

**Delaware Riverkeeper Network ~ Gas Free Seneca**  
**Berkshire Environmental Action Team (BEAT) ~ Schuylkill Pipeline Awareness**  
**OVEC-Ohio Valley Environmental Coalition**  
**Roseland against Compressor Station (RACS)**  
**Stop the Algonquin Pipeline Expansion (SAPE)**  
**Concerned Citizens of Lebanon County ~ Sustainable Tompkins**  
**Friends of Nelson ~ Bucks County Audubon Society**  
**Rockfish Valley Investments, LLC ~ Breathe Easy Susquehanna County**  
**Tim Seggerman Design & Building Workshop ~ Resist the Pipeline**  
**Citizens United For Renewable Energy (CURE) ~ Project Coffeehouse**  
**Deep Green Resistance New York ~ Coalition Against Nexus Pipeline**  
**Terra Bella Farm ~ NC Warn ~ Don't Gas the Pinelands ~ 350Brooklyn**  
**Raging Grannies Eugene ~ Aquashicola/Pohopoco Watershed Conservancy**  
**Campaign For Renewable Energy ~ Friends of Horseshoe Bend Park**  
**Delaware Township Citizens Against the Pipeline (DTCAP)**  
**Greenvest ~ Advocates For Cherry Valley ~ Responsible Drilling Alliance**  
**Jewish Climate Action Network ~ Ancientrees ~ Genesis Farm**  
**Winyah Rivers Foundation ~ Physicians for Social Responsibility- Pennsylvania**  
**Bucks County Sierra Club ~ Bucks Environmental Action**  
**New York Climate Action Group ~ Sanderson Architectural**  
**Sanford-Oquaga Area Concerned Citizens (S-OACC)**  
**Action Together NEPA ~ Friends of Buckingham ~ Resist Spectra**  
**Safe Energy Rights Group (SEnRG) ~ Kingston Greenways Association**  
**Grassroots Environmental Education ~ Seed Of SW New Mexico**  
**Union County (NJ) Peace Council ~ Lebanon Pipeline Awareness**  
**Environment New Jersey ~ Move To Amend Central Bucks**  
**The Wei ~ Homeowners Against Land Taking (HALT)**  
**Free Nelson ~ Stop NY Fracked Gas Pipeline ~ Fossil Free Tompkins**  
**Citizens for Clean Water ~ Communities for Safe and Sustainable Energy**  
**Bus for Progress ~ Prince William Soundkeeper**  
**Pine Creek Valley Watershed Association ~ No Fracked Gas In Mass**  
**Potomac Riverkeeper Network ~ Earthworks**  
**Sullivan Alliance For Sustainable Development ~ People, Not Pipelines**  
**Concerned Burlington Neighbors ~ Dine' Citizens Against Ruining Our Environment**  
**Freshwater Accountability Project ~ Transition Town Media**  
**Interfaith Power & Light ~ Beyond Extreme Energy ~ 198 Methods**  
**LEPOCO Peace Center (Lehigh-Pocono Committee of Concern)**  
**Protect Orange County ~ HerbalTherapeutics Research Library**  
**Living Rivers ~ South Coast Neighbors United**  
**Common Ground Community Trust ~ Sustainable Warwick**

**Virginia Citizens Consumer Council ~ Sustainable Medina County ~ NJ Sierra club  
Milwaukee Riverkeeper ~ Bucks County Green Party  
New Progressive Alliance ~ CCAP of Williams Township, PA  
Morning Glory & Bumble Bee LLC ~ PDA NJ ~ Bold Alliance  
ECHO Action NH: #FossilFree603 ~ Concerned Residents of Oxford  
Sourland Conservancy ~ Toxics Action Center  
Rochester Defense Against Fracking ~ Mass Quaker Legislative Action Network  
Milford Doers/Residents of Crumhorn Mtn ~ Paradise Gardens and Farm  
Raritan Riverkeeper ~ Citizens Against the Rehoboth Compressor Station  
Alexandria CAP ~ Otsego Neighbors ~ Mohawk Valley Keeper  
StopNED ~ Middlefield Neighbors ~ No Sharon Gas Pipeline | Clean Energy Now  
DiBianca Associates LLC ~ Orange Residents Against Pilgrim Pipelines  
Franklin Co Continuing the Political Revolution, FCCPR  
Sugar Shack Alliance ~ Guthrie & Larason ~ CMA ~ Marion Institute  
Preserve Giles County ~ Mountain Lakes Preservation Alliance  
Compressor Free Franklin ~ Compressor Free Sullivanville  
People Demanding Action ~ Plymouth Friends of Clean Water  
350Mass South Shore ~ 350 Mass for a Better Future  
Chesapeake Climate Action Network ~ Ann's Choice Progressives 4 + Change  
Concerned Citizens of Allegany County ~ Dryden Resource Awareness Coalition  
Indivisible Lambertville/New Hope ~ POWHR ~ SCRAM  
Andria Nelson Photography  
Already Devalued and Devastated Homeowners of Parsippany  
Coalition Against the Pilgrim Pipeline (NJ) ~ Clean Water for North Carolina  
Preserve Montgomery County VA (PMCVA) ~ Wild Virginia  
Williams Township Citizens Against the Pipeline  
Michigan Residents against ET Rover gas pipeline  
Hilltown Community Rights (HRC) ~ Damascus Citizens for Sustainability  
Citizens for Water ~ NYH2o ~ Preserve Roanoke/Bent Mountain  
Exodus Acres ~ WWALS Watershed Coalition, Inc.  
Stop the West Roxbury Lateral Pipeline ~ Big Bend Conservation Alliance  
New Mexico Story Power ~ Citizens for a Clean Pompton Lakes  
Climate Action Brookline ~ Blue Ridge Environmental Defense League  
Starfish QC And Medical Writing Services ~ Stockton Village Farm  
Kingwood Citizens Against The Pipeline ~ Cooks Creek Watershed Association  
Lancaster Against Pipelines ~ Tidewaters Gateway Partnership Inc.  
Sharon Springs Against Hydrofracking**

Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington D.C. 20426

RE: Time for a Pipeline Review Process Where People and Our Environment Really Matter

**February 12, 2018**

Dear Chairman Kevin McIntyre, Commissioner Cheryl A. LaFleur, Commissioner Neil Chatterjee, Commissioner Robert Powelson, and Commissioner Richard Glick,

You have committed FERC to reviewing both its 1999 Pipeline Policy Statement and its policies on certification of natural gas pipelines. FERC's history of abusing communities and the environment when it comes to pipeline, LNG, and compressor infrastructure reviews make the public highly skeptical of the process and whether it will result in meaningful reforms. And so we request:

To ensure that FERC identifies a full spectrum of truly meaningful fixes to its pipeline review and approval process, FERC's Commissioners need to hear directly from the communities impacted by pipeline infrastructure and the FERC process. FERC should begin the 1999 Policy Statement review process with no less than six public hearings held in affected communities across the nation that are dedicated to the impacted public testifying directly to the FERC Commissioners about their experiences with the pipeline review and approval process.

In addition, we have drawn on the concerns of hundreds of organizations from across the nation to identify critical reforms that must result from any review process. At a minimum, identified reforms to the FERC process must include:

- FERC must mandate a genuine demonstration of an end-use need for a project that is objectively verified by experts and that cannot be fulfilled by renewable energy options.
- FERC must respect state and local authority and expertise by deferring to state and local environmental authorities' findings regarding the environmental, community, and economic impacts of pipelines.
- FERC must respect the authority of other state and federal agencies by instituting a policy that prevents FERC from approving pipeline infrastructure and/or allowing any element of construction to proceed until all state and federal reviews/permit processes have been finalized and approvals/permits granted.
- FERC must end the use of tolling orders, which place people in legal limbo and prevent communities from accessing justice before a pipeline company exercises the power of eminent domain to take property rights and inflicts irreparable harm through significant stages of construction. If tolling orders are not prohibited, then other mechanisms for addressing the problem include
  - Prohibit pipeline projects from advancing in any way, shape, or form, including eminent domain and/or construction, if there is an outstanding rehearing request/tolling order; or

- Mandate FERC response to rehearing requests within 30 days and prohibit projects from advancing in any way, shape, or form during that period.

- FERC must commit to removing bias from the process, by no longer hiring consultants with demonstrated conflicts of interest (i.e., those who are representing a pipeline company seeking Commission approval), and by prohibiting Commission staff or Commissioners from working on/deciding upon any pipeline infrastructure project in which they have a direct or indirect financial stake or have worked to represent the company within the previous 5 years.
- FERC must end the practice of using segmentation to skew environmental and community impact reviews.
- FERC must commit to a complete analysis of the costs and benefits, with a full and fair implementation of NEPA, including, but not limited to, fully evaluating social justice impacts; climate change impacts of pipeline construction and operation; community, environment, and climate change impacts of increased natural gas exploration, fracking, and methane emissions resulting from pipeline infrastructure operations; economic analyses that include costs, not just asserted benefits; alternatives not limited to alternate routes but that also include alternative energy sources; and robust health-and-safety impact analyses.

Respectfully,

Maya K. van Rossum, the Delaware Riverkeeper, Delaware Riverkeeper Network

Yvonne Taylor, Vice President, Gas Free Seneca

Jane Winn, Executive Director, Berkshire Environmental Action Team (Beat)

Faith Zerbe, Co-Founder, Schuylkill Pipeline Awareness

Vivian Stockman, Vice Director, OVEC-Ohio Valley Environmental Coalition

Mary Kushner, Founding Member, Roseland Against Compressor Station (RACS)

Susan Van Dolsen, Co-Founder, Stop the Algonquin Pipeline Expansion (SAPE)

Pam Bishop, Principal, Concerned Citizens of Lebanon County

Gay Nicholson, President, Sustainable Tompkins

Helen Kimble, President, Friends of Nelson

Stacy Carr-Poole, Executive Director, Bucks County Audubon Society

Richard G Averitt, Partner, Rockfish Valley Investments, LLC

Rebecca Roter, Chairperson, Breathe Easy Susquehanna County

Tim Seggerman, Designer/Architect, Tim Seggerman Design & Building Workshop

Marla Marcum, Organizer, Resist the Pipeline

Georgina Shanley, Coordinator, -Citizens United For Renewable Energy (CURE)

Barbara Jarmoska, President, Project Coffeehouse

Mike Bucci, DGR NY Chapter Projects Coordinator, Deep Green Resistance New York

Ted Deming, Administrator, Coalition Against Nexus Pipeline

Wade A. & Elizabeth G. Neely, Terra Bella Farm

Jim Warren, Executive Director, NC Warn

Dr. Bob Allen, Co-Chair, Don't Gas the Pinelands

Sara Gronim, Co-Leader, 350Brooklyn

Laurie Granger, Organizer and Founder, Raging Grannies Eugene

Jim Vogt, President, Aquashicola/Pohopoco Watershed Conservancy  
Brian Eden, Vice-Chair, Campaign for Renewable Energy  
Meg Sleeper, President, Friends of Horseshoe Bend Park  
Debra Bradley, Secretary, Delaware Township Citizens Against the Pipeline (DTCAP)  
David Schreiber, Investment Advisor/Financial Planner, Greenvest  
Lynn Marsh, President, Trustee, Advocates For Cherry Valley  
Robert Cross, President, Responsible Drilling Alliance  
Katy Allen, Rabbi/President, Jewish Climate Action Network  
Shannon Larsen, Co-Founder, Ancienttrees  
Miriam MacGillis, Director, Genesis Farm  
Christine Ellis, Deputy Director, Winyah Rivers Foundation  
Dr. Pouné Saberi, Physicians for Social Responsibility- Pennsylvania  
Sharon Furlong, Spokesperson, Bucks County Sierra Club  
Sharon Furlong, Spokesperson, Bucks Environmental Action  
Judith Canepa, Co-Founder, New York Climate Action Group  
Shannon Pendleton, Principal, Sanderson Architectural  
Gail Musante, Official Signer for S-OACC, Sanford-Oquaga Area Concerned Citizens (S-OACC)  
Scott Cannon, Environmental Advisor, Action Together NEPA  
Lakshmi Fjord, Steering Committee, Friends Of Buckingham  
Courtney M. Williams, Coordinator, Resist Spectra  
Courtney M. Williams, Vice President, Safe Energy Rights Group (SEnRG)  
Tari Pantaleo, President, Kingston Greenways Association  
Patti Wood, Executive Director, Grassroots Environmental Education  
Debaura James, Representative, Seed of SW New Mexico  
Diane Beeny, Chair, Union County (NJ) Peace Council  
Ann Pinca, President, Lebanon Pipeline Awareness  
Doug O'Malley, Director, Environment New Jersey  
Pauline Miklos, Point Person, Move To Amend Central Bucks  
Kimi Wei, CEO, The Wei  
Vincent DiBianca, Trustee, Homeowners Against Land Taking (Halt)  
Marion Kanour, Founder, Free Nelson  
Becky Meier, Co-Founder, Stop NY Fracked Gas Pipeline  
Sara Hess, Chairperson, Fossil Free Tompkins  
Vera Scroggins, Director, Citizens for Clean Water  
John D. Elder, Vice President, Communities for Safe and Sustainable Energy  
Kathy Maher, Treasurer, Bus for Progress  
Kate McLaughlin, President, Prince William Soundkeeper  
Ingrid E. Morning, President, Pine Creek Valley Watershed Association  
Rosemary Wessel, Co-Founder/Director, No Fracked Gas in Mass  
Brent Walls, Upper Potomac Riverkeeper, Potomac Riverkeeper Network  
Aaron Mintzes, Senior Policy Counsel, Earthworks  
Linda Reik, Member, Board of Directors, Sullivan Alliance for Sustainable Development  
Colleen McKinney, Cofounder, People, Not Pipelines  
Suzy Winkler, Cofounder, Concerned Burlington Neighbors  
Carol Davis, Coordinator/Director, Dine' Citizens Against Ruining Our Environment  
Leatra Harper, Managing Director, Freshwater Accountability Project  
Sari Steuber, President, Transition Town Media

Joelle Novey, Director, Interfaith Power & Light  
Ted Glick, Organizer, Beyond Extreme Energy  
Andrew Hudson, Founder, 198 Methods  
Nancy Tate, Coordinator, LEPOCO Peace Center (Lehigh-Pocono Committee of Concern)  
Pramilla Malick, Chair, Protect Orange County  
David Winston, President, Herbaltherapeutics Research Library  
John Weisheit, Colorado Riverkeeper, Living Rivers  
Wendy Graca, President, South Coast Neighbors United  
Elaine Cimino, Co-Director, Common Ground Community Trust  
Russ Layne, Co-Chair, Infrastructure Committee, Sustainable Warwick  
Irene, Leech, Virginia Citizens Consumer Council  
Kathie Jones, Organizer, Sustainable Medina County  
Jeff Tittel, Director, NJ Sierra Club  
Cheryl Nenn, Riverkeeper, Milwaukee Riverkeeper  
Walt Jeranke, Membership Secretary, Bucks County Green Party  
Ed Griffith, Liaison New Progressive Alliance, New Progressive Alliance  
Linda Heindel, Coordinator, CCAP of Williams Township, PA  
Vita Wallace, Co-Owner, Morning Glory & Bumble Bee LLC  
Catherine Hunt, PDA NJ  
Hannah Adams, Deputy Director, Bold Alliance  
Stephanie A. Scherr, Director, Echo Action NH: #Fossilfree603  
Trellan Smith, Co-Founder, Concerned Residents of Oxford  
Caroline Katmann, Executive Director, Sourland Conservancy  
Claire Miller, Lead Community Organizer, Toxics Action Center  
Toby Stover, Founding Member, Rochester Defense against Fracking  
Mary Gilbert, Organizer, Mass Quaker Legislative Action Network  
Otto Butz, Founder, Milford Doers/Residents of Crumhorn Mtn  
James Cleghorn, Owner, Paradise Gardens and Farm  
Bill Schultz, Riverkeeper, Raritan Riverkeeper  
Tracy R. Manzella, Director, Citizens Against the Rehoboth Compressor Station  
Jackie Freedman, Founder, Alexandria CAP  
Julie Huntsman, Representative, Otsego Neighbors  
John Valentine, Founder, Mohawk Valley Keeper  
Cathy Kristofferson, Co-Founder, StopNED  
Kelly Branigan, Founding Member, Middlefield Neighbors  
Birgitta Mcalevey, President, No Sharon Gas Pipeline | Clean Energy Now  
Vincent F. DiBianca, Founding Partner, DiBianca Associates LLC  
Sandra Kissam, Chair, Orange Residents against Pilgrim Pipelines  
Bob Armstrong, Climate Crisis Task Force Chair, Franklin Co Continuing the Political Revolution, FCCPR  
Carole Horowitz, Member, Sugar Shack Alliance  
Patricia Guthrie, Co-Owner, Guthrie & Larason  
Brad Yentzer, Md, CMA  
Nicole Morris-McLaughlin, Program Coordinator, Marion Institute  
Donna Pitt, Treasurer, Preserve Giles County  
April Keating, President, Mountain Lakes Preservation Alliance  
Donald Hebbard, President/Founding Member, Compressor Free Franklin  
Finch, Coordinator, Compressor Free Sullivanville

Andrea Miller, Executive Director, People Demanding Action  
Peter Hudiburg, Founder, Plymouth Friends of Clean Water  
Connie Gorfinkle, Co-Coordinator Emeritus, 350Mass South Shore  
Alan Palm, Director of Organizing, 350 Mass for a Better Future  
Anne Havemann, General Counsel, Chesapeake Climate Action Network  
Patricia Willis, Environment Committee Chair, Ann's Choice Progressives 4 + Change  
Frederick Sinclair, Chairman, Concerned Citizens of Allegany County  
Marie McRae, Spokesperson, Dryden Resource Awareness Coalition  
Elizabeth Magill Peer, Environment Team Lead, Indivisible Lambertville/New Hope  
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Hope Taylor, Executive Director, Clean Water for North Carolina  
Thomas Adams, Chair, Preserve Montgomery County VA (PMCVA)  
David Sligh, Conservation Director, Wild Virginia  
Laura Pritchard, Founding Member, Williams Township Citizens Against the Pipeline  
Jennifer Nelson, Frontline, Michigan Residents Against ET Rover Gas Pipeline  
Delta Carney, Research Manager, Hilltown Community Rights (HRC)  
B. Arrindell, Director, Damascus Citizens for Sustainability  
Joe Levine, Director, Citizens for Water  
Buck Moorhead, Chair, Nyh2O  
Roberta M. Bondurant, Member, Preserve Roanoke/Bent Mountain  
Mary Neville Wall, Owner, Exodus Acres  
John S. Quarterman, Suwannee Riverkeeper, WWALS Watershed Coalition, Inc.  
Nancy Wilson, Member, Steering Team, Stop the West Roxbury Lateral Pipeline  
Joselyn Fenstermacher, Board Of Directors Vice President, Big Bend Conservation Alliance  
Asha Canalos, Co-Director, New Mexico Story Power  
Lisa Raggiola, Director, Citizens for a Clean Pompton Lakes  
Mary Dewart, Board Member, Climate Action Brookline  
Louis Zeller, Executive Director, Blue Ridge Environmental Defense League  
Erica Johanson, President, Starfish QC And Medical Writing Services  
Mary Tolmie, Owner, Stockton Village Farm  
Deborah Kratzer, Leader, Kingwood Citizens Against The Pipeline  
Lois Oleksa, Board Member, Cooks Creek Watershed Association  
Malinda Harnish Clatterbuck, Secretary, Lancaster Against Pipelines  
Richard McNutt, President, Tidewaters Gateway Partnership Inc.  
Lisa Zaccaglini, Administrator, Sharon Springs Against Hydrofracking