Mr. Nathaniel Davis, Sr.
Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington DC 20426

Dear Deputy Secretary Davis:

On behalf of Triangle Native American Society (TNAS), please find comments below concerning the Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC) with regards to the Atlantic Coast Pipeline (ACP) in North Carolina.

TNAS North Carolina American Indians have historical and cultural connections to the proposed path of the Atlantic Coast Pipeline project. The proposed project path is expected to transverse the Fall Line of North Carolina and many major rivers and streams, the areas where our ancestors have lived and resided for thousands of years before the first sustained contact with European cultures. Water informs the history of the American Indians of North Carolina at every major juncture and with the land exposes the lost stories of our journeys. Our stories are contained within the artifacts and the environment you encounter building the pipeline, and represent a lost patrimony to Native American people.

The residual impact of an operational pipeline such as that proposed would potentially pose negative impacts on our Cultural Resources, and on the environmental quality of our tribal homelands. The destruction of our cultural heritage and resources would have grave consequences, and we want to be partners in your efforts to protect those resources.

North Carolina tribes, tribal members and tribal governments, along the pipeline path and downstream from pipeline construction have not received adequate consultation and engagement from FERC, the Atlantic Coast Pipeline and other partners involved in the pre-filing and DEIS preparation process for the pipeline project.

The ACP “Plan for the Unanticipated Discovery of Historic Properties or Human Remains during Construction in North Carolina” is inadequate, and does not properly inform or protect the Cultural Resources of the American Indians along the pipeline project.
1 – We request that you fully consult with the North Carolina American Indian tribes affected by the pipeline and include them in any appropriate cultural reports, activities and decisions regarding the pipeline.

2 - We request the inclusion of an Archaeologist, North Carolina cultural consultant at the construction site during the surveying and staking, and at the clearing and grading activities to identify archaeological and historical resources if they are unearthed during construction.

2 – We request to be notified in the event of the discovery of American Indian archaeological sites during the ground disturbing phase of construction.

3 - We request your commitment and active involvement in saving and protecting our cultural patrimony and the stories unearthed by the Atlantic Coast Pipeline.

Sincerely,

Danny Bell
Triangle Native American Society
Wake, Johnston, Orange, Chatham Counties
North Carolina