

Rockfish Valley Foundation Comments on Docket No. PF15-6-000

**FEDERAL ENERGY REGULATORY COMMISSION, PUBLIC SCOPING MEETING
For ATLANTIC COAST PIPELINE, LLC, DOCKET NO. PF15-6-000
NELSON COUNTY, VA
MARCH 18, 2015**

Rockfish Valley Foundation comments by R. CRAIG COOPER, Vice President & Trustee

Ladies and Gentlemen,

I am offering comments tonight on behalf of the Rockfish Valley Foundation. The comments are for use in preparing the Environmental Impact Study for the ACP pipeline in the Rockfish River Valley and Nelson County. The Foundation and its predecessor, The Friends of the Rockfish Watershed (FORW), have over fifteen years of experience and have sponsored or participated in a number of well documented studies and reports describing the geology, rivers, streams, water shed, natural habitat, natural history, cultural and historic assets of the area. This existing information documents the overwhelming environmental risks associated with the ACP. These risks are readily determined by reviewing existing data and without the need for a physical survey.

I will comment on three issues:

1. The twenty informational resources and studies readily available, and
2. The Green Infrastructure Strategies in Nelson County report dated 2010, and
3. The Green Infrastructure 2009 report by Thomas Jefferson Planning Commission

First, attached to these written comments is a partial list of **ENVIRONMENTAL, HISTORICAL & CULTURAL RESOURCE INFORMATION SOURCES** available for the Rockfish River Valley and **NELSON COUNTY, VA**. This list prepared by the Foundation identifies twenty different environmental and cultural studies and reports prepared over the past 10 -15 years. The hydrology, geological and natural features and historical assets in Nelson County haven't changed in this period and the reports and studies are as valid today as when prepared. Analysis and evaluation of this information should lead a reasonable and informed person to conclude the area is unsuitable for the ACP.

The Foundation specifically urges that the Environmental Impact Study consider, evaluate and address how each and every one of the twenty dataset resources listed in the attachment would be impacted by each and every pipeline route, alternative or prospective route change.

Second, the Foundation directs your attention to an important report, "Green Infrastructure Strategies in Nelson County", December 16, 2010, prepared by University of Virginia School of Architecture, Karen Firehock and Green Infra Structure Center, Inc. This report includes eleven environmental maps of Nelson County including: habitat cores, high intensity forest cores, forest cores, connector patches & corridors, the full green infrastructure network, existing conservation easement lands, water sheds &

major rivers, prime soils map, critical slopes map, parcel boundaries, watersheds, major rivers & public wells and a cultural asset map.

The Foundation specifically urges that the Environmental Impact Study include a pipeline overlay, for each and every route, alternative or prospective pipeline route on each and every one of these eleven critical environmental maps. Further, the EIS must consider, evaluate and address how each and every one of the twenty map areas would be impacted by each and every pipeline route, alternative or prospective route change.

Third, the Foundation directs your attention to another important report, the Green Infrastructure Study, Sep. 30, 2009, prepared by the Thomas Jefferson Planning Commission for a five county area including Nelson County. This report includes seven environmental maps of Nelson County including: environmental areas of opportunity, steep slopes of 25% or greater, third order stream buffers, recreational trails, protected lands and cornerstone layers.

Again, the Foundation specifically urges that the Environmental Impact Study include a pipeline overlay, for each and every Nelson County route, alternative or prospective pipeline route on each and every one of these seven Nelson County environmental maps identified by the Thomas Jefferson Planning District region. The EIS must consider, evaluate and address how each and every one of the seven Nelson County map areas would be impacted by each and every pipeline route, alternative or prospective route change.

The impacts described in all of the above paragraphs should be assessed at both (i) the "micro level" (eg. property owner and "smallest USGS stream assessment unit, 12 digit HUC") and (ii) the integrated levels. On all levels, the EIS should look at a comprehensive set of factors that, at a minimum, include: air quality, water quality, water quantity, geological risks, hydrology, human health & safety, historic & cultural assets, view sheds, recreational impact, economic risks to the tourism industry, wild life habitat, forest cover, and integrated ecological impacts.

In concluding, the Foundation urges FERC to combine its review of all three planned new pipelines in Virginia into one aggregate analysis of the need and assessment of environmental risks versus performing individual and separate reviews. Such analysis must include all existing pipelines to evaluate the total existing and proposed capacity and need, if any. Only by a combined and integrated pipeline infrastructure review can the true need and environmental impact be determined. Such analysis must include the use of existing utility corridors for new pipelines to avoid the unnecessary taking of private property and impairment of natural resources.

In addition to this evenings brief comments, the Foundation expects to submit more comprehensive comments on the scope of the EIS. Thank you for your consideration of these comments and the attached informational resources.

ATTACHMENT

to

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**ROCKFISH VALLEY FOUNDATION COMMENTS by R. CRAIG COOPER, Vice President
& Trustee**

**ENVIRONMENTAL, HISTORICAL & CULTURAL RESOURCE INFORMATION SOURCES
(partial list)
FOR NELSON COUNTY, VA**

Resource Documents (partial list) prepared by the Rockfish Valley Foundation: These documents are held by RVF and/or various other Parties in Nelson County. The following documents have been identified as those containing factual material essential for any Environmental Impact Study, cultural or historical study of Nelson County:

1. Rockfish Valley Watershed Improvement Plan, 2012. (plan to reduce bacteria and sediment in the Rockfish River and its tributaries) (27 pgs) Va Dept. of Environmental Quality, 2012, and Va Dept. of Conservation and Recreation and VA Tech. This is planning tool which should be considered in planning any major construction project. Lists organizations that should be consulted in any planning effort. Draft copy held by RVF.
2. VMI Environment Virginia 2005, Water Supply Planning, Navigating the Merging Streams of Water Law, by James N. Christman & Andrea W. Wortzel (11 pgs) held by Environment Virginia at VMI, Lexington, VA. Copy held by RVF.
3. Rockfish River Watershed TMDL Implementation Plan, 2012, available from VA DEQ, prepared by The Stakeholders of the Rockfish River Watershed, draft copy held by RVF.
4. Geology of the Rockfish Valley, Nelson County, VA, done in 2011, display boards and trail guide for RVF Geology Trail prepared by (about 2012) by geology professors from James Madison University, available at RVF.
5. Geology History of the Rockfish Valley, 2011, same source as #4 above.
6. 1986 Thesis "A Morphometric Study of Slope Stability Controls in Central Virginia" by Judith Peatross (highlights impact of Hurricane Camille on steep slopes in Nelson County and future risks), copy on loan to Friends of Nelson, www.friendsofnelson.com.
7. A Sensitive Soils Map of Nelson County by Nick Evans, copy held by RVF.
8. A History of Southern Rockfish Families and Old Houses, 1999 by Catherine Coleman Seaman. Copies held by the Nelson County Library and likely the Nelson County Historical Society.

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9. A History of Northern Rockfish Valley, Nelson County, VA, 1998 by Catherine Coleman Seaman copies held same as #5
10. Friends of Rockfish Watershed (FORW), www.forwatershed.org. a dormant organization who's web site remains active and has relevant documents online including:
 - a. Nelson County Greenway Corridor proposals included in Nelson County 2001 Comprehensive Plan.
 - b. Soil Survey of Nelson County, Virginia, 1992 conditions, done by Natural Resources Conservation Service under the U.S. Department of Agriculture (252 pgs).
 - c. North Fork of the Rockfish River Study, July 29, 2010,
 - d. A Water Quality Study on the North Fork, South Fork, Rockfish River and Taylor Creek in Nelson County, VA,
 - e. Nelson County Geographic Data Maps,
 - f. Other planning and watershed status information including:
 - i. Rockfish Valley Watershed Improvement Plan,
 - ii. Rockfish River TMDL Bacteria Update, 6/22/2011,
 - iii. Taylor Creek Sediment Stressor, 6/22/2011
11. Green Infrastructure Strategies in Nelson County, December 16, 2010, by University of Virginia School of Architecture, Karen Firehock and Green Infrastructure Center, Inc. Electronic copy held by RVF. Green Infrastructure Center: <http://www.gicinc.org/resourcesonlinelit.htm>
12. Green Infrastructure Study, Sep. 30, 2009, prepared by Thomas Jefferson Planning Commission for 5 County area including Nelson County. Electronic copy held by RVF.
13. Nelson County Comprehensive Plan 2009
14. Virginia Conservation Lands Needs Assessment (VCLNA): The VCLNA is a comprehensive green infrastructure planning tool developed by the Department of Conservation & Recreation. There are a total of six GIS (Geographic Information System) models, including the Virginia Natural Landscape Assessment and the Forest Economics Model. http://www.dcr.virginia.gov/natural_heritage/vclna.shtml
15. Nelson County Board of Economic Development. "November 2010 Report" <http://nelsoncounty.com/cvb/2010/11/18/november-2010-report/>.
16. Rockfish Valley Corridor Water and Sewer Study, February 8, 2002, prepared for Nelson County Service Authority and County of Nelson, VA, by Draper Aden Associates.

ⁱ RVF denotes the Rockfish Valley Foundation, a public 501(c) 3 organization, P.O. Box 235, Nellysford, VA 22958, www.rockfishvalley.org, email info@rockfishvalley.org, primary contact: Mr. Peter A. Agelasto III, President. RVF is an affiliate of the Virginia Museum of Natural History.