

# Citizen Input Regarding the Proposed Atlantic Coast Pipeline

Analysis of Scoping Comments to the  
Federal Energy Regulatory Commission

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*Friends of Nelson County  
Augusta County Alliance  
Conservation Partners, LLP  
Southern Environmental Law Center  
Yogaville Environmental Solutions  
Friends of Buckingham, Virginia  
Chesapeake Climate Action Network*

*Prepared by:*  
Cara Bottorff  
Spencer Phillips, PhD



*Research and strategy for the land community.*

[keylogeconomics.com](http://keylogeconomics.com)

## Authors' Note

We are grateful to have had the opportunity to conduct this independent analysis for Friends of Nelson County, Augusta County Alliance, Conservation Partners LLC, Southern Environmental Law Center, Yogaville Environmental Solutions, Friends of Buckingham Virginia, and Chesapeake Climate Action Network. We owe a special thanks to scores of volunteers who gave their time reviewing comment letters. Without their effort this review would not have been possible. We also thank our wonderful summer interns, Cassidy Pillow and Peter Fafara, who helped with the quality assurance process, reviewed many comment letters themselves, and otherwise supported the project.

Key-Log Economics remains solely responsible for the content of this report, the underlying research methods, and the conclusions we draw from them.

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## Policy Setting

The Atlantic Coast Pipeline (ACP) proposed by Dominion Resources, Inc. and partners would carry natural gas from the Marcellus Shale more than 550 miles to end users and (possibly) export terminals in Tidewater Virginia. It would also carry a variety of adverse environmental and economic effects as it crosses multiple West Virginia, Virginia, and North Carolina counties, two national forests, a national park, and hundreds of private properties. The ACP will likely have a profound impact on the pastoral and scenic landscape of the region and on the many businesses, livelihoods, and quality of life factors that depend on the natural benefits of that landscape.

The Federal Energy Regulatory Commission (FERC) is currently weighing information that bears on its decision on whether to grant a certificate of convenience and public necessity to the ACP's owner/operators. Under the National Environmental Policy Act (NEPA) FERC must consider the environmental effects of its decision. Those effects include impacts on air and water quality, aesthetic value, wildlife, and others, as well as how changes in the physical environment are reflected in effects on people, including through changes in economic well-being.

A key part of any NEPA process is "scoping" or "the scoping period." At that stage any person with an interest in the proposed federal action (in this case the approval or denial of approval for the ACP) has a chance to tell the lead agency (FERC) what concerns them about the proposed action and what they think the lead agency should include in its ensuing environmental review.

During the scoping period for the ACP in 2015, FERC received thousands of individual comments in the form of written letters, entries to FERC's online eComment site, several petitions circulated by groups for or against the proposed pipeline, and verbally at a series of 10 scoping meetings held in communities along the ACP's proposed route. Key-Log Economics, on behalf of several local citizens groups, has completed this independent analysis of the written comments. These comments include excellent information about the economic and other effects that citizens, scientific experts, and various stakeholders expect to see, or are already seeing, as a result of the proposed ACP.

The content of these letters is critically important for two reasons.

- First, the letters provide direct and clear information about the issues of concern to the people and communities through which the pipeline would pass as well as to people who, as visitors, downstream water users, business owners, and others, use and enjoy the directly affected landscape. Combined with our review of existing economic studies and with [our analysis of primary and secondary data on property values, ecosystem service flows, and economic development trends](#), the comment letters help FERC understand the nature and extent of the effects of the proposed pipeline.
- Second, under the National Environmental Policy Act (NEPA), FERC must conduct an Environmental Impact Analysis (EIA), the results of which will be reported in a draft and then final Environmental Impact Statement (DEIS, FEIS). The EIA should cover relevant issues raised in the scoping phase, and this independent review of what citizens have said during scoping will help ensure that FERC's legal obligations to consider the full range of environmental effects of the proposed pipeline are met.

## Methods

The scoping period officially began on February 27, 2015 with FERC's "Notice of Intent" to prepare an EIS<sup>1</sup> and ended on April 28, 2015. However, some comments were submitted either before or after these official dates. We therefore analyzed all comments submitted between October 20, 2014, the earliest date a comment was submitted, and June 26, 2015, which is well past the official end date.

In total, our analysis covers 2,870 different written messages to FERC. The messages are of three types.

1. 1,631 individual or unique comment letters or eComments.
2. 1,227 copies of 21 different form letters.  
There were between 3 and 241 copies of each form letter.
3. 12 petitions with a total of 25,667 signatures.  
Signatures per petition ranged from 60 to 21,840.

See also Figures 1 and 2 under "Results."

To review this volume of communication, we used crowdsourcing – that is, we enlisted the help of a crowd of volunteers to complete the task via the internet. Our crowd consisted of 83 volunteers recruited with help from the sponsoring organizations and through Key-Log Economics's website. These volunteers reviewed at least one comment each, with an average of 18 comments per reviewer.

The reviewers' specific task was to read through the comment letter and log details from the comment using an online form. We developed the online form after reviewing a sample of comment letters so that we could include check-off items for the most common concerns. These concerns included recreation, tourism, agriculture, health, safety, and water quality. The form also included space where volunteers could record commenters' thoughts on items not covered elsewhere on the form. (A copy of the form is included as Appendix B.) For each concern, the form asks whether the commenter views the proposed ACP as likely to have a positive or negative effect.

In addition, we asked our reviewers to rate how strongly positive or negative each commenter felt the effects would be in several overarching areas: Economy; Energy; Environment; and Lifestyle/Quality of Life. The comment reviewer filled out items on the form with information about the issues mentioned by the commenter and what effect (positive or negative) the commenter believes the ACP proposal would have on those issues.

Once the form was set up, our process, in brief, consisted of the following steps:

1. Download all comment letters.
2. Send a batch of three comment letters to each volunteer along with instructions (see Appendix A) and a link to the online form.
3. Monitor the database linked to the online form and send reminders to volunteers who seemed to have missed the initial email.

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<sup>1</sup> Federal Energy Regulatory Commission. "Notice of Intent to Prepare an Environmental Impact Statement for the Planned Supply Header Project and Atlantic Coast Pipeline Project, Request for Comments on Environmental Issues, and Notice of Public Scoping Meetings." *Federal Register* 80, no. 44 (March 6, 2015): 12163–66.

4. Send new batches to volunteers who requested them via a prompt that appeared after submitting previous comments using the online form (see Appendix A).

FERC received comments that varied widely in length, technicality, and the main concerns addressed. They also came from commenters residing or owning property in one of the 31 counties the ACP would cross, from other counties in the three ACP states (West Virginia, Virginia, and North Carolina), and from other states. We were therefore able to stratify the comments according to commenters' location as well as to summarize the various concerns raised.

As noted, we used a sample of comment letters to develop a survey-like online form for use by our volunteers and our own team in their review of each letter or eComment. Based on the sample, we identified dozens of individual factors grouped into four broad categories of economy, energy, environment, and quality-of-life. The environment category, for example, includes forests, plants, wildlife, water supply, erosion, and ecosystem services. For each category, the form asks "Does the commenter mention any of the following environmental factors [for example] that they say will be impacted either positively or negatively if the ACP is built?" For each factor in the category the reviewer would then indicate whether the comment letter writer indicated that the factor would be affected positively or negatively, or that the factor had not been mentioned at all. Some comment letters mentioned many issues while others only mentioned one. (Please see Appendix B for the full form.)

After each category's section, the form included a question of the form "Overall how does the commenter think the ACP will affect the the environment [for example]? Please leave blank if they seem to have no opinion." For comment letters that did indicate an opinion on the category, the reviewer registered the direction and strength of that opinion on a 1-5 Likert scale with 1 being "Extremely Negatively" and 5 being "Extremely Positively."

Additionally, we included 4 free response questions. These questions asked for any additional details about commenters' thoughts on issues covered in the "check-box" part of the form, for reasons for or against the ACP not included in the four pre-identified categories, for references to statistical or other data cited by the commenter, and for any other items not covered elsewhere in the form.

We also included 2 questions about what the comment suggested should happen in the NEPA process and, ultimately, with the ACP. We asked "What does the comment suggest should happen next in the NEPA process (if they suggest anything)?" We provided a list of choices, including "Permit ACP Without NEPA Process," "Extend Scoping Period," and "Assess Alternatives to the ACP" among others. Secondly we asked "What is the desired outcome of the commenter?" Again we provided a set of alternatives ranging from "Pipeline is built on Dominion's proposed route" to "Pipeline is not built." For both of these questions we included an "Other" option with space for the reviewer to provide details. We found that for both of these questions the "Other" option was used quite often, making the responses unsuitable for inclusion in the graphical summaries in the "Results" section.

Finally, we asked the volunteer reviewer to indicate the "demonstrated level of expertise" of the commenter on a 1-5 scale with 1 being "Layperson" and 5 being "Expert." This was obviously a judgement call, but it does offer some indication of the extent to which the scoping process was successful in gathering input from a wide range of stakeholders, and not just policy, environmental, economic, or other experts. The volunteers labeled 60% of the comment letters as having been written by laypersons and just 5% as having come from experts.

One final note is that some comment letters were particularly lengthy and/or technical. We kept those few (96 comments) out of the pool for volunteer review and assigned their review to one of our team members.

## Reviewing the Reviewers

Another important role for our team was to evaluate the volunteers' review of comment letters. To accomplish that, we selected 79 (4.8%) of the comment letters at random and assigned a team member to review those letters from scratch. We then compared the team member's review to that of the volunteer who had previously reviewed the same letter. We found that the reviews by our volunteers and by our team agreed in nearly all cases and nearly all aspects.

For 77% of our sample, our team found either "No Differences" or "Few Minor Differences" compared to the review completed by a volunteer. An example of a "minor difference" would be if the volunteer reviewer had inferred a concern for "forests" from a letter that mentions environmental, habitat, or landscape impacts but where the commenter had not specifically said "forests," *per se*. For an additional 18% of our sample, our team found "Several Minor and/or Few Major Differences," and for the last 5% we found major differences. An example of a major difference would be if the volunteer review indicated that multiple effects of the ACP would be either positive or negative but our team review of the comment letter did not find the same opinion or conclusion regarding *all* of the named effects.

For the reviews where we found major differences between our comment analysis and that of a volunteer, our team pulled all of that volunteer's reviews and examined them for any signs of systematic bias, such as a judgement by the reviewers in question that every comment they reviewed expressed a concern that the pipeline would have either a positive or a negative effect. We found no evidence of such bias, and we are therefore confident that the volunteers' review provided information that is thorough, complete, and reliable as a characterization of commenters' concerns and opinions.

## Results

Based on the information from the comment letters, we can analyze input received via individual or unique comment and from form letters separately from that received via petitions. Second, we can stratify comments according to the commenters' location (or the location of their property) in an ACP-crossed county ("ACP County"), another county in one of the the ACP-crossed states ("Other County, ACP State"), and other states ("Other State") (See Figure 1 and Figure 2).

The results reported here focus on comments that were either individual letters or form letters. While it is true that a signature on a petition does represent the expression of an opinion, the time and effort required suggests a much lower level of engagement with the issue than is required to send a form letter or to compose and send a unique comment. Moreover, for the 12 petitions FERC received during the scoping period, 90% of the signatures were on petitions that came from places outside not only the counties that would be crossed by the ACP, but beyond the borders of the affected states. By contrast, individual and form letters came overwhelmingly from people in one of the three ACP-crossed states. Obviously, the individual views of any petition signer who also sent a comment letter (individual or form) are represented in our reported results below.

Figure 1: Types of Comments, and Locations of Commenters

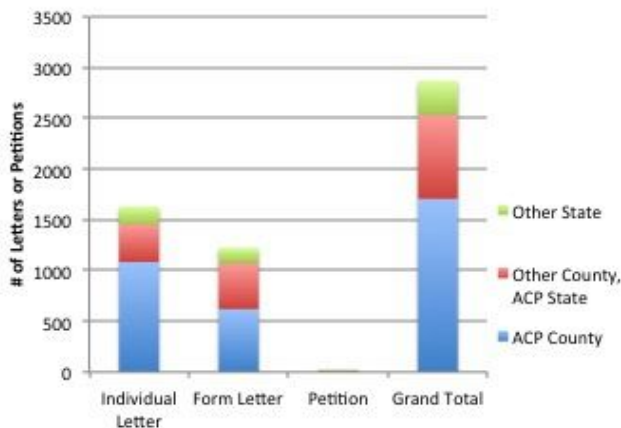
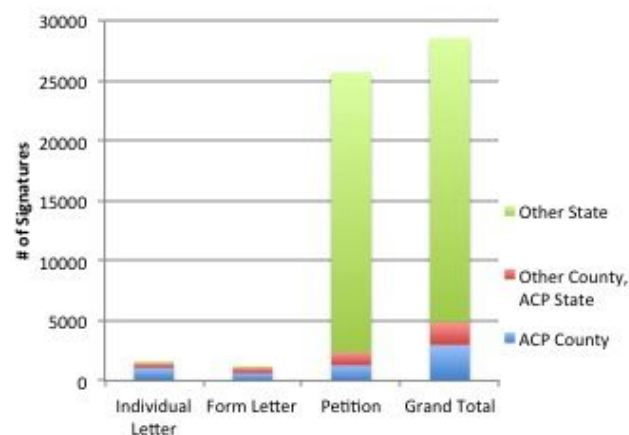


Figure 2: Number of Signatures, Types of Comments, and Locations of Commenters



Note: For petitions, the “# of Signatures” represents the number of signatures on the petition. Each individual letter and each form letter is counted as one signature, however, even though some of those letters were signed by more than one person (a husband and wife, or a pair of business partners, for example).

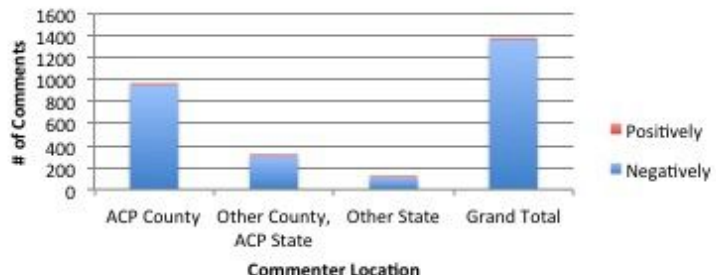
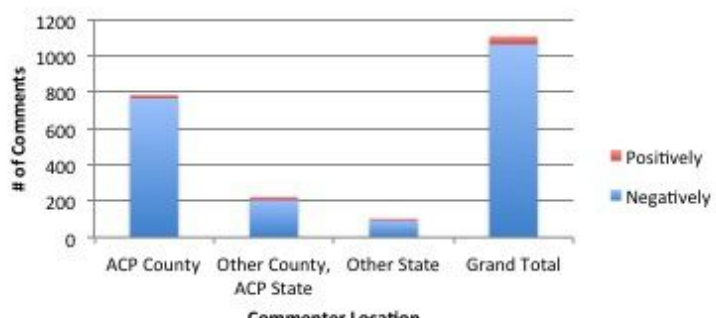
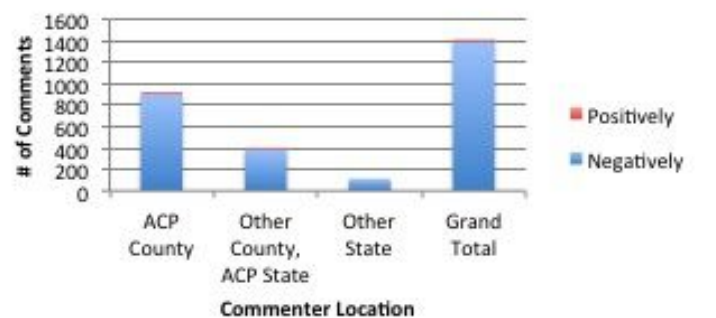
Of the comments received as individual/unique comments or form letters, some 88.5% came from residents of Virginia, West Virginia, or North Carolina. A strong majority (59.7%) of the individual and form letters came from commenters in ACP-crossed counties. Thus, the unique comment letters and form letters represent the concerns of the people most directly affected (for good or for ill in their own estimation) by the proposed pipeline, whereas the petitions tend to indicate the opinions of people with less of a direct stake in the effects of the ACP.

For any given issue, our analysis considers only those comments that mention the issue. Therefore, the base for all percentages of comments expressing a particular view about the effect of the ACP in the issue area (positive or negative) is total number of comment letters that mentioned the issue. We do not, in other words, count comment letters that are silent on the issue in the percentage calculations.

FERC’s Notice of Intent to prepare an Environmental Impact Statement regarding the ACP<sup>1</sup> lists several “Currently Identified Environmental Issues.” Not surprisingly, many commenters addressed these issues directly or indirectly. While the (longer) list of issues included in our survey form does not match FERC’s list exactly, it is possible and useful to group the commenters’ actual concerns according to the closest FERC category. The following charts display the number of (individual or form) letters in which the commenter mentions each FERC-defined issue or a closely related concern as well as whether, in the commenter’s judgement, the ACP would have a positive or negative impact on the issue. Furthermore, each chart provides separate subtotals of the number of comments from residents of, respectively, ACP-crossed counties, other counties in ACP-crossed states, and other or non-ACP-crossed states.

Each chart answers the question “How do citizens believe the ACP would affect the economy” (or “...safety,” “...water,” etc.). As the charts indicate, the vast majority of commenters that mentioned these issues believe there will be negative impacts if the ACP is built. Across the five categories, between 96.1% and 99.4% of the total comments express a concern that the ACP would have a negative impact

on the economy, safety, water, or other critical issues. This concern is greatest among those living in counties that the proposed ACP would cross.

<h3>How Would the ACP Affect the Economy?</h3>  <p>This bar chart displays the number of comments regarding the economic impact of the ACP. The y-axis represents the number of comments, ranging from 0 to 1600 in increments of 200. The x-axis shows four categories: ACP County, Other County, ACP State, Other State, and Grand Total. For each category, there are two bars: a blue bar for 'Negatively' and a red bar for 'Positively'. The 'Grand Total' shows the highest number of comments, with approximately 1400 negative and 100 positive comments. 'ACP County' follows with about 1000 negative and 50 positive comments. 'Other County, ACP State' has around 350 negative and 50 positive comments. 'Other State' has the fewest comments, with about 100 negative and 20 positive comments.</p> <table><tr><th>Commenter Location</th><th>Negatively</th><th>Positively</th></tr><tr><td>ACP County</td><td>~1000</td><td>~50</td></tr><tr><td>Other County, ACP State</td><td>~350</td><td>~50</td></tr><tr><td>Other State</td><td>~100</td><td>~20</td></tr><tr><td>Grand Total</td><td>~1400</td><td>~100</td></tr></table>	Commenter Location	Negatively	Positively	ACP County	~1000	~50	Other County, ACP State	~350	~50	Other State	~100	~20	Grand Total	~1400	~100	<ul style="list-style-type: none"><li>Corresponds to FERC category: "Impacts on property values, tourism, and recreational resources."</li><li>This category matches to our survey's questions about property value, tourism, and recreation.</li><li><b>98.8% mention negative impacts.</b></li></ul>
Commenter Location	Negatively	Positively														
ACP County	~1000	~50														
Other County, ACP State	~350	~50														
Other State	~100	~20														
Grand Total	~1400	~100														
<h3>How Would the ACP Affect Safety?</h3>  <p>This bar chart displays the number of comments regarding the safety impact of the ACP. The y-axis represents the number of comments, ranging from 0 to 1200 in increments of 200. The x-axis shows four categories: ACP County, Other County, ACP State, Other State, and Grand Total. For each category, there are two bars: a blue bar for 'Negatively' and a red bar for 'Positively'. The 'Grand Total' shows the highest number of comments, with approximately 1100 negative and 100 positive comments. 'ACP County' follows with about 800 negative and 50 positive comments. 'Other County, ACP State' has around 250 negative and 50 positive comments. 'Other State' has about 100 negative and 20 positive comments.</p> <table><tr><th>Commenter Location</th><th>Negatively</th><th>Positively</th></tr><tr><td>ACP County</td><td>~800</td><td>~50</td></tr><tr><td>Other County, ACP State</td><td>~250</td><td>~50</td></tr><tr><td>Other State</td><td>~100</td><td>~20</td></tr><tr><td>Grand Total</td><td>~1100</td><td>~100</td></tr></table>	Commenter Location	Negatively	Positively	ACP County	~800	~50	Other County, ACP State	~250	~50	Other State	~100	~20	Grand Total	~1100	~100	<ul style="list-style-type: none"><li>Corresponds to FERC category: "Safety issues, such as construction and operation of the planned facilities near existing residences, schools, businesses, and military training facilities, and in karst and steep slope terrain."</li><li>This category matches to our survey's questions about risk of accidents, personal/family/others' safety, and erosion.</li><li><b>96.1% mention negative impacts.</b></li></ul>
Commenter Location	Negatively	Positively														
ACP County	~800	~50														
Other County, ACP State	~250	~50														
Other State	~100	~20														
Grand Total	~1100	~100														
<h3>How Would the ACP Affect Forests?</h3>  <p>This bar chart displays the number of comments regarding the impact of the ACP on forests. The y-axis represents the number of comments, ranging from 0 to 1600 in increments of 200. The x-axis shows four categories: ACP County, Other County, ACP State, Other State, and Grand Total. For each category, there are two bars: a blue bar for 'Negatively' and a red bar for 'Positively'. The 'Grand Total' shows the highest number of comments, with approximately 1400 negative and 100 positive comments. 'ACP County' follows with about 1000 negative and 50 positive comments. 'Other County, ACP State' has around 400 negative and 50 positive comments. 'Other State' has about 100 negative and 20 positive comments.</p> <table><tr><th>Commenter Location</th><th>Negatively</th><th>Positively</th></tr><tr><td>ACP County</td><td>~1000</td><td>~50</td></tr><tr><td>Other County, ACP State</td><td>~400</td><td>~50</td></tr><tr><td>Other State</td><td>~100</td><td>~20</td></tr><tr><td>Grand Total</td><td>~1400</td><td>~100</td></tr></table>	Commenter Location	Negatively	Positively	ACP County	~1000	~50	Other County, ACP State	~400	~50	Other State	~100	~20	Grand Total	~1400	~100	<ul style="list-style-type: none"><li>Corresponds to FERC category: "Impacts on forested areas and other vegetation."</li><li>This category matches to our survey's questions about forests, plants, and habitat.</li><li><b>99.4% mention negative impacts.</b></li></ul>
Commenter Location	Negatively	Positively														
ACP County	~1000	~50														
Other County, ACP State	~400	~50														
Other State	~100	~20														
Grand Total	~1400	~100														



## How Would the ACP Affect Water?

This bar chart displays the number of comments regarding the potential impact of the Atlantic Coast Pipeline (ACP) on water resources. The y-axis represents the number of comments, ranging from 0 to 1800 in increments of 200. The x-axis shows four categories of commenter location: ACP County, Other County, ACP State, Other State, and Grand Total. For each category, there are two bars: a blue bar for 'Negatively' and a red bar for 'Positively'. The 'Grand Total' shows the highest number of comments, with approximately 1550 negative and 150 positive comments. 'ACP County' follows with about 1050 negative and 100 positive comments. 'Other County, ACP State' has around 450 negative and 40 positive comments. 'Other State' has the fewest comments, with about 150 negative and 10 positive comments.

Commenter Location	Negatively	Positively
ACP County	1050	100
Other County, ACP State	450	40
Other State	150	10
Grand Total	1550	150

- Corresponds to FERC category: "Impacts on surface water resources including rivers, springs, seeps, and wetland; Impacts on groundwater resources and wells."
- This category matches to our survey's questions about waterways, water quality, and water supply.
- 99.0% mention negative impacts.**

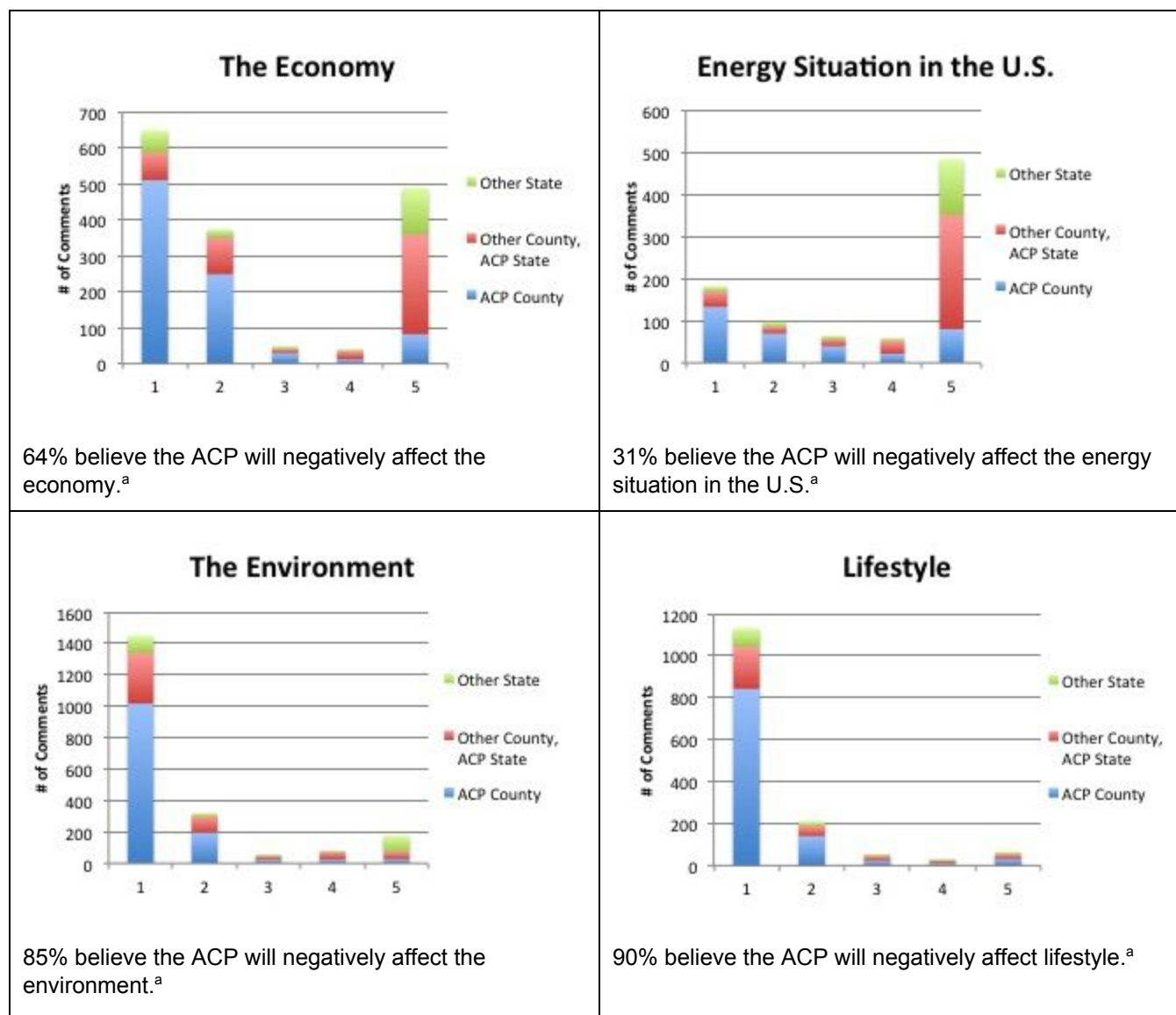
## How Would the ACP Affect Culture?

This bar chart displays the number of comments regarding the potential impact of the Atlantic Coast Pipeline (ACP) on culture. The y-axis represents the number of comments, ranging from 0 to 800 in increments of 100. The x-axis shows four categories of commenter location: ACP County, Other County, ACP State, Other State, and Grand Total. For each category, there are two bars: a blue bar for 'Negatively' and a red bar for 'Positively'. The 'Grand Total' shows the highest number of comments, with approximately 750 negative and 70 positive comments. 'ACP County' follows with about 600 negative and 50 positive comments. 'Other County, ACP State' has around 120 negative and 10 positive comments. 'Other State' has the fewest comments, with about 50 negative and 5 positive comments.

Commenter Location	Negatively	Positively
ACP County	600	50
Other County, ACP State	120	10
Other State	50	5
Grand Total	750	70

- Corresponds to FERC category: "Impacts on cultural resources including battlefields, cemeteries, and historic properties."
- This category matches to our survey's questions about local/rural character and culture.
- 98.9% mention negative impacts.**

The four Likert-scale questions included in the comment review form allow us to gauge the strength of commenters' concern for four overarching issues: effects on the economy; effects on the national energy situation; effects on the environment; and effects on lifestyle/quality of life. For each, the reviewer answered the question "Overall how does the commenter think the ACP will affect the economy [for example]?" by selecting a number on a 1-5 scale, with 1 being "Extremely Negatively" and 5 being "Extremely Positively." For comment letters containing no discernable opinion on the issue, the question was left blank.

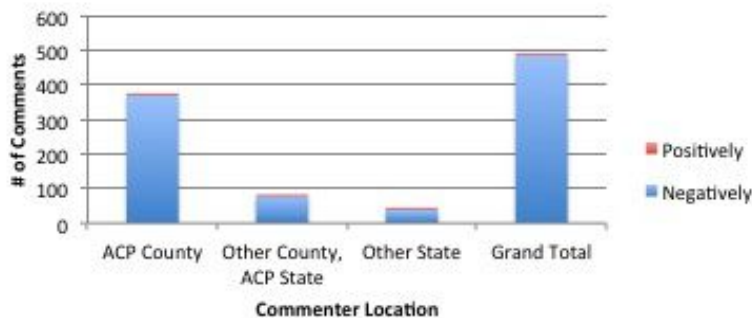


Note: 1 corresponds to “Extremely Negatively”; 5 corresponds to “Extremely Positively.”

a. The percentages that believe the ACP will affect each category negatively are defined as those commenters who ranked the category as either a 1 or 2.

With the exception of the effect on the energy situation in the U.S., the majority of commenters believe the ACP will have a negative effect (1 or 2 on the scale). Of all commenters who mentioned the economy, 64% think the ACP will harm the economy; 85% of those mentioning the environment said the effect will be negative; and 90% of those mentioning lifestyle expect a negative effect. Interestingly, commenters closest to the proposed route (in an ACP-crossed county) are least likely to believe the ACP would help the economy or energy situation. Only 11% of such commenters indicated that the ACP would be good for the economy (a score of 4 or 5), and just 30% thought there would be a benefit to America’s energy situation. Commenters from farther away, meanwhile, seem to recognize that the ACP would be detrimental to people’s quality of life: 81% of those from a non-ACP state said the effect would be negative.

### How Would the ACP Affect Health?

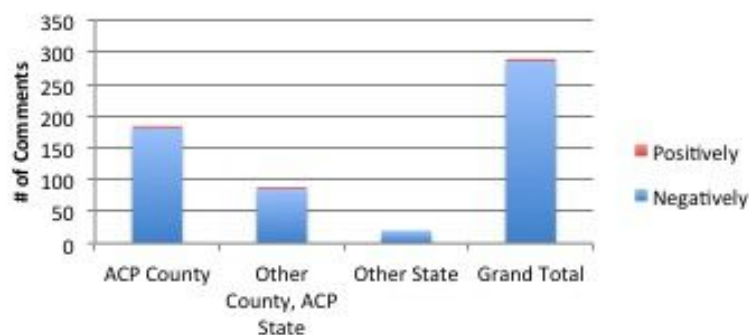


Many comments, 487, also mentioned the issue of health. 99% of these commenters believe the ACP will negatively affect health. Health concerns were wide ranging, but they included concerns about potential leaks from the pipeline and air and noise pollution from the compressor station.

ACP advocates claim that the pipeline will facilitate a shift away from coal in electricity generation and, therefore, a reduction in greenhouse gas emissions.<sup>2</sup>

Citizens commenting on the ACP, however, are rightly dubious of this claim. Of 290 comments that mentioned climate change, 286 voiced the opinion that the ACP would negatively impact climate change.

### How Would the ACP Affect Climate Change?



Science agrees. While burning natural gas (methane) emits less carbon dioxide than coal when it is burned, methane itself is a much more powerful greenhouse gas. According to the US Environmental Protection Agency, just one pound of methane has as much of an impact on climate change as 25 pounds of carbon dioxide (CO<sub>2</sub>).<sup>3</sup> One would therefore have to add the effect of methane emissions at well sites, from gathering lines, from compressor stations, and all along the ACP to the effect of CO<sub>2</sub> emissions at the points

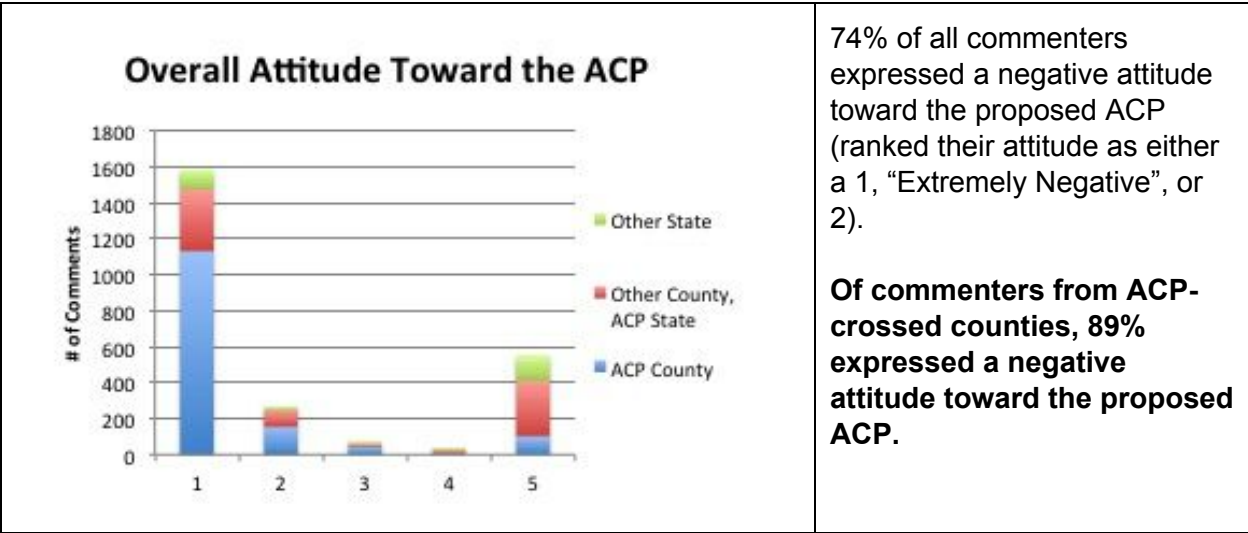
of combustion to have a true picture of the climate implications of switching from coal to natural gas that the ACP is expected to encourage. In a recent study tallying total greenhouse gas emissions, Hall, Penniman, and Bowers found that the ACP and the Mountain Valley Pipeline (MVP) would actually increase greenhouse gas emissions in the region.<sup>4</sup>

<sup>2</sup> See, for example, "Dominion Asks FERC To Begin Environmental Review Of Atlantic Coast Pipeline.", <https://www.dom.com/corporate/news/news-releases/136956>. Such claims focus exclusively on CO<sub>2</sub> emissions at the point of combustion, but it is total emissions of CO<sub>2</sub> equivalent, including emissions of methane from the well to the point of combustion, that matters.

<sup>3</sup> US EPA, Climate Change Division. "Methane Emissions." Overviews & Factsheets. Accessed March 1, 2016. <http://www3.epa.gov/climatechange/ghgemissions/gases/ch4.html>.

<sup>4</sup> Hall, Richard, William Penniman, and Kirk Bowers. 2016. "GHG Emissions Associated with Two Proposed Natural Gas Transmission Lines in Virginia." Virginia Chapter Sierra Club. 17 pp. [http://sierraclub.org/sites/www.sierraclub.org/files/sce/virginia-chapter/documents/GHG%20Emissions%20Associate%20with%20Proposed%20Natural%20Gas%20Transmission%20Lines%20in%20Virginia\\_Final--edit5%20%281%29.pdf](http://sierraclub.org/sites/www.sierraclub.org/files/sce/virginia-chapter/documents/GHG%20Emissions%20Associate%20with%20Proposed%20Natural%20Gas%20Transmission%20Lines%20in%20Virginia_Final--edit5%20%281%29.pdf).

Given the input of citizens regarding individual issues reported thus far, it will come as no surprise that most commenters have an overall negative opinion of the proposed Atlantic Coast Pipeline. Nearly three quarters have negative feelings toward the pipeline. Among commenters who live or own property in an ACP-crossed county, the proportion of commenters opposed to the pipeline rises to 89%.



## Conclusions

This analysis demonstrates the wealth of concerns that citizens have expressed to FERC through the NEPA scoping process and shows the depth and breadth of those citizens’ beliefs that the proposed Atlantic Coast Pipeline will have negative or adverse effects on the environment, the economy, and people’s quality of life. Unlike opinion polls and petition results touted by ACP backers as evidence of the proposal’s merits, this citizen input is what FERC is required to consider and address as it drafts its Environmental Impact Statement (EIS).

The opportunity for citizen input during the scoping period is a core principal of NEPA for good reason. Citizens possess a wealth of knowledge that can be extremely helpful and enlightening for federal agencies. Moreover, these particular comments voice real concerns over aspects of the ACP proposal that FERC itself has flagged as important. Thus FERC will best serve the public by carefully considering the content of the citizen input summarized here and, moreover, by addressing citizens’ concerns fully in its analysis of the potential adverse effects of the ACP.

For their part, citizens and their representatives can use this analysis and the data behind it to evaluate how well FERC succeeds in addressing the adverse effects of the proposed ACP. Any of the organizations listed on the cover can provide interested readers with further information about the ACP and how to become or stay involved in the environmental review process (the NEPA process) going forward.

## Appendix A: Instructions for Volunteers

Dear Volunteer,

Thank you so much for helping to analyze the input received by the Federal Energy Regulatory Commission (FERC) regarding the proposed Atlantic Coast Pipeline. The comments you will review are part of the "scoping" phase, in which citizens, experts and interested parties are to advise FERC on what questions and issues it should consider when writing an Environmental Impact Statement for the ACP. This is all part of FERC's obligations under the National Environmental Policy Act, or NEPA.

You don't have to be an expert on the issues to help out, but your help will enable detailed economic and policy analysis that will lead to better information being brought to bear on FERC's decisions regarding the pipeline over the coming year. If you'd like to learn more about the pipeline proposal and Key-Log Economics' independent research effort, you can read about it at [Key Log Economics' website](#).

Here's how your citizen-science participation works:

1. Attached to this e-mail is a "packet" of 3 comment letters for you to review.
2. For each comment letter in the packet:
  - 2.1. Open the comment letter right in your browser, or download it and open it using Adobe Acrobat Reader or a similar program.
  - 2.2. Click on [the link below] to open a fresh copy of the review / summary form. If that link doesn't work automatically, please paste the following into the address bar of a new browser window and hit <enter>.  
[Link was provided here.]
  - 2.3. To the best of your ability, select (and sometimes type) answers to the questions on the survey using the information in the comment.

You may want to read or skim the comment before you begin answering questions in order to get the idea of the commenter's points first.

Please understand that we are trying to record as accurately as possible what the commenter is portraying in their comment, regardless of what his/her opinion might be regarding the pipeline itself. Our goal is to have a fair and accurate accounting of what people have said to FERC.

3. Repeat steps 2.1 through 2.3 for the other two comments in your packet.
4. When you have finished with your packet, please reply to this email and just say "I'm done!" and we'll be able to check that packet off the list. This step will be extremely helpful for us so that we can keep track of which of the many thousands of submitted comments have been reviewed. If you decide you don't want to participate please respond as well to let us know you won't be

doing any of your comments or perhaps that you only did 1 or 2 of the packet. That is still helpful work and good for us to know! We'll ask a different volunteer to review the other comment(s).

5. If you would like to receive another batch of comments to review, please reply to this email and say "I'm done and ready for my next packet!". Or go to [our crowd-sourced NEPA review page](#) and click the "I'm in" link. We will be thrilled if you do! Also please feel free to spread the word and pass information about this opportunity along to anyone else you think might be interested in helping out!

Most of all, please accept our great thanks for your help. Thanks to your participation and that of many other volunteers we know we can get through the thousands of comments submitted to FERC and help ensure better decisions for the people, communities and economies concerned about the proposed pipeline.

We are so grateful for your time. Please email me at \*\*\*\*@keylogeconomics.com if I have left anything out of the instructions that you need to proceed.

Yours,

Cara Bottorff  
Key-Log Economics

Upon completion of the review of each comment letter, the volunteer received the following message:

Your response has been recorded. If you have finished the last comment in your packet please e-mail \*\*\*\*@keylogeconomics.com to let us know you finished or in order to request more comments to look through. Thank you so much for your time and help with this valuable project!

## Appendix B: Comment Analysis Form

### FERC Comment Analysis

Thank you so much for helping to analyze the input received by the Federal Energy Regulatory Commission (FERC) regarding the proposed Atlantic Coast Pipeline.

You don't have to be an expert on the issues to help out, but your help will enable detailed economic and policy analysis that will lead to better information being brought to bear on FERC's decisions regarding the pipeline over the coming year.

Just as a reminder here's how to analyze your comment:

1. With your comment letter open in another window, fill out the form below to the best of your ability. Select (and sometimes type) answers to the questions on the survey using the information in the comment.
2. You may want to read or skim the comment before you begin answering questions in order to get the idea of the commenter's points first.
3. Please understand that we are trying to record as accurately as possible what the commenter is portraying in their comment, regardless of what his/her opinion might be regarding the pipeline itself. Our goal is to have a fair and accurate accounting of what people have said to FERC.
4. When you have finished filling out this form click submit.
5. Choose "submit another response" to repeat for another comment letter.
6. After submitting the form for the third comment letter, email \*\*\*\*\*@keylogeconomics.com and say "I'm done" and tell us whether you'd like another packet of letters to review.

Most of all, please accept our great thanks for your help.

Please e-mail \*\*\*\*\*@keylogeconomics if you have any other questions about this process.

Disclaimer: This information is being collected for independent research conducted by Key-Log Economics on behalf of several community groups interested in the economic effects of the proposed Atlantic Coast Pipeline.

\* Required

Please enter your email. \*

Your answer

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### Example of "Submittal Number"


20150504-0028 FERC PDF (Unofficial) 05/04/2015

April 21, 2015

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

Atlantic Coast Pipeline Docket # PF15-6-000

Dear Ms. Bose:

 ORIGINAL FILED  
SECRETARY OF THE  
COMMISSION  
2015 MAY -4 A 9 29  
FEDERAL ENERGY  
REGULATORY COMMISSION

Please enter (or copy and paste) the "Submittal Number" of the comment. \*

See example above: the "Submittal Number" can be found in the upper left hand corner of the first page of the comment. It will be numbers in the form XXXXXXXX-XXXX (12 total digits).

Your answer

How does the person who submitted the comment describe him/herself?

Check all that apply

- ☐ Individual (including landowner)
- ☐ Business
- ☐ Association or Organization
- ☐ Government Official
- ☐ Other: \_\_\_\_\_

Please list the name of the commenter, including any associations they list.

Association Examples: Dominion Energy, Owner/Employee of \_\_\_\_, Member/officer of [organization] (Homeowners Association, Sierra Club, Chamber of Commerce, etc.)

Your answer



If the commenter specifically states, or if you know from other information they give, check off the County in which they reside (or own property/ do business).

The counties listed are those crossed by the proposed pipeline route. Please use the "other" option for Albemarle, Rockingham, etc.

- ☐ Cumberland, NC
- ☐ Halifax, NC
- ☐ Johnston, NC
- ☐ Nash, NC
- ☐ Northampton, NC
- ☐ Robeson, NC
- ☐ Sampson, NC
- ☐ Wilson, NC
- ☐ Augusta, VA
- ☐ Brunswick, VA
- ☐ Buckingham, VA
- ☐ Cumberland, VA
- ☐ Dinwiddie, VA
- ☐ Greensville, VA
- ☐ Highland, VA
- ☐ Nelson, VA
- ☐ Nottoway, VA
- ☐ Prince Edward, VA
- ☐ Southampton, VA
- ☐ Chesapeake, VA

- ☐ Suffolk, VA
- ☐ Harrison, WV
- ☐ Lewis, WV
- ☐ Pocahontas, WV
- ☐ Randolph, WV
- ☐ Upshur, WV
- ☐ Unstated/ Not Sure
- ☐ Other: \_\_\_\_\_

If the commenter lists his/her residence or other property near the proposed pipeline route, please indicate, as specifically as possible, the property's location.

For example "123 main street, Lovington, VA;" "Wingina;" "Wintergreen" or just "Virginia."

Your answer \_\_\_\_\_

Does the commenter mention any of the following economic factors that they say will be impacted either positively or negatively if the ACP is built?

Please choose a rating for all that are mentioned. Leave blank any others.

	Positively	Negatively	Did Not Mention
Economy (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Property Values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Jobs (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Jobs (short-term)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Jobs (long-term)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment Opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Businesses (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local Businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic Competitiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tourism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Overall how does the commenter think the ACP will affect the economy?

Please leave blank if they seem to have no opinion.

	1	2	3	4	5	
Extremely Negatively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Extremely Positively

Does the commenter mention any of the following energy factors that they say will be impacted either positively or negatively if the ACP is built?

Please choose a rating for all that are mentioned. Leave blank any others.

	Positively	Negatively	Did Not Mention
Total Energy Supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
"Clean" Energy Supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Reliability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to Energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
U.S. Energy Independence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Overall how does the commenter think the ACP will affect the energy situation in the U.S.?

Please leave blank if they seem to have no opinion.

	1	2	3	4	5	
Extremely Negatively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Extremley Positively

Does the commenter mention any of the following environmental factors that they say will be impacted either positively or negatively if the ACP is built?

Please choose a rating for all that are mentioned. Leave blank any others.

	Positively	Negatively	Did Not Mention
Environment (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ecosystems (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ecosystem Services (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waterways (generally)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wildlife	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific Animal Species	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific Plant Species	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Pollution (Emissions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Livestock	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Erosion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Sedimentation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scenic Beauty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Climate Change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Overall how does the commenter think the ACP will affect the environment?

Please leave blank if they seem to have no opinion.

	1	2	3	4	5	
Extremely Negatively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Extremely Positively

Does the commenter mention any of the following quality-of-life factors that they say will be impacted either positively or negatively if the ACP is built?

Please choose a rating for all that are mentioned. Leave blank any others.

	Positively	Negatively	Did Not Mention
Recreation Opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Educational Opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
American Values	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Standards of Living	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of Life	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local / Rural Character	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Property Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of Accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personal/Family/Others' Safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Culture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Overall how does the commenter think the ACP will affect lifestyle?

Please leave blank if they seem to have no opinion.

	1	2	3	4	5	
Extremely Negative	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Extremely Positive

**Did the commenter mention environmental justice?**

Environmental Justice is the fair treatment of all people regardless of race, color, national origin, or income when it comes to environmental impacts. Leave blank if they did not mention.

- ☐ Positively
- ☐ Negatively

**Overall what is this comment's attitude toward the proposed ACP?**

	1	2	3	4	5	
Extremely Negative	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Extremley Positive

**If the commenter went into detail on any reasons for/against the pipeline that were listed above please explain the commenter's details here.**

For example if they explained why they thought the ACP would help/hurt jobs or certain species (can use quotes when applicable).

Your answer

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**If the commenter mentioned any other reasons for/against the pipeline that were NOT included above please list them here with any details they provide for their reasoning.**

Your answer

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**If the commenter used or referenced any statistics in their comment please list them here with the source of the statistic, if available.**

Please be as specific as possible to enable our researchers to find the source data if needed.

Your answer

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**What does the comment suggest should happen next in the NEPA process (if they suggest anything)?**

Please be specific (can use quotes if appropriate).

- ☐ Extend Scoping Period
- ☐ Speed Up NEPA Process
- ☐ Hold Additional Scoping Meetings
- ☐ Permit ACP Without NEPA Process
- ☐ Assess Concepts of "Need" and "Harm" More Fully With Respect to the Use of Eminent Domain (eminent domain may only be used if public need is demonstrated to outweigh public harm)
- ☐ Assess Alternatives to the ACP
- ☐ Assess the Cumulative Effects of Multiple Pipeline Proposals
- ☐ Other: \_\_\_\_\_

**What is the desired outcome of the commenter?**

- ☐ Pipeline is built on Dominion's proposed route
- ☐ Pipeline is built on alternative route
- ☐ Pipeline is built (unsure of desired route)
- ☐ Pipeline is delayed
- ☐ Pipeline is not built
- ☐ Pipeline minimizes seizure of private property
- ☐ Pipeline seizes no private property
- ☐ Pipeline uses current utility easements/rights of way
- ☐ Other : \_\_\_\_\_

**Please list anything else the comment said that you felt was of importance and not covered in previous questions.**

Your answer

What was the demonstrated level of expertise of the commenter?

	1	2	3	4	5	
Layperson	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Expert

Does this comment appear to be a form letter?

A form letter is a letter written from a template, rather than being specially composed by each individual.

- ☐ Yes
- ☐ No
- ☐ Maybe

**SUBMIT**

Never submit passwords through Google Forms.