

TALKING POINTS TO HELP WRITE YOUR COMMENTS ON NC ACP 401 PERMIT

CUMULATIVE IMPACTS, NO NEED FOR PIPELINE, ENV. JUSTICE

The application doesn't acknowledge any cumulative impacts due to additional development near the project that could impact downstream water quality. If economic development projected by ACP happens, construction of additional pipeline connections, service roads, industrial sites and other buildings would follow the construction of the ACP, causing major cumulative environmental impacts.

THE NEED FOR THE ACP PROJECT HAS NOT BEEN JUSTIFIED

The ACP is described as a pipeline to “serve the growing energy needs of multiple public utilities and local distribution companies in Virginia and North Carolina.” ACP's statements misleadingly include only estimates of growth in gas fired power demand, while failing to show that overall electric demand for the region during this period has been essentially flat. Studies have shown that the pipeline is not necessary to meet future demands, as projected demand is expected to stay static through 2030. As the renewables market increases, the pipeline becomes even less relevant in future energy generation mixes.

Benefits of the ACP listed by the applicant include “reduced energy costs” for the region. However, Duke Energy and Dominion Resources, the corporations whose affiliates want to build the pipeline to supply their power plants, will both seek major and repeated rate hikes to recover the cost of the pipeline from ratepayers PLUS a high guaranteed rate of return, and the cost of construction for unneeded additional gas-fired power plants.

Alternatives Analysis and Climate Impacts

Transitioning from coal to power generation at plants fueled by natural gas from fracking forces the region to rely on a fossil fuel, methane, whose non-combustion emissions are now known to be substantial from both pipeline operations and the power plants they supply. Methane is over 80 times more powerful, over a 20 year range, as a greenhouse gas than carbon dioxide. NC and VA both have substantial wind and solar resources, as well as the potential for cost effective reduction in demand by 30 to 40 % through efficiency upgrades to residences, businesses and industry. ACP's claim that population growth in VA and NC from 2000 to 2030 is a reason to expect continued growth in demand is not credible. We are already halfway through that period, and, despite significant population growth, overall electrical demand has been essentially flat!

ACP makes the completely unsubstantiated statement that “energy conservation measures alone (or in conjunction with other alternatives) will be unlikely to offset more than a fraction

of anticipated demand for the foreseeable future.” In fact, the renewables market is growing rapidly in eastern NC and increased energy efficiency measures in homes, businesses and industries have flattened electricity demand in the past decade, despite population increases.

Environmental Justice

Tribal Coordination: ACP describes letters sent to state recognized tribes asking for information related to recognized historical or cultural sites. This is not adequate tribal consultation for either state recognized tribes and completely excludes a non-recognized entity (Tuscarora Nation) that has experienced discrimination even relative to other tribal groups. There has been a complete marginalization of tribal concerns and sites of long-standing tribal use.

The ACP would bring disproportionate impacts to rural, low-income and communities of color as the route proposed runs through some of the most rural and economically depressed counties of the state, most with higher populations of color than the state as a whole.

Dominion states that the construction of the pipeline will lower customers’ energy costs, but this is a false hope. Duke and Dominion customers will pay for the construction costs plus profit for the ACP, even if the pipeline is used at a fraction of its full capacity. This creates a further unjustified burden for low-income residents.

End your comments by asking the NC Division of Water Resources to deny the 401 permit for the Atlantic Coast Pipeline.

The deadline for comments is August 19th at 5:00 pm.

Email your comments to publiccomments@ncdenr.gov (include “ACP” in subject line).

Or, mail your comments to 401 Permitting, 1617 Mail Service Center, Raleigh, NC 27699