The Nature Conservancy in Virginia 490 Westfield Road Charlottesville, VA 23413 tel (434) 295-6106 nature.org

December 18, 2015

Mr. Norman Bey, Secretary Federal Energy Regulatory Commission 888 First Street NE Washington, DC 20426

**RE:** Docket Nos. CP15-554-000 and CP15-555-000 December 4, 2015 Environmental Information Request for the Atlantic Coast Pipeline and Supply Header Project.

Dear Mr. Bey:

The Nature Conservancy (TNC) is responding to the Environmental Information Request for Atlantic Coast Pipeline (ACP) and Supply Header Project (SHP) filed by FERC on December 4, 2015.

Through its numerous revisions of the pipeline route, Atlantic Coast Pipeline, LLC (Atlantic) and Dominion Transmission, Inc. (DTI) have greatly reduced the extent to which the preferred alternative intersects with preserves, [conservation] easements and Critical Habitats for Conservation. This is consistent with a request included in TNC's April 28, 2015 comments on the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for this project that "the recommended alternative for the Atlantic Coast Pipeline avoid all preserves, easements and Critical Habitats for conservation." We are grateful for the substantial effort Atlantic and DTI have demonstrated thus far toward fulfilling this request.

In our scoping comments TNC also requested – as we have in numerous conversations with the applicant – that Atlantic "propose a constructible alternative that avoids Cheat Mountain." We further requested that "impacts to public lands [be] evaluated according to the consistency of the introduction of linear infrastructure with management area objectives and desired conditions stated within the area's resource management plan." We included this same request in the EIS scoping comments we submitted on June 16, 2015 regarding the Mountain Valley Pipeline Project (FERC Docket No. CP16-10-000).

TNC strongly supports the statement by FERC in request 154 that it "will not be able to consider construction and operation of any proposed action or alternative unless it complies with the National Forest's [Land and Resource Management Plan] LRMP or Atlantic has documented that the USFS would amend a respective LRMP for activities deemed inconsistent with the LRMP."

TNC further appreciates the specificity with which FERC has indicated areas within the Monongahela and George Washington National Forests that should be avoided in the

refinement and assessment of alternatives MNF5 and the Conceptual Southern Alternative. This approach recognizes that there exist certain irreplaceable resources for which impacts cannot be offset, and therefore must be avoided entirely. TNC has consistently advocated for the identification and avoidance of areas that support such resources as early as possible in project planning. We thank FERC for recognizing the importance of indicating areas to which impacts should be avoided.

TNC again thanks FERC for its detailed review of the application submitted by Atlantic and DTI, and for the proactive efforts it is making to ensure that the assessment of environmental impacts associated with the ACP and SHP is accurate and thorough.

Sincerely,

Michael J. Jup

Michael L. Lipford

Virginia State Director and

Thomas Minney West Virginia State Director Katherine Skinner North Carolina State Director

Mid-Atlantic Lead State Director

Cc: Pam Faggert, Vice President & Chief Environmental Officer, Dominion Resources Clyde Thomson, Forest Supervisor, Monongahela National Forest Joby P. Timm, Acting Forest Supervisor, George Washington & Jefferson National Forests Michelle B. Lakly, Eastern US Division Director, The Nature Conservancy Nels C. Johnson, N. American Energy by Design Project Director, The Nature Conservancy