



April 15, 2021

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

Re: Restoration Plan for the Atlantic Coast Pipeline, Docket CP15-554-009

Dear Ms. Bose:

I submit the following comments about the proposed Restoration Plan for the now cancelled Atlantic Coast Pipeline (ACP) on behalf of the members of our coalition, many of whom are filing their own comments. The Allegheny-Blue Ridge Alliance is a coalition of conservation organizations in Virginia and West Virginia concerned about promoting and protecting the integrity of the Central Appalachian Highlands region, through which the ACP route traversed.

On February 9, 2021, the Southern Environmental Law Center, a member of ABRA, filed comments with the FERC docket on behalf of several members of our coalition. I underscore the major points that were made in that filing:

1. Atlantic should release easements upon request from private landowners or open-space easement holders. 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. On this point, we strongly agree with the comments filed with you on April 14 by the Nelson County (VA) Board of Supervisors (emphasis added):

It is inevitable that the county tax assessments on these properties will be reduced due to the limitations that the easements put upon the landowner's properties, costing a loss of county tax revenue on these properties. The impacted landowners who had their properties taken by eminent domain should "be made whole" in the process, for a pipeline that will not be built. FERC, having authorized this process and its consequences, bears the responsibility of creating a process whereby landowners can have their previous property rights fully restored as well as ecological restoration or full reimbursement of the economic costs of physical ecological restoration.

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. The ACP Plan reports that Atlantic has contacted specific landowners to discuss whether felled trees will be cleared or left in place.⁸ But it is unclear whether Atlantic intends to contact all landowners with felled trees on their property.
3. Atlantic should not be permitted to engage in new tree-felling within established setbacks around wetlands and waterbodies.
4. Atlantic should be required to treat non-native invasive species on national forest lands 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.
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.
7. Atlantic should fulfill its specific commitments regarding treatment of historic and cultural resources affected by ACP construction.
8. Atlantic should remain responsible for all restoration work until it is determined that such restoration has been successful.
9. Eastern GTS still has not demonstrated good cause to extend the deadline for completion of the Supply Header Project.

Sincerely,

A handwritten signature in black ink that reads "Lewis Freeman". The signature is written in a cursive, flowing style.

Lewis Freeman
Executive Director