



April 7, 2016

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

RE: **Atlantic Coast Pipeline, LLC**
Atlantic Coast Pipeline
Docket No. CP15-554-001

Dear Secretary Bose:

The Virginia Outdoors Foundation (VOF), a body politic created by Act of the Virginia General Assembly in 1966 was established to *“to promote the preservation of open-space lands and to encourage private gifts of money, securities, land or other property to preserve the natural, scenic, historic, scientific, open-space and recreational areas of the Commonwealth.”* VOF is Virginia’s leader in land conservation currently holding over 3,700 open-space easements on nearly 800,000 acres throughout the Commonwealth. VOF has been working with representatives of the Atlantic Coast Pipeline for many months and has provided detailed information on protected open space properties that might be impacted by the pipeline route.

The most recent route changes, specifically the route segment referred to as GWNF-6, proposed by ACP to avoid Forest Service lands and certain wildlife species has resulted in significant potential impacts to VOF open-space lands. This route change would result in the pipeline crossing 9 protected open-space easements in Highland, Bath and Augusta Counties. The pipeline also crosses an additional open space easement in Nelson county. These properties include areas of high ecological integrity, high priority conservation area forests, critical karst resources, scenic protected areas, streams designated as supporting trout habitat as well as important historic resources. VOF is extremely concerned about the impacts this project will have on these critical protected resources and has stated its opposition to this new alignment. VOF urges ACP representatives to avoid these open-space easement properties.

To reiterate our position, as stated within the letter to you in April, 2015, VOF holds open-space easements on behalf of the Commonwealth of Virginia under authority of the Open-Space Land Act (Va. Code § 10.1-1700 et seq.) in order to preserve natural, scenic, historic, scientific, open-space and recreation areas. As such, these open-space easements represent the fulfillment of state policy and as real property interests of the Commonwealth, they are not subject to condemnation.

Also, and as stated within our previous correspondence to you, an application for conversion or diversion of open-space land may be required if the pipeline project encroaches on land protected by an open-space easement. The process for conversion or diversion of open-space land is provided for in Va. Code § 10.1-1704, and ACP may be required to apply for conversion or diversion of open-space land depending on the specific purposes and terms of each deed of open space easement as well as other circumstances.

As FERC is specifically tasked with the responsibility to reduce environmental impacts from Natural Gas Projects, it is our hope that full consideration will be given to the importance of these easement properties that provide critical public benefits by protecting in perpetuity lands with significant and extensive conservation values. Please contact me at 804-577-3337 or via email at mlittle@vofonline.org.

Respectfully,



Martha Little
Deputy Director of Stewardship

CC [EMAIL ONLY]:

- Robert Bisha, Director – Environmental Business Support, Dominion Resources Services, Inc.
- Robert P. Hale, Sr. Sr. Manager, Environmental, Dominion Resources Services, Inc.