Columbia Gas (TC Energy) Virginia Reliability Project & Transco-Williams Commonwealth Energy Connector Project

FERC Scoping-Period Talking Points

Want additional information? Review: FERC notice or the overall pipeline fact sheet from the Sierra Club.

Submit your comments by 5 PM on April 6th, 2022

- **Submit via eComment at https://ferconline.ferc.gov/QuickComment.aspx**
- **Or mail to:**

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
988 First Street NE, Room 1A
Washington, DC 20426

In your comments, please incorporate:

1) **The docket number for either or both projects: PF22-3-000 / PF22-4-000**
2) **Request for involvement from the Office of Public Participation as an environmental justice area**
3) **That the open public comment period for FERC guidelines on climate change should prohibit decisions made on projects with considerable GHG emissions (which both projects would have)**
4) **Your personal reasons for opposing the projects**
5) **Any of the talking points below (please put in your own words)**

Virginia Reliability Project: [Docket number: PF22-3-000]
TC Energy's Virginia Reliability Project is aimed at upgrading a pipeline and a polluting gas compressor station. The VRP intends to replace 48 miles of pipe, increasing the diameter from 12 inches to 24 inches to carry an additional 135 million cubic feet of gas per day, and upgrade a compressor station in Emporia to use electric turbines. The line runs south of Petersburg and into the Hampton Roads Region. The anticipated in-service date is November 2025, with construction beginning the year prior.

Commonwealth Energy Connector Project: [Docket number: PF22-4-000]
Transco-Williams has proposed almost 7 miles of new pipeline, a new compressor station in Mecklenburg County, and upgrades to an existing compressor station in Greensville County in order to ramp up capacity by 105,000 dt per day. The anticipated in-service date is the end of 2025, with construction beginning the year prior.

Potential Concerns

Climate Change
Any upgrades to fossil fuel infrastructure further entrenches an industry that is on its way out. Investments should be made in future sustainable infrastructure that meets energy needs – and therefore these projects' lifetime emissions should be measured in the context of lower state and national emissions goals. There should be adequate assessment of the proposed

purpose/demonstrated need and alternatives considered that are not based on increasing greenhouse gas (GHG) emissions.

Climate change should be considered at every step of the process. This means establishing a baseline level of emissions and clear and accurate data reflecting the emissions resulting from proposed projects, alternatives considered and no action. It should also consider the cost of construction on GHG, including deforestation.

FERC must consider its open docket for public comment on guidelines to permitting fracked gas projects when evaluating these upgrades. The Commonwealth Energy Connector Project would bring the CO2 equivalent to over 2 million tons annually, putting it well above the threshold of 100,000 tons for "significant climate impacts," without even including emissions from construction. This pending application should not even be considered until FERC has clarity on how it will weigh projects' impacts on climate change.

Minimizing Ecosystem Impact

There should be baseline data taken to assess the impacts construction and permanent impacts would have on nearby waterbodies, wetlands, wildlife, and air quality. As of right now there have been no surveys conducted by Virginia DCR for the Suffolk/Nansemond region. All impacts for all stages of the project should be minimized according to federal law (Clean Water Act Section 404, Clean Air Act). There should also be robust study of downstream/downwind impacts and an analysis of the effect of cumulative impacts on water and wildlife. The companies should utilize the best available technology for all construction.

Environmental Justice

These communities are areas of legacy pollution and will require studies of baseline impacts before any future modeling. Areas like Oakland and Chuckatuck are already struggling without adequate infrastructure, including proper sewage storage. Additionally, there should be a consideration of cumulative impacts on human health when assessing new projects to ensure that there is not disproportionate impact. The terminus of these projects in the Hampton Roads region is laden with superfund sites and has a clear determination of status as an environmental justice community by EJ Screen data.

There has not been significant or proper outreach into affected communities, institutions, or groups, with most living in the area unaware of the projects. Therefore, this case should be flagged by the newly founded Office of Public Participation. This would include outreach from: reaching out to major institutions (churches, community centers, schools and civic leagues), notices in media (print/digital/radio), door to door outreach in closest areas to project site, letters to all affected community members. There should be special attention to tribal communities and governments.

All historic and cultural resources need to be adequately accounted for using the best available technology, especially during periods of construction.

Challenging the narrative of public necessity

Mothers Out Front conducted a study of need in the Hampton Roads area that proved that there has been no increase in demand in recent years. While development has skyrocketed since the 1950s when the pipelines were first put in, the need in recent years has not increased. This means that folks, like those in rapidly developing Hillpoint, will be affected by any upgrades in a distinctly different way than the original projects.

* Updated March 2022