

## SOUTHERN ENVIRONMENTAL LAW CENTER

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February 9, 2021

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Comments on Restoration Plans for Atlantic Coast Pipeline and  
Supply Header Project, Dockets CP15-554 & CP15-555**

Dear Secretary Bose:

On behalf of Alliance for the Shenandoah Valley, Appalachian Voices, Chesapeake Bay Foundation, Inc., Chesapeake Climate Action Network, Cowpasture River Preservation Association, Friends of Buckingham, Friends of Nelson, Highlanders for Responsible Development, Piedmont Environmental Council, Shenandoah Valley Battlefields Foundation, Sierra Club, Sound Rivers, Inc., Virginia Wilderness Committee, Wild Virginia, Inc., and Winyah Rivers Foundation (collectively, “Conservation Intervenors”), we submit these comments on the restoration plans for the Atlantic Coast Pipeline (“ACP”) and Supply Header Project filed in response to an October 27, 2020 information request issued by Commission staff.<sup>1</sup>

On November 20, 2020, Eastern Gas Transmission and Storage, Inc. (“Eastern GTS”) filed its Project Restoration Plan for the Supply Header Project (“SHP Plan”).<sup>2</sup> On January 4, 2021, Atlantic Coast Pipeline, LLC (“Atlantic”) filed its Disposition and Restoration Plan for the ACP (“ACP Plan”).<sup>3</sup> We write to highlight shortcomings in the

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<sup>1</sup> Letter from Rich McGuire, FERC, to Matthew R. Bley, Dominion Energy Transmission, Inc., Dkt. Nos. CP15-554 et al. (Oct. 27, 2020) (eLibrary No. 20201027-3057) (“October 2020 Information Request”).

<sup>2</sup> Letter from Matthew R. Bley, Eastern GTS, to Kimberly D. Bose, FERC, Dkt. No. CP15-555 (Nov. 20, 2020) (eLibrary No. 20201120-5243). Eastern GTS was previously known as Dominion Energy Transmission, Inc. (“DETI”) before DETI was acquired by Berkshire Hathaway Energy Company in November 2020. *Id.* at 1.

<sup>3</sup> Letter from Sharon L. Burr, Atlantic, to Kimberly D. Bose, FERC, Dkt. No. CP15-554 (Jan. 4, 2021) (eLibrary No. 20210104-5278). Atlantic’s January 4, 2021 letter indicated that Atlantic had previously filed its plan with the Commission on December 18, 2020,

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 2

two plans; to request that the Commission approve a limited extension of the ACP's construction deadline only upon ensuring that Atlantic addresses the shortcomings described in this letter; and to renew our request, set forth in comments dated August 3, 2020,<sup>4</sup> that the Commission deny the application by DETI (now Eastern GTS) for an extension of time to construct the Supply Header Project and place it into service.

**1. Atlantic should release easements upon request from private landowners or open-space easement holders.**

Over the course of planning its now-abandoned pipeline, Atlantic obtained thousands of easements from private landowners, many secured through eminent domain proceedings or through agreements backed by the express threat of Atlantic's exercise of eminent domain. Some landowners incurred tens of thousands of dollars in costs for assessments and attorneys' fees—costs that the landowners cannot recoup—before ultimately being compelled to sign easement agreements.

These easements represent a severe, continuing, and now wholly unwarranted burden on properties throughout the ACP's 604-mile path. The typical agreement provides for a 50-foot-wide permanent easement and an additional "temporary" easement that remains in force for years. Landowners cannot build, operate heavy machinery, or move earth within the easements, which can significantly impair the owners' enjoyment of their property and diminish its value. Owners who wish to sell their property may find that potential purchasers are deterred by these same restrictions. And the easements also burden landowners' peace of mind, due to the threat that Atlantic could someday transfer the easement to the developer of another project.

Even though it no longer plans to build the ACP, Atlantic has publicly stated that it does not intend to voluntarily release the easements.<sup>5</sup> Nor has Atlantic committed not to transfer the easements to a third party for use in another pipeline or infrastructure project, saying only that it "ha[s] no plans to do so at this time."<sup>6</sup> Atlantic's intransigence

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but that the filing had never been accepted to the Commission's docket due to webpage technical difficulties. *Id.* at 1.

<sup>4</sup> Letter from Gregory Buppert, SELC, et al. to Kimberly D. Bose, FERC, Dkt. Nos. CP15-554 et al. (Aug. 3, 2020) (eLibrary No. 20200803-5194) ("August 2020 Comments").

<sup>5</sup> Sarah Rankin, *Regulators Get Plan for Undoing the Atlantic Coast Pipeline*, Associated Press, Jan. 5, 2021, <https://bit.ly/3c9R3ki>.

<sup>6</sup> *Id.*

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 3

raises questions about why it needs to hold onto easements for which it should have no future use.

The Commission should require Atlantic to give private landowners and open-space easement holders the opportunity to regain full ownership of their property—by releasing easements held by Atlantic for a pipeline it does not intend to build. Specifically, as set forth in our August 2020 Comments, Atlantic must contact the owners of all property where a right-of-way easement exists and inform them that (a) Atlantic will release the right-of-way easement within 90 days of a written request from an affected landowner or open-space easement holder; (b) Atlantic will provide the affected landowner or open-space easement holder with the proposed written release of the right-of-way easement; (c) Atlantic will pay the reasonable attorneys' fees of the affected landowner or open-space easement holder incurred in reviewing and negotiating changes to the proposed written release of the right-of-way easement; and (d) Atlantic will file the final, executed written release of the right-of-way easement in the land records of the appropriate jurisdiction.

**2. Atlantic should afford *all* affected landowners the opportunity to communicate specific restoration requirements.**

Now that it has abandoned the ACP, it is important that Atlantic permit landowners to have a voice in how their property is to be restored.<sup>7</sup> The ACP Plan reports that Atlantic has contacted specific landowners to discuss whether felled trees will be cleared or left in place.<sup>8</sup> But it is unclear whether Atlantic intends to contact *all* landowners with felled trees on their property. And beyond those parcels that contain felled trees, there is no indication that Atlantic plans to consult with *any* owners of disturbed land to ask about their restoration preferences. Consistent with its recently avowed commitment to improving fairness and transparency for landowners affected by energy projects under the Commission's jurisdiction, the Commission should require such consultation by Atlantic.

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<sup>7</sup> Atlantic should also reimburse landowners for the reasonable costs incurred in obtaining professional advice as to appropriate restoration measures for their property. *See* Reh'g En Banc Br. of FERC at 48, *Allegheny Def. Project v. FERC*, No. 17-1098 (D.C. Cir. June 30, 2020), 2020 WL 635749, at \*48 (recognizing that if certificate is vacated and pipeline does not go forward, pipeline company that proceeded with condemnation and construction prior to appellate review "would be liable to the landowner for the time it occupied the land and for any damages resulting to the land and to fixtures and improvements, or for the cost of restoration.") (quoting *E. Tenn. Nat. Gas Co. v. Sage*, 361 F.3d 808, 826 (4th Cir. 2004)).

<sup>8</sup> ACP Plan at 17.

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 4

**3. Atlantic should not be permitted to engage in new tree-felling within established setbacks around wetlands and waterbodies.**

Atlantic proposes to engage in new tree-felling in segments associated with setbacks around wetlands and waterbodies, in order to move equipment between work areas where tree-felling has already occurred. These riparian buffers, acknowledged in the Clean Water Act Section 401 certifications issued by both Virginia<sup>9</sup> and North Carolina,<sup>10</sup> protect waters from the impacts of nearby land use. We see no compelling reason why waters currently protected from tree-felling should no longer receive that protection under Atlantic's plan. The Commission should require Atlantic to continue to comply with such setbacks and to develop an alternative to tree-felling in these areas that continues to protect the identified wetlands and waterbodies.

**4. Atlantic should be required to treat non-native invasive species on national forest lands to halt their spread.**

In its site assessment and recovery recommendations for project areas in the Monongahela and George Washington and Jefferson National Forests (Appendix I to the ACP Plan), the U.S. Forest Service reports that "the following non-native invasive species were found [within the project right-of-way]: autumn olive, mullein, Queen Anne's lace and thistle,"<sup>11</sup> and that these observed invasive species were "limited in occurrence."<sup>12</sup> Yet the Forest Service recommends no treatment of such invasive species, claiming that treatment "would have potential to cause more harm to the recovery of native vegetation" and that non-natives would likely be outcompeted by native vegetation.<sup>13</sup>

Considering that the infestation of invasive species is limited, the Forest Service and the Commission should require Atlantic to treat any areas infested with non-native species. Atlantic's Invasive Plant Species Management Plan identifies hand application of herbicides as an effective means of reducing the size of invasive plant species

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<sup>9</sup> Va. Dep't of Env'tl. Quality, Section 401 Water Quality Certification No. 17-002 (Dec. 20, 2017), <https://bit.ly/2YAe7Rn>.

<sup>10</sup> N.C. Dep't of Env'tl. Quality, Section 401 Water Quality Certification #WQC004162 (Jan. 26, 2018), <https://bit.ly/3j6gW6h>.

<sup>11</sup> ACP Plan App. I, at 10.

<sup>12</sup> *Id.* at 22.

<sup>13</sup> *Id.* at 22–23.

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 5

problems,<sup>14</sup> and the Forest Service routinely treats non-native invasive species through hand application of herbicides to avoid impacts to adjacent native species. We see no reason that Atlantic should not be required to do so here. The currently “limited” infestation should be easy to target; otherwise, once these species get a toehold in the area, it will become increasingly difficult to halt their spread.

**5. Atlantic should honor its commitment to reseed the high-potential zone and dispersal zone for rusty-patched bumble bee with pollinator-friendly plant species.**

The rusty-patched bumble bee (“RPBB”) is an endangered species “so imperiled that every remaining population is important for the continued existence of the species.”<sup>15</sup> Since 2017, federal, state, and private surveyors have documented multiple occurrences of RPBB in the ACP’s proposed path along the Virginia-West Virginia border.<sup>16</sup>

Throughout the planning and construction of the ACP, Atlantic committed to reseed all construction right-of-way and workspace areas within the high-potential zone and dispersal zone for RPBB with pollinator-friendly plant species, including species believed to be preferred by RPBB.<sup>17</sup> The U.S. Fish and Wildlife Service (“FWS”) made the use of pollinator-friendly plant species an express condition of the Biological Opinion and Incidental Take Statement for the ACP.<sup>18</sup> Now, however, Atlantic is proposing to

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<sup>14</sup> Letter from Matthew R. Bley, DETI, to Kimberly D. Bose, FERC, at 1–2 & Encl. (“Invasive Plant Species Management Plan”) at 6–7, 9–10, 11–12 & Attach. A, Dkt. Nos. CP15-554 et al. (July 12, 2018) (eLibrary No. 20180712-5138).

<sup>15</sup> FWS, Survey Protocols for the Rusty Patched Bumble Bee at 1 (Apr. 12, 2019), <https://bit.ly/2Ajffji>.

<sup>16</sup> See *Rusty Patched Bumble Bee Map*, U.S. Fish & Wildlife Serv. (“FWS”), <https://bit.ly/2TJsil2> (last visited Feb. 5, 2021) (providing shapefiles documenting specimen detections).

<sup>17</sup> ACP Plan App. H (citing, *inter alia*, Letter from Richard B. Gangle, Dominion Energy, to Troy Andersen, FWS, at 1 (Sept. 15, 2017)); Letter from Angela M. Woolard, Dominion Transmission, Inc., to Kimberly D. Bose, FERC, App. D (Updated Draft Biological Assessment) at 18, 44, 232, Dkt. Nos. CP15-554 et al. (Jan. 27, 2017) (eLibrary Nos. 20170127-5202 and 20170127-5203).

<sup>18</sup> FWS, Biological Opinion and Incidental Take Statement for ACP and Supply Header Projects at 56, Dkt. Nos. CP15-554 et al. (Oct. 16, 2017) (eLibrary No. 20171103-3008); FWS, Revised Biological Opinion and Incidental Take Statement for ACP and Supply Header Projects at 82, Dkt. Nos. CP15-554 et al. (Sept. 11, 2018) (eLibrary No. 20180917-3001).

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 6

abandon this commitment, without any explanation.<sup>19</sup> Using pollinator-friendly plant species is a simple restoration measure that could have a meaningful impact on the survival of the endangered RPBB. The Commission should ensure that Atlantic honors its prior commitment.

**6. Atlantic should quantify and offset freshwater-mussel impacts from tree-felling and other disturbances by providing funding to regional hatcheries for mussel propagation and release.**

Freshwater mussels represent a highly imperiled class of organisms that are sensitive to water-quality disturbances such as sedimentation and erosion.<sup>20</sup> Sedimentation and erosion can cause mortality, inhibit reproduction, or cause sublethal effects,<sup>21</sup> as described in the biological assessment prepared for another pipeline project in the region.<sup>22</sup> Further, impacts to filter-feeding mussels deplete ecosystem services, with consequent negative impacts for downstream waterbodies. Specifically, mussels have the capacity to sequester suspended solids or nutrients and enhance denitrification. Mussels also serve as habitat and food source for other organisms.<sup>23</sup>

Atlantic's tree-felling and resulting erosion and sedimentation occurred in systems that are potential habitat to endangered mussels including James River spinymussel, Atlantic pigtoe, dwarf wedgemussel, and yellow lance. These waters are also habitat to numerous other common freshwater mussels such as *Eastern elliptio* that are considered generally ubiquitous across freshwater ecosystems. In addition, Atlantic's refusal to reroute the ACP to avoid a population of clubshell mussels in Hackers Creek, West Virginia, led to extensive damage to one of the last remaining populations of this

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<sup>19</sup> ACP Plan App. H.

<sup>20</sup> Siu Gin Cheung et al., *Size Effects of Suspended Particles on Gill Damage in Green-Lipped Mussel Perna Viridis*, 51 Marine Pollution Bull. 801 (2005), <https://doi.org/10.1016/j.marpolbul.2005.02.019>.

<sup>21</sup> Sean B. Buczek et al., *Effects of Turbidity, Sediment, and Polyacrylamide on Native Freshwater Mussels*, 54 JAWRA J. of Am. Water Resources Ass'n 631 (2018), <https://doi.org/10.1111/1752-1688.12639>.

<sup>22</sup> Biological Assessment for Mountain Valley Pipeline § 4.1.3.1, Dkt. No. 16-10-000 (July 7, 2017) (eLibrary No. 20170707-4008), [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd565174.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd565174.pdf).

<sup>23</sup> Caryn C. Vaughn, *Ecosystem Services Provided by Freshwater Mussels*, 810 Hydrobiologia 15 (2018), <https://doi.org/10.1007/s10750-017-3139-x>.

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 7

endangered species. Atlantic's attempt to salvage and relocate the population during construction backfired; nearly every clubshell that was moved died while in captivity.<sup>24</sup>

The Commission should ensure that Atlantic, in conjunction with FWS, quantifies and mitigates impacts to freshwater mussels through propagation and augmentation of mussel populations in impacted areas, just as other restoration plans have required.<sup>25</sup> Restored mussel assemblage would help mitigate impacts to vital aquatic ecosystem functions such as nutrient retention that have been caused by the ACP's construction.

**7. Atlantic should fulfill its specific commitments regarding treatment of historic and cultural resources affected by ACP construction.**

Appendix E to the ACP Plan identifies certain activities related to cultural and archaeological resources that Atlantic plans to complete. In addition to these general plans, it is critical that Atlantic uphold the specific commitments it made in its July 3, 2018 response<sup>26</sup> to an information request from Commission staff, in which Atlantic detailed how it would carry out its treatment plan for historic rock walls in Augusta County, Virginia.<sup>27</sup> Among those commitments, Atlantic pledged to notify and provide access to the Augusta County Historical Society ("ACHS") during the reconstruction of rock walls that Atlantic had dismantled; to consult with the ACHS on Atlantic's public education measures; and to provide the ACHS with a popular report on this historic resource so that the report may be preserved in the ACHS archives.<sup>28</sup> The ACP Plan makes no reference to the specific commitments set forth in Atlantic's July 3, 2018

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<sup>24</sup> FWS, Clubshell (*Pleurobema Clava*) 5-Year Review 10 (2019), [https://www.fws.gov/northeast/pafo/pdf/20190828\\_Clubshell%205YR\\_signed.pdf](https://www.fws.gov/northeast/pafo/pdf/20190828_Clubshell%205YR_signed.pdf).

<sup>25</sup> See, e.g., FWS et al., Restoration Plan & Env'tl. Assessment for DuPont Waynesboro-South River/South Fork Shenandoah River/Shenandoah River Site § 5.3.2 (Mar. 2017), [https://www.fws.gov/northeast/virginiafield/pdf/contaminants/dupont\\_waynesboro/20170414\\_DuPont\\_Waynesboro\\_RPEA\\_FINAL\\_signatures.pdf](https://www.fws.gov/northeast/virginiafield/pdf/contaminants/dupont_waynesboro/20170414_DuPont_Waynesboro_RPEA_FINAL_signatures.pdf).

<sup>26</sup> Letter from Matthew R. Bley, DETI, to Kimberly D. Bose, FERC, Attach. (Response to Environmental Information Request Dated June 28, 2018), Dkt. Nos. CP15-554 et al. (July 3, 2018) (eLibrary No. 20180703-5160) ("Response to June 2018 Information Request").

<sup>27</sup> See Letter from Angela M. Woolard, DETI, to Kimberly D. Bose, FERC, App. B (Treatment Plan for Historic Resource Potentially Eligible for the National Register of Historic Places: Rock Walls and Rock Features (007-5765)), Dkt. Nos. CP15-554 et al. (May 1, 2018) (eLibrary No. 20180502-5019).

<sup>28</sup> Response to June 2018 Information Request.

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 8

response, but the Commission should ensure that Atlantic fulfills all of its prior commitments regarding treatment of historic and cultural resources.

**8. Atlantic should remain responsible for all restoration work until it is determined that such restoration has been successful.**

According to its proposed project schedule, Atlantic expects to complete all cleanup and restoration by December 2022 and all monitoring and maintenance by November 2023.<sup>29</sup> Elsewhere in the ACP Plan, Atlantic reports that it “will comply with the maintenance provisions and timelines in the *Upland Erosion Control, Revegetation & Maintenance Plan* and *Wetland and Waterbody Construction and Mitigation Procedures* (*‘Plans and Procedures’*) which extend to approximately 3 years following construction”—specifically, “two years of monitoring and maintenance in upland areas following construction and a minimum of three years of monitoring in wetland areas following construction.”<sup>30</sup> But Atlantic’s monitoring and maintenance obligations will necessarily extend more than three years following construction (i.e., beyond December 2021), as actual project construction ceased in December 2018 upon the court-imposed stay of the ACP’s Biological Opinion.<sup>31</sup>

Aside from these potentially conflicting timelines, the ACP Plan does not clearly commit that Atlantic will remain responsible for all restoration work until it is determined that such restoration has been successful. The Commission should ensure that Atlantic retains this responsibility for as long as it takes to achieve successful restoration of the ACP’s footprint.

**9. Eastern GTS still has not demonstrated good cause to extend the deadline for completion of the Supply Header Project.**

In July 2020, DETI (now Eastern GTS) formally requested that the Commission extend the deadline for constructing the Supply Header Project and placing it into service—without demonstrating the required good cause for the extension.<sup>32</sup> The extension request came while DETI was admittedly still considering whether it would

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<sup>29</sup> ACP Plan App. A.

<sup>30</sup> ACP Plan at 4.

<sup>31</sup> Letter from Matthew R. Bley, DETI, to Kimberly D. Bose, FERC, Dkt. Nos. CP15-554 et al. (Dec. 11, 2018) (eLibrary No. 20181211-5109).

<sup>32</sup> Letter from Matthew R. Bley, DETI, to Kimberly D. Bose, FERC, Dkt. Nos. CP15-554 et al. (July 10, 2020) (eLibrary No. 20200710-5088); *see Constitution Pipeline Co.*, 165 FERC ¶ 61,081, at ¶ 9 (2018) (applying good-cause standard).

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 9

even complete or use the Supply Header Project; DETI reported that it was “evaluating options for use of some or all of the” project.<sup>33</sup> To our knowledge, the Commission has never granted an extension request while an applicant considered whether or not to complete or use the proposed project. Rather, where the applicant cannot demonstrate that the project will actually be constructed and placed into service, the Commission has held that it must consider the impacts “imposed by a project that remains authorized but unbuilt” and “weigh those potential impacts against the prospects for the project ever being completed.”<sup>34</sup>

For good reason, then, the information request by Commission staff specified that the “plan that addresses all contemplated disposition and restoration activities for ... the Supply Header Project ... include, at a minimum,” the “[i]dentification of all [Supply Header Project] components that DETI plans to place into service, and how those facilities would integrate with DETI’s system.”<sup>35</sup> Yet nowhere in its SHP Plan has Eastern GTS provided the requested information. Instead, Eastern GTS offers a single paragraph that repeats what it reported in July 2020: Eastern GTS “is currently evaluating options for use of some or all of the [Supply Header Project].”<sup>36</sup> Eastern GTS’s response fails to establish good cause—or, really, any cause—to extend the deadline for completion of the Supply Header Project. Consequently, and for the additional reasons set forth in our August 2020 Comments,<sup>37</sup> the Commission should deny Eastern GTS’s extension request.

\* \* \*

As described in this letter, the ACP Plan and SHP Plan fall short of Atlantic and Eastern GTS’s responsibility to respect the interests of affected landowners and to fully restore the land and resources disturbed by their abandoned project. For the reasons set forth herein and in our August 2020 Comments, the Commission should (1) approve a limited extension of the ACP’s construction deadline only upon ensuring that Atlantic addresses the ACP Plan’s shortcomings described in this letter; and (2) deny Eastern GTS’s request for a two-year extension of time to construct the Supply Header Project and place it into service.

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<sup>33</sup> *Id.*

<sup>34</sup> *Chestnut Ridge Storage LLC*, 139 FERC ¶ 61,149, at ¶ 16 (2012).

<sup>35</sup> October 2020 Information Request Encl. ¶ 3.

<sup>36</sup> SHP Plan tbl. (“Key to Location(s) of Information in the Plan”), at 1.

<sup>37</sup> August 2020 Comments at 7–11.

Kimberly D. Bose, Secretary  
February 9, 2021  
Page 10

Sincerely,

/s/ Gregory Buppert

Gregory Buppert  
Mark Sabath  
SOUTHERN ENVIRONMENTAL LAW CENTER

*On behalf of Alliance for the Shenandoah Valley, Cowpasture River Preservation Association, Friends of Buckingham, Friends of Nelson, Highlanders for Responsible Development, Piedmont Environmental Council, Shenandoah Valley Battlefields Foundation, Virginia Wilderness Committee, Sound Rivers, Inc., and Winyah Rivers Foundation*

/s/ Benjamin A. Lockett

Benjamin A. Lockett  
APPALACHIAN MOUNTAIN ADVOCATES

*On behalf of Appalachian Voices, Chesapeake Climate Action Network, Sierra Club, and Wild Virginia, Inc.*

/s/ Jon A. Mueller

Jon A. Mueller  
CHESAPEAKE BAY FOUNDATION, INC.

*On behalf of Chesapeake Bay Foundation, Inc.*

cc (via email):

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated: February 9, 2021

/s/ Gregory Buppert

Gregory Buppert

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Document Content(s)

ASV et al. Comments on ACP Restoration Plans 2-9-21.PDF.....1