



COUNTY ADMINISTRATOR
ROBERTA A. LAMBERT
MONTEREY, VIRGINIA

HIGHLAND COUNTY BOARD OF SUPERVISORS

P. O. BOX 130
MONTEREY, VIRGINIA 24465
Phone: 540-468-2347 Fax: 540-468-3447
E-mail: hcboard@htcnet.org
Website: www.highlandcova.org

BOARD MEMBERS:

DAVID W. BLANCHARD
MONTEREY, VIRGINIA

KEVIN W. WAGNER
MONTEREY, VIRGINIA

HARRY B. SPONAUGLE
DOE HILL, VIRGINIA

April 6, 2017

Ms. Cheryl A. LaFleur, Acting Chairman
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Atlantic Coast Pipeline Project (ACP)
Docket Nos. CP15-554-000; CP15-554-001 and CP15-555-000

Dear Ms. LaFleur:

The Highland County, Virginia Board of Supervisors has reviewed the ACP Draft Environmental Impact Statement (DEIS) submitted to FERC. The DEIS fails to adequately address the Board's ongoing concerns about adverse impacts to groundwater sources in Highland and fails to specify necessary protections for endangered species like the Indiana Bat.

The DEIS relies heavily on "desktop analysis" regarding construction of the pipeline in our karst terrain, which inadequately identifies barriers to construction such as sinkholes and does not fully consider groundwater recharge areas in the pipeline path. Highland farmers rely on spring water to raise sheep and cattle. Dominion's offer to provide wells to farmers whose springs cease to flow as a consequence of the pipeline construction is not acceptable. A farm that must rely on well water is no longer a viable farm. Dominion should be directed to provide an independent analysis of groundwater recharge areas based on actual site visits and real data before being allowed to proceed.

Highland has an active caving community which has explored and surveyed our numerous caves. The caves are home to several bat species, including the federally-protected Indiana Bat. The DEIS fails to adequately address mitigation regarding this endangered species.

Ms. Cheryl A. LaFleur, Acting Chairman
April 6, 2017
page 2

The Highland Board of Supervisors has remained neutral on the ACP. However, we were alarmed to read of the March 2017 decision by a U. S. District Judge in Virginia, who found that Dominion Virginia Power violated the Clean Water Act by leaking arsenic into waters surrounding a coal ash storage area. Our small county cannot and should not have to rely on Dominion's "good will" where the ACP is concerned. Hard facts must be demanded by FERC.

We ask that you require detailed, independent analyses of the threats to our groundwater and the threats to all endangered species. Our County does not have a staff engineer, a staff erosion and sediment control expert, or a staff biologist. We are reliant on FERC to protect us from all unreasonable adverse impacts as a result of this for-profit project.

Thank you for the opportunity to have our concerns identified and considered by the Commission.

Sincerely,

HIGHLAND COUNTY BOARD OF SUPERVISORS

By: 
David W. Blanchard, Chairman

MAD/acr

cc: The Honorable Senator Mark Warner
The Honorable Timothy Kaine
The Honorable Congressman Bob Goodlatte
The Honorable Governor Terry McAuliffe
The Honorable Senator R. Creigh Deeds
The Honorable Senator Emmett Hanger
The Honorable Delegate Dickie Bell
Scott Smith, WVLS ✓
John Bruce, The Recorder
Emmett W. Toms, Jr.