Water swirling as it goes underground near the Ellison's Mill Pond on Hans Creek

Hans Creek Underground Part 6--- (33 seconds)
https://www.youtube.com/watch?v=Evay2QYoY4

Hans Creek Underground Part 7--- (33 seconds)
https://www.youtube.com/watch?v=62F1OeEGvB&feature=youtu.be

Other Slide areas along Hans Creek Valley

Hans Creek Road slid away in 1975 at this point, according to Google Earth it is located at 37.547666, -80.759688
A major slide occurred along the Hans Creek Road in the early 1960's at this area. It was so large that a 6 acre field above the road had to be abandoned. It is still slipping today; the road in the next picture is also in this general area. Other slides have occurred in 1974 and 1983. The entire hill, including Hans Creek Road (County Route 25) continues to slip to this day. This area according to Google Earth is between 37.549345, -80.725591 and 37.547696, -80.725668.
The Indian Creek Crossing in Monroe County WV

The following picture shows the area where the MVP proposes to cross Indian Creek. It would be wise to note that the slope from the creek to the top of Ellison Ridge is extremely steep, approaching 55 to 60 degrees in some areas. The soils are very unstable, keeping the area from sliding would almost be impossible. Sediment and erosion going into the creek would also be a problem. None of this is adequately addressed in the DEIS.

Finally attached are three videos I took (November 2019) of a dye trace of a tributary of this stream that enters Indian Creek at this point. The stream goes underground just before it enters Indian Creek and the water enters Indian Creek right where the Pipeline would cross Indian Creek. This seems like a severe problem to me. Again neither the Karst topography nor the hydrogeology of this area is addressed in the DEIS.

Slate Run dye test near Indian Creek Part 1 - (55 seconds) - https://www.youtube.com/watch?v=RRfsluiSKqE
Slate Run dye test near Indian Creek Part 2 - (30 seconds) - https://www.youtube.com/watch?v=alCXSNq85lQ
Slate Run dye test near Indian Creek Part 3 - (50 seconds) - https://www.youtube.com/watch?v=omXFrGpzybo
As you can see from the photos and the videos contained in this letter, the MVP across this area would be highly destructive not only to the Old Shanklin Farm, but to the entire area. I am sure there are even more severe problems as the pipeline crosses the states of WV and VA, especially as it approaches and tries to cross Peters Mountain on Monroe County’s Eastern Edge. The environmental, economic and cultural destruction should make this a no build pipeline.

Sincerely,

Maury W. Johnson

CC

Neil Kornze, Director
BLM Washington Office
1849 C Street, NW, Rm. 5565
Washington, DC 20240

Tony Cook, USFS Southern District Regional Forest Supervisor
Forest Service-USDA, Room 801 N
1720 Peachtree Road,
Atlanta, GA 30309

Jody Timm, Supervisor, GW and Jefferson National Forests
Jennifer P. Adams, Special Project Coordinator, GW and Jefferson National Forests
562 Valleypointe Parkway
Roanoke, VA 24019

US Army Corp of Engineers
December 20, 2016

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

Forests; jtimm@fs.fed.us Jennifer Adams, Special Project Coordinator, Jefferson
National Forest; jenniferadams@fs.fed.us
Neil Komze, Director, US Bureau of Land Management Vicky Craft, Bureau of
Land Management vcraft@blm.gov

Re: CP16-10-000 Mountain Valley Pipeline Project - Request for public meeting
with the BLM

I concur with the Bureau of Land Management (BLM) regarding the permitting
timetable schedule and need for public outreach meetings related to the
Mountain Valley Pipeline (MVP) project CP16-10-000. It is appropriate that the
BLM should hold public meetings to hear the concerns of the citizens along the
proposed pipeline route. I am certain there is sufficient public interest to have
these meetings.

The history of America's love affair with the forests is long standing. President
Theodore Roosevelt's establishment of the United Stated Forest Service circa
1901-1905 assured in perpetuity, under the 1906 American Antiquities Act, 220,
million acres of public land. His legacy and concepts of conservation still endure
and should be admired.

The BLM and the USFS must make a decision of enormous consequence: to
protect the lands in its care, or let Corporate America take what it pleases for a
pittance. A proposed 500-foot Energy Corridor will destroy many homes sites,
because the eastern homesteads are much more densely situated than in the
west. In the 12 western states, where many lands are in the care of the BLM,
energy corridors likely result in minimal disruption, because the tracts of land are
very large. This also applies to the typical landownership in that area. Private
property owners hold hundreds and sometimes thousands of acres in the west.
If an Energy Corridor crosses their lands, it may be 5 to 10 miles from their home
site. This is not true for the east, where the average lot size in rural areas is 5 to
10 acres. A 500-foot corridor would render these lands useless and unsellable.

The BLM and the USFS are in need of a new concept in land management, the
prevailing western states paradigm simply will not work in the eastern
states. Property owners near the USFS land now have much to fear if this 500-
foot pipeline corridor is approved. Nevertheless, I was encouraged to read the

1 FERC submittal 20151207-0067
INDIVIDUALS
IND546 – Louisa Gay

comments of Mr. Timothy Spellak’s on May 20, 2015, to the House Natural Resources Subcommittee on Energy and Mineral Resources on HR 2295. He stated:

The Department opposes establishing a new system of corridors on top of those designated under Section 368(a) of EP Act and opposes the requirement to designate at least 10 new 368(a) corridors within two years in the eastern United States, which is too short a timeframe to adequately coordinate with states, tribes, other Federal partners, and the public. The Department also questions the significant role given to the Department of the Interior in designating corridors in the eastern United States under H.R. 2295, where the Department manages very little multiple-use land and has a significantly different role than it does in the western United States.

Furthermore, the Department opposes the bill’s provisions declaring that energy corridor designation and incorporation into a land use plan shall not be treated as major Federal actions under NEPA and that approvals are required.

This NEPA waiver is unnecessary and counterproductive, as it would only complicate the deliberative process necessary for the appropriate consideration of specific authorization decisions. Designating corridors on Federal land does not create a contiguous corridor, rather intervening parcels of state and private land complicate corridor designation and are important considerations in both Federal and state permitting processes. The Department does not support limiting public input through the environmental review process under NEPA; it is a critical tool for engaging the public and for analyzing and mitigating for impacts to adjacent private lands and state-managed resources. These open, public processes help the land managing agencies consider impacts on the surrounding communities and the environment, as well as identify unknown or unforeseen issues, which is invaluable to sound public land management and appropriate routing for these corridors.

I am ever hopeful that the BLM will continue to espouse the opinions expressed by Mr. Spellak to the House Natural Resources Subcommittee on Energy and Mineral Resources.

On the FERC website, I came upon another landowner’s submission. I copy Mr. John Gross’ lamentations here in address and solidarity.

The offer I have received from the pipeline company is audacious and insulting to say the least. Whichever American among us would even
submit such an offer to his fellow American with a little sticky tag saying “sign here” should hang his/her head in shame. This intentional infliction of emotional pain and trauma for the benefit of a narrow segment of our society should be actionable under the law. Causing the financial ruin of fellow Americans with their insulting low offers for a lifetime of effort by the landowner cannot stand. When an easement attaches to the deed of a relatively small parcel of land, and that land is the owner’s only form of retirement savings, the future worth of that property and immediate worth of the entire property has been put in jeopardy. This seems criminal given the offers and payouts I’ve read about in other pipeline cases.

As it is most likely a certainty that there are elderly, or otherwise unsophisticated people along the path of this pipeline who don’t feel they have the financial means to solicit legal council to protect themselves and their property, to allow this process to enable the company to prey upon their financial weakness, and take them a part of their only financial security for such a pittance, all the while hiding behind the skirt of the federal government and the authority of eminent domain is obviously unethical at the very least. 1

I humbly beseech your recognition that these decisions have significant, life altering implications for every landowner and abutter from northern West Virginia to the Transco line in southwest Virginia.

Respectfully Submitted,

Louisa Gay
December 19, 2016

Subject: Docket CP16-10-006 Comments on the DEIS for the proposed Mountain Valley Pipeline

Dear Secretary Bose and Members of the Commission:

We would also like to comment on the Amendments to the USFS Land Management Plan Amendments as proposed by the NOAA contacted as part of the DEIS for the MVP, regarding the MVP DEIS Section 4.8.2.6 (proposed amendments 1 through 4 to the Jefferson National Forest Plan): We are opposed to the granting of the right of way changes to the Forest Plan or LRMP, as requested in the NOA. For MVP to construct and operate a pipeline across federal lands managed by the U.S. Forest Service (USFS) and the United States Army Corps of Engineers, a designation of a “utility corridor” in the JNF would be required if the application is to be approved.

The National Forest Service land is for all citizens of the US, preservation of our heritage, our rights, our water and our natural resources provided by the Forest is a privilege of all and not something that should be given away to a corporation for financial profit. We urge that you consider the amendments with all due caution for how they will impact the future of the Jefferson National Forest. Public input is essential, and should not be ignored by the Bureau of Land Management, the Army Corp of Engineers, or the USFS.

The JNF and the BLM proposed amendments are disturbing and great care and deliberations should be taken for how they will impact the future of the Jefferson National Forest (JNF) and generations to come. The mission of the USFS is to “sustain the health, diversity, and productivity of the nation’s forests and grasslands to meet the needs of present and future generations” it should be a servant of the people. Allowing the pipeline to be constructed within the Jefferson National Forest (JNF) would violate the trust citizens have placed in our government to protect and steward a national treasure. This proposed pipeline crosses numerous delicate ecosystems, karst regions, and mountainsides and private properties. Decisions made by the USFS concerning the land they oversee will also impact communities in the area.

In our opinion, the regulatory protections for projects such as this should be more stringent, instead of the minimal environmental protections that exist now. The removal of old growth trees within the construction corridor is a horrible idea. They are symbols of our heritage and should be treasured, not destroyed. They are part of a unique ecosystem that the USFS is meant to preserve, not be allowed to be destroyed forever. Allowing MVP to avoid the environmental controls mandated by NEPA strictly for a profit company and in total disregard of citizens and the environment is inexcusable.

To achieve their mission and vision, the USFS states they use an “ecological approach” and the “best scientific knowledge” along with “listening to people” in making decisions. Consideration of public input is critical and should not be ignored by the USFS or the Bureau of Land Management. The “people” have spoken. They have expressed their respect and concerns for
INDIVIDUALS
IND547 – Wilbur and Irene Larew

20161220-5035 FERC PDF (Unofficial) 12/19/2016 5:12:14 PM

IND547-1

Continued... the National Forest and its fragile ecosystem. They realize not only the potential catastrophic changes that could occur in the immediate future but also in years to come if this pipeline is constructed in the National Forest.

Recreation and tourism are critical to many communities, especially in Monroe county and surrounding area. A prime reason many people live or visit come here is for health, wellbeing and relaxation, the income that is generated by tourism, which is possibly the largest economic driver in Monroe County. This source of income would be severely impacted by a pipeline corridor across the county, Peters Mountain and the Jefferson National Forest. The proposed corridor would very severely and negatively impact that industry in the county/region.

While each amendment is individually and separately without merit, Proposed Amendment 1 is the most egregious and constitutes a serious violation of the basic social contract between FERC and us, the stakeholders.

We strongly oppose the proposed 500 ft Designated Utility Corridor across Peters mountain and the JNF. A 500-foot ROW would be like building a super highway across the JNF and the entire area. A corridor such as this would insure that future expansion, with the potential for more pipelines, electrical lines, water lines, etc., would be constructed. The impact of the entire width of the designated corridor and whether that conflicts with the forest use plan must be evaluated, as well as the impacts to private landowners within and at each end of the corridor.

This proposed amendment would not only create a "utility corridor" across the JNF, but would also create a pipeline/utility alley in Monroe, Summers, and Greenbrier Counties, WV and other counties in VA. The damage done by this "Access Alley" across these counties would be severe, but the greatest impacts would be to private landowners in counties on each end of this corridor, as all future projects would have to traverse these areas to enter and leave the corridor across the National Forest Lands. Many landowners in these adjacent counties could become nothing more than custodians of the utilities, i.e., they would become the guardians of pipelines and power lines on their land, making their land useless for anything else.

IND547-2

We oppose amendment 2 because the proposal would permit exceptions to the soil and riparian corridor conditions. We believe that Peters Mountain Wilderness Area, The Appalachian National Trail, Mystery Ridge, Brush Mountain Wilderness the old growth Forest, Roadless Areas, as well as other sensitive areas in the forest could suffer substantial damage with the construction. We find it objectionable to allow the construction of the MVP pipeline to exceed restrictions on soil conditions. These exceptions in the fragile forest should not be allowed. MVP should comply with the current restrictions in place regarding soil and riparian corridor conditions and not be allowed to exceed them. Furthermore, We firmly believe that if soil conditions are exceeded, both ascending and descending Peters Mountain and other steep slopes in the JNF, it will cause silting of the water bodies below, damaging critical habitats and drinking water sources. Peters Mountain also has numerous endangered and rare species in its confines.

IND547-3

Regarding amendment 3, this amendment, like all the others, would allow the removal of old growth trees within the construction corridor. Ancient woodlands have attained unique ecological features because they have not been disturbed. They are a rare natural resource than
can never be replaced once destroyed. To destroy these marvelous trees would be reprehensible. This great National resource should not be sacrificed for an industry's private gain. The existing regulations are sufficient and should not be changed to remove old growth trees. It would also have many of the same detrimental effects as have all the proposed amendments. The forest plan should not be amended as proposed in Amendment 3.

Finally, the forest plan should not be amended as requested in Proposed Amendment 4 to allow the MVP pipeline to cross the Appalachian Trail on Peters Mountain. The Appalachian Trail is so vital to the identity of our area and its economy. Allowing the Scenic Integrity Objective to change from High to Moderate near the crossing of the most famous and prestigious national scenic trail in the U.S. is inconceivable. A recent statement released by the ATC said that the: 

"Mountain Valley project represents a serious threat to the scenic value of the A.T. well beyond the scope of similar projects - as many as 19 prominent A.T. vistas may be severely impacted from this project, many of them viewing impacts as they occur on USFS land." And that it would impact the AT for “100 miles...” 

The ATC went on to say "These amendments would not only be unprecedented, but would significantly erode the value of the Appalachian Trail which the public has spent millions to protect"... "Further, it would require the establishment of a new 5e utility corridor directly adjacent to Federally Designated Wilderness, leading up to the AT's doorstep in a location that is currently wild and pristine."

We fear the Jefferson National Forest and its fragile ecosystems will be so irreparably damaged by the construction of MVP that it will never be whole again. Decisions made about the forest will have adverse consequences to streams, wells and springs both inside and outside of the forest. The Forest Service's actions could erode private landowners to pipelines forever. They certainly do not deserve to become “guardians of pipeline and power lines”.

Since the Mountain Valley Pipeline project has not yet been approved, I find it hard to believe the proposed amendments which would vastly expand the amount of infrastructure, transporting who knows what, would even be considered by the FERC. These amendments are irresponsible from every standpoint conceivable. Given the obvious lack of correct information and data, there is need for a new environmental impact statement to address changes of this magnitude. In spite of the insistence on the part of FERC and Mountain Valley Pipeline that any disruptions to local communities would only be temporary and limited to the construction phase, Proposed Amendment 1 effectively guarantees disruptions in perpetuity for our communities.

We strongly oppose these amendments to the Forest Service Plan. Enacting these amendments will irrevocably harm the invaluable cultural resources we derive from the forests, streams, and other fragile areas of the National Forest. These amendments will also have lasting negative consequences on our property values, and disrupt many carefully planned retirements via loss of equity in homes in the area.
We strongly condemn the utter disregard for basic science and human health concerns made clearly evident in the four proposed amendments. Enacting of these amendments will threaten not just the health of our soil and streams, but poses a lasting threat to our groundwater aquifers and human health.

Once contaminated, our aquifers will never return to their original quality, depriving current and future generations of this resource. It also poses a threat to many endangered and rare species found in and near the JNF. We, therefore, request the United States Forest Service, the Army Corp of Engineers and the Bureau of Land Management not to grant a right-of-way in response to the MVP application.

Furthermore we believe that the proposed Mountain Valley Pipeline (MVP) is not in the public interest. It poses a very real threat to public health and safety to West Virginians and Virginians. It will have permanent adverse impacts on the local environment. It will drive several more decades of global climate pollution. The primary beneficiaries of the pipeline will be private companies. The Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC) rightly concludes that constructing the pipeline will have significant adverse impacts to forests. However, the DEIS fails to fully account for the other threats posed by the MVP.

The DEIS merely states that pipeline developers would comply with minimum construction and operation standards. It gives no reason for people living within the 1,400-foot blast radius to feel safe. Recent news reports are alarming, documenting pipeline, leaks accidents and explosions on an almost routine basis. There is just no way to justify the risk of an explosion or leak to the people who live within the quarter-mile, which includes us and many family members and friends.

Drinking water resources are discussed in section 4.3 of the EIS.

Comments noted.

See the response to comment IND2-1 regarding safety.
hundred or more attending. Family and friends enjoy a stress filled weekend each year with a picnic, square dance, hay rides, and hikes into the Narrows of Hans Creek, which passes through part of our property. Our farm extends to the adjacent lands of neighbors, where the proposed pipeline corridor is planned. This pipeline will impact our lives in many ways including our water, property values, peace and serenity to name just a few.

These two pictures were taken recently, by a neighbor earlier this month (December 2016). They are taken in the Narrows of Hans Creek, which passes through one part of our property. This is a very unique area both geologically and biological as well as for its scenic wonders. The area has numerous springs and at least one wetland area. The first picture is of the real unique “Blue Hole”. The second is taken atop the 100 ft “Lovers Leap” that towers above the trees and the stream below. This feature is not far from the proposed crossing of Hans Creek and adjacent to our property. Passing through this area would severely impact or even destroy this area that is beloved by many. It is a part of our culture and history.

Finally I would like to offer this video as an example of “Cultural Attachment” or “a Traditional Cultural Place” known now as the Lasure Farm, in the video it was named Valley View Farm, as described in the Thomas King submission accession # 20160830-5133 FERC PDF (Unofficial) 8/30/2016 9:19:02 AM. This video was made in 1961 and uploaded to YouTube in 2011 by our nephew. It shows a ritual that was started over 200 years ago and continues today, family and friends gathering from all over the country to celebrate some event. People in this video came from several states including Washington state and Arizona.

https://www.youtube.com/watch?v=5f6lhl1_lms

Many studies and reports have shown that there are enough existing pipelines to carry the gas needed to meet customer demand in the Mid-Atlantic and Southeast. As many states shift their electric generation from coal and gas to wind, solar, and other renewable, it’s likely that demand for gas will decrease in the long run. But right now, bad policies are creating incentives for companies to overbuild the pipeline, including the MVP.

See the response to comment FA11-12 regarding need. Renewable energy sources and energy efficiency are discussed in section 3.0 of the EIS.
Section 4.3.2.1 of the EIS discusses monitoring and testing of water wells within 150 feet of the proposed workspaces as well as testing of wells and springs within 500 feet of karst areas.

See the response to comment IND2-3 regarding hydraulic fracturing. Climate change, GHGs, and cumulative impacts are discussed in section 4.13.

See the response to comment FA15-5 regarding forest impacts. A revised discussion regarding the ANST can be found in section 4.8 of the EIS.

Environmental justice is discussed in section 4.9 of the EIS.
Below is a picture of The Larew Farm, established 1789 in the Beautiful Hans Creek Valley
(Picture taken by neighbor Maury Johnson and was picture of the day on WVVA TV late this summer)

The Mountain Valley pipeline would run along Ellison's Ridge adjacent to the Valley and would cross into the valley very nearby. It would also cross Peters Mountain seen in the far center of the picture.

The pipeline corridor would be very prevalent in the view.

Because of the vulnerability of critical water resources in the karst areas at the base of Peters Mountain, we support the requests that have been made by the Monroe County Commission and others, that the FERC require an independent, comprehensive hydrogeological study of the public and private water resources in Monroe County (especially in areas of karst) before issuing a Revised Draft Environmental Impact Statement or a Final EIS, or approving an MVP route through Monroe County. We also encourage the GW & Jefferson National Forest office to complete such a study per the request of numerous citizens and citizen groups as well as public officials, on Peters Mountain before any decision is made about crossing this unique aquifer.

Sincerely,

Wilbur and Irene Larew
Hans Creek Road
Greenville, WV 24945
Claudia Neely, Morgantown, WV.
The Reverend Claudia Neely
88 Ridgeway Avenue
Morgantown, WV 26505

December 19, 2016

Federal Energy Regulatory Commission
c/o https://ferconline.ferc.gov/FERCONline.aspx

Dear FERC,

I am writing to comment on concerns I have about the Draft Environmental Impact Statement (DEIS) for the Mountain Valley Pipeline, which has the potential to cause major harm to the people and environment of West Virginia. I work with families throughout West Virginia who depend upon their lands for sustenance and livelihood, and I am concerned that the Draft Environmental Impact Statement more fully addresses these families. I believe it is essential and morally imperative to pursue these questions.

First of all, I am very concerned that groundwater and drinking water impacts have not been assessed. I believe an environmental impact statement that ignores well and drinking water along the proposed line is deeply immoral and unethical. I work with families along this route who have young children, elderly relatives, and loved ones who depend upon local water resources. To ignore the needs of West Virginia families is terribly wrong. All drinking water wells along the route must be assessed.

I am also concerned about geologic hazards along the route. Many families with whom I work live near caves, and being sure to evaluate the impact on local water resources along the MVP route is important for those families.

The Draft Environmental Impact Statement already states that 79% of the pipeline is on a route that is susceptible to landslides. As the flooding in central West Virginia, where I have worked with many families, already shows, landslides are already a vulnerability throughout the state. The DEIS must address landslide issues that could harm West Virginia families.

The Mountain Valley Pipeline is planning to fill in 44 West Virginia wetlands to build their line. This is unacceptable and should be addressed in the DEIS. Nationally, the loss of wetlands is creating perverse problems for hunters and families who participate in sport fishing, and this loss of wildlife is especially upsetting for West Virginia families who use fishing and hunting to supplement family meals. We as a state cannot afford to lose 44 wetlands.

IND548-1
Groundwater and drinking water impacts are discussed in section 4.3 of the EIS. See the response to comment IND3-1 regarding drinking water testing. Caves are discussed in section 4.1 of the EIS.

IND548-2
Landslides are addressed in section 4.1 of the EIS.

IND548-3
See the response to comment IND209-1 regarding the permanent fill of wetlands.
Finally, I am concerned about river crossing plan for the pipeline, which plans to use the most invasive construction methods to cross the Elk, Greenbriar and Gauley rivers. This is horrific. Families along these rivers depend upon these rivers for their economic livelihood, including fishing, sports activities, tourism, and recreation. The loss of tourism to river destruction is very concerning. West Virginia rivers are essential to state tourism, and the pipeline should not be putting these iconic rivers at risk.

Due to all of these objections, I believe the Federal Energy Regulatory Commission needs to more fully evaluate how this pipeline could significantly harm West Virginia families. West Virginia citizens should be a priority for protection and safety, and it is the duty of the commission to consider these many issues and concerns.

Thank you for considering my comments

The Reverend Claudia Neely

Mountain Valley now proposes to cross the Elk, Gauley, and Greenbriar River using dry-trenching techniques. Tourism is discussed in section 4.9 of the EIS and recreation is discussed in section 4.8 of the EIS.
December 19, 2016

Ms. Jennifer P. Adams, Special Project Coordinator
George Washington and Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, VA 24019

Cc:
Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Proposed Mountain Valley Pipeline Route (FERC Docket No. CP 16-10-000)

Dear Ms. Adams,

I have sent several letters to the Federal Energy Regulatory Commission (FERC) addressing concerns regarding the proposed route of the Mountain Valley Pipeline (MVP) and the significant negative impact to the Appalachian National Scenic Trail (ANST). I have expressed concerns regarding the four proposed amendments to the Jefferson National Forest Land and Resource Management Plan (LRMP), the complete lack of respect for ANST by MVP, and the extremely deficient and inaccurate analysis of impacts to the ANST as presented in the September 2016 Draft Environmental Impact Statement (DEIS). I have copied you on a few of these letters; however, I felt a strong need to write you directly.

First, I am writing to strongly oppose the four proposed amendments to the Land and Resource Management Plan (LRMP) for the Jefferson National Forest. FERC has proposed Forest Plan amendments that would allow activities that would substantially interfere with the nature and purposes of the ANST. I am especially concerned with Proposed Amendment 1 and Amendment 4. Proposed Amendment 1 would allow an expansion of the 50-foot right away to a 500-foot right of way (250-feet on each side of the pipeline) for establishing a "Utility Corridor." Proposed Amendment 4 would allow Mountain Valley Pipeline to cross the protected Appalachian National Scenic Trail on Peters Mountain and to change the Scenic Integrity Objective for the area and the Appalachian Trail from "High" to "Moderate" with restoration permitted to take 5-10 years after construction. Neither one of these amendments should be allowed because of the serious negative impact to the Appalachian National Scenic Trail.

The original 50-foot right of way for this proposed pipeline will alone spoil the experience by ANST users in this area. A huge 500-foot wide corridor would open this area for future utility projects and leave a massive scar in the Jefferson National Forest. The location of the proposed ANST crossing is a scenic and unbroken forested landscape that is adjacent to the federally designated Peters Mountain Wilderness area.

See the response to comment FA8-1 regarding Amendment 1.
See the response to comment FA10-1 regarding Amendment 4.
INDIVIDUALS
IND549 – Tina Smusz (on behalf of Mark A. Hileman)

IND549-1 cont’d

It would impact ANST users not only at the proposed crossing location but also open up a 500 foot wide corridor on adjacent private lands that will reduce the scenic views from many areas along the ANST with the massive scar it will create. I have hiked along this section of the Appalachian Trail many times and know the considerable damage to the view shed that this pipeline will cause. The proposed route will significantly degrade the views visible from many sections of the trail including important viewing areas from Angels Rest, Kelly’s Knob, and Rice Fields – just to name a few. The Appalachian Trail Conservancy (ATC) has indicated there may be as many as 19 prominent ANST vistas severely impacted by the proposed pipeline route.

IND549-2

Secondly, the complete lack of respect for the Appalachian National Scenic Trail by MVP is appalling. As a member of the Appalachian Trail Conservancy, I am well aware that the ATC has a history of working cooperatively with various industries to ensure that the energy needs of the public are met while simultaneously preserving the beauty of the Appalachian Mountains and the unique hiking experience provided by the ANST. The ATC and the Roanoke Appalachian Trail Club provided input to the MVP on adjustments to the proposed project route which would avoid significant negative impact to the trail, including following existing infrastructure corridors already cut into the landscape. A May 4, 2016 correspondence from the ATC to FERC objected to the current planned crossing for the ANST. The ATC preferred that the crossing location be moved to a location where the ANST is already being crossed; that it be moved further away from the Peters Mountain Wilderness area; and that it be moved further away from Angels Rest to reduce the significant impacts to trail users.

But MVP has treated this input as unimportant and has proceeded with a route that was unacceptable from the start in regards to the impact on the ANST. The ATC stated that the proposed MVP route threatens the ANST on an “unprecedented scale.” I have been a member of the Appalachian Trail Conservancy for many years and I have never witnessed the organization so strongly opposing a utility construction project to this extent!

IND549-3

Thirdly, the 2016 DEIS for the MVP route completely fails to address the substantial visual impacts of the proposed pipeline on the Appalachian National Scenic Trail. The lack of appropriate information in this document is indefensible! The ATC stressed the need for visual simulations to be conducted to evaluate the impacts to the ANST. An August 5, 2016 correspondence from the ATC to FERC noted the proposed MVP pipeline route would be visible to users from multiple locations along the ANST. The United States Forest Service made repeated comments on Resource Reports and FERC documents that MVP needed to perform visual impact assessments regarding the ANST for all route alternatives, and noted that a basic visual analysis conducted in October of 2015 found that the proposed ANST crossing would result in significant visual impact for hikers on the trail. But no appropriate visual impact assessment was conducted by MVP as part of the DEIS. This is totally unacceptable. It is likely that the visual impacts of the proposed pipeline route to the scenic view shed from the ANST would be very negative and extensive. At a minimum, the Forest Service should demand that a more appropriate and accurate DEIS be published to address the substantial visual impacts of the proposed pipeline on the Appalachian National Scenic Trail with the legally required 90 day comment period for the public to review and respond to the document.
In conclusion, I am requesting the Forest Service deny the four proposed amendments to the Land and Resource Management Plan for the Jefferson National Forest and reject the current pipeline route. These unprecedented amendments would significantly erode the protection of the ANST. MVP’s lack of understanding and respect for the ANST, reluctance to partner with the ATC, and unwillingness to conduct appropriate visual simulation impact analysis has lead to the development of the current unacceptable poor route. The Appalachian National Scenic Trail is managed and protected for the public by the National Park Service, US Forest Service, Appalachian Trail Conservancy and numerous state agencies and volunteers. Please do your part in protecting this magnificent public treasure, the Appalachian National Scenic Trail.

Sincerely,

Mark A. Hileman
Catawba, Virginia

cc: Wendy Janssen, National Park Service, Appalachian National Scenic Trail Park Superintendent, wendy.janssen@nps.gov

Joby Timm, George Washington and Jefferson National Forest, Forest Supervisor, jtimm@fs.fed.us

Tim Kaine, Virginia Senator, nick_barbash@kaine.senate.gov

Mark R. Warner, Virginia Senator, Zach_Lewis@warner.senate.gov

Honorable Morgan Griffith, Virginia’s 9th Congressional Representative, kevin.baird@mail.house.gov
December 19, 2016

To: Kimberly D. Bose, Secretary; Federal Energy Regulatory Commission
Norman Bay, Chairman; Members of the Commission

Re: Draft Environmental Impact Statement: CP16-10-000 Mountain Valley Pipeline
DEIS Failure to Address Major Issues in Socioeconomics

While the Draft Environmental Impact Statement for the Mountain Valley Pipeline reveals a deeply-ingrained bias against any environmentally sensitive mode of economic analysis, I want to comment here on the utter inadequacy of the treatment in the DEIS of other significant aspects of the socioeconomic environment. Section 1508.4 of the National Environmental Protection Act defines the human environment “comprehensively to include the natural and physical environment and the relationship of people with that environment.” The definition concludes saying that “When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated then the EIS will discuss all of these effects on the human environment.”

My objections are founded on the following basic assumption: the relations between an action or object and its environment are systemic and interactive. Therefore, the expectation is that a Draft Environmental Impact Statement will address both the impacts of the proposed action on the environment and also the potential impacts of the environment on the proposed action. On a physical level, for example, the DEIS must not only account for the impact of pipeline construction on water resources at stream crossings, but it must also account for the potential of streams to dismantle the pipeline itself through damaging floodwaters. Only by such treatment can the FERC establish that the proposal is of minimal environmental impact and at the same time can be built safely.1 The discussion of the socioeconomic environment is no different: the DEIS must analyze those ways the socioeconomic context of action has shaped and may continue to shape the proposed pipeline, as well as the ways the pipeline’s construction and operation may affect the socioeconomic conditions of the surrounding area for good and for ill.

Given this orientation, the Draft Environmental Impact Statement for the MVP is completely inadequate to the task of assessing the Socioeconomic dimensions of the project. Specifically missing from the materials presented are the following crucial dimensions of the interactions between the proposed action and the contexts in which it has been put forward:

1. The account of the project’s purpose and origin is incomplete and significantly misleading, constructed to obscure and frustrate appropriate analysis of many other aspects of the project’s design;

2. The descriptions of socioeconomic and demographic data serve no ostensible purpose in understanding the effects of the project’s physical impacts on the particulars of the human environment;

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1 These being the two critical decisions on which FERC must base a decision to grant a certificate of convenience and necessity, see former Chairperson Lafleur’s address to the Washington Press Club, January 2016.
The materials on socioeconomic and demographic data provide no objective measure of the disproportionate impacts on the subject population—thereby making impossible any discussion of the issue of environmental justice;

(4) The discussions of socioeconomic factors do not include the required evaluations of alternatives (including the proposed action and the no action alternatives) in socioeconomic terms;

(5) The discussion contains no historical or cultural account of the effects of economic instability on the subject populations affected by the proposal, and fails to explore significant features of the socioeconomic context which reveal the potential for serious negative effects from the short-term economic benefits associated with by the proposed action.

When taken in conjunction with the previously demonstrated failure of the DEIS to adequately consider negative economic effects from environmental damages, these five (5) shortcomings demonstrate the necessity for a total re-conception of the socioeconomic evaluation of the MVP. In keeping with the directives in NEPA 1502.9 (a),¹ the re-written section of the draft should be circulated to cooperating agencies and the public for evaluation and critique well before any subsequent close of the period for comment on the DEIS.

1. ANALYZING THE ORIGINS AND PURPOSE OF THE PROJECT

The discussion in the DEIS of the Socioeconomic dimensions of the proposal is a disingenuous attempt to portray the project in the most positive terms possible. It is an utter failure as an analysis of relations between the socioeconomic environment and the proposed action. FERC leaves out of the discussion numerous crucial factors, including those necessary conditions without which the project would not have been initiated. The overall effect of these omissions is to seriously misrepresent any further analysis of the development and potential effects of the proposed construction.

On page 1—7 of the DEIS, FERC staff recount the purpose and need for the project: “In general, as described by the applicants, the purpose of both the MVP and the EEP is to transport natural gas produced in the Appalachian Basin to markets in the Northeast, Mid-Atlantic, and Southeastern United States.” On the following page, the DEIS acknowledges that an additional purpose of the MVP would be to “alleviate some of the constraints on … natural gas production by adding infrastructure” (pg. 1—8) that could move gas from Appalachia to markets in the Southeast and Mid-Atlantic regions. I find nothing in the discussion of the Socioeconomic context that expands upon or in any way contradicts this simplistic account, which is—indeed—described by the applicant.

From the point of view of the economic analysis used by FERC for their dismissal of the Key-Log Economics’ studies, a significant aspect of the socioeconomic environment is missing from this account of the project’s purpose. That is, the desire of the applicant to make a significant profit from the construction of the pipeline. The DEIS devotes extensive space to rehashing the financial benefits of the pipeline to landowners, businesses, county and state governments—so why omit discussion of the financial benefits that motivate the applicants? One purpose of the pipeline is to make money for the sponsoring corporations and their stockholders, a purpose that can be fulfilled by transporting natural

¹ § 1502.9 (a) reads, in part “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”
gas to the specified markets. Despite all the charts and graphs supplied with the DEIS, there is no delineation of the profits to be enjoyed by the founding company, the ways in which these will be distributed among the corporate partners and their stockholders, or the ways in which these profits will be generated through commodity prices and other charges to the public. Nor is there any analysis of the fact noted in some comments to the Docket for the application that part of the socioeconomic machinery involved in shaping the proposal is FERC itself, especially through the agency's regulations governing return on corporate investment in infrastructure—a—which, as I understand it, will be the source of part of the commodity pricing.

Putting forth the notion that the purpose of the project is to supply gas (rather than to make money doing so), the DEIS is able to avoid any discussion of the intimate involvement of FERC in manipulating and controlling the economic context for the proposed action. As noted above, FERC's generous rate of return on investment may well be a major stimulant for any proposed expansion of infrastructure. Similarly, the DEIS sidesteps any reference to FERC's involvement with the so-called "secret purpose" of the proposal being to sell gas overseas (pg. 1—7-8). In rejecting such an idea out-of-hand, FERC staff responsible for the DEIS re-affirm the position of MVP spokespersons that they do not presently intend any such sales. But this omits discussion of the ways in which MVP could avail themselves of regulatory permission to do so if the domestic market for gas were to fail to turn an adequate profit. The authors of the DEIS stress all sorts of current circumstances that mitigate against overseas sales—but fail to discuss the ease with which regulations can be adapted to future circumstance—for example, declining profitability of domestic sales, which the DEIS refuses to foresee or acknowledge as possible. It is certainly true that the necessary permits could be obtained in such a situation—and it is disingenuous of staff to pretend otherwise. An accurate analysis of the socioeconomic context would discuss both the structural possibility for such a transformation of the project, and the economic potential for such a market situation developing in the future.

Further details of the 'purpose' for the proposed pipeline should be analyzed in the socioeconomic account of its development and design. FERC has systematically resisted any suggestion that the problems of fracking are connected with the development of the proposal—despite the fact that NEPA does require an examination of both direct impacts of a proposed action (such as direct effects damaging to the environment) and indirect impacts (such as damaging actions encouraged or stimulated by the proposed actions). If the socioeconomic analysis acknowledges the profit motive as one necessary condition for the proposal, it is much easier to track the connection between the MVP and the fraking of the gas it will transport: EQT corporation—the original sponsor for the project and one of its most obvious beneficiaries—is a major producer of fracked gas, and EQT and its partners will be the primary shippers of gas through the pipeline. Add to these two facts the DEIS's acknowledgement of the sponsors' claim that the pipeline will "alleviate some of the constraints on this natural gas production" (pg. 1—8). Clearly, in the current socioeconomic context, a major purpose of the proposal is to create market-access in order to expand the potentially profitable gas production from the

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1 See for example the discussion at http://www.appalced.org/2016/04/17/study-mvp-and-apc-show-overbuilding

2 For example, the position noted in an industry discussion of infrastructure issues, where a 9.34% rate of return was rejected because it was "substantially below the 12-14% FERC has authorized in most cases during the last 30 years." See http://www.coe.com/articles/print/volume-104/issue-33/general/int-INGA-to-FERC-include-MUPS-in-EQUITY-RETURN-FORMULA
Impacts on agricultural land is discussed in sections 2, 4.2, and 4.8 of the EIS. Soils are addressed in section 4.2 of the EIS. Recreation is discussed in section 4.8; tourism in 4.9.

Marcellus Fields—which will logically entail expanded use of hydraulic fracturing. To pretend otherwise is dishonest—and an incompetent exercise of economic analysis which must be remedied in the revision of the DEIS.

The correction in statement of the purpose of the project will result in a number of additions to the DEIS discussion of the Socioeconomic environment:

1. A more detailed discussion of gas industry constraints in relation to production and marketing of the resources available in the Marcellus Field—including a thorough analysis of the social and environmental costs of fracking;

2. A more thorough analysis of the projected time-frame for profitable exploitation of the resource given multiple drains on reserves;

3. A more detailed examination of the financial and economic incentives faced by the sponsoring corporations in framing and shaping the proposed action; this will necessarily involve discussions of the economic and physical effects of "fracking" and of the economic effects of competing energy production (including sustainable sources); and

4. A more forthright discussion of FERC’s role in stimulating and shaping proposals for infrastructure (especially needed given the unexpected inclusion in the MVP proposal of plans for a utility corridor development through the dangerous terrain of southeastern West Virginia and southwestern Virginia)—and a more complete analysis of the extent to which rates of return may be stimulating over building of pipeline capacity.

2. Integrating Socioeconomic Data with Environmental Information

In its current form, the discussion of Socioeconomics is almost entirely divorced from any discussion of the environmental impacts of the proposal. As demonstrated by the studies submitted to the docket from Key-Log Economics, it is possible to evaluate the economic costs associated with the various impacts on the environment, and these should be revealed and analyzed in the course of discussion. Moreover, the DEIS discussion makes no mention of those aspects of the proposed action which would incur indirect or induced impacts in the form of societal costs for climate change and global warming. Thus a large body of information must be assembled and analyzed clarifying the value of environmental impacts.

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1 In large part this has been accomplished by the highly suspect and unsupported claims in the analysis of environmental impacts that there are no such impacts, at least none that are more than temporary and insignificant. That these claims are completely unsupported with empirical data on the projected effects of construction must be remedied—and the results must be calculated in their economic implications.

2 I realize that the DEIS proclaims—despite extremely scant empirical evidence—that there will be no impacts on the environment; for instance they write of the possibility of environmental justice issues that "There is no evidence that the projects would cause significant adverse health or environmental harm to any community..." (pp. 4—32).

3 A thorough discussion of this issue can be found in Docket CP16-10, Document #20161207-5000. The comment makes numerous detailed suggestions for important additions to the DEIS attempt to meet recent requirements for consideration of these social costs.
But a more systematic analysis of existing data is needed as well. In examining potential impacts on agricultural communities—or, for that matter, on the numerous individual families that depend on home gardens for substantial amounts of their food—the analysis should be far more sensitive to ways in which construction may affect productivity—and estimates and projections should be incorporated in the discussion. Comments to the docket from practicing soil scientists indicate that disruptions and compacting of soils will affect productivity—and the DEIS must treat both the environmental and the economic implications. Acreage of prime farmland disrupted by the project have been documented in Appendix N-1—N-8, and there should be estimates available for the reduction of productivity resulting from construction, given the supposedly vast record of FERC-sponsored projects mentioned in the footnote on pg. 4—239. Such detailed discussion is required before stating generalized conclusions that there will be negligible impacts on the agricultural economy of affected counties—or of individual landowners and their families.

Similarly detailed analysis is needed for other aspects of existing economic activity: the DEIS presents generalized figures for recreational activities, tourism, and so on. These data reveal the relative importance to the overall economy of these activities. But the DEIS provides no indication of the extent of physical impacts that could affect such activities, nor any projected measure of intensity demonstrated by research. To refer to an example developed in some detail in my previous comment: the DEIS identifies only 7 tourist attractions that might be affected by construction activities producing “noise, and dust.”(pg. 4—309) These include the Appalachian National Scenic Trail, the Blue Ridge Parkway, three other popular trails, and the Jefferson National Forest. But the earlier list of significant tourist attractions in Table 4.9.1—5 (pg. 4—277-279) includes 73 sites, and even this list is inadequate and incomplete as a delineation of the recreational and tourist resources affected. Beyond direct effects of ‘dust and noise’ the analysis needs to attend to other effects such as sedimentation (a significant issue for recreational activities on the Greenbrier and Gauley Rivers in West Virginia), effects of stream temperatures of forest clearing (especially a problem in trout streams like the Honiny Creek drainage in West Virginia, or Sinking Creek in Virginia), and all those intrusions on daily pleasures such as increased traffic problems that can undermine tourism.

The revision of the discussion of Socioeconomic effects will need to more fully acknowledge and deal with the interaction of the physical and environmental impacts of the proposal with their socioeconomic expression. The DEIS should fully document the ways in which specific aspects of the proposal may have specific impacts on economically significant activity, and provide some sort of documented estimate of the effects. At present, documentation is largely in terms of statistical description of general elements, and projected effects of spending calculated by the applicant. While this information is useful in gaining a generalized picture of some positive effects, it fails to account for the connections between the physical actions’

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5See for example the materials submitted in Docket CP16-10, Document # 201611216—5063, Document #20161207—5159, and #20150616—5364.
Short-term employment is discussed in section 4.9 of the EIS. The environmental justice analysis provided in section 4.9 of the EIS is consistent with EO 12898.
percentage of elderly citizens: in only three counties is the percentage equal to or lower than the state average; percentages range from a low of 11.3% in Montgomery County, VA to a high of 22.1% in Webster County, WV, and in all but one county the percentage exceeds the national average. The percentage within county populations of disabled persons under 65 is also high, exceeding state averages and national averages in all but 2 counties, ranging from a low of 6.6% in Montgomery County to a high of 22.5% in Summers County, WV. Without evidence, the DEIS simply asserts that there will be no negative impacts of the project on vulnerable populations. If this project is approved, prior to construction thousands of acres of forests will be destroyed and the slash burned. Those residents with asthma or other breathing difficulties will be affected. During construction, residents whose only access is via one-lane rural roads will have to navigate construction activity and equipment just to reach a doctor’s office, hospital or to shop for food. The unsupported statements by which the DEIS dismisses the potential of significant effects from the MVP project on vulnerable populations are unconscionable.

There is another telling statistic that I do not find in the DEIS, but which could be an important part of the full picture of the pipeline’s impact—and should be added to tables during revision of the DEIS. For Summers County in 2014, owner-occupied housing rates exceeded both the national and the state average. In Summers County, 79.6% of homes are lived in by their owners. Statewide in West Virginia the figure is 73.4%, which is considerably above the national average of 64.9%. Again, it is important to consider the human implication of this number: almost 80% of the homes in Summers County are occupied by their owners—including, one assumes, 80% of those directly impacted by the ROW, the construction easement, the Primary Impact Radius and the Evacuation Zone of the pipeline. This implies that these homes are a significant financial resource—and given that the poverty rate in Summers County is 22.6%, the value of the home may be the largest part of the family’s economic worth. Any diminution of that value represents a disproportionate impact on a family living in poverty. It’s important to note that many citizens of this region depend on their agricultural and forest land (i.e., the environment) for food and fuel: thus damages to the environment will hit such people harder than, say, middle class suburbanites whose properties are likely to afford their owners many pleasures but few necessities beyond shelter.

So while it is clear that the project may have significant impacts on three groups of vulnerable citizens, how is one to determine whether or not those impacts are “disproportionate”? The DEIS suggests that the route was specifically designed to minimize impacts on urban population centers: “The pipeline route mostly crosses rural regions with relatively low population densities. By avoiding metropolitan areas, the MVP should reduce impacts on communities with high percentages of minorities, low-income populations, and other vulnerable populations” (Pg. 4—321). How can the FERC staff write that the preferred route “should reduce impacts” on vulnerable populations when their own data in the same chapter shows quite clearly that vulnerable populations in West Virginia and Virginia (with the exception of minorities) are precisely those who are impacted? The DEIS claim seems to be that fewer persons within vulnerable populations will be impacted in rural areas of West Virginia or Southwest Virginia than
in a metropolitan area [an almost certain point, since fewer people of any sort live in rural areas of the country] But the point of NEPA guidance concerns the populations affected by the Route—of which an above-average percentage (by both state and national comparisons) are “low-income, elderly, and/or disabled”. The choice of a rural route through this section of West Virginia and Southwestern Virginia made this inevitable. And who, one might ask, designed the route to achieve this? The answer would seem to be fairly straightforward: the managerial staff of EQT/MVP and the consortium of corporate interests that submitted the application, and the staff of FERC who have helped adjust and steer the development of the route. And thus the question becomes: to what extent are these populations affected by the proposed actions? Another population that is affected will be the end users of the gas—how will they be affected by the proposed line? Thus what is needed in relation to the social impacts of the project is a far more extensive demographic study than what is offered. The current information provides an oddly abstract portrait of the populations in the directly affected counties, but they represent only a fraction of the people affected by the proposal.

What would be required of such an analysis? It would require analyzing the attributes of and impact on the following groups:

1. The corporate managers and staff, and the corporate stockholders in all the participating corporations—these are the people who originated and shape the project, and whose intentions are now embodied in the refined plan;

2. The FERC managers, staff, and Commissioners whose input frames and shapes the decisions controlling the project’s development;

3. The end users supposedly benefiting from the clean, cheap, dependable energy provided by the gas transported.

4. A detailed comparison of the impacts entailed by the project for each group.

4. Evaluating the Socioeconomic Impacts of Alternatives

Another significant omission from the socioeconomic analysis in the DEIS is any evaluation of the socioeconomic impacts associated with alternatives to the proposed route. The section of the text devoted to socioeconomics provides materials related to the proposed route only; it makes no attempt to evaluate similar impacts accruing from alternative routes (which have been rejected without such an evaluation), and does not provide the sorts of comparative presentations required by NEPA. As noted above, the socioeconomic analysis also fails to consider the economic implications of the predictable impacts of the project—or any alternatives to the preferred route—on greenhouse gases, climate change and related social costs.

NEPA guidance emphasizes the crucial role of comparative analysis. Section 1502.14 requires that the EIS “should present the environmental impacts of the proposal and the alternatives in
The FERC does not regulate the exploration or production of natural gas; that is the purview of individual states (see section 1.3 of the EIS). The FERC would not revise or supplement the draft EIS, but would produce a final EIS that addresses comments on the draft.

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3. Analyzing the Effects of Economic Instability

In a comment I submitted to the prefiling Docket for the MVP application, I pointed out in some detail the extent to which the Appalachian region has been the object of national exploitation in repeated waves of extractive development. The timber industry had largely clear-cut the region’s old-growth forests by the time of the First World War; coal mining destroyed environmental resources and local communities even as it brought short-term economic growth to portions of the state by employing upward of 250,000 miners at the height of production; and with ‘mountaintop removal’ the industry has been able to level huge tracts of land, extracting the little coal left—with a greatly reduced workforce. Like strip-mining, the gas industry is notably high on capital investment and low on worker employment. Yet spokesmen for the project still are willing to proclaim that the fracking of the Marcellus, and the shipping of Marcellus gas through pipelines like the MVP, will be the economic salvation of West Virginia and the Appalachian Basin.

As noted above, one of the major issues to be addressed by the Socioeconomic discussion of the project is the entire issue of how long the Marcellus fields are likely to be fully productive to an extent that keeps extraction economically feasible. Clearly there are two issues which must be addressed: the amount of gas that is economically retrievable, and the rate at which it is...
going to be extracted. As much as FERC dislikes the notion of looking at more than one project at a time, it will prove absolutely necessary to do so. Even had FERC not proposed a utility corridor through the Jefferson National Forest as part of the MVP project—thus signaling the intention to direct further infrastructure development to the affected area—the rapid growth in extraction in the Marcellus region would require such evaluation of the MVP in the DEIS.

A thorough and persuasive account of the potential period of operation for the line is crucial to understanding the actual implications of many of the promised benefits of the project, and also of many of its potential negative impacts. While EQT has submitted elaborate tables of tax benefits from construction and operation of the pipeline, some of these endure only so long as the line is in use. If prices for gas should fall too far, the company might shut down operation; if the price of gas rises too high due to ever-shorter supply, the company might shut down operation. So clearly the public needs some substantial information on the likelihood that suppliers will last the 20 to 50 years that have been promulgated by FTI and MVP and the DEIS as the probable operational lifetime of the project. There are conflicting expert reports on these projections. How long will the compressor stations present negative impacts for real estate values and citizen health in their immediate neighborhoods? How long will these 25 lucky West Virginia operations employees12 enjoy their $65,000 salaries? We cannot know an answer for sure, but we can have a far more scientifically-sustained examination of the issue than appears in the DEIS’ present discussion of socioeconomic factors affecting the project.

But there is another equally significant factor involving the duration of various aspects of the project. Construction spending—including workforce hires and contracting locally for goods and services—will last no more than 29 months according to information in the DEIS. That is a little over two years. While the IMPLAN model has generated an intricate web of economic interconnection that is the potential out-growth of the construction investment, there is no detailing of how long this upsurge in activity will last. If employed workers are smart and are able to save substantial portions of their wages, the effect of construction may endure somewhat beyond the period of construction activity. But for many, the wages may be spoken for by the demands of daily living. The projected potential benefits of operating the pipeline will endure with whatever variations prove expedient for as long as it is sufficiently profitable to keep the pipeline in operation. But at best, these benefits will be far less dramatic than the construction-spending boom that precedes them. Following the decision to close down operation, there is the ayet-unsettled question of the how to cope with the expense of the decommissioned line—an expense we can realistically assume will be left to the public—not to mention coping with whatever environmental mess West Virginia and Virginia are left with as a result of the loss of thousands of acres of core forests and the depredations induced by fracking.

12 This number can be found in MVP’s Resource Report 5. Socioeconomics in the discussion of operational employment: of the 55 jobs estimated for West Virginia (including direct employment by MVP and indirect and induced jobs in the state economy) only 25 will go to new employees (pp. 5-28).
As I have noted in earlier comments, West Virginia (and Appalachia as a whole) is no stranger to this sequence of events. The current socioeconomic conditions in the state are in some considerable part an expression of what extractive industrial development means for people in a largely rural culture. I asked previously—and repeat the request now—that the DEIS include a discussion of the long-term social and psychological impacts of economic instability—the boom-bust cycle of intense bursts of high-level employment alternating with longer periods of economic depression—that have characterized extractive industry. These are indirect effects of encouraging and authorizing the expanded infrastructure that will hasten the utilization of the Marcellus gas fields—and which run the risk of significantly impairing the growth of non-industrial economic developments in the affected counties.

It seems all too likely that, as in the past, the greatest benefits of exploiting the natural wealth of the region will go to the companies that finance the operation. The environmental burdens, the physical dangers, and the economic, social and cultural costs will be borne mostly by Appalachian families. That seems to be the plan, judging by the DEIS as it currently stands. And it was certainly the plan from the point of view of MVP when they forced themselves onto reluctant landowners' properties insisting that West Virginia state law gave them the right to trespass for surveys without the landowner's permission. The West Virginia Supreme Court of Appeals set the company straight on that issue in their ruling in November 2016—which is not to say that the power of corporate wealth may not buy a change in the law for next year. But this is just one more facet of the socioeconomic context for the proposed Mountain Valley Pipeline which FERC cannot afford to ignore in drafting a Draft Environmental Impact Statement.

Once FERC has reviewed the literature on social damage of extractive economics, perhaps the staff will develop and evaluate an alternative plan for EQT's excess production of natural gas. Perhaps FERC will evaluate the long-term benefits and shorter-term inconvenience of utilizing the Marcellus in a less frenetic way, producing and utilizing the gas at a slower pace and thus extending the period of economic benefit to the term of several generations, rather than the 20-year service of a single CEO. NEPA does say that the agency must evaluate all reasonable alternatives—and while such an approach would not lead to this pipeline through the vulnerable terrain of southern West Virginia and western Virginia, it would no doubt provide more modest energy relief to far more people, while still handing gas corporations a respectable profit.

In light of the significant flaws in the treatment of the socioeconomic implications of the Mountain Valley Pipeline project, a revised or supplemental DEIS for the Mountain Valley Pipeline project must be issued and a new comment period opened. Given the potential negative impacts of this project on disadvantaged populations in West Virginia and Virginia, it is imperative that NEPA guidelines be taken seriously in drafting an Environmental Impact Statement. By those reasonable and important standards for serious analysis and consideration of socioeconomic impacts, the current DEIS fails entirely.
Respectfully submitted,
Thomas Bouldin and Susan Bouldin
Intervenor
Pence Springs, West Virginia

Cc: Ted Boling, Associate Director for NEPA, Council on Environmental Quality
    Shawn Garvin, Regional Administrator, US EPA, Region 3
    Barbara Rudnick, NEPA Team Leader, US EPA Region 3
    Ben Luckett, Staff Attorney, Appalachian Mountain Advocates
December 19, 2016
Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426
Re: Mountain Valley Pipeline Proposal, Docket No. CP 16-10

Dear Ms. Bose and Members of the Commission,

As a resident of the New River Valley, I have been following the continual attempts by the MVP to undermine the environment, economy, and safety of one of our country’s most beautiful geographic regions. My husband and I moved to this area 20 years ago when we discovered this pristine place.

Do short-term profits reign over the long-term peril and destruction of our water supply and old-growth forests? The proposed amendments to bypass buffer restrictions and exceed soil and sedimentation restrictions along creek areas and vulnerable watersheds are criminal in consideration of the damage that would result from such relaxation of standards. The loss of old-growth forests will invite invasive species and lead to erosion, and cheats future generations of this treasure. The proposal for the pipeline crossing the Appalachian Trail in federally designated wilderness land proves to me that nothing is sacred when a corporation decides to thumb its nose at all that we consider precious, just so they can worship the almighty dollar. Finally, a pathway of wasteland will be left if a 500 foot right of way is allowed.

Natural resources are invaluable, not expendable. As we have recently seen in a variety of scenarios, our water supply is incredibly vulnerable. Please think about the inherent harm that the above 4 amendments, if allowed, will do. Much more is at stake for many than what might be gained by a few stakeholders of an energy corporation, which, by the way, has never constructed a pipeline so large in diameter. Do you want to give away irretrievable natural resources for generations to come, in order to appease a few greedy individuals in the short term?

Please respect the many true stakeholders of our natural treasures, not the few driven by profit margins, and disallow the four amendments proposed regarding the MVP. Please know that I appreciate the soul searching that this consideration calls upon you to do.

Respectfully,

Vicki Tolbert
Radford, VA

Cc: U.S. Forest Service, comments-southern@georgewashington-jefferson@fs.fed.us

See the response to comment FA8-1 regarding Amendment 1. The opposition to the LRMP amendments is noted.
Chris Hazynski, Bordentown, NJ.

Please protect WV's rivers and streams and ensure the state is as clean and healthy as possible.

America needs clean energy, not dirty, polluting fossil fuels.

Water resources are discussed in section 4.3 of the EIS.
INDIVIDUALS
IND553 – Pat Chlepas (on behalf of Constantine Chlepas)

December 19, 2016

Kimberly Bose; Secretary
Ferc
888 First St., NE, Room 1A
Washington, WC 20426

Joby Timm; Forest Supervisor
Jefferson National Forest
5162 Valleypointe Parkway
Roanoke, Va. 24019

Docket # CP16-10-000

Dear Ms. Bose

I would like to comment on the 4 proposed amendments to the Forest Service Land and Resource Management Plan (LRMP) contained in the Notice of Availability of the DEIS for the proposed MVP Project dated Sept. 16, 2016. I would like to go on the official record as opposing all 4 of the proposed amendments. By doing so, I understand I have the right to appeal the Forest Service or BLM decision.

Proposed Amendment 1: This amendment would concentrate future utility construction through Karst features and groundwater supplies of Peters Mountain in WV. At this time, the size, location and interconnectivity of the aquifers and groundwater are unknown. Until this information is known, any decision by the FS to amend its LRMP could affect the drinking water supply of over 5000 residences in southern Monroe County. THIS AMENDMENT SHOULD BE DENIED.

Proposed Amendment 2: Allowing MVP to exceed restrictions on soil conditions and riparian corridor conditions is a disaster waiting to happen. The ability to construct a 42” pipeline on the steep slopes of Peters Mountain where depth to bedrock is minimal will negatively impact the first order streams in the area and change the recharge characteristics of the watersheds. The FS is aware of these challenges as evidence in their letter to Ferc dated October 24, 2016 File Code 1900;2720. THIS AMENDMENT SHOULD BE DENIED.

See the response to comment FA10-1 regarding Amendment 2.
INDIVIDUALS
IND553 – Pat Chlepas (on behalf of Constantine Chlepas)

IND553-3  Proposed Amendment 3: The LRMP should not be amended to allow MVP to remove old growth trees.  ONCE THEY ARE GONE, THEY ARE GONE FOREVER.

IND553-4  Proposed Amendment 4: The Scenic Integrity Objective of the LRMP should not be downgraded from High to Moderate for private profit. Walking the Appalachian Trail along Peters Mountain is a wonderful and humbling experience. Having a deforested ROW for a pipeline along the Trail is absurd. THIS AMENDMENT SHOULD BE DENIED.

IND553-5  I would also like to go on the record as having requested Joby Timm; Forest Supervisor, Jefferson National Forest, to do an independent hydrogeologic study of the size, location and interconnectivity of the aquifers and groundwater on the FS and adjacent lands along the MVP corridor. This request was made at a meeting held Oct. 12, 2016 from 1:30 -4:00 at the FS offices in Roanoke, Va. Without having this knowledge, any decision on FS land could negatively affect the drinking water supply of over 5,000 residences in southern Monroe County. Without an independent hydrogeologic study it would be extremely irresponsible to endanger the drinking water supply of over 5000 residents of Monroe County.

Sincerely
Constantine Chlepas
Route 1, Box 37
Lindside, WV 24951
Dear Forest Service,

We residents of Mt. Tabor Road object to the misery that will be caused by permitting the proposed amendments 1, 2, 3 and 4 to the Land Resource Management Plan (Docket CP16-10-000 [MVP]) in the Jefferson National Forest that will permit construction of the Mount Valley pipeline project to happen within forest lands.

The 3rd amendment allowing for cutting of old growth trees in addition to the 1st amendment permitting the 500’ construction right of way will be an invasion of our lifestyle. We object to the ugly scar the pipeline will plague us with, and fear the pollution of our water table.

Please protect us from this unnecessary danger, and do not permit these amendments to the Land Resource Management Plan.

Sincerely,

Debora Warren
5236 Mt. Tabor Road
Blacksburg, VA 24060
December, 2016

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission

888 First Street, NE
Washington, DC 20426

Re: Mountain Valley Pipeline proposal, Docket No. CP 16-10

Dear Ms. Bose and Members of the Commission,

We are avid campers and so love to utilize State and National Parks and Forest lands, and we know and feel deeply that we need to care for our most valuable resource - our forests.

We are very concerned about the MVP Pipeline coming through our area; Jefferson National Forest and the Appalachian Trail. What a travesty to destroy parts of this area for pipeline construction. I am specifically concerned with the 500 ft wide right of way through the Appalachian Trail, Peters Mountain Wilderness and any portion of old growth forestlands. Particularly in requested amendments 1, 2, 3 and 4 of Docket CP16-10-000 [MVP] to the Jefferson Forest Land Resources Management Plan.

Please reject these amendments that would allow for the pipeline and it’s 500 foot right of way in our public forest lands.

Thank you for all you can do in this. I am very concerned about this issue, as is the earth care committee of our Quaker meeting. I have so loved living here in this beauty. I can’t cope thinking of how our beautiful land will be destroyed by this pipeline.

Sincerely

Therese B. Lundberg
Blacksburg, VA 24060

Cc: US Forest Service, comments-southern-georgewashington-jefferson@fs.fed.us

See the response to comment FA8-1 regarding Amendment 1. The opposition to the LRMP amendments is noted.
INDIVIDUALS
IND556 – Barbara Coe

20161220-020011851105
Barbara Coe, Morristown, NJ.

IND556-1

I object to the proposed pipeline because of the environmental impact and its harm to animal habitat as well as its negative visual impact on the Appalachian Trail, one of the nation’s shared treasures.

Despite the so-called environmental impact statement, harm by forest fragmentation, wildlife disruption and destruction, compromising water supply and quality, and overall environmental degradation are clearly to result from this project. Please cancel or redraw the proposed project!

Thank you for your response.

IND556-1

See the response to comment IND270-1 regarding wildlife. The ANST is discussed in section 4.8 of the EIS. Forest fragmentation is discussed in section 4.4. Water resources are addressed in section 4.3 of the EIS.
I am writing to request that you not approve the Mountain Valley Pipeline. Its construction is not in the public interest, as it is a threat to public health, safety, water quality, and the environment. The primary beneficiaries of this pipeline would be private companies, as research shows the current gas infrastructure is more than sufficient as it is.

As it stands, the DEIS already admits the MVP would cause significant, permanent adverse impacts to old growth forests, habitats of threatened and endangered species, and historical and national landmarks. It would also harm local businesses that rely on tourism in the area, especially on the Appalachian Trail, which would also be irrevocably damaged. Building a pipeline provides short-term employment to people in a poverty-stricken area. It does not result in long term help.

The Forest Service’s Forest Management Plan directly prevents MVP construction, and they can and would take legal action against it. This pipeline is simply not mitigatable and would cause irreparable harm to this region. Please do not approve its construction.

The Commission would decide about public interest in their Project Order. Safety is discussed in section 4.12 of the final EIS. Water resources are addressed in section 4.3; forest in 4.4; threatened and endangered species in 4.7; historic resources in section 4.10; tourism and employment in 4.9. The ANST is discussed in section 4.8 of the EIS.
First of all, MVP is a PRIVATE COMPANY who wants to make money by bulldozing (literally and figuratively) over the people and properties in their path. OUR rights as citizens and landowners mean nothing to any of you because your greed is so huge. We have spent the last two and one half years being threatened and intimidated by the agents of the Mountain Valley Pipeline just so they could enter our properties for 15 minutes to tell us that our land is perfect for the pipeline. They are ignoring the wetlands that are found everywhere in this part of the country, the water basins, the wildlife, our beautiful landscapes and our very lives just so they can make a buck. It is very clear that this is all just a game. You have decided that you and your agents want to put in more pipelines and you are not even trying to pretend that you are thorough and accurate and are acting for the greater good. I have heard nothing about the many benefits that a pipeline will bring. And the proposed pipeline is mysteriously stopping in Pittsylvania County. WHY?? We all know the pipeline route will end at the Atlantic Ocean and the natural gas will be sold overseas. THERE IS NO BENEFIT TO ANY AMERICAN FROM THESE PIPELINES. It is common knowledge that we have saturated the markets for natural gas in this country. Studies have shown that there is no benefit to continuing to put in more pipelines. And finally, I want to address why FERC exists with no accountability to anyone. This feels like Nazi Germany and the Gestapo is killing millions of people while the rest of the world stands by and does NOTHING. We have seen enough devastation starting in Alaska and moving across the country to our part of the world. Your agents from the many pipelines that have raped the land and cut a swath of destruction throughout this country will have to answer for your actions at some point. We are already seeing the courage of people in the path of the Dakota Access pipeline taking a stand against this insanity and Virginians will have the same courage. We have all had enough with incompetent politicians who are getting elected because they are in the pockets of special interest groups [like yours] who are intent on destroying our way of life for their own greedy purposes.

Water resources and wetlands are discussed in section 4.3 of the final EIS; wildlife in 4.5; visual resources in 4.8. Benefits are mentioned in section 4.9. See the response to comment FA11-12 regarding need. See the response to IND2-3 regarding export.
Landslides are addressed in section 4.2 of the EIS. Wildlife is discussed in section 4.5. Tourism is discussed in section 4.9 of the EIS. A highway alternative is examined in section 3. Underground, FERC-regulated welded steel natural gas transportation pipelines rarely leak.

Susan P. Thames, Williamsburg, VA.
RE: Docket FCP16-10-000 (Mountain Valley Pipeline)

Ms. Bose,

I am writing to let you know that I am opposed to the Mountain Valley Pipeline going through this amazing natural habitat. I have seen mudslides in these mountains. I have seen what leaks from these pipelines do to the surrounding wildlife. Please protect these areas. They make Virginia and West Virginia some of the most beautiful country in the US and bring in countless tourists. Put the pipeline in areas populated by people or by highways at least so we can see when a leak begins and stop it promptly. Please stop the greed of these energy people.

Sincerely,
Susan Thames
TO: Kimberly D. Bose, Secretary

Norman Bay, Chairman

Members of the Commission Federal Energy Regulatory Commission

FROM: Rosemary Goss, Registered Intervenor

Date: December 19, 2016

RE: Docket # CP16-10-000 Mountain Valley Pipeline

Comments regarding the Mount Tabor Sinkhole Plain—original routing, Mt. Tabor Alternative, and the Virginia Department of Conservation and Recreation (VDCR) proposal

I live at 2355 Mount Tabor Road in Montgomery County, VA, and I am on the original proposed route as proposed for the Mountain Valley Pipeline. My property was surveyed by MVP in March 2016. As I understand the process, FERC must abide by the National Environmental Protection Act, so I, and other landowners in the Mount Tabor area, should expect that expert agency comments are utilized in the decision making process. Therefore, I do hope that FERC will consider the comments of the VDCR to avoid the Slusser’s Chapel Conservation Site in its entirety instead of the original route through the Mount Tabor Sinkhole Plain or the Mount Tabor Variation (letter from VDCR dated September 9, 2016).

The 76 acres on which we live has pasture, wooded areas, and a lot of karst with many sinkholes very closely spaced. We have lived on the site for almost 30 years and have seen new sinkholes form during that time. The views from our property are wonderful, and although we fell in love with the property when we found it, we were worried about the sinkholes. It was suggested to us to invest in hiring a geologist who could help us site the house so we could avoid damage to the house and our water. The geologist we hired was Dr. Kastning who was very specific about what we should and should not do in or around the sinkholes on our property. Thus, Dr. Kastning has long been familiar with the sinkhole problems around Mount Tabor Road. When the karst surveyors for MVP came to my property, they only walked the area of the pipeline right of way and did not venture further, where other karst features exist. This troubles me because I know from the report filed with the FERC by Dr. Kastning in July 2016 that karst features do not exist in isolation and that is certainly not the case on my farm. I actually live in what you would call the Mount Tabor Sinkhole Plain.

The high spot on my property is where I have my woods, and this helps to block the view of the AEP powerline. In the updated Karst Features Table provided by Draper & Aden, dated April 2016, they show the pipeline at milepost 222.19 in deep orange color. It is described as "multiple sinkholes in vicinity of proposed alignment. The proposed alignment is located along the edge and between two sinkholes in particular." This is accurate. Their concern is that "construction across sinkholes, or narrow ridge separating two sinkholes, may lead to long-term
diff erential settlement and pipeline instability. Construction run-off and fluid discharge may impact sinkholes, which may in turn lead to subsurface discharge to groundwater. Their recommendations are:

Adjust alignment as needed to avoid two prominent sinkholes, possibly southward by crossing under the electric line at MP 222.05 instead of MP 222.80, while maintaining parallel co-location. Ground stabilization and sinkhole mitigation is likely required. Ensure construction ESC will retain fluid and sediment within construction footprint, and prevent run-off into the sinkhole and surface drainage(s). See Notes 3,4 at bottom of this table.¹

I believe MVP’s claim that the Mount Tabor Sinkhole Plain ends at my property is incorrect because one can see many more karst features listed in the Table further on down the proposed pipeline. I do have other sinkholes on my property too, some that are open throat. They all likely drain to the Mill Creek Spring Cave just below my property in Blake Preserve.

Homeowners, like us, throughout this area are dependent upon well water, so protection of our water quality is essential. If we do not protect this water source, the consequences are grave indeed. The Department of Conservation and Recreation in its letter of September 9, 2016 reaffirmed their concerns about the impact of the pipeline on the Slussers Chapel Conservation Site.

DCR recommends avoidance of the Slussers Chapel Conservation Site. Routing the pipeline north along or near the topographic divides could avoid or minimize the disturbance of channels, and by removing the pipeline from areas of concentrated water flow significantly reduce the potential for erosion and sedimentation to affect the underground streams and caves of the Slussers Chapel Conservation Site.

To protect our water and the water of the many homeowners in the Mount Tabor area, I respectfully request that MVP be required by FERC to abide by the VCDR request and avoid passage through the entire Mount Tabor area.

Rosemary Goss
2355 Mt. Tabor Road
Blacksburg, VA 24060

¹ Submission 20160422-5012 (31404057), p. 46
Good morning, FERC, FS, DEQ, USFWS, COE.

Ok, but see the bigger picture, say a fractal related to other fractals, and look at a relief map of the
Bluefield, WV, VA, KY. Clearly the upland wetlands of Mountain Lake, Sinking Creek Valley and
Mountain, Johns Creek Mountain, Potts Mountain and Burks Garden are all upland wetlands. Newport
Quad in Craig Co at affected area (MVP ROW) shows many springs and upgradient there are many more.
Water is the problem.

These areas are not to be trifled with, and their roots go deep, several thousand feet deep of
connectivity. I absolutely agree with you that the MVP routes be monitored, before a decision of a route
can be made. FERC is blind to the impact, and not to just a small area where I live. The pipeline route is
inherently flawed because this is a delicate soil geology water ecosystem and always has been, and no
less so now. The "No Action" Alternative protects the integrity of the water as it is now.

The diversity of life here is fantastic and the soils have not even been investigated for the associated
diversity of soil life. This MVP pipeline would slash a 10-20 feet deep impenetrable wall of a dead zone –
everywhere along its route – should not be run near our upland wetlands nor their flanks nor roots of
mountain footslopes. Thank you, I do appreciate your consideration of the issue. If DAA surveyed the
same sinkhole that I found, told MVP, why did MVP not tell FERC?

Pipeline specifications should require Class 4 pipe, design and construction, if the pipeline is considered
further. The question of boring capacity of extra pipe weight and facilities, monitoring and shutoff
valves every 500 feet that would need to be maintained for the life of the pipeline (75 years), and
requiring the route to have no- pipe-bridging over voids clause, monitoring at every water crossing,
remediation requirements site specific, DEQ oversight, and an Action Plan to immediately stop leaks and
remEDIATE problems. My wish for Christmas is that MVP goes away forever.

I do wish you and your family a safe and happy Holiday Season!

Nan Gray, LPSS
P.O. Box 3
Newport, VA 24128
(540) 544-7791
soilwork@pmtel.net

Springs, water resources, and wetlands are discussed in section 4.3 of the EIS. Sinkholes are addressed in section 4.1 of the EIS. The No Action Alternative is discussed in section 3.

The DOT regulations determine class pipeline thickness and shutoff valves. The potential for pipeline leakage is discussed in section 4.12.
IND562 – Steven Powers

The Mountain Valley Pipeline (FERC Docket No. CF16-10-000) along the current route outlined in the Draft Environmental Impact Statement will pose a definite and grave threat to the endangered Roanoke Logperch, Percina rex. Construction of MVP and maintenance its right of way will be in clear opposition to the recovery plan for this endangered species, will make recovery and delisting of the species nearly impossible, and will undoubtedly increase the greatest current threat to its survival: neglecting decades of work by the U.S. Fish and Wildlife Service, Virginia Department of Game and Inland Fisheries, and countless other biologists and environmental educators.

According to the Draft Environmental Impact Statement for the MVP (FERC Docket No. CF16-10-000), the pipeline is planned to cross the Roanoke River and tributaries 85 times with open cut crossing methods and will denude 75 linear feet of stream bank on each side of these streams during construction. After construction, 50 feet on each bank will be permanently maintained as gravel and/or shrub vegetation. This will equal to 3,500 feet of riparian forest permanently eliminated from the upper Roanoke River drainage. During construction, an additional 1750 feet of stream bank will be denuded. The MVP will also closely parallel tributaries to the Roanoke River for approximately another 12,000 feet in narrow valleys with varying impacts on the riparian vegetation of these tributaries. As the U.S.GS isotyries slopes up 60% grade that will be denuded during construction and maintained as right of way indefinitely, sediment loads are certain to increase dramatically in runoff from the right of way. Elimination of riparian buffers along the MVP route will further reduce the already insufficient riparian filtration of sediments increasing sediment loads in the Roanoke River. The unpublished analysis by Environmental Solutions & Innovations, Inc. (2016) estimates an increase of 3,000.62 tons of sediment each year in the North Fork of the Roanoke River alone. This is a 73% increase in sediment load for the North Fork Roanoke, and this sediment is projected to contaminate the Roanoke River proper downstream to the upper reaches of Smith Mountain Lake. The previous analysis does not include increases from the South Fork Roanoke River and its tributaries. As the currently proposed route for the pipeline crosses South Fork Roanoke tributaries more times than tributaries to the North Fork Roanoke River, a comparable increase in sediment load will likely occur in the South Fork Roanoke above its confluence with the North Fork Roanoke where the Roanoke River proper begins. This section of the Roanoke River hosts the largest known populations of Percina rex, Roanoke Logperch, and its protection from specific threats to the species is essential for its recovery and delisting.

The Recovery Plan for Percina rex, Roanoke Logperch, specifically identifies a need to "reduce erosion and excessive stream sedimentation. Highest priority should be placed on reducing the quantity of silt entering the North Fork Roanoke." The recovery plan also specifically states "Measures should include the establishment of vegetated buffers (shrub and trees) along the banks of the above rivers and their tributaries." Sediment mobilized by construction of 35 stream crossings by the MVP will be substantial, and continued erosion of banks will persist due to maintenance of a deforested riparian zone.

IND562-1
See the response to comment CO107-26 regarding the Roanoke Logperch.

IND562-2
See the response to comment FA11-15 regarding turbidity and sedimentation. See the response to IND70-1 regarding erosion. See the response to comment CO107-26 regarding the Roanoke Logperch.
INDIVIDUALS
IND562 – Steven Powers

IND562-2
Throughout the recovery plan, there is much discussion of Percina rex being sensitive to siltation. The recovery plan executive summary identifies “stream sedimentation” as the only specific threat to the species and a reduction of stream sedimentation as the only mechanism of recovery in “Actions Needed”. Recovery hinges on “Protecting and enhancing habitat containing Percina rex populations.” Repeatedly, the 1992 recovery plan and 2007 update identify increased silt levels as the primary threat to the species and seduction of silt in the Roanoke River as the primary mechanism for recovery. In the 2007 update, “Proposed Recovery Practice #3 is to reduce sediment loading by at least 50% through restoration activity.” Proposed Recovery Practice #4 is to “Use restrictive zoning and wide riparian buffers to protect logperch habitat.” Proposed Recovery Practice #5 is “Establish minimum riparian buffers necessary to stabilize stream banks and reduce silt loads. A minimum of 20 meters should be set.” The 1992 Recovery Plan and the 2007 update both make it abundantly clear that the greatest threat to the Roanoke Logperch is the runoff of silt from upstream surrounding land, and the only way to recover the species is to decrease this silt by increasing riparian vegetation within its range. Construction of the MVP will increase siltation and reduce riparian vegetation within the upper Roanoke River increasing the primary threat to the Roanoke Logperch directly impeding its recovery. Even if erosion and sediment control practices contain much of the projected increase in sediment load within the Roanoke River, there is no way to establish the 20m riparian buffer called for in the recovery plan along the pipeline right of way. Thus, even with the most effective implementation of best management practices, construction and maintenance of this pipeline will directly impede recovery and increase threats to this endangered species.

The approval of the MVP application with its current route will equate to FERC actively impeding the recovery of this endangered species negating decades of work by the UNFWS, VDGIF, researchers at Virginia Tech, Roanoke College, outreach by the Science Museum of Western Virginia, and countless media outlets. Please work with EQT to find a route for this pipeline that does not include the Roanoke River drainage, allowing for construction that will not increase threats to Percina rex and hinder recovery of this endangered species.

Steven L. Powers, Ph.D.

IND562-3
See the response to comment CO107-26 regarding the Roanoke logperch.
Kevin Klesenski, Los Altos, CA.

In order to accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely reckless, as it would open the gates for future infrastructure projects to cause similar destruction.

The Roanoke Appalachian Trail Club and many other local stakeholders provided input on how the project could be adjusted to avoid unnecessary environmental hazards and unsightly alterations to Appalachian vistas, including following existing infrastructure corridors already cut into the landscape. I understand almost all of this advice went unheeded.

Please reconsider this decision.

Thank you,
Kevin Klesenski

IND563-1 Crossing of the ANST, including a visual analysis, are discussed in section 4.8 of the EIS.
INDIVIDUALS
IND564 – Regina Lorenzen

Regina Lorenzen, Summersville, WV.
To Members of the Federal Energy Regulatory Commission:

IND564-1 I am writing to express my objection and concern over the proposed route of the Mountain Valley Pipeline, which snakes its way through the mountains of southeastern West Virginia.

I have lived in West Virginia for over 30 years, witnessing time after time the unfair exploitation of the people who call this beautiful state their home. I must now stand up for my family and my neighbors and reject this proposal, which will benefit few, while putting hundreds of mountain families at risk.

IND564-2 Like many others, I live on a farm in a rural county in southeastern West Virginia. My neighbors have lived in this valley for generations, hunting, fishing, farming and raising cattle. All of our lives depend on one thing: the precious water that we take from a hole in the ground. It is this water that sustains us all. We are many, many miles from any municipal or public water district.

The Mountain Valley Pipeline is a threat to our water, and thus our livelihoods, and our very future. How can you propose to risk fouling the water of thousands of families along this mountainous route? This water is absolutely essential for our lives. Without it, these mountain valleys would become uninhabitable and the land would be made totally useless.

IND564-3 There is no fair compensation for land that will be perpetually at risk. A spill or explosion could make this entire valley uninhabitable for generations. And what of those of us who will be left here to clean up the mess, unable to sell our contaminated land, while the gas and pipeline companies are free to collect their profits, unconcerned about how many lives they have destroyed?

IND564-4 The excavation work involved in placing the pipeline will disturb our fragile water table, and the risk of seepage and spillage and contamination and explosion will continue for hundreds of years. Private and domestic drinking water wells within the pipeline route have not even been identified. How can FERC determine the impact of blasting on water wells without this information? All water wells within the impact zone must be identified and protected.

IND564-5 The MVP plans to cross the Elk, Gauley and Greenbrier Rivers using the open-cut wet crossing method. This method uses no water diversion and is the most invasive and impactful crossing method available. FERC must require MVP to minimize impacts during river crossings including reducing the construction area to a minimum.

IND564-6 The Mountain Valley Pipeline will make a one-time payment for an easement. That easement severely restricts what can be done on the property and limits the use of farmland and timber resources, even though property owners will still be responsible for property taxes on that land.

IND564-1 See the response to comment CO2-1 regarding benefits. See the response to comment IND2-1 regarding safety.

IND564-2 Water resources are discussed in section 4.3 of the EIS. See the response to comment IND3-1 regarding drinking water.

IND564-3 See the response to comment CO14-3 regarding spills. See the response to comment IND2-1 regarding safety.

IND564-4 See the response to comment IND401-5 regarding pending water wells. As stated in section 2.7 of the EIS, the useful life of the projects is expected to be about 50 years.

IND564-5 See the response to comment FA11-15 regarding open-cut wet waterbody crossings.

IND564-6 See the response to comment IND184-1 regarding easements and compensation.
At the same time, the pipeline constantly jeopardizes the future safety and stability of the land and valuable water resources. Furthermore, properties on which the pipeline will be constructed will permanently lose value as will neighboring properties.

Given the undeniable importance of fresh, clean water to the future of southern West Virginia, the potential danger that the pipeline poses to this valuable resource far outweighs the compensation offered by the gas company to property owners.

Additionally, those of us who own property in this part of West Virginia will not even receive gas from this pipeline, only risk our land, our water, and our future as the gas can be exported overseas as liquid propane.

Why should we endanger the very earth that sustains us, just so a few can profit? How many thousands are making sacrifices, unable to use their own land for any other purpose because of the presence of this pipeline, so just a few executives and shareholders can benefit? Is this just?

This has been the story of West Virginia played out over and over: first they came for the timber, then the coal, now the gas and oil, with no concern or punishment for destroying the land, wildlife and other resources, and the residents and businesses who choose to remain are left to pay for the clean up. When does it stop?

Isn’t it time to stop treating West Virginia like a “colony” and let us preserve our most precious resource of all - our fresh water?

I urge you to reject this project that endangers the very future of the inhabitants in this river valley. The risks are too high for the many, while the benefits are few. Save our water.
INDIVIDUALS
IND565 – Susan Cleaver

Susan Cleaver, Salem, WV.
Letter to FERC regarding Mountain Valley Pipeline

IND565-1 I personally endorse all of the comments by the WV Rivers Coalition concerning ACP HARM to wetlands, streams, karst geology, WATER, hillside erosion, and aquatic populations.

IND565-2 To these harms I need to address the HARMs posed for nearby COMMUNITIES like mine in Center Point, WV. Already friends and neighbors are moving away and community resources are drying up. AIR is impacted by all the compressor stations. There is fear of a pipeline blow-out, which, being a 42" pipeline at 1,440 PSI would be DEADLY to humans and everything else in the blast zone. Houses cannot sell because nobody wants to move here, let alone get a mortgage. And tourists also don't come.

IND565-3 The pipeline would encourage more fracking in my neighborhood/county, and we have already had enough destruction of hillsides, creeks, drinking water, OUR HEALTH, wildlife, clean air, roads, forests, and general WV natural beauty.

IND565-4 Building this infrastructure will help to ensure that clean, renewable energy does NOT get developed as it should, and along with that, also NOT the many more jobs that it would support. I have read that this pipeline is not absolutely necessary, that there is no need in the near future for it. We need to get off burning our planet with nonrenewable, toxic, deadly, high-energy, job-killing fossil fuels. Fracking and their Pipelines do not Good Neighbors make, for our people, animals, water, communities, forests, LIFE. The ACP's permit is drastically flawed and incomplete. It MUST NOT be granted by FERC.

Sincerely, Susan Cleaver and Howard Stiler

IND565-1 This EIS is for the Mountain Valley Project, not ACP.

IND565-2 Air quality is discussed in section 4.11.1 of the EIS.

IND565-3 See the response to comment IND2-1 regarding safety.

IND565-4 Property values, mortgages, and tourism are discussed in section 4.9 of the EIS.

IND565-5 See the response to comment IND2-3 regarding hydraulic fracturing.

IND565-6 Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy. See the response to comment FA11-12 regarding need.
IND566-1

Pris Sears, Blacksburg, VA.
Federal Energy Regulatory Commission
Kimberly O. Bose, Secretary
888 First St. N.E. Room 1A
Washington, DC 20426

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Dear Mr. Bose,

I am very concerned about the Mountain Valley Pipeline routing through both the Appalachian Trail/National Forest and the surrounding communities.

This proposal would do serious and unavoidable damage to the Appalachian Trail. It will displace people from their communities. It will threaten fresh waters and break the Jefferson National Forest Management Plan standards, setting a terrible precedent.

Please protect the Appalachian Trail and its surrounding landscape and communities.

Sincerely,

Pris Sears

The ANST and Jefferson National Forest are discussed in section 4.8 of the EIS. Citizens would not be displaced from their communities.
1. FERC must require MVP to minimize impacts during river crossings including reducing the construction area to a minimum.

IND567-1

2. The permanent filling of 44 wetlands is a significant impact to the environment. Information on wetlands impact must be provided to FERC.

IND567-2

3. All potable water wells that could be influenced by blasting must be identified to determine impact.

IND567-3

4. DEIS must include an analysis of turbidity and sedimentation from wet crossing construction methods.

IND567-4

5. FERC must require a study to determine the interconnection between karst and water sources. FERC must require a final route that avoids all karst features.

IND567-5

6. FERC has requested route adjustments, additional information on landslide prone areas, and additional Best Management Practices to mitigate hazards from potential landslides. This information must be included in the DEIS.

IND567-6

See the response to comment FA11-15 regarding open-cut wet waterbody crossings. If Mountain Valley crosses all waterbodies using dry techniques, there would be a low potential for downstream sedimentation and turbidity.

IND567-1

See the response to comment IND209-1 regarding the permanent fill of wetlands.

IND567-2

See the response to comment IND226-17 regarding water wells and blasting.

IND567-3

See the response to comment FA11-15 regarding sedimentation and turbidity at waterbody crossings.

IND567-4

Karst is addressed in section 4.1 of the EIS.

IND567-5

Route adjustments received after issuance of the draft EIS are discussed in the final EIS. Landslides are addressed in section 4.2 of the EIS.

IND567-6
Please, the United States government’s record on water and environmental safety is getting worse and worse. I want my children and grandchildren to have clean drinking water and be able to enjoy the beauty of nature in Virginia and West Virginia. I beg of you, please reconsider the pipeline. Its expediency in the short term will not be worth the costs to both human and animal qualities of life or to the environment. You have the opportunity to do the right thing, please.

In addition, this is only one of many concerns, private and domestic drinking water wells within the pipeline route have not yet been identified. FERC cannot determine the impact of blasting or water wells without this information. All water wells within the impact zone must be identified in the DEIS.

I don’t want my children and grandchildren to have to experience what happened in Flint, when we should have learned from our mistakes.

Water resources are addressed in section 4.3 of the EIS.

See the response to comment IND401-5 regarding pending water wells. See the response to comment IND226-17 regarding water wells and blasting.
The proposed pipelines would transport natural gas, not oil. See the response to CO14-3 regarding spills. The ANST is discussed in section 4.8 of the EIS. The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS).

As someone who resides near the Appalachian trail, and someone who regularly makes use of our national parks in the Appalachian, I'm horrified at the possibility of a pipeline in this ecologically-sensitive area. There's mounting evidence of the catastrophic ecological effects these kinds of pipelines have on the areas they're present in - just this month, we saw yet another pipeline rupture, spilling over a hundred thousand of gallons of oil into South Dakota. I and many others love to hike and camp these trails, and the idea of having that taken away from us for pure private gain is almost unfathomable - to say nothing of the kind of ecological catastrophe such a pipeline would inflict. I urge you to reject these proposals, and protect this national park.
The EIS concluded that impacts on most environmental resources (except the clearing of forest) would be short-term and not significant. Water resources are discussed in section 4.3 of the EIS.
Josh Moore, Williamsburg, VA.

I oppose the routing of the pipeline through the Appalachian Trail at the proposed location. The pipeline could be routed through a location that allows it to access some of the existing tunnels that have been abandoned or vacated by the railroads, or the pipeline could run alongside the railroads or along the roadways instead of cutting across the trail and through forest lands.

The temporary benefits of the construction jobs to companies that mostly reside outside of Virginia would be much less than the destruction of the scenic vistas for the future of Virginia tourism and the environmental health of the state.

If the pipeline would not have to cross the trail at a remote, scenic location, but at one of the roadway arterial links, that would be acceptable.

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Alternative routes using existing rights-of-way was addressed in section 3 of the EIS.

Visual impacts are addressed in revisions to section 4.8 of the EIS. Tourism is discussed in section 4.9 of the EIS. See also the response to comment IND191-3 regarding local jobs.

The ANST is discussed in section 4.8 of the EIS.
Alyssa Fowers, Arlington, VA.

I am a current Virginia resident who has lived in the Mid-Atlantic for the last seven years. Every summer, I hike on and around the Appalachian Trail. It’s the site of happy memories with friends and hours of private contemplation. The AT is a treasure that millions of Americans enjoy every year.

I’m deeply concerned about the proposed Mountain Valley Pipeline, and I believe the FERC should not allow the pipeline to be permitted. The pipeline will run over an unstable seismic zone, putting it at risk for leaks and potentially exposing multiple fresh water sources to natural gas from the pipeline. I am particularly concerned that the U.S. Forest Service would lower the standards Jefferson National Forest Management Plan to allow the pipeline to be constructed. That would open the door to future projects that endanger the health of the region.

From the perspective of a frequent trail visitor, the 125-foot zone that would be cleared around the pipeline would significantly impact some of the most iconic vistas on the AT such as Angels Rest and Rice Fields. I have seen the impact of pipeline crossings on hiking trails that I know and love. The scar on the landscape is impossible to ignore.

Before permitting the Mountain Valley pipeline, please evaluate the need for a new pipeline, the impact on the economy of nearby communities that rely on income from tourism, the disruption of the natural beauty of the area, and the potential dangers to the environment.

Thank you,

Alyssa Fowers
Kevin Groth, Charlottesville, VA.
Please do not move forward with proposed pipelines on the the Meadow River or Gauley River. These rivers are important for recreation and could potentially be damaged due human interaction with the environment. Impact to this environment would have terrible consequences to tourism to an already struggling economy and community.

Stream crossings are addressed in section 4.3 of the EIS. Recreation is addressed in section 4.8 while tourism is addressed in section 4.9 of the EIS.
INDIVIDUALS
IND574 – Joseph Roberts

IND574-1
This communication is to inform the Federal Energy Regulatory Commission (FERC) that the Boones Mill Christian Church, a church of the Disciples of Christ denomination, stands against the implementation of the above referenced Mountain Valley Pipeline project. On November 13, 2016 at the church’s regularly scheduled Annual Congregational Meeting the whole congregation present reached consensus that we speak with one voice that we are opposed to the construction and operation of the proposed Mountain Valley Pipeline as it is currently routed. The congregation further authorized the pastor, Reverend Joe Roberts, to communicate our concerns to FERC.

IND574-2
Our opposition is based on the fact that the proposed pipeline represents a threat to our safety as the proposed route brings the high pressure line very close to our building and that the project has the potential to adversely affect our water supply. Our building is used weekly for worship as well as almost daily for other activities of the church such as funerals, weddings, vacation Bible schools, Bible study, and fellowship gatherings. The church is also a community hub. Groups that regularly use our building include a local Frontier Girls Club, the Boones Mill Garden Club, the American Red Cross Blood Drive on a quarterly basis, as well as occasional use by home schooling groups and other community meetings. The church’s property also includes a columbarium, a sacred place of rest for the cremains of many of our now deceased church members. We feel that the proposed pipeline has potential to disturb this as well. Actually, our concern is not only for our safety and the potential loss of the beauty and tranquility of our own setting, but also for the safety and losses that our neighbors here in Virginia stand to suffer. Therefore, we petition and pray that you will reject the license for this conveyance as it will disrupt our community at best and will end up ruining our community and costing lives to worst.

IND574-1
Comments noted. The Boones Mill Christian Church would be about 500 feet from the proposed pipeline. Given the distance from the proposed pipeline, impacts to the church’s property are not expected.

IND574-2
See the response to comment IND2-1 regarding safety. See the response to comment IND3-1 regarding drinking water.
INDIVIDUALS
IND575 – Gordon P. Engelbrecht

December 20, 2016

Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
888 First St. N.W. Room 1A
Washington, DC 20426

Re: Letter of opposition to the proposed mountain valley pipeline (MVP)
Route #200, Docket No. CP16-10-000, preference for Hybrid Alternative 1A.

Ms. Bose:

I hereby submit this letter of opposition to Mountain Valley Pipeline (MVP) Route #200.

I am an active member of Preserve Newport Historic Properties, a group of concerned and affected citizens. We collectively object to the inadequate information thus far published and/or provided to our community regarding permanent disastrous changes to our safety, our way of life and the natural resources we treasure.

My farm and home for the past 38 years is in the Greater Newport Rural Historic District (GNRHD), Giles County Virginia and a part of the National Register of Historic Places. I personally object to the procedures and documentation put forth to evaluate the suitability of the GNRHD as a location for the proposed MVP and specifically Route #200.

I am educated as a soil scientist, agronomist and engineer with considerable real world experience and a strong research background. With these qualifications I am capable of discerning and evaluating the analysis thus far put forth in support of constructing the MVP and I find the analysis woefully inadequate, incomplete, incorrect, misleading and lacking relevant attention to my concerns.

The current MVP DEIS leaves too many concerns unaddressed or inadequately clarified. Detailed explanations of specifically how mitigation will address impacts on water resources, karst terrain, fragile soils, steep slopes and timber resources are sorely needed. In addition, way of life and preserving historic communities deserve accuracy and examination.

I am requesting the Federal Energy Regulatory Commission (FERC) to delay any decision regarding adequacy and acceptance of the current Draft Environmental Impact Statement (DEIS) until the Bureau of Land Management (BLM) and the United States Forest Service (USFS) conduct and complete

IND575-1 The Greater Newport Rural Historic District is discussed in section 4.10 of the EIS.

IND575-2 See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. The EIS provides a discussion of water resources in section 4.3, karst in section 4.1, soils in section 4.2, steep slopes in section 4.1, and timber in section 4.4.

IND575-3 See comment CO16-1 regarding FERC decision process.
INDIVIDUALS
IND575 – Gordon P. Engelbrecht

The BLM has received requests for additional public meetings on the Mountain Valley Pipeline Project. In lieu of additional public meetings, the BLM will be soliciting comments on the final EIS specific to impacts on federal lands.

IND575-4

The comprehensive analysis requested needs to include public hearings and opportunities for citizens to meet with, discuss and make comments on the record of their concerns with qualified representatives of the BLM, USFS and Jefferson National Forest managers. Such meetings will only be relevant and representative when conducted locally in and around the communities affected by the profound decisions under consideration. The meetings must not be convened in localities remote to the National Forest and the rural lands involved.

IND575-5

If the MVF receives approval the problems associated with proposed route #200 do not go away. Therefore, Hybrid Alternative 1A must be evaluated and analyzed as an optional corridor that has fewer devastating impacts to registered historic districts and the environment.

Sincerely,

Gordon P. Engelbrecht
339 Spruce Run Road
Newport, Virginia 24128

See the response to FA8-2 regarding the Hybrid 1A alternative.
The MVP is slated to cross parts of the Jefferson National Forest, the Appalachian National Scenic Trail, and numerous public rivers and streams. These natural resources are for the public benefit of all and should not be degraded on behalf of private corporate profit. Such degradations will likely include fragmented forests and habitat destruction, impaired surface and groundwater quality, erosion and sedimentation, noise and light pollution, and visual scarring.

Public resources and eminent domain should not be utilized for a project that does not directly benefit the communities nearby or the public at large. Local communities will be left to shoulder all the impacts so that gas can be exported to fuel growth and development elsewhere, with minimal money remaining in state for the benefit of West Virginians.

The PA and WV Supreme Courts have recently upheld eminent domain and private property suits against pipelines, including the MVP, citing that the projects have little “public use.”

The EIS addresses the ANST and Jefferson National Forest in section 4.8.

See the response to comment IND3-1 regarding eminent domain. See the response to comment CO2-1 regarding benefits. See the response to comment IND2-3 regarding export.
INDIVIDUALS
IND577 – Logan Bockrath

Logan Bockrath, Ansted, WV.

IND577-1
For years I lived on the Meadow River at the edge of Fayette, Greenbrier, and Nicholas counties. I have also hunted, canoed, fished, and kayaked on the Meadow, Gauley, Elk and Greenbrier rivers for the last thirteen years. Those rivers are the reason that I moved to West Virginia and decided to start a business here. I enjoy electricity as much as the next person and know the tradeoffs that demands. I also know that pipelines can be the safest method to transport gas and the more that we prohibit new pipelines from being constructed the more vulnerable the old pipelines are to malfunction. That being said, I have seen on multiple occasions how floods tear to pieces any human engineering in their path. For instance, the railroad bridge on the Meadow River outside of Russellville which was recently converted to a rail trail had a 50’x15’x18’ steel beam ripped from its foundations which are typically 15’ above the water’s surface and carried downstream during this year’s flood. The banks are chiseled 30’ high in places on the Meadow and Gauley rivers and the riverbed completely rearranged itself in places. As much as people refer to these events as century floods, it happens much more frequently than that. Case in point, the flood of 2001 which rolled house size boulders and actual homes down Laurel Creek and into the New River near Cotton Hill. The next of these events would undoubtedly take out a pipeline creating a spill that would threaten wildlife, fish, water quality, and our tourism economy.

Section 4.3.2 Stream Crossings: The DEIS states that MVP plans to cross the Elk, Gauley and Greenbrier Rivers using the open-cut wet crossing method. This method uses no water diversion and is the most invasive and impactful crossing method available. FERC must require MVP to minimize impacts during river crossings including reducing the construction area to a minimum.

IND577-2
Section 4.3.3 Wetland Crossings: The DEIS claims there is no net loss of wetlands, but then states that MVP has not supplied information regarding their proposal to permanently fill 44 wetlands along access roads. The permanent filling of 44 wetlands is a significant impact. Information on wetland impacts must be provided to FERC.

IND577-3
Section 4.3.1 Groundwater: Private and domestic drinking water wells within the pipeline route have not yet been identified. FERC cannot determine the impact of blasting on water wells without this information. All water wells within the impact zone must be identified in the DEIS.

IND577-4
Section 4.6 Aquatic Resources: The DEIS does not adequately assess impacts of construction on aquatic life. MVP has not submitted the results of their analysis on sedimentation and turbidity from wet crossing methods. This information must be included in the DEIS.

IND577-5
Section 4.1.1.5 Geologic Hazards: The DEIS identifies 94 karst features, or caves, to be crossed by MVP. FERC has requested route variations to avoid some of these features. A study to determine interconnection

IND577-1
A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. See the response to comment CO14-3 regarding spills. See the response to comment FA11-15 regarding open-cut wet waterbody crossings. Since Mountain Valley would cross all waterbodies using dry techniques, there would be a low potential for downstream sedimentation and turbidity.

IND577-2
See the response to comment IND209-1 regarding the permanent fill of wetlands.

IND577-3
See the response to comment LA13-16 regarding water wells and springs. See the response to comment CO14-1 regarding blasting.

IND577-4
See the response to comment FA11-15 regarding sedimentation and turbidity.

IND577-5
An updated discussion of karst is provided in section 4.1 of the EIS. See the response to comment LA1-4 regarding existing 42-inch-diameter natural gas pipelines in karst terrain.
Section 4.1.2.4 Landslide Potential: The DEIS states that 98% of the pipeline route is highly susceptible to landslides; however, MVP has not supplied a detailed Landslide Mitigation Plan. FERC has requested route adjustments, additional information on landslide prone areas, and additional Best Management Practices (BMPs) to mitigate hazards from potential landslides. This information must be included in the DEIS.

See the response to IND177-1 regarding landslides and Mountain Valley's revised *Landslide Mitigation Plan*.
Lawrence M Beyer, Roanoke, VA.

Issues:

BACKGROUND: Married w/children and grand-children; Retired: Career Army Officer with rank of Lt Colonel; Vietnam Vet, Undergraduate degree in Economics, MBA from Syracuse; Subsequently, Served in positions in all levels of government to include town, county, and State (Regional Administrator in DTVAX-11 years); private business and non-profit (TAF Head Start budget director-5 yrs). Lived in Roanoke County for 31 years.

My position on this issue is balanced primarily between economic growth and protecting citizens’ private property rights to include their right to obtain a fair remuneration from this economic opportunity. My hope is that there is agreement between property owners and MVP, and that legitimate protections for County responsibilities to include storm water, water supply, parks and recreation, safety, and other concerns are maintained. As a member of the County’s Pipeline Advisory Committee (PAC) I contacted many Hollins citizens early in the process and received positive feedback for the proposal.

Why support MVP.

-I support economic growth for this region. This require cheap, efficient, energy – life blood or economy. Benefit of Pipeline is Energy for Economic Development. In general, Carbon-based energy sources give the comparative advantage to this geographical area in contrast to renewable sources – wind, solar all of which are relatively, inefficient, intermittent, high cost alternatives and which have their own environmental issue and resistance as we have seen in Botetourt County. We should also be more proactive with nuclear power generation.

Demand for NG in this area has not been growing – However, during discussions and briefings Roanoke Gas, who has partnered in the pipeline project, has reported that their existing pipeline capacity is about maxed out. If a large energy-consuming business desired to locate here we would be unable to provide the desired quantities and they would not come. Businesses cannot wait several years for capacity to be develop capacity.

An analogy of this situation is the Roanoke County’s investment in Broadband where they are creating high-level capacity enabling modern high-content users to be attracted to the area. Proponents of the Broadband desire is to have that capacity on hand to readily provide businesses – not with a promise but with real existing capacity. The Natural gas pipeline holds the same promise. Although there is debate about the amount of NG in the ground there is sufficient to produce for several generations.

Manufacturers and other businesses are demanding natural gas because it is so affordable, reliable and clean. MVP will provide access to natural gas for parts of Southwest Virginia that currently don’t have access, and it will provide an additional source for other areas that do have access.
Redundancy of supply is important for ensuring reliable service and for promoting economic development. MVP will provide access to natural gas for parts of Southwest Virginia that currently don't have access, and it will provide an additional source for other areas that do have access. Redundancy of supply is important for ensuring reliable service and for promoting economic development.

The U.S. has a massive supply of natural gas, but the nation doesn't have enough infrastructure to bring it to the market. The MVP helps address that, and its capacity is fully subscribed. Roanoke Gas is one of the local distribution companies that has signed on to the project so that it can provide gas to Southwest Virginia customers.

There are environmental issues. The MVP generates all the classical concerns. There are always a downside and sacrifices to be made for economic development and progress. We have witnessed this for centuries in the development of industrial infrastructure such as a railroad, electrical power grid, mining, urbanization, roads and parking lots associated with vehicles, and other industries. I can't imagine going back to a pre-industrial standard of living that would be associated with availability of cheap, efficient energy. These issues have to be addressed from the perspective of property owners, environmental and cultural stakeholders, general citizenry, and local governments.

Protection of property rights. The legislature has delegated the negotiation to be between property owners and the developer. I defer to the voice of each property owner to make his or her own decision without intimidation or coercion of others. There are some who oppose the pipeline and will never agree to allow the pipeline on their property for any number of reasons, some reasonable and some unreasonable. There are many others who have agreed. The last report of the MVP indicated that surveys had been completed in most localities with Roanoke County having about half.

The federal government recognizes pipelines as the safest way to transport natural gas. The MVP, which will be buried underground, will be monitored electronically 24 hours a day, 7 days a week, 365 days a year.
IND579-1 See the response to comment IND1-3 regarding eminent domain.
See the response to comment IND2-3 regarding export.

IND579-2 See the response to comment IND2-3 regarding hydraulic fracturing.

IND579-3 Karst is addressed in section 4.1 of the EIS. See the response to comment IND2-1 regarding safety.
Both the strong public concern and the comments rate lack a consideration of the public good to West Virginians suggests that the proposed pipeline is not a reasonable project. If a for-profit company is pressing this issue, it’s rewarded, where will it end? Any company can ask for special consideration of landowners and protectors of public lands, just because they create a few jobs or increase the production of some product. For me, there is little added to the public good by this project and much to be taken from us.

Commenter’s Name and Mailing Address (Please Print)

H. Randell Grumpelt, Ph.D.
320 Misty Mtn Trail
Secaucus, WVV 24974
See the response to comment FA11-15 regarding open-cut wet waterbody crossings. Since Mountain Valley would cross all waterbodies using dry techniques, there would be a low potential for downstream sedimentation and turbidity.

See the response to comment LA15-14 regarding water wells and blasting.
See the response to comment FA11-15 regarding open-cut wet waterbody crossings. Since Mountain Valley would cross all waterbodies using dry techniques, there would be a low potential for downstream sedimentation and turbidity.
Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

The EIS provides a discussion of impacts and mitigation measures for vegetation in section 4.4, wildlife in section 4.5, agricultural in section 4.8, and water resources in section 4.3.

The commenter’s statements are noted. As stated in section 2.7 of the EIS, the useful life of the projects is expected to be about 50 years. Socioeconomics is discussed in section 4.9 of the EIS.

I urge that the FERC reject the Mountain Valley Pipeline.

Respectfully,
The EIS provides a discussion of karst in section 4.1, water resources in section 4.1, landslides in section 4.1. The No Action Alternative is discussed in section 3.
Margaret A. Roston, Blacksburg, VA.

Dear FERC Commissioners,

I want to know how MVP is going to be made to guarantee they will NOT need a compressor station in Virginia, EVER, no matter who owns this pipeline or who manages it. If MVP is allowed to build a compressor station ANYWHERE in Virginia because it suddenly says it needs it, then that would be allowing what most certainly would be A BAIT AND SWITCH INFLICTED UPON THE AMERICAN PEOPLE! This would be a terrible precedent. No matter if MVP has constructed all but that last bit of pipeline they MUST NOT BE ALLOWED TO ADD A COMPRESSOR STATION!

Only after being faced with major opposition in Montgomery, Roanoke, and Giles Counties to the construction of a compressor station, did MVP, LLC remove a compressor station from anywhere in Virginia.

I have heard from several people who are knowledgeable about the construction and operation of pipelines that a compressor station in Virginia is going to be needed to safely and effectively operate this pipeline.

The US government should not tolerate the changing of routes and apparatus in any of these projects after permission has been granted based upon submitted information, even if construction is significantly underway, especially when the question has been raised repeatedly about the need for such a huge environmental, scenic and otherwise offensive item as a compressor station in rural countryside.

Please protect America from such over-reaching at the detriment and demeaning of the American public.

Sincerely,
Margaret Roston
US Citizen

See the response to comment LA15-5 regarding changes to the proposed MVP. No compressor station is proposed in Virginia.
December 12, 2016

Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
888 First St. N.E. Room 1A
Washington, DC 20426

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)

Dear Ms. Bose,

I am deeply worried that your agency may approve the Mountain Valley Pipeline project despite all the evidence of environmental and aesthetic damage presented by many learned and concerned people. You have a grave responsibility to the people and the land this project will impact, and I pray that your decision will be based on science and the will of the affected landowners rather than political pressure by politicians taking a short rather than long range view. Long after all of us are now living are dead and gone, and the probable need for natural gas has been replaced by other energy sources, this project will continue to be a blight on the unique and beautiful mountains and ecosystems of West Virginia.

Let us not repeat the mistakes made by the coal industry and some of these same short-sighted politicians that have left ecological and economic disasters upon the citizens of West Virginia. This project will supply only a handful of mostly temporary jobs to West Virginians, and the gas that will be transported through it will never be used by any citizens of this state. Please do not allow a private company seeking profits to foist this long term ecological disaster upon us by their greasing of the right palms. If this project really is not important to the energy security or even trade imbalance of the United States of America, which all available data seems to support, then using the power of Federal eminent domain to approve the project is a misuse of power and a travesty to those of us affected. It is certainly a slap in the face to West Virginians who once again will be abused by their long history of corrupt politicians.

Moreover, it is a violation of personal property rights, one of the foundations upon which this great country was built. As one of the affected landowners (proposed 3,013 feet through my property, negating the use of about 1/3 of my 90 acres, including prime 360 degree view homesites), I do not wish this project to enter my property under any circumstances, or for any amount of compensation. It is unbearable to think that this project could proceed against my objections, destroy my lifelong dreams and plans, and then after the expense and aggravation of the inevitable legal proceedings, I would be subject to a ruling and arbitrary settlement at a fraction of the value I place on my property.

It is also a basic principle of our system that if someone desires something that someone else owns, then the one wishing to buy must meet the price set by the owner. How can an eminent domain ruling, especially one considered so spurious, negate this basic principle? If Mountain Valley Pipeline wants private property, then it should pay the price demanded by the property owner. If it is not willing to do so, alternative routes can be chosen. If a route through my property is essential to this project, then MVP must negotiate the terms and compensation acceptable to me, not what a judge that may be in their pocket "rules" is fair and just compensation. MVP has made an offer to me that is both an insult and a telling indication of their methods and expected rulings in their favor. The written proposal is so one-sided that only an illiterate hillbilly would sign it. MVP’s faith in the unlimited power of eminent domain, expecting it to be granted by a ruling in their favor by your FERC, has emboldened them to run
IND586 – Robert M. Jarrell

Consider also the logistics of MVP’s proposed route through my property. I have included a few photos to help illustrate why their choice of routing on my property (which is typical of a majority of the proposed route through my immediate area), makes no sense. MVP explains that they have chosen a route over the high ridges because of concerns for landslides. The highest point on my property is over 2,000 feet above sea level, dropping to below 1700 feet above sea level, and 200 feet above the Greenbrier River, which is at 1504 feet above sea level. The majority of the proposed pipeline on my property drops about 200 feet in elevation over about 1500 linear feet, then another drop of about 150 feet in elevation for the remaining 150 linear feet. Where it exits my property is the real concern! The elevation drops another 160 feet over approximately 180 linear feet! I have included photos to illustrate the danger of this route.

The DEIS states that 78% of the pipeline route is HIGHLY susceptible to landslides. Having begun construction of a new home on my property, I’d say 100% better describes my property due to the soil being shale and sandstone. Shale rocks that we excavated while digging the foundation just weeks ago have already begun turning to mush after being exposed to the air and changes in moisture and temperature. The road that leads up the mountain to my property and the many other properties in this area is cut into the mountain and BORDERS THE STEEPEST SLOPE I DESCRIBED ABOVE! How can this mountain road, utilized by many families daily, possibly be stabilized after removing the many nearby trees with their stabilizing roots and digging up the underlying shale and exposing it to the elements which change its composition? I doubt a deer can climb this steep slope, and yet MVP is proposing to install their pipeline on it and expect no landslides in soil prone to landslides on a gentle slope. This past summer’s floods also show the potential disaster if flood waters were to wash out the bottom of the slope at 3R 120, POTENTIALLY CAUSING THIS PART OF THE WHOLE SIDE OF THE MOUNTAIN TO SLIDE ACROSS THE HIGHWAY AND INTO THE GREENBRIER RIVER! In addition, the location of the pipeline about 500 feet above my new homesite and about 100 feet higher in elevation makes the possibility of a landslide coming into my bedroom a distinct possibility if the pipeline is installed in its proposed location.

I am opposed to the MVP project whether it crosses my property or not. It is obvious that the MVP has used criteria other than safety and convenience to residents to choose its pipeline route, as evidenced by their route choice through my property. MVP does not have a track record of pipeline construction to foster any confidence in their ability to prosecute such an environmentally sensitive project, and their dealings with landowners and flawed DEIS they submitted make it unpalatable that FERC and/or the politicians who support it, would consider approving the project. I implore the FERC to reject this project as unsafe, unnecessary, and unwanted by both affected property owners and right-thinking citizens of West Virginia.

Thank you, and please, do the right thing and reject the MVP project!

Sincerely,

Robert M. Jarrell
482 West Clayton Road, Alderson (physically Pence Springs), WV 24910
Home: (304) 445-3002 Cell: (304) 398-3234
Email: robertjarrell3002@comcast.net
Dear FERC Commissioners,

The Bureau of Land Management has wisely pointed out many faults to the DEIS. They also have offered to meet with the citizenry if the people feel they have not had adequate representation in this process.

They also have pointed out that the inaccuracies and incompleteness of the DEIS warrants the extension of the deadlines, especially since they cannot complete their work with incomplete information from various sources.

Please ask that the BLM hold such a public hearing, comment period in a public forum in an accessible location convenient to the hundreds of families in the Blackburg area whose homes, drinking water, fresh air, pristine vistas, etc. are in the cross-hairs of the MVP project. This should be held in Blackburg, a location to which the residents of Giles County are also used to accessing.

I sincerely hope that the Bureau of Land Management will take note of the overflowing crowds when meetings were held at the Blacksburg High School and the hotel on South Main Street in Blacksburg and compare that to the amount of people from the Blacksburg area, Montgomery County, and Giles County who were able to attend the public comment session in Roanoke a month or so ago.

I was appalled at the low turnout of people from our area when FERC had its last public comment session (November 2016) anywhere near Blackburg, Virginia. For some reason FERC thought Roanoke was a convenient location for the people from Montgomery County!! How absurd we thought it was before the meeting and it proved to be a very unfair choice. This is because of the time and expense involved for the people who live on the backroads of Montgomery and Giles Counties. FERC, MVP and others may be paid to attend such meetings so they can pay for travel, childcare, etc. Also, they do not have to take time off from work to attend. They may have vehicles that easily drive that far. There are many, many people in the outlying areas (which is where this pipeline is proposed to go) who do not have vehicles that can get them farther than to and from work or they have only one vehicle in the family and scraping together the gas money to get to work and the grocery store is a hardship. Many people are working multiple jobs and cannot show up in the six hours it took for me to attend a supposedly local public comment session.

It is actually double-jeopardy for the people who are being told they are likely to have their lives, health, property values, etc. destroyed to also demand that they drive a couple of hours, some having to leave work early just to get to the public comment location, and then have to stay there for many hours, or their voices will not be heard. I looked on the FERC website today and was unable to find comments I had posted there in 2015. Did I do something wrong or were they removed. If many people hear me make a comment, then I know my thoughts were expressed where FERC should have heard them.
When I got there to that public comment event it was OBVIOUSLY intimidating for many people to be taken into individual sessions to have their words recorded. That can be VERY scary for some people. There should have been a public forum with the opportunity to speak privately, if someone chose to do so.

I was very much unprepared to be sitting there 3/4's asleep with a stop watch and no responses from anyone. Likely, I will not have time before December 22nd, 2016 to ensure that my words and thoughts were correctly transcribed at this meeting. I have not figured out how to find what is in the record that I said.

In addition, I arrived around 6PM after many other people were already on the list. I did not leave until after 9:30PM and that was only because someone else had given up waiting for her few minutes of time in the monologue session (with zero feedback) and gave me her number. As it was I had another nearly hour drive back to my house.

This was unfair and dangerous to elderly people, who do not drive after dark. It also made it impossible for people with small children to leave for the entire evening and to have to find childcare.

This was unfair for people who work and need to get some sleep.

The list of the unfairness of this choice of location is obvious and longer than I have enumerated.

In addition, the routes keep changing and being modified. Also, there are now proposals to convert such corridors into even wider swaths through what we here value very highly. . . our homes, our watersheds, our vistas, our safety, the environment, etc.

Forums and information sessions need to be held NOW in a reasonable location so those affected can be adequately represented.

Hopefully the BLM will take the necessary action to allow us a voice to discuss the more current proposed routes.

Sincerely,
Margaret Roston,
Blacksburg, VA
December 14, 2016

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE, Room 1A
Washington, D.C. 20426

Re: Draft Environmental Impact Statement for the
Mountain Valley Pipeline CP16-10-000

Dear Ms. Bose,

In May of 2015, I sent a letter to you with a comment on the proposed Mountain Valley Pipeline (MVP) regarding the archeologically significant areas around the Pence Springs area in Summers County, West Virginia. When the Draft Environmental Impact Statement (DEIS) was released for this project, I anticipated learning how MVP planned to address protecting these documented Native American sites since they represent a significant part of my Native American ancestry and the ancestry of many residents in southern West Virginia.

The sites were only mentioned once in the 721 page document (on page 563 in Table 4.10.1-2) and the report lists the Pence Springs site under “Cultural Resources Identified by the Public in the Vicinity of the Mountain Valley Project and the FERC Staff’s Evaluation of Potential Project Effects.” However, the DEIS states that this site is “Not yet evaluated” and the “Potential Project Effects” are “unknown” as the sites are “not yet tested.”

How can FERC make a determination on the impact to these areas if the sites have not been evaluated and the potential project effects are unknown? These sites must be evaluated and the effects from this project fully assessed before any accurate EIS can be considered.

I have included a copy of my comment from May 2015, to assist your staff in properly evaluating the site and providing a full and comprehensive assessment on the impact potential construction of a massive pipeline would have on this area. Failure to adequately address these culturally significant areas is unacceptable and would undermine any legitimate analysis of the true impact this proposed project would have on this region.

Sincerely,

Elise Keaton

Section 4.10 of the final EIS discusses archaeological sites identified in the APE. As upheld by the courts, the FERC does not have to make final determinations of NRHP eligibility and project effects on historic properties at the NEPA stage.
Dollie Wright, Spencer, WV.
Hello,

I am writing to you on behalf of my grandmother, Mrs. Dollie Wright of Spencer, West Virginia. Dollie was born and raised in West Virginia and has always taken great pride in her state and the people who live there. One of her greatest pleasures is walking in the woods and enjoying all the nature activities that West Virginia has to offer. I have also enjoyed kayaking, fishing, snow skiing, and hiking in West Virginia. The unadulterated open space must be saved not ruined with pipelines of gas. I am writing to request that you reconsider the Mountain Valley Pipeline proposal. Dollie Wright and I are against it.

Thank you for your time,

Sincerely,

Dollie Wright and Tonya Shackelford

Open spaces would not be ruined by the MVP. After the pipeline is installed, and the right-of-way restored and revegetated, kayaking, fishing, snow skiing and hiking could resume.
IND590-1

See the response to comment IND3-1 regarding drinking water.
See the response to comment IND1-3 regarding eminent domain.

INDIVIDUALS
IND590 – Charlotte Thomas

Date: 12-11-16

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

Re: Draft Environmental Impact Statement, Docket No. CP16-10-000 & CP16-13-000

Dear Secretary Bose,

I am commenting on Section 4.3.2 of the Draft Environmental Impact Statement (EIS) for the proposed Mountain Valley Pipeline, Docket No. CP16-10-000 and Equitrans Expansion Project, Docket No. CP16-13-000.

I have not been informed of the effect the project will have on drinking water. Our water source is the most important thing to our lives.

Also, I think that as a land owner, it is against our civil rights to have this come on our private land. We have purchased and are paying taxes.

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

Charlotte Thomas

Address: 675 Shadrack Drive
City & State: Breaston, MI
Zip Code: 48420
The project area is not pristine. It contains existing infrastructure, such as roads, pipelines, powerlines, towns, housing developments, farmsteads, schools and churches, and commercial structures. Visual resources are discussed in section 4.8 of the EIS.

See the response to comment IND92-1 regarding leaks.

Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS).
IND592-1 We address comments on the draft EIS in this final

IND592-2 See the response to comment FA11-12 regarding need.

IND592-3 See the response to comment LA1-4 regarding existing 42-inch-diameter pipelines in karst terrain. See the response to comment IND62-1 regarding Dr. Kastning’s report.

IND592-4 The opposition to the LRMP amendments is noted.

IND592-5 Climate change is addressed in sections 4.11 and 4.13 of the EIS

IND592-6 Historic Districts are discussed in section 4.10 of the EIS. Impacts on historic properties can be mitigated, as specified in 36 CFR 800, the regulations for implement Section 106 of the NHPA.
FERC’s DEIS is woefully inadequate and dismissive of many concerns submitted by citizens, landowners, and experts who are all committed to protecting our private and public lands, all of our water sources, our wildlife, and our heritage.

Darlene Cunningham
Wadace Cunningham
1108 Wenonah Ave.

Pearisburg VA 24134
Giles County

December 13, 2016

IND592-7

See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS.
Margaret A Roston, Blacksburg, VA.
Dear FERC Commissioners:
Please address all these issues BEFORE giving any more consideration towards allowing MVP to be built.

IND593-1
FERC is supposed to be protecting the public not assisting industries to make money.
As a US Citizen, my well-being, health and rights are supposed to be at least as important as the pocketbooks of a powerful industry.
FERC and other governmental agencies are charged, first and foremost, with protecting the people of our great nation.

IND593-2
I am terrified about what the erosion will do to our water. The watersheds in jeopardy are part of the water supply for rural homes and tiny communities as well as Roanoke, Virginia and Hinton, WV, etc.

IND593-3
I want to know how MVP is going to be made to pay for wearing out our rural roads that VDOT cannot afford to fix now, even with only reasonable local traffic.

IND593-4
I want to know how MVP is going to supplement this area for the negative effects on the tourist industry.

IND593-5
I want to know how MVP is going to make it possible for us to get to and from work, school, the grocery store, etc. when they have clogged our roads with their construction traffic.

IND593-6
I want to know why MVP is more important than our National Forests. The National Forests NEED to stay intact to protect the diversity of the flora and fauna they are designed to protect. If the integrity of the forest is chopped up, the smaller critters and even the large trees are all impacted by changes to the food chain. The introduced and opportunist vegetation will significantly damage much of the forest and region.

IND593-7
I want to know how MVP will NOT USE HERBICIDES in our regime for something as needless to us as a pipeline. If MVP wants to hand pull and hand cut weeds, it will not have the impact power equipment and chemicals will have on our water supply and air quality.

IND593-8
I want to know how MVP will contain all the spillage from dripping oil pans, during filling of vehicles and equipment, etc.

IND593-9
I want to know how MVP will protect the water supply from the taking of the water from the water supply and then putting it back after running it through dirty pipes during the pressure testing. That is a double whammy to our drinking water.

IND593-10
I want to know how MVP will EFFECTIVELY contain ALL the mud that will flow past their barriers when there are the inevitable 2 to 3 inch gully washer thunderstorms for which this area is know. Vehicles wash down our local streams. Now is MVP going to contain all the soil, trees, debris,
IND593-10

diesel, motor oil, etc. that they will be using, even if they never dripped it on the ground.

IND593-11
I want to know how MVP will NOT do work during seasons that affect migration habits, mating habits, etc. of the wildlife.

IND593-12
I want to know how MVP will be required to put in escrow the huge amount of funds that will be needed to completely fill with concrete or remove the pipeline when they no longer need it so that it will not fall on the local people to suffer the problems of toxicity, collapse and diversion of water, and pay the costs of dealing with them.

IND593-13
I want to know how MVP will be required to restore the value of my home. My husband literally suffered a heart attack this Fall and he insists he needs to keep working so hard to keep the bills paid. I want to put our house on the market so we can pay off many of them, but we cannot sell it for a price that would pay off all these bills and allow us to afford a smaller place to live. This has been our retirement plan since 2002. Now that property values have improved we should be able to exercise this plan. However, MVP has destroyed the value of our home, if we can even find a buyer, even during the uncertainty about if the pipeline will be built. We are in the blast zone and the views that make our property valuable (location, location, location) will be permanently ruined if MVP is built. Also, we face the prospect of having to filter who-knows-what from our water supply.

IND593-14
I want to know how MVP will be required to pay, in perpetuity, for weakening the integrity of the rock in this area. The blasting and jacking by heavy traffic, jack hamers, and equipment pounding on the Earth, will send shock waves through our region. We have Earth collapse insurance. Most of our neighbors do not, and they, likely, cannot get it.

IND593-15
I want to know how MVP will be required to have more than the meager (though large) amount of insurance to cover catastrophic mistakes or failures of the pipeline or during the construction process. I speak with my home owner’s insurance company. They told me that if there is a fire is proved to be caused by MVP related activities, then our insurance company will not cover the loss. We would have to collect from MVP. MVP is an LLC and they will file bankruptcy if their insurance runs out. Where will that leave us and our neighbors? With no homes, possibly dead family members and/or neighbors, health issues, massive erosion problems further aggravating our water supply, etc.

IND593-16
I want to know how MVP is going to be made to guarantee they will NOT need a compressor station in Virginia. EVER, no matter who owns this pipeline or who manages it. IF MVP is allowed to build a compressor station ANYWHERE in Virginia because it suddenly says it needs it, that is allowing what most certainly would be A RAIS AND SWITCH INFLECTED UPON THE AMERICAN PEOPLE! This would be a terrible precedent. No matter if MVP has constructed all but that last bit of pipeline they MUST NOT BE ALLOWED TO ADD A COMPRESSOR STATION!

Please consider these AND MANY OTHER ISSUES as much more important than helping EQT and other companies to get their natural gas to their

IND593-11
Timing windows are discussed in section 4.5 and 4.6 of the EIS

IND593-12
Section 2.7 of the EIS provides an overview of future plans and abandonment.

IND593-13
See the response to comment IND12-1 regarding property values.

IND593-14
See the response to comment CO14-1 regarding blasting

IND593-15
See the response to comment IND28-3 regarding financial responsibility.

IND593-16
See the response to comment LA15-5 regarding changes to the proposed MVP.
customers, especially those overseas! If you let them build this line, it is imperative that they are REQUIRED TO PAY THE TRUE COST TO ALL WHO ARE AFFECTED NEGATIVELY.

Thank you for taking the time to make sure that all these issues are addressed to protect the American public in perpetuity.

Margaret Roston, US Citizen
Robert, St. Marys, WV.
To the Federal Energy Regulatory Commission

I would like to comment on the major pipeline that would cross a large part of my home state of West Virginia. I am concerned that this oil pipeline could disturb or pollute several streams, creeks, and rivers in West Virginia. Moreover, it could have a bad effect on the drinking water of residents living near or perhaps not so near to the pipeline.

Let me make a position of mine clear. I am not necessarily opposed to all pipelines. Transporting oil via pipeline is sometimes better than transporting it by train or by truck. (A few months ago there was a major explosion involving a train that was carrying oil through West Virginia.*) But the fact that pipelines are usually better than other means of transporting oil does not change the fact that pipelines themselves can be problematic.

I would respectfully request that the Federal Energy Regulatory Commission carefully consider the environmental impact of this proposed oil pipeline. There are, to be sure, many aspects of the matter that must be taken into consideration.

Sincerely, Robert Stanley
St. Marys, West Virginia

The proposed pipelines would transport natural gas not oil. See the response to comment IND3-1 regarding drinking water. We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS).
Section 4.10 of the final EIS discusses archaeological sites in the APE, including those recorded near Pence Springs.

May 13, 2015

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

Ms. Bose:

At an MVP Open House in January, I asked Mr. Paul Friedman how FERC could allow the proposed pipeline to impact documented Native American burial grounds and locations know to be archeologically significant to me and others who share Native American ancestry.

Mr. Friedman replied that FERC would adjust the route of the pipeline to preserve any "archaeologically significant" area. This comment is intended to highlight the "archaeological significance" of the Pence Spring area, particularly the floodplain proposed to be impacted by the MVP.

The parcel maps for the MVP demonstrate the proposed construction will tunnel under the Greenbrier River near Pence Springs in Summers County. For generations local community members have documented the archaeological finds from the area along the proposed route including numerous burial mounds along Buffalo Creek and the banks of the Greenbrier River. Thousands of arrow heads and hand tools spanning ions of time have been located in these areas by dozens of local historians.

In 1984, archaeologists from the University of Kentucky joined with local volunteers of Summers County to search for prehistoric remains at Pence Springs. The Summers County Historical Landmark Commission invited the University of Kentucky Program for Cultural Resource Assessment to oversee the study which was funded by a Federal Survey and Planning Grant administered by the West Virginia Department of Culture and History. The result: "Prehistory Along the Greenbrier" written by Nancy O'Malley. A photocopy of that 35 page document is enclosed here and intended to be included as part of this comment.

The goal of this study was to "determine whether the area in question holds significant archaeological remains important enough to earn them a place on the National Register of Historic Places." (O'Malley page 3) Briefly, here are some of the findings from that study:

1. "While some stays may have been longer or shorter and the tools and weapons differed in style through time, the springs and the area around them were probably the intermittent focus of hunting and wild plant collecting for nearly all of the time prior to European settlement of the Greenbrier River Valley." (O'Malley page 2)
2. The alluvial deposits along the floodplain in Pence Springs is a very good place to find prehistoric artifacts because early people here saw this as a desirable place to live (O’Malley page 4).

3. "The Indian remains of greatest interest were collected from the large broad floodplain and a narrow toe ridge to the west of Buggy Branch. (O’Malley page 7) "...there were six areas around the spring and near the river where artifacts seemed to cluster. Of these six spots, three contained heavier concentrations of artifacts." (O’Malley page 9)

4. Artifacts that were found included (O’Malley pages 10-21):
   a. Cherts – a very good type of stone to make efficient sharp tools.
   b. flakes – a piece of very sharp rock struck from another rock which could be used multiple times.
   c. Scrapers or Planes used to plane wood and scrape animal hides.
   d. Arrowheads or "projectile points."
   e. Drills used for piercing materials ranging from leather to stone.
   f. Choppers with scratched designs on the stone.
   g. Pottery vessels made of natural clays mixed with crushed rock, sand or mussel shells.

5. "Identifiable styles in the artifact collection indicate that Indians used the springs throughout prehistory." (O’Malley page 21)

I urge FERC to consider the archaeological significance of the Pence Springs area and to carefully review the attached study. The artifacts found there document an area of longstanding historical significance. All efforts should be made to prevent the destruction of our natural history and to protect the Greenbrier River.

Sincerely,

Elise Keaton
Outreach and Education Coordinator
Greenbrier River Watershed Association
120 Washington St. Suite #4
PO Box 1419
Lewisburg, WV 24901
Dear Secretary Bose,

I am commenting on Section 4.3.2 Drinking Water of the Draft Environmental Impact Statement (EIS) for the proposed Mountain Valley Pipeline, Docket No. CP16-10-000 and Equitrans Expansion Project, Docket No. CP16-13-000.

Private and domestic drinking water wells within the pipeline route have not yet been identified. FERC cannot determine the impact of blasting on water wells without this information. All water wells within the impact zone must be identified in the FEIS.

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

[Signature]

Name: [Name]
Address: 205 Church and Kemp St.
City & State: Lewisburg, WV
Zip Code: 24901

See the response to comment LA15-14 regarding water wells and blasting.
IND597-1

See the response to comment LA15-2 regarding karst. Dye trace studies which may illustrate groundwater connections between caves conducted after the draft EIS are discussed in this final.

The DIES identifies 44 karst features, or caves, to be crossed by MVP. FERC has requested route variations to avoid some of these features. Results of a study to determine the interconnection between karst and water resources has not been completed. An independent study concluded that karst is a no build zone. FERC must require a final route that avoids all karst features.

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

Name: Willa Izzo
Address: 265 Chestnut Farm Lane
City & State: Lewisburg, WV
Zip Code: 24901
See the response to comment LA15-14 regarding water wells.

IND598-1

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Water Concerns

In the DEIS on page E5-5 it states: “Because the Applicants, in part due to lack of access, have not completed field surveys to identify water wells and springs within 150 feet of construction workspaces (500 feet in karst terrain), we are recommending that Mountain Valley and Equitrans provide the location of all water wells, springs, and other drinking water sources identified during pre-construction surveys after access is obtained. The Applicants have agreed to perform pre-construction monitoring of water quality and yield for drinking water resources, and would evaluate any complaints or damage associated with construction of the projects and identify suitable settlements with landowners, including providing alternative sources of potable water during repair or replacement of the damaged water supply.”

Water quality is one of the most important issues that most land-owners have to consider when a MVP pipeline is being proposed. An application decision should not be put forward if all water wells, springs, and other drinking water sources have not been identified. Without knowing where the drinking water sources are located, MVP should not be allowed to propose a path. Once identified, changes should be made to take these wells and water supplies into account.

Long term damage over time and use of the pipeline has not been addressed in enough detail to ensure land-owners have an “avenue” to know how to address these issues if they come up during construction, post-construction, or long into the life of the pipeline. Could you please take the water in wells and springs into strong consideration for determining the decision to the project.

Please do not approve this for-profit project that is not a public good or use.

Pat Curran Leonard
4638 Difone MH Road
Cutlsey, VA 24065
540-929-5184
Dear Secretary Bose,

I am commenting on Section 4.3.3 Wetland Crossings of the Draft Environmental Impact Statement (EIS) for the proposed Mountain Valley Pipeline, Docket No. CP16-10-000 and Equitrans Expansion Project, Docket No. CP16-13-000.

The DUIS claims that there is no net loss of wetlands but then states that MVP has not supplied information regarding their proposal to permanently fill 44 wetlands across access roads. The permanent filling of 44 wetlands is a significant impact. This information must be included in the final EIS. If MVP has not supplied FERC with enough information to assess impacts in the EIS, then FERC must choose the no action alternative.

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC choose the No Action Alternative.

Sincerely,

Name: Willa Izzo
Address: 265 Chestnut Farm Lane
City & State: Lewisburg, WV
Zip Code: 24901
The pipeline routing on the subject property is discussed in section 3.5 of the final EIS.

Four archaeological sites (44FR398, 399, 400, and 404) were recorded by Mountain Valley’s contractor during surveys of the APE on Mr. Angle’s property. All four sites were evaluated as being not eligible for the NRHP.

See the response to comment IND12-1 regarding property values.

See the response to comment FA11-12 regarding need.

Dear Secretary Bos:  
This is a separate entry from the National Forest Service letter responding to the Environmental Impact Statement (Docket No. CP16-10-000)  

IND600-1 Our property is located on 1116 Iron Ridge Road of which the pipe line is dividing our property in half  

IND600-2 There are Native American Artifacts on our place and crossing the headwaters of Smith Mountain Lake  

IND600-3 Also according to you all the pipeline will not lower property taxes or values - This is an outright lie but that's nothing new with you people it seems  

If this pipeline didn't affect property values, then why are banks recalling the bank loans on property where land owners have borrowed the money to build on property and some of which the pipeline is not even going thru but in close proximity to the property??  

IND600-4 There is no public need for this pipeline. We have enough pipelines going thru this country as well as the state already. Or is this just another way for big government to take peoples land away that they have worked hard for?? This company (MVP) is not a public utility nor is it registered in the state of Virginia. MVP is a private company listed as a LLC  

I do not want to see this pipeline here in this county  

Daniel Angle
IND601-1  See the response to comment LA15-5 regarding changes to the proposed MVP. Actions under a Blanket are still reviewed by FERC staff.

IND601-2  See the response to comment FA8-1 regarding the 500-foot-wide utility corridor in the Jefferson National Forest.

IND601-3  The EIS provides a discussion of air quality in section 4.11.1, water in section 4.3, soils in section 4.2, threatened and endangered species in section 4.7, and forests in section 4.4.

Allyn M. Moss
2007 Warm Hearth Drive
Blacksburg, VA 24060
alwyn24060@yahoo.com, 540-552-3136
The MVP would not be located within Pocahontas County, West Virginia. Karst is discussed in section 4.1 of the EIS. FERC-regulated buried welded steel natural gas transportation pipelines rarely leak. In such an unlikely event, natural gas is lighter than air and would dissipate into the atmosphere; so there would be no contamination of groundwater. See the response to comment LA1-4 regarding existing 42-inch-diameter pipelines in karst terrain.

I am concerned about the MVP being built in karst areas of our county, Pocahontas, and the possible effects on water resources. This type of topography is more vulnerable than most and I am encouraged that FERC has requested route variations to avoid geologic features such as caves, etc. However, this area is "the Birthplace of Rivers" and leaks from the MVP may result in a network of contaminated water tables affecting an unknown number of people in our area and beyond. All karst features should be avoided by the MVP!

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

Christine Smith

830 John Upson Rd.
Hillsboro, WV 24946
See the response to comment IND18-2 regarding emergency response.

The following quotation is from DEIS p. 2-15, Section 2.1.2.1, paragraph 3:

"In the event of an incident, an electronic command for valve closure can be sent, with the MLV closing within 2 minutes following issuance of a remote signal."

The FERC assumes a reliable power grid exists in our mountainous rural areas. It does not. Power outages are a common occurrence. Therefore the predicted 2 minute shut down time originating from the Pittsburg Center may or may not occur predictably. Furthermore traversing our extremely steep terrain to accomplish a local shutdown could take quite a bit of time dependent on weather conditions. This situation puts both federal forestland and private landowner properties at risk of conflagration since a fire could be fueled for a considerable period before the gas supply is diminished and the fire can be fought safely by area personnel.

Of course, since the Newport Rescue Squad is located within the High Consequence Area (instant incineration zone) where the proposed route crosses St. Rt. 42, we may have no one left on site to respond to an area disaster. The occupants of the Mayapple School and the Newport Mount Olivet United Methodist Church would also be incinerated since the school, the rescue squad and the church are less than 1400 feet apart and the current surveyed pipeline route goes across the middle.
The locations depicted on the commentor’s map are noted.
Climate change is addressed in sections 4.11 and 4.13 of the EIS. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

Dear Ms Rose:

I’m sure you’re getting many letters from people who oppose the pipelines that are proposed to crisscross the state. We feel about the pipelines here like the Indians feel about theirs in North Dakota. We don’t have sacred burial grounds, but we have land that we consider sacred and don’t want to see pipelines crossing it. The main concern is that it’s so backward looking, instead of forward looking. We all know that climate change is real and that we have to go for a non-polluting fuel. The solar industry is growing rapidly and becoming cheaper and cheaper. I realize that we don’t have much in the way of solar vehicles, but we could make great progress if our efforts were put into that instead of digging pipelines.

Yours hopefully,

Pat Churchman
If the American chestnut trees are more than 500 feet away from the pipeline, it is not likely they would be affected by the MVP.

Topsoil is discussed in sections 2, 4.2, and 4.8 of the EIS. Climate change is addressed in section 4.13 of the EIS.
The project area is not pristine. It contains existing infrastructure, including highways, pipelines, powerlines, towns, housing subdivisions, farmsteads, churches and schools, and commercial buildings. Safety is discussed in section 4.12 of the EIS. See the response to comment IND28-3 regarding financial responsibility.

GHG are discussed in sections 4.11 and 4.13.

As discussed in section 4.1, the MVP pipeline is routed across some coal mines.

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). See the response to comment IND2-3 regarding hydraulic fracturing.
Dear Secretary Bose,

I am commenting on Section 4.3.2 Drinking Water Impacts of the Draft Environmental Impact Statement (EIS) for the proposed Mountain Valley Pipeline, Docket Nos. CP16-10-000 and Equitrans Expansion Project, Docket No. CP16-13-000.

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

Christina Lewencruk

See the response to comment IND3-1 regarding drinking water.
See the response to IND177-1 regarding landslides and Mountain Valley’s revised Landslide Mitigation Plan.

IND608-1

The DEIS states 77% of the pipeline is highly susceptible to landslides. However, MVP has not conducted landside mitigation plan. FERC has requested route adjustments, additional wetlands, and additional Best Management Practices (BMPs) to mitigate risks from potential landslides. The impacts are critical in evaluating the impacts of pipeline construction and must be included in the FEIS.

I request that the issues listed above be fully addressed in the Final EIS. If these issues are not addressed in the Final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

Name:
Address:
City & State:
Zip Code:

[Signature]
See the response to comment LA2-1 regarding the draft EIS comment sessions. See the recommendation for complaint resolution procedures as discussed in section 4.8.2 of the EIS. See also the response to comment LA14-9 regarding the FERC’s dispute resolution service.

In the DEIS on page 2-53 it states: “We recognize that during and after construction, issues or complaints may develop that were not addressed during the environmental proceedings at the Commission, and it is important that landowners have an avenue to contact the Applicants’ representatives. Should the Commission approve the MVP and the EEP, we are interested in ensuring that landowner issues and complaints received during and after construction are resolved in a timely and efficient manner. As such, we recommend in section 4.8 that Mountain Valley and Equitrans file detailed environmental complaint resolution procedures and identify related issues in their weekly status reports.”

I call this paragraph to FERC’s attention because it states that FERC finds that complaints and issues are important and that landowners have an “avenue” to contact MVP/representatives. What does FERC consider that avenue is? What are the details that FERC is recommending to the applicants?

I think back to the FERC “sessions” that were held where I attended, was given a number, and had three minutes to state my issues/concerns. At that meeting there were many landowners that had questions, concerns and did not have an “avenue” to use. The applicants had provided paperwork that they had questions about and were looking to get answers. FERC gave three minutes.

This is why I question any importance that FERC has identified that the applicants address and would like to see the details spelled out in writing. Please identify what the details of the “Avenue” will be to landowners and those in the path of the MVP pipeline.

Please do not approve this for profit not for public use project.

Pat Curran Leonard 4638 Dillon Mill Road Callaway, VA 24065 540-929-5184
IND610-1 The locations depicted on the commentor’s map are noted.
Tourism is addressed in section 4.9 of the EIS

A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. See the response to comment IND12-1 regarding property values.

See the response to comment IND288-3 regarding road repairs. Appendix E provides a list of access road improvements to insure safe transport during construction.
IND612-1

Jbí, Bethesda, TN.

I am very concerned about this pipeline. I do not feel that this should be approved without further discussion and consideration of the potential impact on the environment and people's homes. I am also concerned that the economic benefits to neighboring communities will not be realized.

Socioeconomics are addressed in section 4.9 of the EIS.
Section 4.3.1 of the EIS states that construction of the proposed MVP could also result in minor fluctuations in groundwater levels. However, groundwater flow is typically significantly deeper than the proposed trench depth of 10 feet, which would be refilled, and graded to original contours during restoration. Groundwater levels would not be significantly affected by project construction.
(orientation and distribution of bedrock fractures); the mass strength properties of in-place bedrock and slope deposits; the nature of the contact between in-place bedrock and slope; the nature of the contact between in-place bedrock and fill; rainfall quantity and intensity; surface and near surface drainage, including groundwater, seeps, and springs."

An unstable slope that slips is a slope that can permanently change the flow of the shallow water aquifer. Thus, the DEIS is internally inconsistent in using the term "temporarily" in section 4.3.1.2, Page 4-76, and acknowledging on Page 4-29 possibilities of permanent slope instabilities and effects on "groundwater, seeps and springs." It is also inconsistent with common sense.

On Pages 4-80 and 4-81, respectively, the DEIS sets distance limits for monitoring and remediation:

"In the event that a public or private water supply well or spring is identified within 150 feet of the projects (500 feet in karst terrain), the Applicants would flag the wellhead or spring as a precaution, and notify the owner or operator of the water resource. The Applicants would conduct two pre-construction water quality evaluations on water wells within 150 feet of the project (500 feet in karst terrain). One pre-construction evaluation would be conducted 6 months prior to construction; the second pre-construction evaluation would be conducted 3 months prior to construction."

"If suitable potable water is no longer available due to construction-related activities, Mountain Valley and Equitran would provide adequate quantities of potable water during repair or replacement of the damaged water supply."

The arbitrary decision to limit surveying, monitoring, and remediation of the Project’s effects to springs and wells that are within 150 feet/500 feet of construction work spaces is a major flaw in this DEIS. As previously noted, disruption of the surface of impervious bedrock can disrupt the flow of shallow aquifers along the surface of that bedrock for many thousands of feet. It would be highly irresponsible of FERC to allow these arbitrary cutoffs to be applied. A large body of geologic evidence suggests that these respective distances for non-karst and karst geology are inadequate. I ask that these limits be expanded by at least an order of magnitude to 1,500 and 5,000 feet in non-karst and karst areas, respectively, for identification of springs and wells. Detailed geologic studies must be required in the broad area around those water sources. Landowners in these zones must not be deprived by government (FERC), in collusion with a private profit-making entity, of their right to demonstrate effects and receive remediation should the vital resource of water be taken from them.

Given the flaws I have noted, and the need to expand water source monitoring and remediation distance limits, I request that FERC issue a new, corrected, DEIS, to allow the public an opportunity to assess realistic impacts of the Project before issuance of the FEIS. In lieu of that, I ask FERC to choose the No Action Alternative.

Sincerely,
Robert J. Gronan, DO, PhD
robgroman@yahoo.com
304-645-4318


Cc: US Environmental Protection Agency

See the response to comment IND374-3 regarding monitoring distances for drinking water sources.

The draft EIS would not be re-issued, but FERC produced a final EIS that addresses comments on the draft.
Seismicity is discussed in section 4.1 of the EIS. Tourism is discussed in section 4.9 of the EIS. See the response to comment IND3-1 regarding drinking water.

Socioeconomics is discussed in section 4.9 of the EIS.

The Roadless Area Conservation Rule and impacts to roadless areas under this regulation are discussed in section 4.8 of the EIS.

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest).
December 19, 2016

Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
888 First St. N.E., Room 1A
Washington, D.C. 20426

Joby Timm, Supervisor and Jennifer Adams, special project coordinator
George Washington and Jefferson National Forests
5162 Valley Pointe Parkway
Roanoke, VA 24019

Re: Docket No. CP 16-10, US Forest Service Amendments and the Mountain Valley Pipeline,

Dear Ms. Bose, the Commission and Forest Service Staff,

IND615-1 We are residents of Montgomery County, Virginia for more than 30 years. We are homeowners here. We love the beauty, peace and quiet, and nature here. This is why we chose to make our life here. Our life and happiness is deeply connected to our land and our environment that surrounds our home. We are writing to express our strong opposition to the granting of a Certificate of Necessity and Convenience of the Mountain Valley Pipeline (MVP).

IND615-2 Although we are not personally scientists or geologists, we have many friends who are leaders in these professional academic fields, who are highly recognized for their work, who have presented significant factual information that explains clearly the potential devastation and destruction that the MVP will create in our county, and other nearby counties and communities as well. Our personal land and neighborhood is full of sinkholes. The instability of the land, the inability to control erosion on the steep slopes, the water contamination, and the strong likelihood for leaks and explosions, are all devastating realities should MVP be allowed construction.

IND615-3 The National Environmental Policy Act requires that the need for the MVP must be clearly demonstrated in your environmental impact statement. Studies have shown that current energy demand can be met without the MVP. The MVP is not needed. It will cause irreparable harm to Virginia.

Sincerely,

David and Teresa Ehrlich
2070 Mt. Tabor Road
Blacksburg, VA 24060

IND615-1 Comments noted.

IND615-2 The EIS took into consideration comments from the public, including reports submitted by outside parties who claimed to be academics or professional scholars. The EIS provides a discussion of sinkholes in section 4.1, water resources in section 4.3, and safety in section 4.12. See the response to comment IND2-1 regarding safety. See the response to comment IND3-1 regarding drinking water. See the response to comment IND92-1 regarding leaks.

IND615-3 NEPA does not require that need be demonstrated in an EIS. See the response to comment FA11-12 regarding need. The EIS indicates that the MVP would not cause irreparable harm to the environment of Virginia; most effects on resources (except forest) would be temporary or short-term.
As stated in section 4.1 of the EIS, maintained pipelines constructed using modern arc-welding techniques have performed well in seismically active areas of the United States, such as California. A review of gas transmission line performance after a 1994 seismic event in Northridge showed that 91 percent of all pipeline damage occurred in areas with earthquakes of MII greater than or equal to VIII (O’Rourke and Palmer, 1994b). Only large, abrupt ground displacements have caused serious impacts on pipeline facilities.

IND616-2 A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. Karst is discussed in section 4.1 of the EIS.

IND616-3 See the response to comment FA11-12 regarding need. See the response to comment IND3-1 regarding drinking water. See the response to comment CO2-1 regarding benefits. See the response to comment IND2-1 regarding safety. See the response to comment IND2-3 regarding hydraulic fracturing. See the response to comment IND28-3 regarding financial responsibility.

IND616-4 See the response to comment IND2-3 regarding hydraulic fracturing.
The comment is noted. The FS has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources on NFS lands. These mitigation measures and monitoring procedures are described in the POD.
In respect to “removing the most hazardous fuels”, the Forest Service would not comply with this safeguard if it permitted a 42” high pressure natural gas pipeline to be embedded within forest land. The safeguard here lies in “preventing fire hazards” by denying access to any such intrusion that would place its forest land and surrounding communities in eminent danger.

In respect to “illustrate the importance of the link between forests and fauces”, the Forest Service would not adhere to this pledge if it permits a natural gas pipeline to cross National Forest land which lies surrounded by communities whose sole water supply comes from water that flows via kars conduit within a region that poses other potential hazards such as land instability, weak soils, and potential seismicity. Please refer to ELK ADVISORY COMMITTEE ON GEOLCIG HAZARDS IN THE KARST REGIONS OF VIRGINIA AND WEST VIRGINIA by Ernst H. Kastning, Ph.D., P.G., previously submitted to FERC and available to view at elkadvcom filib.org/KastningReport.pdf.

In regards to other pledges within the Forest Service Plan that I have noted above, one could not very well experience the serenity of nature, escape the sights and sounds of civilization, maintain local culture and tradition, or experience overall health and well-being in a forest being subjected to bulldozing, trenching and blasting for an unnecessary and vastly offensive project that leads our nation away from ending environmental abuses and into the likelihood of ecocide. Ecocide: the destruction of the natural environment, especially when willfully done.

The photo on the cover of your USDA FOREST SERVICE STRATEGIC PLAN FY 2015-2020, can you picture this same view with an extensive line of heavy construction equipment rupturing the scene? Can you hear what the forest inhabitants and human visitors will hear during this lengthy project? Will the aftermath improve the health and resilience of the land, or will it just remind us of yet another sight and sound of civilization that we should have never let happen?

Respectfully,

Dianne Broussard

cc: The President, The White House
Gina McCarthy, EPA
Randy Huffman, WVDEP
As explained in section 1.2 of our final EIS, the Commission would decide if the economic benefits outweigh the environmental costs of the MVP in its Project Order. Visual impacts on the Jefferson National Forest and ANST are discussed in section 4.8. Steep slopes are addressed in section 4.1 of the EIS.

IND618-1

Dec. 13 2016

Andrew Schenker
1025 Tannolla Rd.
Blacksburg VA 24060

Dear Mr. Bruce and FERC,

I am writing to ask FERC to deny approval of construction of the Mountain Valley Pipeline. As a 25 year resident of Blacksburg, VA, I believe the costs, both locally and nationally, do not outweigh the benefits. The visual scars on the landscape in the National Forests and from the Appalachian Trail, invasions of private property rights for private investors, and the destruction of steep slopes and resulting threats to water quality are a few of the costs. The benefits will be to private investors of the pipeline and not the public. The environmental analysis for the project failed to adequately address the concerns of the Appalachian Trail Conservancy for the protection of our national treasure, the Appalachian Trail.

Sincerely,
Andrew Schenker
Section 4.12 has been revised to provide a citation for that statement. Section 4.12 provides fatalities for the public and pipeline workers. The nature of the injuries is not available. The response to comment IND138-1 regarding setback distances.

As a landowner who owns property which will be crossed by the Mountain Valley Pipeline (MVP), (Docket No. CP16-10-000), and as a licensed professional engineer, I would like for you to clarify some terms and assumptions which are used to support your findings in Section 4.12.3, Impacts on Public Safety, of your draft Environmental Impact Statement which was issued for this project in September 2016. In this section the statement is made that from 1966 to 2015 there were an average of 65 significant incidents and 2 fatalities per year. What is a significant incident? How are fatalities tabulated? Does this number only include those who are immediately killed or does it also include those who are injured but die at some later point from complications associated with the injury? Natural gas transmission lines are a mature supposedly well understood technology, that there are any accidental deaths resulting from inadequate or improper maintenance or design failure of these pipelines is unacceptable. Are these fatalities truly members of the public at large and why and how did the injuries occur? Without a better understanding of the accidents evaluated and without a definition of your terms it is difficult to make a judgment concerning your data or to assess the true risk associated with this project. Given the proximity of the pipeline to several schools and communities, the risk should be properly defined in the EIS so that an informed decision can be made concerning the overall safety of the project. If the risk is as it seems to be in this section of your draft EIS, then FERC is allowing a level of risk for this pipeline which would be considered unacceptable for other similar regulated technologies.

Thank you for your consideration of this comment.

Robert Pierson
Section 2.7 of the EIS provides an overview of future plans and abandonment.

As a landowner whose property which will be crossed by the Mountain Valley Pipeline (MVP), (Docket No. CP16-10-000), I am concerned over the apparent failure to include a safe decommissioning protocol for this project. Although I recognize that pipelines are needed for a modern industrial society and I would in principle support the construction and use of a pipeline, I do not support this application since allowing this pipeline to be built with no consideration for its future decommissioning is irresponsible. The failure to safely decommission this pipeline at the end of its useful life will pose an unnecessary safety and environmental risk to me or the future owner of my property.

During negotiations with MVP concerning a pipeline right-of-way on my property, a representative of MVP informed me that MVP will not negotiate decommissioning provisions since they are not required to decommission the pipeline and consequently at the end of the pipeline’s economic life they will simply abandon the pipeline in place. Without cathodic protection this 42 inch diameter pipeline will begin a process of discontinuous corrosion and the real possibility exists that portions of the pipeline will corrode through, allowing people or animals to literally fall through the corroded pipe wall into the pipe resulting in death or serious injury for children or animals. In addition the pipeline could serve as a conduit to allow the movement of water along the pipeline. This could contribute to erosion and stream contamination.

Following abandonment of the pipeline as a landowner I will be left with the liability and the personal and environmental risk this abandoned pipeline poses. To suggest that a 42 inch diameter pipeline buried a mere 3 feet below the surface of the ground will not pose a safety risk or an environmental risk is not credible. As a licensed engineer I think this is irresponsible on both the part of the responsible regulatory agencies for allowing this option and MVP for choosing this option. I am sure that following the abandonment of these large pipelines that someone will need to do some sort of action to make them safe for the public and the environment; that responsibility will likely fall to the future landowner or the public at large. Neither should be responsible for this action. Let the company building the pipeline, which is presumably benefitting from this pipeline, provide funds to ensure that the pipeline is rendered to a safe condition following the end of its useful economic life.

Decommissioning of the pipeline should include removal of the pipeline and restoration for the land or at the least the filling of the pipeline with earth and when it crosses streams filling the pipeline with
IND620 - Robert Pierson

Without adequate decommissioning requirements in place I do not want this pipeline placed on my property.

Thank you for your consideration of this comment.

Robert Pierson
As stated on page ES-2 of the EIS, “We,” “us,” and “our” refer to the environmental staff of the FERC’s Office of Energy Projects. See the response to comment IND152-1 regarding the FERC’s third-party monitoring program.

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Oversight Monitoring –II

In the DEIS on page ES-15 it states: “We would provide oversight for an environmental inspection and mitigation monitoring program that would ensure compliance with all mitigation measures that become conditions of the FERC authorizations.”

I am assuming the “we” in the above statement is MVP? If that is so, ensuring compliance with all mitigation plans and standards is the monumental task. Throughout the document, MVP and EQT have stated there would be compliance with standards but who will be monitoring? And don’t come back with “an independent consulting firm” that MVP and EQT hire. How independent is that? If there are standards from DOT, the EPA, the many state and federal agencies that this pipeline need to be held to, a firm that MVP and EQT hire is not going to have anyone’s best interests except for those that are paying their wages. If FERC is placing conditions upon approval, then FERC should be out in the field ensuring standards are being maintained.

If any soil and water disturbance is under construction, a person has to be permitted, inspected, monitored and documented that standards are being met. The person does not choose the inspection agency, that is done by the state and federal level that make the rules. As land owners being affected by the MVP pipeline, the same oversight and monitoring is not only expected but because of the impact on risk of life and environment, MVP’s construction should be held to a higher standard.

The DEIS does not offer assurances that this monitoring and control will be unbiased or held in such high standards. What agencies will be conducting the monitoring? What reporting as a follow up to permitting will be conducted? Where can this documentation on past pipelines be found today?

FERC, please do not approve this for profit proposal that will not benefit me as a landowner in the path of its destruction.
The projects would be constructed in accordance with federal and state regulations. Oversight would be the responsibility of the federal DOT program.
The comment is noted. The FS has worked with MVP to develop project design features, mitigation measures and monitoring procedures to minimize the impacts to the resources on NFS lands. These mitigation measures and monitoring procedures are described in the POD.

IND623-2
See the response to comment FA11-12 regarding need. We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest).

IND623-3
Karst is addressed in section 4.1 of the EIS. See the response to comment LA1-4 regarding existing 42-inch-diameter pipelines in karst terrain.

IND623-4
Climate change is discussed in sections 4.11 and 4.13 of the EIS.

IND623-5
Historic resources are addressed in section 4.10 of the EIS. Impacts on historic properties can be mitigated, in accordance with 36 CFR 800, the regulations for implementing Section 106 of the NHPA.

IND623-6
See the response to comment IND12-1 regarding property values. Tourism is addressed in section 4.9 of the EIS.

IND623-7
The Commission would decide whether or not to authorized the projects.
IND624-1 The environmental surveys referenced in the EIS are not inaccurate.

IND624-2 See the response to comment IND2-3 regarding hydraulic fracturing and export. See the response to comment CO2-1 regarding benefits. See the response to comment IND70-1 regarding erosion.

IND624-3 Karst and steep slopes are addressed in section 4.1 of the EIS. See the response to comment IND3-1 regarding drinking water. See the response to comment CO14-1 regarding blasting. See the response to comment CO14-3 regarding spills. See the response to comment IND277-11 regarding chemicals.

IND624-4 Earthquakes are addressed in section 4.1 of the EIS.
Karst is addressed in section 4.1 of the EIS. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

Dear Ms. Bose and FERC,

I am writing a letter to you today to urge you to deny approval of construction of the Mountain Valley Pipeline. Having lived here in the New River Valley of South West Virginia for more than 25 years, it is only too apparent to me that this project would be a tragedy on many levels for our beautiful mountain community with its fragile karst topography. Technological advances in renewable energy are quickly becoming a reality and it is clear that this project is really about making a lot of money for private investors at the expense of the general public. We are at a point in our history of humans living on this earth that we need to phase out all types of fossil fuel dependant energy consumption if we want to survive. Please deny approval of this and other pipelines which are dangerous on so many levels and approve any promote investment in sustainable, renewable energy projects.

Sincerely,
Lauren Cooper
1025 Jenelle Rd
Blacksburg, VA
29060
December 20, 2016

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission (FERC)
888 First Street, N.E.
Washington, DC 20426

Re: Opposition to Mountain Valley Pipeline, Docket CP16-10-000

Dear Ms. Bose and Members of the Commission,

I am writing this letter to voice my strong opposition to the proposed Mountain Valley Pipeline (MVP) in general and specifically to the proposed temporary access to the route along Labelleve Drive in Franklin County, Virginia at approximately mile 257 of the proposed pipeline.

- **MVP has not shown the pipeline itself is needed.**
  - NEPA requires an agency to define the “purpose and need” for a proposed project in its DEIS. Once it knows the need, FERC can analyze a range of alternatives to the proposal that meet the same need. Here, however, FERC has refused to determine the need for or public benefits of the Mountain Valley Pipeline as part of the NEPA process. Without defining the need that the project would satisfy, FERC cannot know what alternative measures—many of which would likely have significantly less severe impacts to the environment and to landowners—would also meet that need. FERC’s failure to comply with NEPA’s “purpose and need” requirement is especially problematic here because the MVP would have significant adverse impacts to public lands and would require the taking of private property through the use of eminent domain.

- **The DEIS Lacks critical environmental Information.**
  - NEPA requires agencies to take a “hard look” at the environmental impacts of a proposed project and to make that information available to the public. Here, FERC released the DEIS despite the absence of information necessary to assess the impacts of the project on a wide range of resources, including streams, wetlands, threatened and endangered species, cultural resources, and recreation resources such as the Appalachian Trail. FERC has said that MVP can submit the
missing information before construction begins. This, however, prevents the meaningful public participation in the decision making process that is required by NEPA. A thorough analysis subject to public scrutiny is particularly necessary here because a pipeline of this size has never been built through the type of steep terrain and karst geology that MVP would cross. Past experience with adverse effects from construction of much smaller pipelines in the region—such as the Celanese and Stonewall Gathering lines—shows that the public cannot rely on FERC’s assurances that such impacts will be successfully mitigated.

- **FERC has failed to assess cumulative life cycle climate impacts.**
  - FERC’s assessment of both climate-altering greenhouse gas (GHG) emissions and the effect of those emissions on the environment is woefully inadequate. FERC’s analysis is opaque and difficult to evaluate, and appears to ignore significant emissions sources such as pipeline leakage and production of the fracked gas that would be carried on the MVP. Further, FERC does not use readily available tools such as the social cost of carbon to estimate the environmental impacts of the GHG emissions, but rather simply compares the projected annual GHG emissions of the MVP Project to global GHG emissions and concludes they are insignificant. FERC’s approach mirrors its flawed analysis in other pipeline proceedings, which EPA has repeatedly criticized for failing to comply with the Council on Environmental Quality’s NEPA GHG guidance. On a broader scale, FERC’s runaway permitting of major, long-term natural gas pipelines commits the U.S. to continued fossil fuel dependence that is inconsistent with the emissions reduction goals necessary to curb global warming and commitments made in international agreements such as those at the Paris Climate Conference.

- **FERC has failed to consider potential cumulative impacts of induced fracking.**
  - FERC has failed to meaningfully analyze whether there would be significant cumulative environmental impacts from additional fracking in the Marcellus and Utica shale formations of WV and PA to supply the MVP with gas throughout its lifetime. Despite clear statements from both production and transmission companies that new pipelines will sustain drilling in the area, FERC refused to consider the potential of severe environmental impacts of those fracking operations, such as deforestation, air pollution, and water pollution. NEPA requires that those indirect effects be analyzed in the MVP.

- **No public need is being met by the Mountain Valley Pipeline (MVP) project and the potential use of eminent domain.**
  - The MVP is designed to make profits for private companies by selling US resources to overseas markets. Any cooperation with local utilities is minimal and designed only to give the appearance of meeting a public need. The “markets” MVP claims are in the Southeast United States are not residents or

IND626-3

See also the response to comment FA15-10 regarding lifecycle emissions. Fugitive emissions are addressed in section 4.11.1 of the EIS. See the response to comment IND2-3 regarding hydraulic fracturing.

IND626-4

See the response to comment IND2-3 regarding hydraulic fracturing. Section 4.13 provides an assessment of gas wells to the extent that information is available.

IND626-5

See the response to comment FA11-12 regarding need. See the response to comment IND1-3 regarding eminent domain. See the response to comment IND2-3 regarding export.
Labellevue Drive would be used as a temporary access road and restored following construction. The statements regarding use of the access road are noted. As stated in section 4.8 of the EIS, Mountain Valley expects a maximum of about 45 vehicle trips from each yard between 7:30 am and 8:30 am, with return trips from the right-of-way between 4:30 pm and 6:00 pm.

See the response to comment IND3-1 regarding drinking water.

Section 3.5 has been revised to provide a discussion of the Labellevue Drive access road.
The statements regarding use of the property during construction are noted.

As Labellevue Drive is an existing road, the well should not have to be relocated.

As stated in section 2.4.2 of the EIS, construction would generally proceed in an assembly line fashion with construction crews moving down the construction right-of-way as work progresses. Construction and restoration at any particular point along the pipeline route would take about 3 weeks to complete; although progress could be delayed by topography, weather, or other factors.
The landowner is encouraged to negotiate changes to Mountain Valley’s easement agreement directly with Mountain Valley.

IND626-12

IND626-11 cont'd

- At a minimum, the following are basic easement requirements which will be required concerning the temporary construction easement along Labelleve Drive, the driveway at 887 Labelleve, and the permanent easement along the pipeline route:
  - Temporary easement along Labelleve Drive and property at 887 Labelleve is limited to no more than 30 feet from the East property line.
  - Pipeline route permanent access is limited to no more than 30 feet from North property line.
  - A permanent poured concrete retaining wall is built to the property owner’s satisfaction to the East and North of barn to ensure heavy equipment does not collapse the ground which was dug out to allow the barn construction.
  - Permanently move well to a location and depth acceptable to the property owner.
  - Move chicken coop to a location acceptable to the property owner and return following construction. Rebuild coop if coop is damaged.
  - Move underground fence to an area acceptable to the property owner, retrain dogs, and return fence following construction.
  - Temporary easement along Labelleve expires 12 months after construction of the pipeline begins. No future easements will be sought or granted.
  - Build 8’ privacy fence along length of temporary easement and remove fence following construction. Fence will allow for access from 887 Labelleve to driveway via remote control gate.
  - No use of easement between 9pm and 8am daily or on weekends.
  - Land is returned to its state prior to construction including land elevation. Trees planted of substantial height (at least 20’), same number, and same species as those destroyed during construction.
  - Rebuild gate, to property owner’s satisfaction, at end of driveway following construction.
  - No trees removed on property, or adjacent to it, until 100 feet north of (behind) barn.
  - Workers are not armed or under the influence of drugs/alcohol while on property.
  - Hold harmless clause included for owner of 887 Labelleve in perpetuity.
  - Prior notice required for high traffic periods.
  - Easement access is for construction workers only and cannot be extended or transferred to third parties such as private citizens, local, state, or Federal entities or those that represent them or are otherwise associated with them.
INDIVIDUALS
IND626 – Keith Wilson

IND626-12
cont'd

- MVP assumes liability for any contamination to property, damage to buildings, etc in perpetuity. Property owner and his/her agents will determine if pollution or contamination has occurred.
- Easement is only granted for what is approved by FERC. No additional pipelines, conveyance of material other than natural gas, etc.
- No Jake breaking by drivers.
- Drivers will obey 10 MPR speed limit on Labellevue Drive.
- Penalties for easement violations must be clearly defined and acceptable to the property owner.
- Asphalt paving on Labellevue Drive installed with speed bumps.
- Asphalt paving is removed following construction.
- Gates are placed at each end of the permanent easement along pipeline route.

Sincerely,

/s/
KEITH M. WILSON
IND627-1

See the response to comment FA11-15 regarding open-cut wet waterbody crossings. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS.

December 14, 2016

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE, Room 1A
Washington, D.C. 20426

Re: Draft Environmental Impact Statement for the
Mountain Valley Pipeline CP16-10-000

Dear Ms. Bose,

After reviewing the Draft Environmental Impact Statement (DEIS) for the proposed Mountain Valley Pipeline (MVP) it is clear that the document does not address a number of issues that were raised by local community members in the Greenbrier River Watershed during the scoping process.

Specifically, the DEIS states that MVP plans to cross the Greenbrier River using the open-cut wet crossing method. This method uses no water diversion and is of deep concern regarding maintaining the integrity of the river. Most commonly used for small stream crossings, this method is particularly troublesome regarding crossing the Greenbrier River because with no water diversion, a tremendous amount of sediment disturbance will occur and will likely impact the Big Bend Public Service District public water intake a short distance downstream. We know from other pipeline projects in the area that this sediment causes detrimental and costly problems for water treatment plants.

Further, it is incumbent upon FERC to require MVP to minimize the impacts during river crossings. This may mean requiring a less invasive and impactful crossing method. A more thorough analysis of the river crossing method across the Greenbrier River is necessary to reduce potential harmful impacts from the proposed MVP.

Sincerely,

Elise Keaton
PO Box 481
Hinton, WV 25951
IND628-1

I am writing to urge FERC and the U.S. Forest Service to reject the Mountain Valley Pipeline DEIS and the proposed amendments to it. The Draft Environmental Impact Statement is severely flawed and incomplete on a number of counts (e.g., inadequate recognition of impact on karst terrain and water sources, impact on the town of Newport, protection of cultural resources), but it is especially troublesome that Amendment 1 proposes a 500-foot wide utility corridor through the Jefferson National Forest. This corridor would severely fragment the forest, disrupt animal habitat and migration, increase soil erosion and water turbidity and pollution, and destroy the view shed from the Appalachian Trail.

Such a utility corridor will make it easier for natural gas and oil pipelines to cut through this region and facilitate greater use of fossil fuels at a time when scientists urgently tell us we need to move away from fossil fuels as quickly as possible. This expensive natural gas infrastructure will lock the nation into using fossil fuels for many years instead of moving swiftly to renewable non-greenhouse-gas energy sources, which are now affordable and as capable of producing the same high-quality power as fossil fuels.

IND628-2

The DEIS is incomplete because it does not adequately address the issue of methane leaks that are known to occur along such pipelines and from the fracking wells they encourage. Methane is at least 25 times more potent greenhouse gas than carbon dioxide. On page 4-418, the DEIS says that “Emissions generated during operation of the MVP and the EEP would be minimal, limited to emissions from maintenance vehicles and equipment and fugitive emissions (considered negligible for the pipeline).” But the DEIS does not take into account the increased methane leaks from the increased number of wells that will be drilled if the MVP and the utility corridor are approved.

The MVP pipeline and others that might occupy the proposed corridor will encourage more

IND628-3

See the response to comment IND2-3 regarding hydraulic fracturing.
IND628-3

fracking of the Marcellus Shale. A 2014 study published in the Proceedings of the National Academy of Sciences by researchers at Cornell who examined the records of over 41,000 wells in Pennsylvania concluded that: “About 40 percent of the oil and gas wells in parts of the Marcellus shale region will probably be leaking methane into the groundwater or into the atmosphere...” (http://www.news.cornell.edu/stories/2014/06/four-10-wells-forecast-fail-northeastern-pa). Such leaks come from cracks in cement casings that are caused by human error in cement mixing as well as natural occurrences.

While natural gas was once thought of as a “bridge” fuel that was better than coal, our growing understanding of the large volumes of methane leaked into the environment during fracking and transmission have caused many to conclude that natural gas is a bridge to nowhere. The atmosphere is already saturated with CO2; adding methane makes matters worse (http://www.truth-out.org/news/item/17605-former-mobil-vp-warns). Since Virginia’s coastal cities are already suffering from rising waters caused by climate change, it would be foolish to build unnecessary fossil fuel infrastructure that will only hasten the devastating effects of climate change. Climate change is also causing harmful effects on forests, such as increased droughts and forest fires, and ever-rising temperatures to which some trees and other species cannot adapt.

As Senator Elizabeth Warren wrote on Aug. 12, 2014, in a letter opposing a natural gas pipeline in Massachusetts, “Before we sink more money in gas infrastructure, we have an obligation wherever possible to focus our investments on the clean technologies of the future -- not the dirty fuels of the past -- and to minimize the environmental impact of all our energy infrastructure projects. We can do better -- and we should” (http://www.warren.senate.gov/?id=598&p=op_en).

IND628-4

Amendment 2 would permit the MVP to ignore Forest Service standards regarding riparian corridors and soil conditions, adversely affecting the water quality for many. Amendment 3 would permit the removal of old-growth trees, destroying a resource that can never be replaced. Such old-growth trees remove more carbon dioxide from the atmosphere than younger trees (http://www.natureworldnews.com/articles/5658/20140116/older-trees-grow-faster-take-up-more-carbon.html). The fourth amendment would enable MVP to violate the protected Appalachian National Scenic Trail on Peters Mountain and to lower the Scenic Integrity Objective for the area and the Appalachian Trail from “High” to “Moderate,” with restoration permitted to take 5 to 10 years after construction. The grave damage that these four amendments pose undermines the very reasons for being of the Jefferson National Forest and the Appalachian National Scenic Trail.

IND628-5

The DEIS does not establish convincing need for the pipeline. Other studies have shown that existing pipelines can adequately meet current and future needs in this region for shipping natural gas and that gas pipelines are being over-built (https://www.southernenvironment.org/uploads/words_docs/Syncheg_Report_FINAL_FINAL.pdf; http://sefks.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expensive-in-Appalachia_-April-2016.pdf).

IND628-6

I urge FERC and the U.S. Forest Service to pay heed to Dr. Earnst Kastning, whose study of the effects of building the MVP through the karst terrain of this region concludes, “Karst and associated hazards constitute a serious incompatibility with the proposed pipeline. The effect of these threats on the emplacement and maintenance of the pipeline, as well as the potential

IND628-4

See the response to comment FA10-1 regarding Amendments 2 and 4.

IND628-5

See the response to comment FA11-12 regarding need. Section 3.3 of the EIS provided a discussion of using existing pipelines as alternatives.

IND628-6

See the response to comment IND62-1 regarding Dr. Kastning’s report.
Comments noted. Impacts on the Jefferson National Forest, BRP, and ANST are discussed in section 4.8 of the EIS.

IND628-7

hazards of the line on the natural environment, renders this region as a 'no-build' zone for the project" (Kasting Response to DEIS).

IND628-7

It would be a travesty to permit national treasures such as the Jefferson National Forest, The Blue Ridge Parkway, and the Appalachian National Scenic Trail to be forever blighted by the shortsighted profit motives of MVP, LLC and Equitrans, L.P., which can expect FERC-sanctioned allowable rates of 14% return on their investments.

Sincerely,

Dr. Elizabeth C. Fine
1306 Hillcrest Drive,
Blacksburg, VA

cc Thomas L. Tidwell, Chief
U.S. Forest Service
United States Department of Agriculture
1400 Independence Ave., SW
Washington, D.C. 20250-1111
Dear Ms. Bose and Members of the Commission,

The Mountain Valley Pipeline (MVP) Right of Way (ROW) grant application includes construction and operation of a pipeline across the Jefferson National Forest (JNF). I strongly oppose granting the ROW changes to the Land Resource Management Plan for this forest, especially the designation of a utility corridor in the JNF.

Protection of the Forest Service lands afford all Americans the privilege and right to enjoy recreation and nature. Recreation is essential for citizens’ health and well-being, and is crucial for the economic well-being of communities which rely on this forest for tourism. The preservation of the JNF ecosystem with its many species and habitats, old growth trees and water bodies for our future generations is critical.

A 500-foot ROW in the JNF will not only devastate large sections of forest; it will set a precedent for future expansion and the likelihood of severe environmental impacts. This does not stop at the edge of the JNF. Communities on either side of the forest will be destroyed.

Sincerely,

Georgia Haverty
Doe Creek Farm, Inc.
Pembroke, VA

cc: Nell Kornze, Director, BLM; Joby Timm, Supervisor, Jefferson National Forest
Our Family has had the understanding for decades and into the 1800s that we as landowners would be good stewards of the land. At this time we have no erosion problems. We have dealt with these over the years and solved them — look for yourself. We have grass growing on the creek banks right down to the water. We care for the land!

Who can promise that there will be no erosion problems if a pipeline goes through our property? We have seen pictures of pipeline projects and the erosion around/beside the pipe lines.

Who can be sued when the landscape is destroyed? Does FERC care?

Does FERC really care about the erosion problem and scars left on the landscape? — We Do.

We feel like predators have been on our land surveying it.
Cultural resource surveys were conducted for all parcels for which the Applicants had survey permission. A summary of these surveys are included in section 4.10 of the EIS.

IND630-2

The NAFF Road area here in Franklin County across the mountain from us has Historical District status – ours – our property has historical status also, State of Virginia – and eligible for National status. Why are we being discriminated against?

According to reports the pipeline did not go through into the NAFF Road area because of the historical significance – what is the difference?

IND630-3

The proposed pipeline is going through my brothers property also. It is across Cahas Mt. Road from my property. The only time that I have seen any survey people on his property is when they claimed to be working on the proposed route. Surveyors for wetlands, bats, Native American Indians have shown no interest in surveying his property as they have mine. The Indians lived there also. There are natural water springs on his property.
When asking surveyors why they were not treating his property like mine, they either played dumb or were not sure how to answer. Again, this is my brother’s property which is in the proposed path.

When surveyors have showed up they have large back packs full of whatever. Some have said that they have seen firearms on some of these people.

Many people—friends, neighbors, have seen and called and told us that the pipeline people—surveyors have asked—were trying—and indeed sneaking on properties that the pipeline is proposed to go through.

Have you—FERC—ever had anything that you—your members—did not messed up or turn up? Is your heart really in your work or just there to draw a paycheck? What if a pipeline was going through your property.

Under the NGA, the Commission authorizes natural gas infrastructure, so that the public has access to natural gas throughout the country.
IND630-5  See the response to comment FA11-12 regarding need.

IND630-6  While the snail darter is federally threatened, it is only known to occur in Tennessee, Georgia, and Alabama. It is not listed by FWS or VDGIF as being present in Virginia; nor is it noted in the Virginia Wildlife Action Plan.

IND630-7  See the response to comment IND630-3 regarding surveys.
Not survey his property while they are here – They acted as if they did not know what to do. I asked several times - you are here there is the property – you have the tax map – why leave. All properties are not being treated/surveyed in the same manner.

Archaeologist told me that the Native Americans were buried 4 to 6 feet deep – they never dug down that deep when they were here.

With the points of interest that I have written about here on these pages — Does anyone from FERC – any member actually go out to job sites and observe the work to see if it is being done according to standards? Does anyone ever go and check on them? Is FERC really interested enough to follow up — go out and check? Are they allowed to just skim over.

See the response to comment IND152-1 regarding the FERC’s third-party monitoring program.
Will anything that has been written to FERC or said to FERC in meetings make a difference or get an answer?

Are the meetings with citizens—within a 30 minute time limit—or the letters sent to FERC—getting any real attention or is FERC just doing the minimum required?

Does FERC have anyone who does job evaluations on its members/employees—like most of us citizens have at our jobs.

Many in America over the years have gotten a real distaste and mistrust of the Federal government. Will the decisions made by FERC be yet another example for us—the people affected by MVP—and the citizens of America to look and reflect upon.

Wendell W. Flora

150 Floradale Farms Lane
Bookes Mill, VA 24065
Phone 340-334-2401

See the response to comment LA5-1 regarding stakeholder comments.

The work performance of all federal employees are evaluated.
Steep slopes and landslides are addressed in section 4.1 of the EIS. See the response to comment LA1-4 regarding existing 42-inch-diameter pipelines in mountainous terrain. A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. See the response to comment IND70-1 regarding erosions.

IND631-1

I am commenting on Section 4.1.2.2. of the Draft Environmental Impact Statement (EIS) for the proposed Mountain Valley Pipeline, Docket No. CP16-10-000 and Equitrans Expansion Project, Docket No. CP16-13-000.

I am alarmed at the proposed route of the MVP along some very steep mountain terrain. This land was not suited to mining, diggin a significant number of ways proposed for these very large pipelines.

As you know, West Virginia suffered very significant flooding this past June. These were flash floods, much more typical of the western mountains than the Appalachians. Tapes rose quickly, the ground was saturated, basements flooded in high ground. This was an unanticipated flood in high ground. Great human life was lost, many communities lost. Businesses were destroyed. We live in an impoverished area as it is. We cannot risk further destabilizing of our mountainous and potential landslides, erosion, and risk of flooding. The MVP is unacceptable.

I request that the issues listed above be fully addressed in the final EIS. If these issues are not addressed in the final EIS, then I request that FERC chose the No Action Alternative.

Sincerely,

Name: Sam Kessler
Address: 3491 1st Ave
City & State: Lewishay, WY
Zip Code: 24901
IND632-1

The EIS has not established a need for America to put a pipeline through fragile mountain landscapes to benefit American citizens. The various subsidiaries involved ultimately have a goal of shipping gas overseas to other countries. This goal does not justify the taking of private land from American citizens for private economic profit.

IND632-2

Furthermore, the terrain is not suitable for safe, sustainable pipelines. There are many sinkholes and underground caves. The natural resources of the entire environment will be disrupted, not to mention the immense stormwater runoff in construction that will cause great destruction and be harmful to the many streams, many of which ultimate flow into the Chesapeake Bay, where the federal government has mandated enormous clean up programs and penalized citizens with heavy mandated local stormwater runoff taxes. Why make citizens pay additional taxes to mitigate stormwater runoff contamination of the Chesapeake Bay if FERC authorizes the building of the gigantic pipeline corridor --- that will completely undo all the mitigation work going on.

Lynn Davis
310 West Campus Dr
Blacksburg, VA 24061

See the response to comment FA11-12 regarding need. See the response to comment IND2-3 regarding export. See the response to comment IND1-3 regarding eminent domain.

IND632-2

The EIS provides a discussion of sinkholes in section 4.1. See the response to comment IND70-1 regarding erosion.
See the response to comment IND12-1 regarding property values.

See the response to comment IND2-1 regarding safety.

Comments noted. See the response to comment IND281-2 regarding jobs in Virginia. See the response to comment IND345-4 regarding taxes in Virginia.

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS).
On page...of the DEIS it states: "NSPS Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution, establishes emission standards and compliance schedules for the control of VOCs and SO2 emissions from affected facilities that commenced construction, modification, or reconstruction after August 23, 2011. Affected facilities include gas wells, centrifugal and reciprocating compressors, pneumatic controllers, condensate and crude oil storage tanks, and natural gas processing plants."

In a study by Richard Lattanzio for the Congressional Research Service titled: An Overview of Air Quality Issues In Natural Gas Systems, it should be read by FERC in conducting research for the proposed MVP project. The fact that congress has passed more recent air quality standards particularly pertaining to the production of natural gas and natural gas transmission: "Natural gas systems contribute to air pollution in several ways, including (1) the leaking, venting, and combustion of natural gas in the course of production operations, and (2) the combustion of other fossil fuel resources during associated operations. Emission sources include pad, road, and pipeline construction; well drilling, completion, and flowback activities; and gas processing and transmission equipment such as controllers, compressors, dehydrators, pipes, and storage vessels. Pollutants include, most prominently, methane and volatile organic compounds (VOCs)—of which the natural gas industry is one of the highest-emitting industrial sectors in the United States—as well as nitrogen oxides, sulfur dioxide, particulate matter, and various forms of hazardous air pollutants."

The DEIS does not take the new air quality standards into account. FERC needs to work with other agencies for assessing the larger picture of the totality of the MVP proposal please include:

"The EPA and the CAA—are not the only agency and federal statutes that have authority over controlling for emissions from natural gas systems. Other agencies include the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (see examples of the administration’s rulemaking affecting the natural gas industry at http://www.phmsa.dot.gov/regulations) and the U.S. Department of the Interior, Bureau of Land (continued...)."

"There are several efforts underway aimed at producing a current, comprehensive, and consistent emissions data set for the sector. These include (1) EPA’s efforts to update its inventory, as outlined in its annual reporting, https://www3.epa.gov/energychange/gghemissions/act/inventoryreport/natural-gas-systems.html; (2) the Environmental Defense Fund’s Methane Leakage Study, http://www.edf.org/methaneleaksage; and (3) several data harmonization studies of existing inventories (e.g., U.S. Department of Energy, National Renewable Energy Laboratory, “Life Cycle Assessment Harmonization,” http://www.nrel.gov/analysis/sustain_ch4.html)."

https://fas.org/sgp/crs/misc/942986.pdf

Please do not approve this for profit bias application, FERC please research more current info.

Pat Curran Leonard
4538 Dillons Mill Road
Callaway, VA 24065
540-928-5184

See the response to comment FA15-10 regarding lifecycle emissions.
As a landowner who owns property which will be crossed by the Mountain Valley Pipeline (MVP), (Docket No. CP16-10-000), I would like to raise an issue concerning the routing of this pipeline. The current proposed route on our property is on land which borders land which is currently owned by the United States Government and which is presently part of the Burnsville Wildlife Management area in central West Virginia. The Burnsville Wildlife Management Area is part of the property which was taken by the United States Government in the late 1960’s and early 1970’s when the Burnsville Dam was built for flood control. This dam was built to benefit the public to prevent downstream flooding. It is particularly ironic to see that this proposed pipeline parallels this public land for some distance and in our case the proposed pipeline will be within 100 yards of the already publically owned property which was earlier taken for the Burnsville dam. Why is it necessary to take yet more land for the so called public benefit which this pipeline purports to serve? The pipeline should use publically owned land whenever possible. I do not believe it is justifiable to take more private land with the threat of eminent domain than public land which was taken a generation earlier with the threat of eminent domain is available so close by. If this is truly for the public benefit then let the public use their land for this project.

Thank you for your consideration of this comment.

Robert Pierson
As stated in section 1.3.2 of the EIS, Mountain Valley would be required to obtain a permit from the COE to cross wetlands. Table 1.5-1 provides a list of major federal and state permits for both projects.

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Compensatory Mitigation

In the DEIS on page 4-129 it states:

"Mountain Valley submitted their compensatory mitigation plan to the COE in February 2016. The COE is still reviewing Mountain Valley's plan and will continue to work with Mountain Valley to determine the appropriate type and amount of mitigation needed for the MVP's wetland impacts in West Virginia and Virginia. Mountain Valley submitted its wetland permit application to the COE under Section 404 of the CWA and Section 10 of the RHA in February 2016. In a letter to Mountain Valley dated June 15, 2016, the Norfolk District of the COE indicated it will not consider the application to be complete until after Mountain Valley provides..."

The above lacks enough information for FERC to even begin to make an approval for a natural gas pipeline project. FERC needs to send the DEIS to other agencies for oversight and provide an objective research and analysis document before rendering a decision on this project.

It seems that the US Army Corps of Engineers (COE) is the only agency that has provided an un-biased analysis for the MVP project. Other agencies such as those that monitor the wetlands, the protected forests and natural places, the DOT, USGS, NCDC and others that the MVP will impact all should have input before FERC decides on granting the applicant an approval.

The MVP proposal has such a far-reaching impact to environment and land-owners that further research should be conducted by experts that don't have a financial stake in the project.

At one of the FERC "sessions" an older land owner said what he fears the most about this project is that he does not know what questions to ask prior to construction beginning. Once approval is done, it will be too late. FERC take the time to exhaust the MVP application for safety, reliability, and usefulness.

Pat Curran Leonard
4538 Dillons Mill Road
Callaway, VA 24065
540-929-5184
The EIS provides a discussion of sinkholes in section 4.1.

Water resources are discussed in section 4.3 of the EIS. See the response to comment IND3-1 regarding drinking water.

Generations have been aware of the unique qualities of the Roanoke valley, now known as Catawba valley. Caves and sinkholes riddle the land. It is common to have difficulty with land perking. Disturbing the balance of the land, as the mountain valley pipeline would do, will threaten water supply and quality to the community. This remains an agricultural and recreational area; peacefulness and serenity are valuable commodities. Please do not approve the mountain valley pipeline as it will not support or enhance life here.
Laura Dent, Harrisonburg, VA.

Please do NOT spoil our beautiful national forests and streams with this pipeline! STOP building infrastructure for fossil fuel projects! The environmental impact is not worth the diminishing returns on a dying energy form.

Thank you.
Laura Dent
Harrisonburg, VA

The EIS provides a discussion of the Jefferson National Forest in section 4.8 and waterbody crossings in section 4.3. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.
Sarah Waldrop, Bethesda, MD.

I am concerned about the effect the Mountain Valley Pipeline would have on outdoor enthusiasts and the outdoor tourism industry in the affected parts of Virginia and West Virginia. As avid hikers in the DC metro area, my husband and I frequently travel to the national forests in Virginia and West Virginia to spend time in the woods. These types of day trips and weekend trips both immeasurably improve hikers’ lives and measurably impact the economies of the surrounding areas. Hikers and nature enthusiasts stop for sandwiches or supplies on the way to the forests, go to local restaurants for dinner after hiking, and stay at local hotels, B&Bs, or vacation rentals near hiking trails for longer trips.

If the proposed pipeline is built, it will destroy many of the scenic views and natural environments that draw so many people to the Appalachian Trail and other local trails. Hikers and other outdoor enthusiasts like myself will choose to visit less damaged areas with more unspoiled panoramas instead. A decrease in the number of day-trippers and overnight hikers could hurt business in the towns near trails, rivers, and mountain scenery. Furthermore, the loss of scenic views will destroy one of the major selling points for real estate in the area, including vacation rentals and hotels that advertise “mountain views.”

Finally, if the pipeline ever ruptures, the resulting environmental catastrophe would devastate outdoor tourism in the area (in addition, of course, to the impact such an event would have on local drinking water, wildlife, and public health and safety).

Outdoors tourism is an important part of the economy in Virginia and West Virginia, and an important part of life for hikers and other nature enthusiasts. Indeed, West Virginia’s marketing slogan – “Wild and Wonderful” – demonstrates how vital this sector of the economy is to the state. Please take into account the negative effects this pipeline would have on outdoor tourism in Virginia and West Virginia.

Visual impacts are addressed in section 4.8 and tourism in section 4.9 of the EIS.

See the response to comment IND2-1 regarding safety. The EIS provides a discussion of water resources in section 4.3 and wildlife in section 4.5.

Tourism is discussed in section 4.9.
Climate change is addressed in sections 4.11 and 4.13 of the EIS. It is unclear how the projects would spread lyme disease, result in lengthier asthma and allergy seasons, create weather that would harm crops, and result in rising sea levels.

The FS said that the MVP could not meet certain standards in the LRMP as worded; however, the project design features, mitigation measures and monitoring procedures were developed with Mountain Valley to minimize the impacts to the resources those standards were designed to protect.

See the response to comment FA8-1 regarding the 500-foot-wide utility corridor in the Jefferson National Forest.

See the response to comment IND281-2 regarding jobs in Virginia. See the response to comment IND345-4 regarding taxes in Virginia. See the response to comment FA11-12 regarding need. Section 3.3 of the EIS provides a discussion of using existing infrastructure as an alternative to the projects.
The Roadless Area Conservation Rule and impacts to roadless areas under this regulation are discussed in section 4.8 of the EIS. The mitigation measures, monitoring procedures, and reducing the permanent operational right-of-way that is converted to herbaceous cover from 50 feet wide to 10 feet wide are designed to minimize the effects to the inventoried roadless area.

The EIS provides a discussion of wildlife in section 4.5 and groundwater in section 4.3. See the response to comment IND3-1 regarding drinking water. See the response to comment IND2-1 regarding safety.

Socioeconomics are addressed in section 4.9 of the EIS. The ANST crossing is discussed in section 4.8 of the EIS.
See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. The visual impacts analysis regarding the ANST has been revised in the final EIS. Tourism is discussed in section 4.9 of the EIS.

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IND642-1

As a resident of Bent Mountain, Virginia, I am concerned about the proposed Mountain Valley Pipeline and the published DEIS. Several agencies and organizations have refused to comment on the DEIS for this project due to the omissions and inadequate content. I have chosen to comment, not to point out all the omissions in the document but to voice my concerns during this public comment period. My concerns include impacts on public lands in my area and the impacts on private landowners.

The proposed Mountain Valley Pipeline (MVP) threatens the Appalachian Trail at an unprecedented scale and will set a dangerous example for development in all our natural areas. The location of the proposed crossing of the Appalachian Trail is a scenic and unbroken forested landscape with an immediately adjacent federally designated Wilderness area. The proposed project would significantly degrade the views visible from up to 100 miles of the Appalachian Trail, including some of Virginia’s most iconic vistas—Angela’s Rest, Rawls Fields and potentially McAfee Knob. Both the Appalachian Trail and the Blue Ridge Parkway with their many beautiful vistas provide valuable tourism dollars to surrounding communities and small businesses. Construction of this pipeline project will negatively impact these communities and businesses financially as well as emotionally.

IND642-2

A section of the proposed MVP will travel through the Jefferson National Forest. A popular destination for both local residents and visitors for outdoor recreation, wildlife observation, fishing, and hunting. It is also contains precious and fragile old-growth forests that require our protection. In order to accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely reckless, as it would open the gates for future infrastructure projects to cause similar destruction.

IND642-3

I reside in Bent Mountain, Virginia, located within the proposed route for MVP. Bent Mountain is also home to many environmentally sensitive natural resources. Numerous wetlands are located in Bent Mountain, integral to

Wetlands as delineated during surveys are discussed in section 4.3 of the EIS. Bottom Creek and paralleling waterbodies within 15 feet are discussed in section 4.3 of the EIS.
See the response to comment IND3-1 regarding drinking water.
See the response to comment CO14-1 regarding blasting. See the response to comment IND70-1 regarding erosion.

IND642 - Paula Bittinger

I urge FERC to protect our natural resources and communities. Please evaluate the comprehensive need for pipeline development to transport natural gas from the same Marcellus shale plays in a single Programmatic Environmental Impact Statement so that this infrastructure can be appropriately sited and the cumulative impacts to our National Parks, National Forests, and private lands can be understood before moving forward. It is FERC’s responsibility to do the right thing and represent the people.

Respectfully,

Paula M. Bittinger
resident of Bent Mountain,
Roanoke County VA

IND642-3 contd

maintaining water quality and wildlife habitats. Not all of which have been identified and delineated which causes concern when the DEIS states "impacts to wetlands will not be impacted". Locating the proposed pipeline closer than 15 feet when paralleling waterbodies is unacceptable when these waterbodies are wild natural trout streams, particularly the Tier III (Exceptional State Waters) Bottom Creek Watershed. The Bottom Creek Watershed and its tributaries are not only high quality wild natural trout waters but home to four rare and threatened species of fish.

IND642-4

Long term impacts on these threatened fish include high water temperature due to cutting of trees, high turbidity and sedimentation due to run off from steep slopes and potential spills. Bent Mountain residents rely on private wells and springs for their drinking water. These shallow wells and springs will be negatively impacted by the blasting which will be required due to shallow soils to bedrock particularly on Poor Mountain, the highest and steepest elevation crossed by the proposed MVP. Erosion and run off will be extensive impacting the entire Bottom Creek watershed which not only supplies drinking water to the residents of Bent Mountain but all of Roanoke Valley. The only way to protect the Bottom Creek watershed is to not allow blasting and reroute the proposed pipeline as necessary. If this watershed has long term negative impacts from the construction of this pipeline project it will be a violation of the Clean Water Act.

IND642-5

See the response to comment FA11-12 regarding need. See the response to comment FA11-3 regarding a Programmatic EIS.
INDIVIDUALS
IND643 – Kenneth J. Srpan

Comment noted.

Kenneth J. Srpan, Roanoke, VA.
Can we afford to do nothing?

In these uncertain times, it makes perfect sense to proceed with the Mountain Valley Pipeline, using all the resources available as we face the future. Jobs are leaving the valley. The stock market is playing havoc with your 401(k) and retirement funds. Unfriendly business policies have a choke hold on economic development. On and on it goes.

The pipeline’s economic projections – from new jobs to tax revenues – will be needed to help keep this area viable and our children here.

I know there are objections. Some are always looking for 100% guarantees, but that is not the essence of life. The great writer and moralist, Samuel Johnson told us, “Nothing will ever be attempted, if all possible objections must be first overcome.”

Can we afford to be among those who “do nothing” this time?
INDIVIDUALS
IND644 – Michelle Williams

IND644-1

Michelle Williams, University Park, MD.
It deeply concerns me that this pipeline’s proposed route passes through scenic, highly protected forest lands with enormous cultural and ecological value. I and many other Americans value the unspoiled beauty and undisturbed wildlands along the Appalachian Trail as a unique national treasure.

IND644-2

We also have absolutely no excuse to continue building natural gas pipelines. We close 2010 with record temperature highs, record ice sheet loss, record droughts—all symptoms of increasing greenhouse gases. Stopping this pipeline can block enormous amounts of GHGs from being released into the atmosphere, and can save swaths of forest that provide critical ecosystem services to our region, including carbon sequestration. I’m 22 years old, and I hope you understand that protecting my future and my children’s futures is more important than short-term profits from an unnecessary pipeline. I’m counting on you.

Thank you for receiving my comment.

Merry Christmas,
Michelle Williams

IND644-1
Project-related impacts to the Jefferson National Forest are discussed throughout the EIS.

IND644-2
GHGs and climate change are discussed in sections 4.11 and 4.13 of the EIS.
Tobie Baldwin, Bridgewater, NJ.

As an avid hiker and outdoor enthusiast, I have hiked many sections of the Appalachian Trail, including the sections on Virginia this pipeline would affect. I find it appalling that a gas pipeline would be built any place near the trail, or through a National Forest. These spaces were set aside as wild places for posterity. Allowing projects that endanger and mar these wild places are antithetical to why these lands were set aside in the first place. Plus, given all that we know about climate change, we should trying to curtail, not expand the use of fossil fuels? I implore you to reject this project and all other attempts to encroach on our Nation's already endangered wild spaces.

Project-related impacts on the Jefferson National Forest are discussed throughout the EIS.
The visual impacts analysis regarding the ANST has been revised in the final EIS. As stated in section 2.7 of the EIS, the useful life of the projects is expected to be about 50 years.

Forest fragmentation is discussed in section 4.4 of the EIS. See the response to comment FA15-5 regarding forest impacts.

See the response to comment IND241-1 regarding induced development.

As a resident of Blacksburg Virginia I am concerned about the impacts of the proposed Mountain Valley Pipeline. This proposal has the potential to do serious damage to the forest surrounding the proposed route of the pipeline and to the Appalachian Trail. The Appalachian trail is a national treasure. It traverses 2,200 miles of the east coast. It is an incredible achievement that is degraded every time another piece of infrastructure comes close to it. Part of the attraction of the AT is its miles of uninterrupted forest with little impact from humans. All of the impacts for a pipeline that will supply natural gas for less than ten years.

The more infrastructure like the proposed pipeline that are built within sight of the trail the less the trail means. The proposal doesn’t go into enough detail on the potential visual impacts from various points, McAfee’s Knob and Angel’s Rest to name two of the most iconic. The visual impacts from other trails in the area should also be considered, North Mountain trail across from Mohave’s Knob for example.

Another impact of the proposed pipeline is on the forests. While these impacts seem to be dismissed because they don’t affect people they still need to be considered. The idea that breaking up large tracts of forest by clear cutting a fifty foot wide channel through will not have effects doesn’t make sense. A lot of animals rely on the tree cover for protection and are therefore reluctant to cross such wide gaps in the tree canopy. This includes many species of native song bird and the West Virginia northern flying squirrel. The northern goshawk is also impacted due to it needing the uninterrupted tree cover to hunt.

Yet another impact of this pipeline will be the lowering of the standards required for such pipelines. This pipeline will have effects on the areas it crosses but the fact that it was build could open the door for far more invasive projects that will have even more devastating impacts.

I urge the FERC to protect the Appalachian Trail and the surrounding forests. Approving this proposal will have long term effects.

Henry Trease
See the response to comment FA11-2 and LA5-1 regarding preparation of the EIS. See the response to comment FA8-1 regarding the 500-foot-wide utility corridor in the Jefferson National Forest.

The EIS provides a discussion of the Jefferson National Forest in section 4.8 and steep slopes in section 4.1. Forest fragmentation and invasive species are discussed in section 4.4.

Water resources, including aquifers, are addressed in section 4.3 of the EIS.

See the response to comment IND70-1 regarding erosion. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the EIS. A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS.

Invasive species are addressed in section 4.4 of the EIS. See the response to comment LAI-7 regarding herbicides.

See the response to comment IND28-3 regarding financial responsibility. See the response to comment IND3-1 regarding drinking water.
As a scientist myself, I concur with the many experts who have put in thousands of hours of work that frankly should have been done by MVP as part of the DEIS. You have heard from government agencies, experts in geology, geoscientists, engineers, and wildlife biologists and all agree that MVP has submitted an entirely inadequate DEIS which does not answer critical questions and is filled with inaccuracies. Dr. Murphy has thoroughly evaluated the invasive plant problem. Dr. Willis has pointed out the sedimentation problems in a very thorough report submitted by Preserve Craig. Mr. Mode Johnson has submitted his assertion that effective LIDAR techniques were not used by MVP to avoid disruption of water and sinkholes. The highly qualified Dr. Kastning has done extensive work on the geology of the area and concludes that karst topography found on the pipeline route is not appropriate for this type of construction.

Thomas Bouldin has brought to your attention the many stream crossing discrepancies and inaccuracies. He points out that endangered species of fish such as the Logperch are not being adequately avoided in the DEIS. I agree wholeheartedly with the well stated comments made by the Blue Ridge Land Conservancy on Dec 15, 2016. Dr. Tina Guzuz correctly describes the risks of water contamination and points out the economic losses to the area. The Cultural Attachment Report presented by Preserve Craig, Inc. documents that this part of America retains its varied roots of tradition and is as valid as any Native American culture. In addition, the Key Log Economic Study accurately quantifies the serious losses in property values, losses of tourism and farmland as well as economic loss of clean water supplies which will be borne by the residents of counties along the Pipeline Route.

Amending the National Forest Resource Management Plan to allow our forest acreage to be destroyed by a private corporation is a very dangerous precedent and will reduce support of this agency which is in fact, entrusted with protecting these resources. We have heard from the Appalachian Trail Conservancy and many others who value the unscarred landscape and object to the defacing of the trail by any type of pipeline crossing. The placement of the route along the border of wilderness areas is irresponsible because of the noise, road construction and invasive species that will encroach into the protected areas. I urge officials at the US Forest Service to amend the Jefferson National Forest Management Plan at the request of this private corporation. There is no benefit to the National Forest and unneeded destruction of our forests is not worth the so-called economic benefits.

Public need for the product being delivered has not been documented. The natural gas is, in fact, a limited resource for short term gain for private corporations with a permanent loss for the citizens of Virginia and West Virginia. A pipeline of this diameter has never been built before and to try it out in this environment denotes a lack of understanding at every level. The clean water and forest resources reach far beyond the immediate area of the pipeline. Pretending that the land will be returned to its former use is a short sighted argument by MVP. The topography of the published route is clearly full of steep unstable slopes, seismic areas, treasured ecological habitat, and fragile water resources. The area is inappropriate for pipeline transport of natural gas and this land contains important data of environmental impacts. These have been clearly documented in the comments submitted. The haphazard way

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS). The EIS provides a discussion of steep slopes and seismic areas in section 4.1, water resources in section 4.3, vegetation in section 4.4, and wildlife in section 4.5.

Mr. Johnson’s letter is addressed in comment IND498.

Mr. Bouldin’s letters are addressed in comments IND87, IND119, IND136, IND149, IND276, IND292, IND301, IND321, IND466, IND513, IND550, IND660, IND727, IND826, and IND851.

The Blue Ridge Land Conservancy letters is addressed in comment CO6.

Preserve Craig letters are addressed in comments CO15, CO52, CO53, CO55, CO56, CO57, CO64, and CO85. Cultural attachment is discussed in section 4.10 of the EIS.

See the response to comment IND137-1 regarding the KeyLog report.

See the response to comment FA11-8 regarding the FMP.

See the response to comment FA11-12 regarding need. See the response to comment LA1-4 regarding existing 42-inch-diameter natural gas pipelines.

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS). The EIS provides a discussion of steep slopes and seismic areas in section 4.1, water resources in section 4.3, vegetation in section 4.4, and wildlife in section 4.5.
In which Mountain Valley Pipeline has responded to the omissions forbodes that moving forward towards construction will result in catastrophe. I urge the Federal Energy Regulatory Commission to deny the DEIS submitted by Mountain Valley Pipeline and EGP.

Sincerely,

Marjorie M. Lewter, DVM
As requested by the FERC, Mountain Valley filed a response to the commentor’s letter on February 17, 2017 (Geology 11 Accession number 20170217-5199). Section 4.1 of the EIS has been revised to provide a discussion of LiDAR, fracture trace analyses, and electrical resistivity studies conducted by Mountain Valley.

INDIVIDUALS
IND648 – Pamela L. Ferrante

To: Federal Energy Regulatory Commission; Kimberly D. Bose, Secretary; Norman Bay, Chairman; Members of the Commission

From: Pamela L. Ferrante, DVM, PhD, Registered Intervenor and Affected Landowner

Date: December 20, 2016

Re: Docket No. CP16-10 Mountain Valley Pipeline – Supplemental information concurring with LiDAR study.

Opening remarks

This document provides supplemental concurring information to the report submitted by Mode A. Johnson on December 16, 2016 concerning the inadequate response of Mountain Valley Pipeline (MVP) to utilize LiDAR (Light Detection and Ranging) technology for sinkhole identification/density analyses. MVP did not fulfill FERC’s requests to identify an acceptable alternative route that would specifically avoid high-density karst area. The LiDAR study concluded that the Mount Tabor Variation route will be within a high-density karst area and does not avoid sinkholes as was originally thought. LiDAR technology also confirmed the expanse of the karst terrane and sinkhole plain involving the Mount Tabor Variation route.

Sinkholes can be difficult to confirm and often sinkholes are missed during tabulation. Consequently, all technology available should have been used when assessing the area along the Mount Tabor Variation route. In tall, thick forests, sinkholes may not be detected from aerial photography due to tree coverage or due to the size of the sinkholes. Small sinkholes can also be missed on topographic maps and also when visually identifying them on-foot. Kastning noted that a higher number of sinkholes that are not identified on topographical maps and aerial photography are likely present along the Mount Tabor Variation route. LiDAR technology utilized to make imagery maps of the karst terrane along the Mount Tabor Variation route was superior to topographic maps and aerial photography to delineate sinkholes.

Landowner accounts / LiDAR study

Personal accounts by landowners have been very valuable in providing detailed descriptions of the karst geology along their properties. One landowner, while describing their property prior to the LiDAR study, stated:

FERC submittal 20161219-5056, Johnson
FERC submittal 20160331-4008
FERC submittal 20160713-5029, Kastning
FERC submittal 20160908-5025 Iones
FERC submittal 20160915-5081 Ferrante
FERC submittal 20161108-5037, Majors
FERC submittal 20161011-5062, Pickett
"The most significant sinkhole on our land, ~200 feet in diameter and ~15 feet in depth, is along Mt. Tabor Rd, near the east boundary of our property. There is also a ~65-foot depression near this sinkhole that extends into our neighbor’s property to the east. On the west side of the driveway along the road there is a 100-foot depression. These sinkholes and depressions are aligned with other such sinkhole and depressions on properties along both sides of Mt. Tabor Rd."

"The proposed Mt. Tabor Variation alternative route **transsects the sinkhole area** on our property as it runs along our east property line..."

The area described above is between MP 223.0 and MP 223.5 of the Mount Tabor Variation route and is described in the LIDAR study as a high-sinkhole dense area (Figure 1, label C).

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Figure 1. Spatial distribution of sinkholes along the Mount Tabor region. Regions of high sinkhole density are marked by A, B, C, D, E. The Mount Tabor Variation route (turquoise) crosses Mount Tabor Road at Point C, a region of high-density sinkholes. MVP’s description of the Mount Tabor sinkhole area is outlined (dashed white line).

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5 FERC submittal 20161219-5056, Figure 5, Johnson

6 FERC submittal 21061014-5022 (31736313)
The description of this property is clearly depicted on LiDAR imagery (Figure 2). The pipeline would make a 90-degree turn to circumscribe the clearly visible ~200-foot sinkhole before crossing Mount Tabor Road (short solid arrow). The 100-foot depression along Mount Tabor Road is also evident.

![Image](Image)

**Figure 2.** A segment of the Mount Tabor Variation route (blue line) as it traverses a high-density sinkhole area: the ~200-foot diameter sinkhole (short solid arrow); cluster of sinkholes (long solid arrow); depression along the road (long broken arrow); open-throat sinkhole (short broken arrow) are clearly depicted.

Another account of karst features on properties along the Mount Tabor Variation route also correlates with the LiDAR study findings. A large area of sinkholes described along Mount Tabor Road is depicted as the "purple" high sinkhole density cell in Figure 1. These sinkholes are clearly depicted on LiDAR imagery along Mount Tabor Road in Figure 2 (long solid arrow).

**Defining the Mount Tabor sinkhole area**

LiDAR imaging the Mount Tabor area contributed to our understanding of the Mount Tabor sinkhole plain and has confirmed the expansiveness of the sinkhole terrane along the Mount Tabor Variation route. MVP has described the Mount Tabor sinkhole plain as a relatively small section within this vast karstic area (Figure 1, dashed white line). A number of sinkholes

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18 FERC submittal 20161219-5056, Figure 4, Johnson
19 FERC submittal 20160916-4001, page 3-53, Figure 3.5.1-8 (massive data release after initial DEIS)
20 FERC submittal 20161001-A-5022, page 5 of 19, Figure 3.5.1-8, (massive data release after initial DEIS)
Section 4.1 provides a discussion of dye traces, fracture trace-lineament analysis, and Mount Tabor. Section 4.3 provides a discussion of the Red Sulphur PSD.
Groundwater recharge in high-risk karst areas is important and buffer zones are necessary to protect karst features have been emphasized\textsuperscript{1} and the purpose of Slussers Chapel Conservation Site and Old Mill Conservation Site is to protect “cave and karst associated element occurrences.”\textsuperscript{17}

**Missing Empirical Data**

MVP has not provided empirical data necessary to evaluate the Mount Tabor Variation route appropriately. MVP was requested by FERC on three separate occasions and also by stakeholders\textsuperscript{1} to utilize LiDAR technology for sinkhole identification/density. FERC asked MVP in March 2016 to “file results of a fracture trace/lineament analysis utilizing remote sensing platforms (aerial photography and LiDAR).”\textsuperscript{2} Please note that FERC asked for both aerial photography and LiDAR. Stakeholders have also requested that data from dye-trace studies in the area be utilized to delineate the groundwater flow.\textsuperscript{18,19} Both LiDAR technology and dye-trace study data have contributed to the understanding of the karst terrane and aquifer in Mount Tabor sinkhole area. Water supply for thousands of citizens is at risk and we need all the information possible to protect the aquifer in the area.

MVP stated there is “no publicly-available remote sensing data, including LiDAR, for the karst areas of the October 2016 Proposed Route”.\textsuperscript{20} If a private citizen was able to obtain this data for LiDAR image creation, I don’t understand why a multibillion dollar project could not obtain this data also. MVP, however, did collect data along a narrow corridor of the October 2016 Proposed route centerline.\textsuperscript{21} MVP also went on to say “the data are not distributed over an appropriate scale to allow for fracture trace analysis relative to wells and springs in the vicinity”. MVP utilized LiDAR to selectively evaluate a narrow area along the pipeline route even though publicly-available LiDAR data covering the vast sinkhole plain area was available. Consequently, MVP has not fulfilled FERC’s request to utilize LiDAR technology to analyze fracture trace to identify karst features and potential influences on groundwater.

**NEPA regulations have not been fulfilled** related to this project. L. Gay\textsuperscript{22}, in a prior submittal referencing CEQ NEPA regulation, stated that: “Agencies are obligated to evaluate all reasonable alternatives in enough detail so that a reader can compare and contrast the environmental effects of the various alternatives.” The Mount Tabor Variation route has not been evaluated “in enough detail”. Stakeholders cannot “compare and contrast the environmental effects” of the pipeline routes.

\textsuperscript{17} FERC submittal 20160317-5126, OCR
\textsuperscript{18} FERC submittal 20160201-5201, Gay
\textsuperscript{19} FERC submittal 20160201-5201, Gay
\textsuperscript{20} FERC submittal 20160201-5201, Gay
\textsuperscript{21} FERC submittal 20160201-5201, Gay
\textsuperscript{22} FERC submittal 20160127-1022, page 15 of 93
\textsuperscript{23} FERC submittal 20160201-5194, Gay
Conclusion

The LiDAR study submitted by Johnson\(^1\) has contributed valuable information concerning the karst terrain in the Mount Tabor area. This study, along with the ongoing dye-trace study, has defined the Mount Tabor sinkhole plain as an expansive area, much larger than the area defined by MVP. Results of these studies demonstrate that the Mount Tabor Variation route crosses a region of high-density sinkholes. **MVP has not rerouted the pipeline around the Mount Tabor sinkhole plain as FERC requested but has rerouted through another section of the Mount Tabor sinkhole plain with a higher karst density.**

The DEIS comment period is coming to a close and yet it is obvious **MVP has not collected and distributed all necessary data** in order for a thorough evaluation of the 2016 Proposed Route that includes the Mount Tabor Variation route. FERC is responsible for the scope and accuracy of the data presented in the DEIS. With the new information provided in the LiDAR study\(^2\) it is evident that the **DEIS was released prematurely**. The 2016 Proposed Route including the Mount Tabor Variation route was not adequately assessed based upon empirical data provided and not provided. FERC has been remiss in its duty and woefully negligent to NEPA regulations.

Cc:
- U.S. Forest Service
- Bureau of Land Management
- Rep. Morgan Griffith
- Senator Tim Kaine
- Senator John Warner
- Montgomery County Board of Supervisors
- Virginia Department of Conservation and Recreation
- Cave Conservancy of the Virginias
- New River Land Trust
- Gov. Terry McAuliffe
To: Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426  
CP16-10-000

From: Linda Parsons Sink, Registered Intervenor

Date: December 20, 2016

RE: The Old Mill Conservation Site
Protection for drinking water (for homeowners and livestock) supplied by Salmon Spring
Protection for Old Mill Cave by Choosing the MVP Proposed Oct 2015 Route

This letter is a follow up to the August 16, 2016 letter to FERC, CP16-10-000, 201608165222, outlining concerns about the pipeline traversing the Old Mill Conservation Site in Mount Tabor Variation route and the November 3, 2016 letter to FERC, CP16-10-000, hand delivered, seeking protection for drinking water from the Salmon Spring located at the Old Mill Cave. Since the filing of both letters, neither I, nor my family, have received any updates or additional information from MVP regarding the route.

I am a registered intervenor and a homeowner that will be impacted by the Mountain Valley Pipeline (MVP) proposed route through the Old Mill Conservation Site and by the alternate Mount Tabor Variation route.

This letter addresses my family’s preference for MVP pipeline’s route to transverse the Old Mill Conservation site. Our choice for the route is MVP pipeline’s proposed Oct 2015 route that follows AEP’s transmission lines from Mount Tabor to Catawba Road. The impact from this route affects a significantly smaller land mass in the Old Mill Conservation site in contrast to the other proposed routes. Even though this route passes closer to Old Mill Cave entrance, the pipeline route for the proposed Oct 2015 route would cross at a higher elevation and thus offer greater protection to the Old Mill’s Cave water supply.

Choosing the Mount Tabor Variation route should not be considered because this route affects a larger and more sensitive section of Old Mill Conservation’s watershed area. As shown in the attached picture, the Mount Tabor Variation route transverses twice the watershed area and, in addition, the watershed area affected is in the area where the water enters the watershed. Trenching through this delicate karst area where Salmon Spring’s water originates in the Old Mill Conservation site can cause irreversible damage to the karst areas where the water begins its filtering process. Blasting through along this route could create obstructions and diversion of how the water travels which could significantly reduce the stream flow to the Old Mill Cave. Without a reliable water supply in the cave, all the cave loving organisms, including globally very rare cave limax invertebrates and a globally rare troglaphilic beetle would perish. A copy of the Report on Old Mill Cave by Wil Orndorf, 8/12/16, is attached.

It is also my understanding that MVP has already secured several easements from the landowners along the proposed Oct 2015 route, so it should be more economical to keep this as the route.

My family is passionately concerned with maintaining our safe water supply from Salmon Spring. We do not want to see the Old Mill Conservation Site negatively impacted by the construction of a pipeline across its watershed. We want to be proactive in protecting our drinking water source. Old Mill Conservation Site’s water protection should also be a top priority for MVP and FERC.

Respectfully submitted by:

Linda Parsons Sink  
1831 Catawba Road  
Blacksburg, VA 24060  
Attachment: Report on Old Mill Cave by Wil Orndorf, 8/12/16
Ms. Kimberly D. Boone, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Mountain Valley Pipeline, LLC  
FERC Docket No: CP16-10-000  
DEIS-DO372 - September 2016

Dear Secretary Bone,

As a 5th generation Franklin County, Virginia, native and registered intervenor, I request that the FERC deny the application for building the proposed Mountain Valley Pipeline.

There are many problems associated with the Draft Environmental Impact Statement for this pipeline specifically, and with the proposed project more generally. I am certain you have been presented with copious data and information from experts who have capably argued the case against the MVP with scientific facts and reports, particularly disputing and raising concerns with details found in the DEIS. I will leave the footnoted challenges to this proposed project to others, and instead relay some of my personal objections.

To establish a starting point, Franklin County does not want or need this pipeline. MVP, LLC’s goal is to paint a rosy picture to sway public opinion in their favor for this project, and their website cheerfully referencing the economic impact report that they themselves commissioned, when lauding the pipeline's merits. But when read closely, these benefits are not guaranteed, they are equivocation: “Franklin County could contribute labor and other resources to the construction effort,” the project “could generate up to 2.2 million dollars in [property] taxes once in service,” “residential, commercial, and municipal sectors could save up to 1 million dollars annually by switching to gas.” Maybe. Possibly. Could. If. The demand for natural gas neither residentially nor commercially has ever spurred action for access. No business or industry has ever walked away from negotiations about locating in the county because of a lack of natural gas. No businesses have committed to locate to Franklin County if we have natural gas access. If the demand existed, a line already could have been run from existing natural gas sources in Clearbrook in Roanoke, less than 15 miles away. MVP, LLC’s campaign that touts the convenience and energy savings of natural gas is a ruse; they never discuss the exorbitant costs associated with converting homes and businesses from electric to LNG. This 42” pipeline would put the people of Franklin, and other counties along its path, in harm’s way. Virginians would assume all of the risk with exactly zero guaranteed rewards, and we do not want or need it.
The jobs promised in MVP’s propaganda campaign are also a deception: they are almost exclusively short-term, largely specialized labor, and less that forty permanent positions would be created from the life-changing destruction of family farms, lost property values, and blighted view sheds. It is very hard to come to any conclusion other than the fact that with the global rise in LNG demand, and the flat domestic market, this gas will serve consumers overseas. This in no way serves the public good of the citizens of Franklin County or of Virginia, so it behooves the FERC to decline the permit. The sanctity of private property rights of the many far supersedes the financial desires of the few associated with MVP, LLC.

On a personal level, I grew up in the farmhouse my great grandfather built in 1875. My parents still live in that house and the edge of that parcel of land is in the blast zone, as the proposed pipeline route now stands. My parents attend Sandy Ridge Baptist Church on Bonbrook Mill Road. I was raised in that church and my father, born in 1939, has been a member of the congregation for his entire life. The current proposed pipeline route runs adjacent to church property, taking over the utility road that runs beside the church cemetery as an access road for construction. A breach in the pipeline would obliterate Sandy Ridge Baptist Church and disintegrate the people laid to rest in the churchyard. How would you feel if one of your relatives was buried there?

My family owns property on Smith Mountain Lake. The lake is an indelible part of my childhood: from happy summers spent at my grandparents’ lot to camping on one of the islands near the dam to the house we built ourselves on the lot my parents purchased in 1979. I learned to swim and to ski in Smith Mountain Lake. My grandfather taught me how to fish in that lake, and it’s where I caught my first smallmouth bass. All these years later I still swim there and ski in the summers. The sunsets are breathtaking and the water is clean and clear—just full pond you can see ten feet to the bottom at the end of our dock. I was blessed to grow up in this beautiful rural setting in southwestern Virginia, in Franklin County. The spring at our family farmhouse, the property that brushes the edge of the MVP blast zone, is still the cleanest, best water I’ve ever tasted.

But Mountain Valley Pipeline is a threat to our environment and our clean water. It is slated to cross over 100 waterways in Franklin County, and run along the crests of hills and steep mountains throughout the Commonwealth. In our beautiful, green county, the streams, rivers, and natural springs are utilized by wildlife, livestock, farms, homeowners, and outdoor enthusiasts, and are all part of the watershed of Smith Mountain Lake. Erosion is unavoidable with the clearance necessary to build this pipeline. Erosion would be a problem not only on slopes, but also where pipes cross rivers and streams, especially in a flooding scenario. It would not be safe to have these pipes laid across running water beds, hoping for the best. I am not satisfied with MVP’s erosion and run-off mitigation plans, or with FERC’s assessment of those plans, in terms of aggressively questioning details and demanding follow-up to ensure that every possible safeguard is in place to guarantee staunch oversight, and to preserve the water quality of all waterways and water sources potentially impacted if the pipeline is constructed. Once an unsupported pipe ruptures, it will be too late. Once the lake is tainted it will take years, decades, for it to recover. Tourism dollars will be lost, property value will be lost, lives could be lost, and the view ten feet down in the clean lake I grew up with will be lost. The MVP is a huge risk to