Virginia listed it as a "Most Endangered Historic Place" in May 2016. Notwithstanding that the African-American community of Union Hill has been a culturally cohesive, agricultural community since the early 18th century, there are no cultural resource reports in Dominion Resource's ACP application documents or in the DEIS. Nor do application documents or the FERC DEIS

contain any survey reports for the pipeline route that would connect with this compressor station.

Union Hill/Woods Corner Rural Historic District (proposed)

The proposed Union Hill/Woods Corner Rural Historic District consists of an agricultural community with interspersed buildings and structures (churches including Union Hill Church and Union Grove Church, schools, dwellings, stores, family burial sites, and cemeteries) established by free African-Americans after Emancipation— all on previous plantation lands. The majority of landowners in closest proximity to the proposed compressor station are the descendants of formerly enslaved people from the locality who have continued the economic activities of farming crops, maintaining orchards and raising livestock. This unbroken history as an agricultural community is particularly threatened by the industrial compressor station facility.

These types of free African-American communities have been scarcely studied in Virginia. Yet, their histories provide invaluable information for fully realized local histories of places where the majority of residents were once enslaved. Communities built by freed slaves before and after Emancipation, during the Reconstruction Era and post-Reconstruction in the Jim Crow Era are now recognized by Virginia and the United States as both highly endangered and irreplaceable resources that are important for a culturally-inclusive historic record. The loss of buildings, burial sites and cemeteries and the practice of discriminatory recordation of land deeds and other records, all contribute to historians' concerns about protecting and preserving what remains in these communities.

At least eight known former plantations are within the proposed district boundaries. Three plantation houses; the National Register-listed Perry Hill, Wilderness, and Willow Lake, still stand and are associated with white families in the Wood's Corner area. The compressor station facility is planned to be built on a former plantation known as Variety Shade. The buildings at Variety Shade are not standing but are likely important archaeological sites. An African-American cemetery at Variety Shade Plantation contains upwards of 200 graves.

Yogaville Historic District

The DEIS mentions the Yogaville (the non-profit spiritual community Satchidananda Ashram Yogaville Virginia or SAYVA) Historic District, but states, "Yogaville is located over 4 miles from ACP and, therefore, we conclude no direct or indirect impacts on tourism and visitation to Yogaville would result from construction and operation of the projects."

We disagree with this evaluation; the amended route does pass through Yogaville Village Center property on property owned by Peter Max. This property was the former Yellow Gravel plantation and contains remains of the house foundation and a cemetery. No cultural resource reports have been filed for this crossing site by Dominion Resources in their application nor does the FERC DEIS mention their omission.

Yogaville's Historic District is specifically not based on buildings alone, but natural and intentionally-formed landscapes working together in unison to achieve its experiential mission at this specific rural site. Natural resources are integral to Yogaville's cultural landscape and include a mile of river frontage on the designated Scenic and Historic James River with multiple overlooks for scenic vistas, 3 live springs and lush forests. The built resources include the Light of Truth Universal Shrine (LOTUS), two additional temples, a Meditation Hall, the Teaching Academy, two schools and summer camp, the Monastery, and densely clustered private residences.

The basis for eligibility for historic district status for Yogaville centers on founder Swami Satchidananda's pioneering role in two major national social movements: interfaith understanding and unity and integrative medicine through lifestyle and behavioral modification with peer support. These core missions guided the decision to purchase land in Buckingham County where the rural character and lack of noise and light pollution, clean water and air and high soil quality— all framed by the Blue Ridge Mountains and the James River – have served Yogaville residents (and more than 6,000 guests and yoga students annually) as a peaceful retreat and sanctuary. Yogaville's National Register-eligible cultural landscape exists because of their core mission. The mission and the place are inextricably intertwined.

The Warminster Historic District

With Yogaville and the Union Hill/Woods Corner area seemingly dismissed, it appears that less emphasis has been placed and fewer comprehensive surveys have been completed for the historic resources in Buckingham County. This holds true as well for the area on the Buckingham County side of the James River. The boundaries of two important historic districts, the Warminster Historic District and the Norwood- Wingina Historic District, erroneously exclude Buckingham County from their boundaries. Because of these artificial boundaries, less emphasis has been placed on investigating and protecting the Buckingham County-side of the James River. Modern land ownership and county boundaries that end at the river have unintentionally altered our historical understanding of contiguous and culturally-congruent prehistoric and historic districts where the James River forms their core, not their edges. The same amount of consideration should be given to both sides of the James River.

Currently, the Warminster Historic District lies within Nelson County with the James River forming its eastern boundary. This rural historic district is principally comprised of the parent mid-18th-century Liberty Hall plantation owned by the Cabell Family, other late-18th-century plantations, the lost town of Warminster and sites and cemeteries associated with African- American families who lived in the District. However, historic settlements and plantations along the James are known to have been built on both sides of the river. An example of these cross-river historic connections is the Yancey Family's plantation Yellow Gravel located on the Buckingham County side. The Yancey Family also owned Montevideo near Wingina Station, originally owned by the original Cabell settlers.

Norwood-Wingina Historic District

The same holds true for the Norwood-Wingina Historic District, which also ends at the James River. This historic district is comprised of the Native American village of Monahassanough as well as the Colonial-era settlement of Hardwickville, which grew up around a trading post on the present-day Buckingham County side of the river.

The possibility of a high presence of artifacts and features related to the Monacan settlement patterns in this area deserves ample investigation on both sides of the James River. It is unclear if sufficient investigations have been completed since only small prehistoric lithic scatters have been recorded on the Buckingham County side.

In some instances, archaeological sites along flood-prone and heavily silted rivers are too deeply buried to be recovered with traditional excavation methods. In order to locate deeply buried archaeological sites in these locations, archaeological investigations employing deep test units and/or trenching may be required. This includes more research and geomorphological testing along rivers and some creeks along the pipeline route including along the James River in Buckingham County.

The South Rockfish Valley Rural Historic District in Nelson County Other than Buckingham County, residents of additional counties, including Nelson County, have also requested our direct assistance on protecting invaluable historic districts. These include the South Rockfish Valley Rural Historic District, a 1,620-acre swath of historic farms, agricultural landscapes, and small residential communities that has retained much of its character and physical integrity due to a long history of farming families in Nelson County. The proposed pipeline route would cross this historic landscape and greatly disrupt the 19th Century Wintergreen Village, the historic Elk Hill Farm, Coleman Mills and numerous other historic sites within the district.

Summary

In summary, we strongly believe that no mitigation procedures can be put forth without full knowledge of all of the historic sites within the APE of the Atlantic Coast Pipeline so they can be reviewed fully by all parties. We trust that an addendum or new DEIS will be submitted so that any new information on historic resources and impacts can be fully reviewed by all parties. Broadly speaking, we also encourage the Atlantic Coast Pipeline to make every attempt to reroute the pipeline so that it does not impact rural historic districts in Virginia. In order to address our specific concerns we are also requesting the following in an upcoming addendum or new EIS:

- Additional research (including inclusion of Charles White's publications and the map of African-American cemeteries) and fieldwork for the area of the compressor station site in the proposed Union Hill/Woods Corner Historic District in Buckingham County, including extant buildings, archaeological sites, transportation routes and viewsheds within the larger cultural landscape.
- Additional research on the Buckingham County side of the James River across from the Warminster and Norwood-Wingina Historic Districts.

- That Yogaville be included in the Section 106 process as a Consulting Party and the impacts on the Yogaville Historic District be fully considered (historic, scenic, and natural resources made vulnerable by proximity to the ACP).
- 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.
- 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). The most recent earthquake with a Buckingham epicenter took place on March 22, 2017.
- FERC respond to concerns about impacts to the scenic vistas, viewsheds, and corresponding heritage tourism industry during and after the pipeline's construction.
- Additional deep testing along rivers and other areas where deeply buried sites may exist.

We encourage FERC to ensure additional research and investigations are undertaken and the information requested is provided with the aim of creating a collaborative environment for all stakeholders so Virginia's irreplaceable historic resources are thoughtfully considered and adequately protected for the benefit of all Virginia citizens.

Sincerely,
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