



Research and strategy for the land community.

**Statement of Cara Bottorff**  
**to the**  
**People's Hearing Investigating FERC**  
**Washington, DC**  
**December 2, 2017**

My name is Cara Bottorff, and I am an ecological economics consultant. My colleagues and I have investigated multiple natural gas pipeline proposals. We analyzed all scoping comments submitted to FERC for the Atlantic Coast Pipeline,<sup>1</sup> and we are working on a similar analysis for the PennEast Pipeline.

“Scoping” or “the scoping period” is a key part of any National Environmental Policy Act process. At that stage any person with an interest in the proposed federal action - in this case the approval or denial of approval for a pipeline - has a chance to tell the lead agency - in this case 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 various pipelines FERC receives thousands of individual comments in the form of written letters, entries to FERC’s online eComment site, petitions circulated by groups for or against the proposed pipeline, and verbally at a series of scoping meetings held in communities along the pipeline’s proposed route. 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 proposed pipelines.

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 living in 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

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<sup>1</sup> Bottorff, C., & Phillips, S. (2016). *Citizen Input Regarding the Proposed Atlantic Coast Pipeline*. Key-Log Economics, LLC.

the affected landscape. The comment letters help FERC understand the nature and extent of the effects of the proposed pipeline.

- Second, the letters provide a benchmark for evaluating the quality of FERC's NEPA review. Under NEPA, FERC must cover relevant issues raised in the scoping phase. Our independent review can therefore help ensure that what citizens have said during scoping does not get lost on the way to a Draft Environmental Impact Statement and that FERC meets its legal obligation to consider the full range of environmental effects of proposed pipelines.

FERC does not have good track record in this regard, so let's consider today what the people most likely to suffer the ill effects of pipelines have to say about the proposals:

- The vast majority of comments submitted to FERC express negative opinions and serious concerns about the proposed pipelines.
- These concerns are greatest among people who would be directly affected by the proposed pipelines. For example people who live in counties a proposed pipeline would cross are more concerned about environmental impacts than are people who live farther away.
- 98.8% of commenters said the Atlantic Coast Pipeline (ACP) will have a negative effect on property values, tourism, and recreation, and
- 99% of commenters said the Atlantic Coast Pipeline will harm their water and their health.
- The list goes on: the ACP is expected to have negative effects on forests, culture and lifestyle, safety, and other values important to the people of West Virginia, Virginia, and North Carolina.

If FERC, once again, ignores these very real and well-founded concerns, decisions about the ACP, the MVP, the PennEast and the rest will mean more unjustified pipelines and more excess environmental harm. With the huge majority of citizens expressing negative attitudes about the

environmental and economic effects of the proposed pipelines, it is intolerable that FERC does not give citizens greater consideration.