

Summary of Major Environmental Deficiencies in ACP's Restoration Plan

(Submit comments to FERC Docket # **CP15-554-009**)

Protect Waterbodies.

Atlantic's plan proposes new tree-felling to facilitate moving equipment in areas around wetlands and other water bodies. These riparian buffers protect waterbodies from erosion and sedimentation, and they are now protected under section 401 of the Clean Water Act in the Virginia and North Carolina certificates for the ACP. **FERC should direct Atlantic to find alternatives to tree removal.**

Control Invasive Plant Species.

Four invasive plant species (autumn olive, mullein, Queen Anne's lace, thistle) were found in limited occurrence in the national forests the pipeline would have crossed. The Forest Service has recommended no treatment, claiming that treatment could damage native vegetation and that native species would outcompete the invasive species. **To keep the "limited" infestations from becoming established, FERC should require Atlantic to treat invasive plants through *hand application* of herbicides.**

Help Endangered Rusty-Patched Bumble Bee.

Prior to abandoning plans for the pipeline, Atlantic had committed to re-seed all disturbed land with pollinator-friendly plant species. Now, Atlantic is proposing to abandon this commitment, without explanation. **FERC should require Atlantic to honor its long-standing commitment to restore lands in a manner that supports pollinators.**

Help Endangered Freshwater Mussels.

The potential habitat of four endangered mussels (James River spiny mussel, Atlantic pig toe, dwarf wedge mussel, and yellow lance) was damaged by Atlantic's tree-felling and the resulting erosion and sedimentation. Mussels are filter-feeders, and they benefit the aquatic ecosystem by removing suspended solids and damaging nutrients, as well as serving as habitat and food sources for other organisms. **FERC, along with Fish and Wildlife Service, should require Atlantic to propagate and augment mussel populations in areas impacted by tree-felling, in order to restore the ecosystem benefits they provide.**