

**April 28, 2022**

**ATTORNEY GENERAL RAOUL URGES FEDERAL ENERGY REGULATORY COMMISSION SCRUTINIZE  
IMPACTS OF NEW PIPELINE PROJECTS ON ENVIRONMENTAL JUSTICE, GREENHOUSE GAS  
EMISSIONS**

**Chicago** — Attorney General Kwame Raoul, as part of a coalition of 12 attorneys general, called on the Federal Energy Regulatory Commission (FERC) to thoroughly consider the impacts of proposed natural gas projects on communities that are already overburdened with environmental harm and on greenhouse gas emissions that contribute to climate change.

Raoul and the coalition of attorneys general filed comments earlier this week on two new proposed policies relating to FERC's review of natural gas infrastructure projects. [In those comments](#), the coalition commended FERC for developing a framework to analyze greenhouse gas emissions and update its pipeline certification policy to respond to significant changes that have occurred since the commission last promulgated such a policy in 1999. The coalition's comments also urged FERC to go further to acknowledge the need to drastically reduce investments in new fossil fuel infrastructure and to protect the rights and interests of landowners and communities, especially those with environmental justice concerns.

"Decisions being made today regarding the development of natural gas projects will have an effect on surrounding communities for decades to come," Raoul said. "As we continue our transition to a clean-energy future, it is vital to the health and welfare of all Illinoisans, particularly those living in areas facing higher levels of pollution and environmental justice concerns, are protected."

FERC issued its draft greenhouse gas policy in February to clarify its procedures for evaluating climate impacts – both those caused by a proposed project and those likely to affect a project – under the National Environmental Protection Act (NEPA) and to describe how the agency intends to integrate climate considerations into its public interest determinations under the Natural Gas Act (NGA).

As the most recent [report](#) by the U.N.'s Intergovernmental Panel on Climate Change (IPCC) confirmed, climate change is already adversely affecting the physical and mental health of people globally, including by spreading new diseases; harming human health, livelihoods, and infrastructure; and contributing to humanitarian crises by increasing food insecurity and associated violence and migration. Limiting global warming to a level that could keep these effects from getting exponentially worse in the coming decades is possible, but it will require rapid emissions reductions across all sectors. Today, natural gas accounts for [for more than one-third](#) of U.S. energy-related carbon dioxide emissions.

As the agency charged with approving all new major interstate natural gas infrastructure projects, FERC's recognition of the importance of considering climate change as part of its environmental reviews is critical.

Raoul and the coalition are calling on FERC to:

- Presume that all new natural gas infrastructure projects will have significant environmental effects under NEPA, and prepare a thorough Environmental Impact Statement for every such project.
- Consider state climate and clean energy policies when evaluating the significance of new proposed fossil fuel infrastructure projects.
- Adopt the presumption that all emissions caused by combustion of transported gas are a reasonably foreseeable impact of new natural gas pipelines.

- Seek information about other emissions impacts associated with proposed natural gas infrastructure projects.

On the same day FERC issued its draft greenhouse gas policy, it also issued a new proposed policy relating to its process for certifying new pipeline projects. The coalition's comments support FERC's proposed comprehensive scheme for reviewing pipeline applications under the NGA that incorporates climate and environmental justice considerations. Importantly, as the attorneys general had previously recommended, the policy commits FERC to considering the effects of proposed pipeline projects on underserved communities that are already overburdened by pollution.

In the submitted comments, Raoul and the coalition also called on FERC to:

- Expand community engagement in FERC proceedings through the newly-established Office of Public Participation.
- Require a robust analysis of the impact of proposed projects to inform public benefits assessments under the NGA.
- Condition certificates to mitigate harm to communities overburdened with environmental harm.
- Commit to taking all steps to avoid the use of eminent domain, whenever possible.
- Consider the regions' and states' ability to meet their clean energy goals and greenhouse gas emission reduction mandates in evaluating the need for a project.

Joining Raoul in filing the comment letter are the attorneys general of Connecticut, Delaware, District of Columbia, Maryland, Massachusetts, Michigan, Minnesota, New Jersey, New York, Oregon and Rhode Island.