

**ROCKFISH VALLEY FOUNDATION, Comments on ATLANTIC COAST PIPELINE, LLC,  
FERC DOCKET NO. PF15-6-000**

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March 25, 2015

TO: Federal Energy Regulatory Commission

FROM: R, Craig Cooper for the Rockfish Valley Foundation, P.O. Box 235, Nellysford, VA 22958, email [info@rockfishvalley.org](mailto:info@rockfishvalley.org).

RE: Submission of Additional Comments for Scoping of Environmental Impact Study of Atlantic Coast Pipeline, FERC Docket No. PF15-6-000

The following comments are submitted on behalf of the Rockfish Valley Foundation (the "Foundation") as an addition to those which I submitted at the FERC Public Scoping Meeting held in Nelson County, VA, on March 18, 2015, including the Attachment. Therto.d

1. Revised Environmental, Historical & Cultural, Resource Information Sources for Nelson County, VA (rev. 3/22/15). The attached revision supplements, expands and replaces the listing submitted to FERC as an ATTACHMENT dated March 18, 2015 to my written comments. These comments were presented at the Public Scoping Meeting held on that date. The revision adds six information sources.
2. Electronic Submission of Documents: The following information documents listed as 'Resource Information Sources' in paragraph 1 above are being submitted electronically for FERC's review and consideration:
  - a. Item 4. Geology of the Rockfish Valley, Nelson County, VA, done in 2011, copy of display boards for RVF Geology Trail prepared by Lynn S. Fichter & Eric J. Pyle, Dept. of Geology and Environmental Science at James Madison University.
  - b. Item 6. 1986 Thesis "A Morphometric Study of Slope Stability Controls in Central Virginia" by Judith Peatross (partial as copies of some computer runs have not be reproduced). The Thesis highlights the impact of Hurricane Camille in 1969 on the steep mountain slopes in Nelson County and future risks.
  - c. Item 11. Green Infrastructure Strategies in Nelson County, December 16, 2010, by University of Virginia School of Architecture, Karen Firehock and Green Infra Structure Center, Inc. of Charlottesville, VA. The study includes extensive maps detailing the environmental risks in Nelson County.
  - d. Item 12. Green Infrastructure Study, Sep. 30, 2009, prepared by Thomas Jefferson Planning District Commission for a five county area including Nelson County, VA. This regional study includes maps of environmentally sensitive areas in Nelson County.
  - e. Item 18. North Fork, South Fork and Mainstream of the Rockfish River Bacteria TMDL's, local steering committee handout, 2/1/2011, by Karen Kline of Virginia Tech Dept. of Biological Systems Engineering. Includes

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descriptive details of Rockfish River Valley watersheds necessary for any EIS.

- i. VR03\_subsheds\_all-1.kml. A SHAPE data file of the Rockfish River Valley watersheds which may be overlaid on Google Earth. Note that Google Earth must first be opened before clicking the SHAPE file to open.
3. Pipeline Overlay's: The Foundation specifically requests that the Environmental Impact Study include a pipeline overlay for each and every pipeline route, alternative or prospective route on each and every one of the maps included in each of the Resource Information Source documents identified in paragraph 2, subparagraphs "a." through "e" inclusive. The EIS must consider, evaluate and address how each and every one of the map areas depicting environmental risks would be impacted by each and every pipeline route, alternative or prospective route change. The EIS must assess the impact at both (i) the "micro level" (eg. Individual property owner or tax map number, and "smallest USGS stream assessment unit, 12 digit HUC") and (ii) the integrated levels. On all levels the EIS must 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, wild life habitat, forest cover, introduction of invasive species, decreased property values, economic risks to the tourism industry and integrated ecological impacts.
4. Water Resources and Water Quality: The Foundation specifically requests the EIS address the critical water resources and importance of water quality in Nelson County. The Green Infrastructure Strategies in Nelson County, December 16, 2010, report (paragraph 2.c., Item 11 on the Attachment) highlights the importance of water in its introduction: "Water Resources: Policies & Strategies:" stating in part:

"Protecting the rivers, streams, lakes and tributaries in Nelson is critical for several reasons. Perhaps the most importantly is the fact that local aquifers provide drinking water for the majority of the county, which has over 3,000 private wells within its borders."

Goal 1 of the report is "Improve and Preserve Water Quality in Nelson County": which states in part:

"Water resources within Nelson County are among the most critical for ensuring its long-term viability. Healthy streams and rivers are necessary to ensure safe drinking water, maintain ecological integrity and preserve the County's status as an area full of unspoiled natural beauty. Therefore, preserving healthy water bodies and impaired sections as identified by the Virginia Department of Environmental Quality's (DEQ) 2010 305(b)/303(d) Water Quality Assessment Integrated Report

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is of utmost importance. With over 3,000 private wells drawing from local aquifers and providing the majority of the County's drinking water, protecting ground water is particularly significant. This can be achieved by the use of vegetated buffers and a reduction in impermeable surfaces as well as the protection of forested areas, which help filter and absorb storm water prior to it entering rivers."

Goal 3 of the report is "Protect Nelson County's Drinking Water Supply": which states in part:

"The majority of drinking water in the county is supplied by private wells drawing water from local water tables. Only approximately 20 percent of Nelson County's residents are served by public drinking wells. Since the primary drinking water source in Nelson County is local aquifers, ensuring adequate aquifer recharge is critical to prevent over-drawing of this important resource."

Map 2 included in the report is "Major Rivers and Drinking Water Infrastructure" and requires careful analysis. The EIS must identify all public and private wells within one (1) mile of either side of the ACP centerline, or any alternate route, and address in detail all measures to insure the integrity of all such wells during construction and in perpetuity once a pipeline is placed in operation. Including, but not limited to, storm & runoff water, uninterrupted ground water flows, sedimentation, contamination, introduction of impurities, maintenance of protective vegetated & forest cover and compliance with all factors identified by all applicable Federal, State and local laws, ordinances and regulations which deal with wells and drinking water safety including 'best practices'. These studies should clearly describe impacts to the level of detail needed to inform individual property owners of the impact on their property.

Additionally, the Foundation directs your attention to the "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: Item 16 on the Attachment. This report focuses on the Rockfish River Valley in detail. The EIS must address this report to the same level of detail as that described in the paragraph above (Map 2).

In addition to these supplemental EIS scoping comments the Foundation expects to submit more comments on the historical and cultural assets of Nelson County. Thank you for your consideration of these comments, the Attachment and the electronic documents.

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Attachment: Environmental, Historical & Cultural, Resource Information Sources (partial list – rev. 3/22/15) for Nelson County, VA, prepared by Rockfish Valley Foundation. (3 pgs)

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**P.O. Box 235  
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**ENVIRONMENTAL, HISTORICAL & CULTURAL RESOURCE INFORMATION SOURCES  
(partial list – rev. 3/22/15)  
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 Lynn S. Fichter & Eric J. Pyle, Dept. of Geology and Environmental Science at 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](http://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](http://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 Infra Structure 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](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.
17. Benthic TMDL Development Report, Taylor Creek, Albemarle and Nelson Counties, VA, draft 7/20/2011, VT-BSE Document No.2011-0008, by VA Dept. of Environmental Quality and Virginia Tech Dept. of Biological Systems Engineering, copy held by RVF.
18. North fork, South Fork and Mainstream of the Rockfish River Bacteria TMDL's, local steering committee handout, 2/1/2011, by Karen Kline, of Virginia Tech Dept. of Biological Systems Engineering, copy held by RVF.

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- a. VR03\_subshes\_all-1.kml, SHPAE data file: note must have Google Earth open before opening this file. Provides Rockfish River watershed overlay.
19. Evaluating and Conserving Green Infrastructure Across the Landscape, December 2012, by Karen Firehock of Green Infrastructure Center, Inc., for Virginia Dept. of Forestry, copy held by RVF.
20. Better Models for Development in the Shenandoah Valley 2010, Valley Conservation Council, copy held by RVF.
21. Historic Resources Identification and Assessment of Nelson County, VA, by Thomas Jefferson Planning District Commission, 1993, copy held by RVF and believed available on-line.

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

Alternate Contact: R. Craig Cooper, Vice President & Trustee, (434)-361-1050, email: [info@rockfishvalley.org](mailto:info@rockfishvalley.org) or, [coopmtn@cyberwind.net](mailto:coopmtn@cyberwind.net).