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Federal Energy Regulatory Commission
888 First Street, N.E. Washington, D.C. 20426

To Secretary Bose:

In light of the Atlantic Coast Pipeline (ACP)'s cancellation, the Federal Energy Regulatory Commission (FERC) must ensure that ACP's abandonment is conducted in a way that fully restores property rights to landowners whose land is currently held in easements by Atlantic Coast Pipeline LLC (Atlantic) and Dominion Energy Transmission Inc. (DETI), and the ecosystems impacted by construction activities. Throughout ACP's abandonment process, adequate public input should be prioritized to ensure past injustices to the environment and landowners are meaningfully addressed.

The extension requests for Atlantic's Supply Header Project (SHP) should be denied because it cannot be justified in accordance with FERC standards. SHP was proposed as being dependent upon the ACP and Dominion Energy has stated on record that, "the SHP does not have independent utility and would not be built without construction of the ACP," therefore ACP's cancellation renders SHP useless.

Additionally, FERC should not grant ACP's request of extension to address abandonment and restoration activities along the project's right-of-way without a public comment period of at least 30 days. FERC must prioritize the public and affected landowners' concerns about restoration activities and the impacts it could have on landowners' rights in the future.

When finalizing ACP's abandonment procedure, the following must be addressed:

- How rights of landowners whose property currently have easements held by DETI will be restored so that they can use their property without any restrictions and done in such a way at no additional cost to the landowner
- Restoration efforts on land that was cleared or otherwise disturbed, especially land adjacent to waterbody crossings and wetlands given the potential impacts to water quality
- How parts of the pipeline that are already in the ground will be abandoned
- Removal of pipeline that has already been staged on the ground and left uncovered, which has resulted in the pipe coating to weather off and potentially contaminate underlying soil
- Evaluation of potential contamination due to the leaching of the pipeline coating should be conducted

- How FERC and other state and federal agencies will monitor restoration activities and associated environmental impacts

After FERC considers the comments garnered from an extended public comment and have incorporated these comments into the ACP's restoration and abandonment procedure, this plan must be subject to another public comment period to ensure it fully addresses concerns from landowners, environmentalists, and the public.

Sincerely,

Jolene Mafnas

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Document Content(s)

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