



88 Wintergreen Drive
Wintergreen Resort, VA 22967-2162

Wintergreen Property Owners Association

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May 4, 2017

Mr. Kevin Bowman
Environmental Project Manager
Office of Energy Projects
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Mr. Bowman,

On April 11, 2017, you submitted a number of additional Environmental Information Requests to the Atlantic Coast Pipeline (ACP) relating to the ACP project. Request number 106 is of interest to the Wintergreen Community and it stated:

"In response to numerous comments received on the draft EIS, describe in more detail how Atlantic would work with local law enforcement and emergency response to promote the safe evacuation of landowners in remote areas should a pipeline incident occur. Consult with each landowner where the proposed pipeline crosses a private egress that is the sole access to/from the property to determine if a site-specific evacuation procedure is requested."

For nearly two years, Wintergreen Property Owners Association ("WPOA"), Friends of Wintergreen ("FOW"), individual homeowners and others have raised serious safety concerns about the catastrophic consequences of a pipeline explosion, landslide or leak requiring evacuation of the immediate area at or near the entrance to Wintergreen. In our submission to FERC dated February 25, 2017, WPOA stated:

"We are at a loss to explain why a high pressure 42 inch pipeline route is currently engineered to disturb a potentially catastrophic landslide area. In the event of slope failure and any potential related explosion, Wintergreen's police offices, 911 command center and the community's administrative offices would likely experience destruction and loss of life. In addition, the Wintergreen community's only entrance and exit would be blocked by the resulting debris avalanche and/or a fire. To further this point, Virginia recently retired state forester describes his concerns in a separate letter enclosed. When considered objectively, the potential risks to human life of this route are real and well supported by science"

On Monday May 1st, 2017 I received notice of ACP's answers to question 106. ACP responded with:

"Atlantic and DTI are currently working with Local Emergency Planning Committees (LEPCs) to develop Emergency Response Plans for construction. In circumstances where ingress and egress may be impaired during construction, Atlantic and DTI stipulate to landowners that temporary measures will be taken to ensure continued ingress and egress. As the project approaches completion, Dominion Operations will provide relevant information, including the pipeline location, to the same LEPCs to support the development of Operational Emergency Response Plans. The Operational Emergency Response Plans would address incident evacuation requirements. In the unlikely case of an operational incident, Atlantic and DTI would coordinate with landowners and local emergency response services to implement the LEPC Emergency Response Plan to address the specific situation"

I am extremely concerned about the lack of detail and inaccuracies offered up in this response. When you consider the risks involved, the response is completely unacceptable. Please consider:

1. In its own words, ACP acknowledges - **"Atlantic and DTI are currently working with Local Emergency Planning Committees (LEPCs) to develop Emergency Response Plans for construction"**. There is no LEPC within Nelson County and ACP has held no discussions with the Nelson County Emergency Services Council. Per Wintergreen Fire and Rescue Chief Curtis Sheets, **"Regarding evacuation planning for Wintergreen in the event of a pipeline emergency, there have been no meetings. In their response to section 106 of the FERC filing, Dominion references their work with Local Emergency Planning Committees (LEPC). There is no active committee in Nelson County Virginia. Nelson relegates this responsibility to the Nelson County Emergency Services Council (NCESC) Wintergreen does hold a voting position on the NCESC and has been represented at every meeting for the past 15 years. At no point has any representative from Dominion Power or the Atlantic Coast Pipeline met with or corresponded with the NCESC."**
2. Wintergreen represents the epicenter of the concerns brought forward in question 106. We know of no other place in the Commonwealth of VA where an entire community is completely trapped should an emergency occur during construction or at any point after the pipeline is in place. A landslide, gas leak, explosion or resulting fire can all isolate and entrap potentially thousands of people.
3. Wintergreen has communicated directly with Dominion/ACP about the enormous risks associated with the current route and the need to have a plan in place that adequately addresses the safety of the community. In their response to your request, ACP states - **"As the project approaches completion, Dominion Operations will provide relevant information, including the pipeline location, to the same LEPCs to support the development of Operational Emergency Response Plans."** Given the circumstances, FERC should not allow construction to begin in hopes that

the safety issues can be resolved. The current route for the ACP blocks the only entrance and exit for the entire mountain community. Given that no other access or evacuation routes exist, it is highly likely that no adequate evacuation plan can ever be developed. With an entire community at risk, FERC should require Dominion/ACP to put in place an acceptable solution BEFORE construction is allowed to begin.

As of today, WPOA has received no communication from ACP or Dominion on request number 106, yet, Dominion and ACP are well aware of Wintergreen's concerns on this issue. We sincerely appreciate FERC recognizing the enormous safety concerns associated with the current route cutting off access and the need to protect the Wintergreen Community from harm. The lack of substance in their official response on May 1st and lack of any follow up from ACP on this issue is deeply concerning and we ask that you continue to engage ACP on the matter. Given the severity of the risk, your request for an acceptable solution before construction begins is both reasonable and critically important.

Sincerely,



Jay Roberts
Executive Director

Wintergreen Property Owners Association

CC: Ms. Kimberly D. Bose, Secretary
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