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January 5, 2018

U.S. Fish and Wildlife Service Division of Environmental Review 5275 Leesburg Pike Falls Church, VA 22041–3803

Re: INGAA Comments on U.S. Fish & Wildlife Service Mitigation Policies, 82 Fed. Reg. 51,382 (Nov. 6, 2017); Docket ID No. FWS-HQ-ES-2015-0126

The Interstate Natural Gas Association of America ("INGAA") respectfully submits these comments in response to the United States Fish & Wildlife Service's ("FWS") request for input on its existing Mitigation Policy and Endangered Species Act Compensatory Mitigation Policy (ESA–CMP). *See* 82 Fed. Reg. 51,382 (Nov. 6, 2017).

INGAA is a non-profit trade association that advocates regulatory and legislative positions of importance to the natural gas pipeline industry in North America. INGAA's member companies transport over 95% of the nation's natural gas through a network of nearly 200,000 miles of pipelines. The interstate pipeline network serves as an indispensable link between natural gas producers and the American homes and businesses that use the fuel for heating, cooking, generating electricity and manufacturing a wide variety of U.S. goods, ranging from plastics to paint to medicines and fertilizer.

INGAA has concerns about FWS's Mitigation Policy and ESA–CMP. INGAA recommends that FWS revise these Mitigation Policies for the reasons identified in the comments filed by AXPC, IPAA, API, Western Energy Alliance, and IADC.

INGAA appreciates your consideration of these comments and welcomes additional dialogue. Please contact me at 202-216-5955 or ssnyder@ingaa.org if you have any questions. Thank you.

Sincerely,

Sandra Y. Snyder

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Regulatory Attorney for Environment & Personnel Safety Interstate Natural Gas Association of America