



June 2, 2016

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A,  
Washington, DC 20426

**Re: Atlantic Coast Pipeline Scoping: Docket No. CP15-554**

Dear Secretary Bose:

Please accept this letter on behalf of The Wilderness Society as comment on scoping for the Atlantic Coast Pipeline route. Alteration of the original route was certainly warranted since this route would have impacted habitat for rare species. However, this should have been a cautionary warning that such routes through the Appalachian Mountains are fraught with the potential for conservation and environmental impacts. This failed initial route proposal should have been a wakeup call that any pipeline through the mountains warrants a careful and considered examination of the overall demand for all proposed gas pipelines, the real needs, the expected lifecycle of pipelines to meet any needs, and the impacts to critical conservation lands and resources in the region from all proposed pipelines.

The several pipelines proposed for the region pose a major threat to the conservation, environmental, and cultural values of the region that cannot be adequately addressed in separate planning processes that do not put the demands, needs, and impacts into an overall context that can be assessed and balanced. To adequately address these threats a programmatic EIS is essential that examines energy supply from renewable sources as well as gas production, the current capacity as well as anticipated need, and the tradeoffs between any

economic and energy benefits with inevitable impacts to conservation, environmental, and cultural values.

The current route, while avoiding some of the rare species habitat identified by the Forest Service, would still impact critical conservation lands on Monongahela and George Washington National Forests, would fragment the landscape disrupting habitat and movement corridors for numerous wildlife species, would open the way for establishment of non-native invasive species, and would threaten water supplies and clean water. The pipeline would travel through karst topography which poses its own unique risks and impacts. And the current approach fails to examine the demand, need, and life of the pipeline in the context of other proposed pipelines.

Even more concerning, the route selection process appears to have only taken a cursory approach to minimizing conservation and environmental impacts. There are tools to minimize conservation impacts of energy corridors. The US Department of Energy funded the development of the Energy Zones Mapping Tool and an associated study. This tool is specifically tailored to allow flexible modeling of energy and corridor siting factors such as slope and land protections. The tool and background material can be found here:

<http://ezmt.anl.gov/>

Below is some of the background material on the tool and its development from the website:

The main purpose of the Eastern Interconnection States Planning Council (EISPC) Energy Zones Study was to develop a methodology and a comprehensive mapping tool that would enable EISPC members and other stakeholders to identify areas within the U.S. portion of the Eastern Interconnection that are suitable for the development of clean (low- or no-carbon) power generation. The product of this study, the comprehensive web-based decision support system, was the EISPC Energy Zones Mapping Tool.

In addition to enabling EISPC members and other stakeholders to identify areas with a high concentration of clean energy resources that could provide significant power generation in the future, another objective of the Study was to promote open and transparent collaboration among state-level energy planning and regulatory agencies and to foster consistent and coordinated direction for regional and interconnection-level electricity analyses and planning.

The Energy Zones Study final report, [Energy Zones Study - A Comprehensive Web-Based Mapping Tool to Identify and Analyze Clean Energy Zones in the Eastern Interconnection](#) provides detailed information about the study and the EISPC Energy Zones Mapping Tool.

The Energy Zones Study was led by the EISPC Energy Zones Workgroup in collaboration with three U.S. Department of Energy (DOE) National Laboratories. The multi-laboratory effort was led by Argonne National Laboratory (Argonne) in collaboration with the National Renewable Energy Laboratory (NREL) and Oak Ridge National Laboratory (ORNL).

The project team also worked closely with the Clean Energy States Alliance (CESA) to implement its energy policy and regulations database into the Energy Zones Mapping Tool, as well as with Navigant Consulting to incorporate their contributions related to demand-side resources.

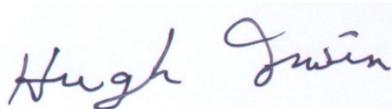
In addition, numerous environmental and non-governmental organizations, including The Conservation Fund, NatureServe, National Audubon Society, The Wilderness Society, and many others, played an active role in the Energy Zones Study. Many of these organizations provided valuable environmental information for the Study.

Perhaps the EISPC resources and mapping tool have been used in route selection for the ACP. However, we have seen no evidence that it has been used. Also being familiar with the mapping tool and the mapping layers available in the tool, the route chosen would seem an odd choice for one making use of the many conservation layers available in the mapping tool.

At the very least, the tool, data, and resources available through the EISPC should be utilized in route design for the ACP. However, this would still fail to comprehensively examine the pipeline in the context of regional needs and impacts. Instead a programmatic EIS should be conducted of overall demand, needs, impacts and possible routes utilizing the EISPC tool, data, and resources.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink that reads "Hugh Irwin". The signature is written in a cursive style and is centered on a light blue rectangular background.

Hugh Irwin,  
Landscape Conservation Planner  
The Wilderness Society  
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828-357-5187

Document Content(s)

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