

Blue Ridge Environmental Defense League

www.BREDL.org PO Box 88 Glendale Springs, North Carolina 28629 BREDL@skybest.com (336) 982-2691

April, 28, 2015

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

RE: Docket Nos. PF15-5-000 and PF15-6-000, Scoping of Environmental Impacts
Supply Header ProjectóDominion Transmission, Inc. and Atlantic Coast Pipeline, LLC.

Dear Secretary Bose:

On behalf of the Blue Ridge Environmental Defense League and its chapters and members in Virginia and North Carolina, I write to provide further comments on the scope of the environmental impact statement for the proposed projects. These remarks will supplement my comments of March 9, 2015. Today I will center on the environmental justice impacts of the proposed Atlantic Coast Pipeline.

Recent census data compiled by the Blue Ridge Environmental Defense League indicate there would be disproportionate impacts on minority communities and families living at or below the poverty level in the areas in Virginia and North Carolina targeted for the Atlantic Coast Pipeline planned by Dominion-Virginia Power, Duke Energy, Piedmont Natural Gas and AGL Resources (Virginia Natural Gas). These data are presented in the two tables below.

Demographic and Income Data for the ACL Route Compared to Statewide NC¹

	Population	White %	Black %	Income \$ per capita	% Income below NC
Northampton	20,463	39.6	58.4	17,919	29%
Halifax	52,970	40.9	53.1	17,937	29%
Nash	94,357	57.3	39.0	22,880	10%
Wilson	81,401	57.3	39.6	20,972	17%
Johnston	181,423	80.5	15.9	22,410	11%
Sampson	64,050	67.4	27.1	19,479	23%
Cumberland	326,328	53.6	37.4	23,067	9%
Robeson ²	134,760	32.4	24.7	15,343	39%
NC Statewide	9,943,964	71.7	22.0	25,284	--

¹ The data on the tables are drawn from the most recent data posted by the US Census Bureau, accessed April 25, 2015 at <http://quickfacts.census.gov/>

² Robeson County's Census Data indicate that 39.5% of its residents identify as "American Indian and Alaska Native alone."

Demographic and Income Data for the ACL Route Compared to Statewide VA¹

	Population	White %	Black %	Income \$ per capita	% Income below VA
Highland	2,298	98.6	0.6	26,372	21%
Augusta	73,862	93.7	4.2	25,519	24%
Nelson	14,850	84.4	12.6	26,059	22%
Buckingham	16,913	62.7	34.8	17,167	49%
Cumberland	9,827	64.6	32.3	21,540	36%
Prince Edward	23,074	64.0	32.8	17,208	49%
Nottoway	15,579	58.0	39.4	19,337	42%
Dinwiddie	27,859	64.8	32.6	23,781	29%
Brunswick	16,498	42.2	56.1	16,060	52%
Greensville	11,681	39.1	59.2	16,380	51%
Southampton	18,059	61.3	36.6	22,433	33%
Suffolk	86,806	52.5	43.0	29,135	13%
Chesapeake	233,371	63.0	30.0	29,905	11%
VA Statewide	8,326,289	70.8	19.7	33,493	--

As shown above, the per capita income levels of residents in all the areas targeted for the Atlantic Coast Pipeline are below North Carolina's average, ranging from 9% to 39% less than the statewide norm of \$25,284. Likewise, in Virginia the income range is from 11% to 52% less than the statewide norm of \$33,493. Further, the official average of the population below the poverty level in North Carolina is 17.5%. Using this benchmark, the number of people living below the poverty line exceeds the statewide average from 30% to 81% in these eight counties. In Virginia, only two municipalities on the pipeline route better the state poverty level, but the number of people living below the official state poverty line in the other eleven exceeds the statewide average by as much as 112%. And seven of the eight counties in North Carolina have African American populations in greater proportion than the statewide average; in Virginia, ten of thirteen counties and cities have African American populations in greater proportion than the statewide average.

Presidential Executive Order 12898 states requires all federal agencies, including the Federal Energy Regulatory Commission, to make achieving environmental justice part of their mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its actions on minority populations and low-income populations.

Council on Environmental Quality guidance for enforcement of the National Environmental Policy Act states: "When a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe has been identified, agencies should analyze how environmental and health effects are distributed within the affected community.... This type of data should be analyzed in light of any additional qualitative or quantitative information gathered

through the public participation process.³

Conclusion

In the counties and cities of Virginia and North Carolina targeted by Dominion and Duke for the Atlantic Coast Pipeline, we see a disproportionate impact all along the proposed route.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Louis A. Zeller", followed by a horizontal line extending to the right.

Louis A. Zeller, Executive Director

³ b. *Environmental Justice Guidance under the National Environmental Policy Act*
http://www.epa.gov/oecaerth/environmentaljustice/resources/policy/ej_guidance_nepa_ceq1297.pdf