

Mr. Nathaniel J. Davis, Sr. Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Docket #CP15-554-000 & CP15-554-001
Proposed Atlantic Coast Pipeline



Figure #1. Recently-discovered sink on the property of the Miller's, Burnsville, VA (cited by some government agencies as Williamsville, as we have no post office).

Dear Mr. Davis:

For many reasons, I oppose construction of the proposed Atlantic Coast Pipeline and am disappointed with the DEIS filed in December 2016 regarding #CP15-540. In this letter, I will address the following points regarding the #GWNF-6 route proposed for the ACP:

- The need for an extensive karst review in the #GWNF-6 area;
- Dominion's failure to communicate with a property owner in the proposed pathway; and
- Dominion's lack of communication with property owners on land proposed for access roads.

The need for an extensive karst review in the #GWNF-6 area

As the proposed GWNF-6 route is slated to traverse Little Valley, cross Jack Mountain, and come through our cave-filled community of Burnsville, Virginia, it is imperative that thorough karst, underground waterways, and ground water studies be conducted to ascertain how construction of the proposed pipeline may impact and be affected by karst in our area; and how our local trout streams (including streams used for household water consumption), underground streams, and groundwater may be affected by proposed construction of the ACP. As there are no public water utilities in our community, residents rely solely on private wells, streams, and springs for household water. (The resulting silt and wash from proposed construction of pipeline and access roads in steep terrain in our area is of major concern as the east-west orientation of the mountains makes it difficult, if not impossible, for grass-seeded areas that replace current forested area to thrive and hold in soil.)

Survey crews hired by Dominion stated in January 2017 that karst experts would come to the area “only on an as-needed basis.” As the next scheduled surveys are slated for June, 2017, in our Burnsville, VA area, the DEIS submitted by Dominion is insufficient; karst experts are needed to properly and thoroughly investigate the challenges of land to be traveled on the GWNF-6 route that comes through our rural Bath County.

For Dominion to summarily dismiss risks associated with our karst topography, especially without knowing the extent of the depth, density, or distribution of caves and sinks, demonstrates either their ignorance and/or arrogance. It’s unprofessional, and perhaps even unethical, for Dominion to equate all karst features as the same. The proposed route of the ACP takes it over the southwestern-most region of the caves of the Burnsville Cove, “one of the most remarkable cave systems in the United States,” which includes Butler Cave, a National Natural Landmark (W.B. White [ed.], “The Caves of Burnsville Cove, Virginia,” Cave and Karst Systems of the World, Springer International Publishing, Switzerland 2015). Surely the proximity of this proposed pipeline to such a fragile subterranean ecosystem is worth delaying a decision until a more detailed study can be performed.

Though the Burnsville Cove is well-documented, other caves, underground streams, limestone, and sinks have not been documented (or even identified) in our area. The photograph in Figure 1 shows a sink on the property of Miller, Muddy Run Road, Burnsville, Virginia (Latitude 38.16563; Longitude -79.66145, taken 2/28/2017 by Joe Murray). Documented by caving experts in the fall of 2016, the sink is approximately 156 feet in diameter and is 330 feet **southwest** of the center of the proposed ACP right-of-way crossing the property owned by E. McDaniel. As the Burnsville Cove is typically thought to be north and northeast of the McDaniel property, the presence of this sink and underlying limestone is significant.

There are disappearing and reappearing streams within the corridor of the proposed route crossing properties of McDaniel (Dominion online map property ID#36-019) and Allen (#36-020 & #36-021) in Burnsville, as well. As karst studies have not been conducted on those properties and the next surveying is scheduled for early June 2017, how can those property owners address concerns they have about Dominion's karst findings, as the karst has not yet been considered by Dominion?

Dominion's failure to communicate with a property owner in the proposed pathway

What about the 50-foot "sliver" of property between properties #36-022 (Stinson) and #36-023 (Normandy, Inc.)? When will someone from Dominion contact Hevener, owner of property that adjoins #36-023, to confirm that the proposed pipeline currently crosses 50 feet of her property? And why hasn't this property been given a number for reference in Dominion's online mapping plan?

Dominion's lack of communication with property owners on land proposed for access roads

We understand from Carla Picard (Dominion) that 20.1 miles of access roads (of the total 266.7 miles for the proposed ACP route) are proposed for our Bath County, Virginia region. One such road, Buck Run Lane, was proposed on 17 July 2016, yet as of 6 April 2017, landowners on this private road have **not** been contacted by Dominion, its land agents, or anyone involved with the ACP. Where is their opportunity to speak about possible impacts of access roads when they have not been notified as landowners that an access road is proposed to cross their properties?

If this omission of communication is happening in our community, where else might it be occurring? Since Dominion elected to remove the access road layer on its online map on 17 June 2016, citizens in West Virginia, Virginia, and North Carolina cannot easily discern where proposed access roads are located in their communities. We also cannot easily see where staging areas are proposed. How can we speak about the impact of an access road or a staging/work area when Dominion has neither communicated directly about those, nor has finalized their decisions about those major components?

The US Forest Service raised objections to a proposed access road in the nearby Laurel Run area, citing the presence of a documented trout stream as a part of their concern. That proposed access road was removed from Dominion's plans in February 2017. Are trout streams on US Forest Service property more valuable than trout streams on private land?

The access road proposed to travel up the private Buck Run Lane threatens a native trout stream flowing along Buck Run Lane, as well as water sources on which local residents now rely after their wells stopped functioning following an earth quake 6 years ago (epicenter recorded in Mineral, Virginia in August of 2011).

To consider widening the current driveway/private road of several households and making that an access road threatens the ability for local residents to continue to remain, live, and thrive on their property. Do you have confidence that Dominion will find a way to mitigate potential harm to residents along Buck Run Lane when Dominion has not begun the conversation with these landowners over eight months since Buck Run Lane was posted in FERC filings as an access road?

In May 2016, Joe Murray presented a document to Dominion at the FERC meeting held in Hot Springs, Virginia which showed that the proposed pipeline route traversing property #36-019 belonging to McDaniel had the pipeline crossing over a disappearing stream on her property (already documented in topographical maps for the area) and across the well head on her property. As of 6 April 2017, the route remains the same. Does that disappearing stream not matter? Does that not warrant careful inspection by a karst expert? We reminded a survey crew leader of this concern when he was on the Allen property in January 2017.

(<https://dom.maps.arcgis.com/apps/Viewer/index.html?appid=ccfd1990e87649d79e7c94fd5e73c2b7>)

I petition FERC to postpone making a decision about issuing a permit for the Atlantic Coast Pipeline until Dominion has submitted clear, specific answers to questions posed to them by citizens, the US Forest Service, and experts. Physicians have to live by a code that says, "Do no harm." Is it too much to ask Dominion and FERC to adopt that same posture and to allow time for all pertinent facts to be presented clearly to the public and to FERC?

Local folks tell of a pig disappearing into a hole in the ground near the Roberts' residence on Dry Run less than one mile **east** of the proposed pipeline, and emerging from another hole on property owned now by Miller, less than 300 feet **west** from the pipeline route. I wasn't there, so I can't tell you what underground route the pig used, but I can tell you with 100% certainty that the underground route that pig used to traverse the direct above-ground 0.9 mile route crossed the path of the proposed pipeline route on McDaniel's property. Yes, we find the humor in that story; it's just that we don't want the last laugh to be had by Dominion. We deserve to know the truth about this proposed pipeline so that we may exercise our full rights to converse openly with Dominion and FERC about our concerns.

Please delay making a decision about a permit for CP15-554 until all information requested by citizens, the US Forestry, and all communities to be affected have been thoroughly addressed by Dominion.

Sincerely,

Anne S. Bryan
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Cc: Dominion Board of Directors, c/o Corporate Secretary, Dominion Resources, Inc., P.O. Box 26532, Richmond, VA 23261

Senator Tim Kaine, U.S. Senate, Washington, DC 20510

Senator Mark Warner, U.S. Senate, Washington, DC 20510

Congressman Bob Goodlatte, U.S. House of Representatives, Washington, DC 20515

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