

Docket #PF15-6
Scoping comments for the Atlantic Coast Pipeline
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According to FERC order 61, 128, FERC approves projects if public benefits outweigh adverse impacts.

Therefore, the EIS scope of work must include a thorough enumeration and evaluation of purported public benefits, justified with empirical data. I realize that FERC's status quo is to take short cuts –defining “benefit” as “need,” and “need” as “Will someone buy the gas?” Such an “analysis” is as valid as justifying drug dealing as beneficial because someone will buy the cocaine. The status quo is not good enough.

FERC's analyses of alternatives in the EIS must include the potential of renewables and increased efficiency to meet the purported needs and goals of the project. Logically, then, the need and benefits must be made clear. Otherwise, there cannot be a valid assessment of alternatives because it cannot be determined whether they would provide the same benefits or not.

Assessing benefits vs. harm requires at a minimum realistic electricity demand projections, and cost projections to consumers for meeting demand using renewables and increased efficiency versus through Dominion's plans.

Current FERC chairperson LaFleur made her bias towards permitting nat. gas infrastructure plain to the National Press club in January. She stated her belief that nat. gas is the only viable way to meet climate goals. Just past Chairperson Wellinghoff, in contrast, said in the Washington Post on March 6, that “Virginians' utility bills will go up if the state chooses not to cut pollution through renewable energy and energy efficiency.” His views, of course, are backed by data.

The EIS is directly responsible for assessing environmental impacts. As such, it must quantify the life cycle green house gasses added to our planet from the ACP's construction and operation including leaking at extraction and transmission, and burning at plants. It should also include emissions from fuel used for liquification and exporting – this necessity again highlights the illogic of ignoring end use and benefits, in any analysis designed to assess harm. Climate impacts ARE quantifiable - many studies in the last year have estimated numbers for green house emissions for natural gas – that's how journals like Nature have concluded recently that EVEN IF THERE WERE NO leaking, increasing natural gas use will not help the climate crisis much, if at all, especially when the gas is not used to replace coal, but rather to expand the market, as Dominion and Duke intend.

My interest in these matters is not academic but visceral. Climate change is personal when you realize the extent of your inter-dependency and you fear for your children. I am also a property owner on the route of the ACP. Its construction and existence through our forest and wetlands irredeemably interferes with my family's goals and values.

Our dreams, like our lives, like every ones', are priceless. FERC's equation of public benefit with contracts makes a mockery of democracy and leaves me enraged as it justifies the theft of my property, of my life, with lies.

The EIS for the ACP must include discussion and analysis of the following documents:

Quantifying climate impacts of natural gas:

Sep 24, 2014, Switching from coal to gas may not cut carbon emissions,
Environmental Research Letters
<http://environmentalresearchweb.org/cws/article/news/58684>

4|NATURE|VOL000|00MONTH2014
Limited impact on decadal-scale climate change from increased use of natural gas,
http://www.eenews.net/assets/2014/10/15/document_ew_01.pdf

Science 14 February 2014:
Vol. 343 no. 6172 pp. 733-735
Methane Leaks from North American Natural Gas Systems,
<http://www.sciencemag.org/content/343/6172/733.summary>

Analyzing viability of solar and renewables:

Wellinghoff's remarks to the post:
Clean Power is right for Virginia,
http://www.washingtonpost.com/opinions/the-clean-power-plan-makes-sense-for-virginia/2015/03/06/944c6318-a658-11e4-a7c2-03d37af98440_story.html

PJM's analysis showing financial viability of using renewables and efficiency to meet CPP goals:
<http://www.pjm.com/~media/documents/reports/20150302-pjm-interconnection-economic-analysis-of-the-epa-clean-power-plan-proposal.ashx>

http://www.washingtonpost.com/national/health-science/utilities-sensing-threat-put-squeeze-on-booming-solar-roof-industry/2015/03/07/2d916f88-c1c9-11e4-ad5c-3b8ce89f1b89_story.html?hpid=z1

[http://www.nbad.com/content/dam/NBAD/documents/Business/FOE Full Report .pdf](http://www.nbad.com/content/dam/NBAD/documents/Business/FOE%20Full%20Report.pdf)

<http://www.bloomberg.com/news/articles/2015-02-12/tesla-planning-battery-for-emerging-home-energy-storage-market>

Analyzing need and public harm (cost to consumers) in NC:

<http://www.ncwarn.org/wp-content/uploads/ResponsibleEnergyFuture-3-3-15.pdf>

<http://www.ncwarn.org/wp-content/uploads/2013/03/Responsible-Energy-Future.pdf>