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P.O. BOX 590, VERONA, VA 24482-0590

(540) 245-5610 FAX (540) 245-5621

coadmin@ccofaugusta.com

December 9, 2015

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

Dear Ms. Bose:

RE: OEP/DG2E/Gas4
Atlantic Coast Pipeline, LLC
Atlantic Coast Pipeline Project
Docket No. CP15-554-000

FILED
 SECRETARY OF THE
 COMMISSION
 2015 DEC 21 A 11:53
 FEDERAL ENERGY
 REGULATORY COMMISSION

Augusta County is in receipt of your mailing dated November 13, 2015 notifying us of the Federal Energy Regulatory Commission's (FERC) intention to evaluate seven new route modifications to Atlantic Coast Pipeline, LLC's proposed Atlantic Coast Pipeline route. Two of those proposed modifications are in Augusta County, Virginia. The Atlantic Coast Pipeline proposed to be installed through Augusta County is obviously a significant issue sparking a number of concerns for citizens and county leaders alike. The pipeline is concerning to the County both in terms of the short term and long term impacts the proposed pipeline may have on current residents, as well as future generations. On behalf of the Augusta County Board of Supervisors, I respectfully submit the following comments to FERC on the proposed modifications.

Cow Knob HDD Route Modification

While no map of the specific route modification was provided due to concerns about protection of the cow knob salamander habitat in the National Forest, it would appear that there are no new significant impacts to residential structures in the County. We respectfully yield to the concerns of the U.S. Forest Service on the appropriateness of this route modification.

Augusta County Service Authority Route Modification

The Augusta County Board of Supervisors joins the Augusta County Service Authority (ACSA) in thanking Atlantic Coast Pipeline, LLC for rerouting the proposed Atlantic Coast Pipeline Project out of the Source Water Protection Area for the Lyndhurst Water System.

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The Lyndhurst Water System has the capacity to supply more than 2.0 million gallons of water per day to residents on public water in the County. As such, this is an important water resource for the County and we appreciate Atlantic Coast Pipeline, LLC's efforts to address our concerns regarding this public water supply.

However, as with any reroute, this route does raise new concerns for the County and continuing concerns on specific aspects of this project which will also be impacted by the route modification. Those concerns are:

1. While some of the County's issues regarding protecting the public water supply have been addressed by the Lyndhurst reroute, others remain. The County remains concerned about the impact of blasting on public water lines and the protocols associated with construction once the pipeline is in place. At this point, the burden of accommodating the pipeline appears to be squarely on the Service Authority when doing routine water and sewer pipeline maintenance. These increased costs will, by necessity, have to be passed on to the Service Authority's ratepayers.

While the reroute allows the public water supply to be protected, concerns remain about the private wells that will be impacted by the reroute, as well as any route through Augusta County. Your agency is requiring Atlantic Coast Pipeline, LLC to recognize all private wells within 150 feet of the proposed pipeline construction area and within 500 feet "in karst areas". We are still unclear as to what will be identified as being "in karst areas" and as far as we know, this has not yet been defined by your agency. The County remains concerned about the impact on the private wells and what recourse will be available to private landowners if their wells are impacted. Much of the proposed pipeline route goes over land that is not currently served by public water and areas that are not planned to be served by public water in the future. What safeguards will be put in place to guarantee the safety of the private water supplies of our residents?

Augusta County recommends that Atlantic Coast Pipeline, LLC be required to establish water quality and yield baselines during the varying seasons prior to the start of construction. If a private property owner has a subsequent issue with their well, the baseline and quality data would be available to verify the claim. This effort would evaluate the potential impacts of the gas pipeline installation on groundwater users throughout the County that are not connected to the ACSA public water supply. Those groundwater users would include (but not be limited to) farmers, small transient and non-transient community water systems (e.g. day care centers, commercial businesses, volunteer fire houses etc.) and private residences. Based upon a preliminary review of the properties that exist within 500 feet of the proposed pipeline route where water is not supplied by the ACSA, there appears

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to be approximately 110-120 potential sites where private and commercial wells may exist. The key potential impacts that could occur as a result of the pipeline installation would be related to a reduction in yield or impairment to the groundwater quality of water produced from these wells. Augusta County is asking FERC to require Atlantic Coast Pipeline, LLC to conduct a study which would consist of the following five phases:

Phase 1. Conduct Regional Hydrogeological Assessment along the Proposed Gas Pipeline Route. This work would begin with identifying every well that exists within 500 feet of the proposed pipeline route. This would require that each well be field inspected to assess actual location on a given property and to obtain as much information as possible on the well construction, purpose of use, yield, and known quality. All well locations would be tied into a GIS base map.

A hydrogeological assessment would then be performed throughout the pipeline corridor that focused on evaluating the potential recharge area to each well, presence of karst features in close proximity to the well, underlying geology and fracture systems, proximity of surface water, identification of potential contamination sources nearby, and an overall hydrogeological assessment of the vulnerability of the wells to impact from the pipeline installation.

Phase 2. Conduct a Detailed Assessment of Those Private and Commercial Wells Most Vulnerable to Being Impacted by the Installation of the Gas Pipeline. Conduct a yield and quality testing program on those wells within 500 feet of the proposed pipeline prior to the pipeline installation to establish necessary baseline data. This would include a detailed water quality assessment of each well. It would also include conducting a short term pumping test (4-6 hours) on each well to assess its yield and drawdown (where possible). This data would be compiled, analyzed, and provided to each individual homeowner.

Phase 3. Conduct a Groundwater Monitoring Program Prior To, During, and After the Construction/Installation of the Gas Pipeline. Monitor water levels in private wells prior to, during, and after the pipeline construction activities to assess if impacts to the well(s) are observed. This is anticipated to be done over a 90 day period. This work would include the installation of automated water level recorders in each of the monitored private and commercial wells.

Phase 4. Conduct Post Construction Assessment on all Wells Being Investigated. Post construction another round of water quality assessments for each well identified in Phase I would be conducted. In addition, for only those wells where water levels were impacted as a direct result of the construction and blasting activities associated with the installation of the pipeline, a second yield test on

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those wells to confirm whether an adverse impact relative to yield had occurred would be done.

Phase 5. Prepare Final Report and Present Conclusions and Recommendation for Mitigating Observed Adverse Impacts/Damage to Wells. Compile all data collected in Phases 1-4 and prepare a final hydrogeological report. This document would serve as a professional and legally defensible opinion as to what adverse impacts to private and commercial wells were observed as result of the pipeline installation and what type of mitigation measures would be required or recommended.

This study is very important to County citizens as it would provide a baseline yield and quality data so that residents will have the information they need to quantify any damage done to their wells.

2. Augusta County also requests that Atlantic Coast Pipeline, LLC be required to establish a reserve or contingency fund to provide for compensation for damages to private wells. This contingency fund would provide a mechanism for compensation for our citizens versus having to go through the normal claims process of an insurance company which can be expensive and time consuming for citizens with a damaged water supply.
3. The County would also like to reiterate some of the concerns we raised in our March 30, 2015 letter on Atlantic Coast Pipeline, LLC's Atlantic Coast Pipeline Project. These concerns are applicable to the reroutes being proposed and under review currently, as well as the route submitted by Atlantic Coast Pipeline, LLC earlier this year. The impacts to future land use in the county are extensive due to the size of the impacted area from the construction of the Atlantic Coast Pipeline. The proposed pipeline goes through most of the County's zoning districts and all four of the Planning Policy Areas identified in the County's Comprehensive Plan. Taxpayers have invested millions of dollars in infrastructure and planning in our growth areas and this investment needs to be taken into consideration and *protected when deciding the location, thickness and depth of the pipeline.* In our growth areas, future roads, water and sewer, and other utility infrastructure need to be able to cross the pipeline to facilitate the development planned for the County. If built, the County encourages the pipeline to be installed in areas that have the least negative impacts, specifically, the Board asks that the pipeline be installed away from developed areas (both existing and proposed), schools, and future economic development sites. The proposed Lyndhurst reroute crosses several industrial sites that have been identified in the County's Comprehensive Plan for development, some of which are already zoned Industrial. Each of the potential industrial sites impacted by the reroute have public water and sewer and good road

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and rail access. We would continue to encourage a route that minimizes the impact on industrial sites in Augusta County and particularly in Stuarts Draft.

4. The County recommends the pipeline be routed to minimize the impacts to individual parcels by using property lines and not going through the center of parcels. A portion of the route running south of Howardsville Turnpike to the Augusta County/Nelson County line appears to be running through homes. The County remains concerned about any route that negatively impacts private property owners.
5. Blasting is another concern shared by county residents and Headwaters Soil and Water Conservation District. The County and Headwaters remain concerned about the integrity of the flood control structures and the impact on other structures and infrastructure due to blasting and looks to FERC to require Atlantic Coast Pipeline, LLC to utilize Best Management Practices when determining blasting protocols.

Again, the Augusta County Board of Supervisors thanks FERC for the ability to comment on the proposed reroutes proposed by Atlantic Coast Pipeline, LLC. If you have any questions about our comments and concerns, please feel free to contact me.

Sincerely,



Michael L. Shull
Chairman

cc: Ken Fanfoni, Executive Director, ACSA

Document Content(s)

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