The event consistently serves over 800 people, which almost reaches the published data for Roanoke County on the population of the Mountain. Kathy DeWeese, wife of a third generation former Fire and Rescue Chief describes it like this:
“Life on Bent Mountain isn’t only just living in the country on a beautiful mountain among the fields of cows and apple orchards. It’s about friends and family, so closely entwined they are only a phone call away for help or fun. It’s a place where people gather yearly for fellowship and financial support for their fire and rescue department at their annual pancake supper. It’s a place where people coordinating and working the event are 3rd generation or more of rescue members and/or fire fighters as well as volunteers from the community.”

Kristen DeWeese Beckner and family live on the Mountain, near the Fire Station, in the home where her maternal grandfather, Ed Harnack, lived until his recent passing. Her grandparents Hubert DeWeese and Ocelia Manning DeWeese still live in the Bottom Creek neighborhood. The Beckner family history on the Mountain dates back to the early 1900’s Bottom Creek Gorge area.

NEWCOMERS:

“Each new generation is taught how to cherish the people and protect the land of this small mountain community. Newcomers are welcomed and embraced in the small circle of this mountain life. Many choose to make the Mountain their forever home as they fall in love with the culture, families and land. My family was one of the new families and I was blessed to marry one of the generational members of the Mountain.”

Kathie Harnack DeWeese, Roanoke County teacher, family gardener, Fire and Rescue Family, mother of Kristin and Noah, who were each Bent Mountain School-educated and lifelong mountain residents, grandmother of two.

COFFEY GROUNDS FARM:

While the Coffeys have lived here most of their married lives like many of us, as Kathy DeWeese explains, they still might be considered “not from here,” and so might be among us “newcomers.” Their farm lies in the heart of the Mountain, and in the crosshairs of the proposed MVP pipeline route. It is a relatively small parcel, surrounded by wetlands, but set upon a hill with a view of Poor Mountain lying majestically across the horizon to the west. Mary Beth Coffey recalls a trip as a young child, up the winding, dizzying “switchback” of Route 221 when she

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37 See Attachment 4, excerpt from “Life On Bent Mountain” by Kathie Harnack DeWeese, 12/12/16.
38 Crawford, p. 49.
travelled up "The Mountain" with her father, on the way to Floyd. She recalls "the amazing straight stretch, cradled by wetlands" after you crest the plateau. That day, her father described to her the vast wetlands atop the Bent Mountain Plateau, and the "pure sources of water" providing life to those living upon this place and to those living below.

The Coffeys sought refuge on the Mountain following the flood of '85, which took their home in the Valley. "We moved into a house on a small lot surrounded by the ridges and hollows of Bent Mountain; surrounded, literally, by wetlands and supplied by clean, fresh water from a well close to our house. This mountain land has allowed us to raise three sons, grow food and nurture livestock...we added a great room to our house so our elderly father could have a safe place to live out his final years. Our sons still come up from the valley once a week to celebrate 'Mountain Monday' with family and friends at our homeplace."

The Coffeys have paid off their mortgage. But the proposed pipeline was routed by MVP to be closer to the Coffeys’ home pursuant to a minor adjustment of route to get the pipeline away from a much larger property that is in landtrust. Construction of a 42” gas pipeline will take out about half of their homeplace, threatening everything that belongs to them, and their water source.

The Coffeys have provided for educational field trips on their land for public school children in efforts to promote knowledge of the need to conserve lands and resources, especially water. Mary Beth works as a speech pathologist for children in public schools. Outside his work, her husband Bruce volunteers as Chair of our Community Center Board, having established a program at the repurposed 100-year old school, including athletic programs, picnics and dinners, concerts and artisan space. Along with neighbors, they have planted sacred corn carried through the Pocahontas Trail of Tears, and have shared the seed produced with their neighbors, a symbol of protection for the Mountain. They have become an integral part of the fabric of our community. Mary Beth writes, "Our plan is to live the rest of our years as stewards of this small yet vital piece of mountain plateau."²⁹

²⁹ In a relatively short distance from Poor Mountain to Ashby Gap, the proposal directly impacts an inordinate number of landowners who are already or will be seniors within the time the proposed pipeline is constructed. MVP admitted disparate impacts to the elderly in Resource Report 5, but stated it had no obligation to mitigate because it would do them no harm.
Conclusion

Last winter, as she laid out her photos, artifacts and memorabilia and began to regale listeners with stories of her home in the heart of this Mountain, Lois King Waldron said, “I’ve lived in this place all my life. I don’t want to live anywhere else.”

“...there is only one THIS place.”

Many years ago, writer and historian Jim Crawford, took note of what one resident held most dear about life on Bottom Creek: “I’d say it’s the quietness.” There is “a lesson in the quietness” of Bottom Creek, Crawford wrote: “If we take time to listen, to see and learn, we can understand ourselves as part of the culture that this land nourished.”

\[\text{\引用 James A Kent, defining Cultural Attachment.}\]
\[\text{\引用 Crawford, p. 67.}\]
COMPANIES AND NGOs
CO69 – Chesapeake Climate Action Network

CO69-1

See the response to FA11-2 regarding the adequacy of the draft EIS. The EIS concludes that construction and operation of the projects would not have significant impacts on environmental resources; except for the clearing of forests.

CO69-2

Cumulative impacts are addressed in section 4.13 of the EIS.

CO69-3

See the response to comment IND2-3 regarding hydraulic fracturing. See also section 1.3.3 of the draft EIS.

CO69-4

Water quality and streams are discussed in section 4.3.2 of the EIS.

CO69-5

Cumulative effects are discussed in section 4.13 of the EIS.

CO69-6

Historic Districts and archaeological sites are discussed in section 4.10 of the EIS.

CO69-7

The Commission would consider need in its Project Order (see section 1.2.3 of the EIS).

CO69-8

The reasons the FERC did not prepare a programmatic NEPA document are explained in section 1.3.

Ms. Kelly Trout
7057 Carroll Avenue Apt. 7
Takoma Park, MD 20912
COMPANIES AND NGOs
CO70 – Preserve Roanoke/Preserve Bent Mountain/Protect Our Water, Heritage, Rights (POWHR)

This is not a comment on the draft EIS produced by the FERC staff in September 2016 for the MVP. Comments on surveying are noted.

DEIS Comments on Survey Abuses, by Roberta M. Bondurant, Preserve Roanoke/Bent Mountain and Protect Our Water, Heritage, Rights (POWHR).

Bent Mountain is just south of Roanoke, Virginia and northeast of Virginia Tech - a community atop an almost 4,000 foot mountain, an upland plateau of rich, fertile farmland, orchards, springs and streams – it is home to The Nature Conservancy’s Bottom Creek Gorge Preserve. Once you get up route 221 to what’s known as “the Big Bend,” you’re a stone’s throw from the Adney Gap entrance to the Blue Ridge Parkway, you’re on the Crooked Road Music Trail and the home of FloydFest Music festival. We’re perched at the crossing of the proposed Mountain Valley Pipeline through Roanoke County.

Since October 2014 residents here have suffered abuses that exist in many other states with so-called state “survey statutes.” (See Carolyn Elefant, “Survey or Not, A Survey of State Survey Laws on Property Access pre-FERC Certificate Issuance” (2015), www.lawoffice carolynelefant.com). Far from typical boundary surveys, these laws circumvent basic legal requirements of landowner permission to allow data mining and physical takings – of soils and rock samples, biota and vegetation, and historic and cultural artifacts that could not be otherwise obtained. In the “information age” the landowner owns not just the property, but the information on the water, the flora, fauna and everything contained in that tract of property – all of that holds certain value. With the onslaught of mega pipeline proposals under federal fast track permitting rules, these statutes are being used, up front, early, pre-application and precertification as part of the larger FERC/Natural Gas taking schemes of Eminent Domain for Private Gain. There are no restrictions on what these many companies may do with this information; no present process whereby landowners can obtain copies of reports from international survey companies such as Search, Inc., and Environmental Surveys International. There is no apparent disposal or destruction of landowners’ information in the event this pipeline is denied...no telling where it goes and who uses it next.

Virginia’s statute, §56-49.01, was passed in 2004. At least one former state legislator who voted on the statute has reflected to he believed the legislation was designed for the absentee landowner who doesn’t answer his mail-- but was NOT intended to ignore a landowner’s Constitutional and common law right to deny permission to enter his or her property, which is also a responsibility under most individuals’ homeowners’ insurance policies. Read with federal regulations the statute recognizes a landowner’s denial of permission – but in the fast track permit universe, the companies, the courts and enforcement authorities have ignored that right.

The statute has been used to muscle landowners into submission; barraged with confusing and repetitive sets of certified letters, covering broad and rolling ranges of dates, so as to allow survey crews to troll the area for unattended properties and thus to steal on with the owner never knowing they were there; they’ve been sued for injunctive relief and money damages, further in an effort by Next Era, MVP and Coates surveyors to chill their absolute right to deny permission.
COMPANIES AND NGOs
CO70 – Preserve Roanoke/Preserve Bent Mountain/Protect Our Water, Heritage, Rights (POWHR)

Virginia’s statute includes very specific notice provisions, and a consequence for failure of notice that include criminal and civil trespass, and landowners have rallied with these provisions to keep the company out, unless and until federal “certification,” which some say triggers “public utility” status. Yet many crews descend upon properties regardless of whether the landowner is present, without any apparent background checks or personal identification tags or ID’s required of individuals. These provisions are an enforcement nightmare when landowners call police for help. For a variety of reasons, including the officers’ experience with the statute or lack thereof; varying county attorney and circuit court interpretations; in a state with a legislature that is heavily funded by the gas industry; and with a legislature that appoints its judges – enforcement of the statute is unpredictable and prone to creating chaos at the scene.

The process is offensive enough for the working landowner who is simply not able to be present when the company decides to order surveyors onto the property; but those most vulnerable to these laws, of course, include many fragile and elderly folks living alone. (In its application, MVP admits that the elderly are disproportionately affected in each of the counties it proposes to blast and burrow through, but insists it has no obligation to mitigate for the elderly because it would do them no harm. (MVP App. Resource Report 5.) One neighbor, a 70 year old Vietnam vet, twice attempted gentleman’s agreements with the company so that he could attend a few special trips with his only grandson; both times, upon his informing the company he’d be away on the company’s preferred day, surveyors stole on; when he secured warrants for criminal trespass, the company sued him for money damages;

Another neighbor, an 80 year old who’s lived her whole life in the home beside her farm and orchard, denied permission and called her neighbors, surprised by three surveyors one day walking out of her wetlands and past her house, refusing to stop until she told them a three times to stop. They had apparently been dropped off and picked up by cars evading detection of the public and police.

On Columbus Day Monday, with courts closed and ignoring its own scheduled hearing on the matter set for two weeks later, MVP ordered well over thirty surveyors on two properties of sizable acreage, these surprise invasions went forward — literally in the face of opposing landowners. One neighbor, a 6th generation descendant of Poor Mountain, was distraught when the young surveyors leaving her land showed her 6 bags of artifacts they dug from her property and told her that, although they are commonly ordered into the property by GIS data and they showed the landowner her data points that day, they couldn’t give her the GIS points for her to return them to their sacred place.

With three potentially armed parties at the scene, the inconsistent enforcement of the provisions of the statute in Virginia are a recipe for mayhem. Franklin County Sherriff Bill Overton has continued his support in excusing surveyors from properties and Virginia’s State Police have followed suit to assist landowners across counties the day after Election Day.
These abuses are dangerous and intolerable. We are asking state courts and legislators for abolition of these statutes, but federal authorities should also take heed. We are moving for relief in state courts and legislatures, but federal courts and legislators should take notice. Long before gas lobbyists sponsored these statutes we wrote a Constitution that embraced a fundamental right to private property, with private being the operative word.

Legislators, regulators and courts should abolish mechanisms like the precertification survey statutes to support private corporate taking, under the cloak of Eminent Domain.


http://www.roanoke.com/business/news/pipeline-surveying-conflict-heats-up-on-bent-mountain/article_caa96d8-4401-5fe7-9056-6077027205fa.html#Wfa_z2Z8TY#email
Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426  
(Via e-filing)  

RE: Docket No. CP16-10-000  

Dear Ms. Bose,  

Indian Creek Watershed Association hereby files the attached supplemental information to Docket CP16-10-000:  

Mountain Valley Pipeline Draft Environmental Impact Statement Ignores Significant Information and Lacks Analysis of Compound and Cumulative Hazards  

Please file in the appropriate manner.  

Respectfully submitted,  

Indian Creek Watershed Association Board of Directors  
Judy Azulay, President; Scott Womack, Vice President;  
Howdy Henrtiz, Treasurer; Nancy Bouldin, Secretary  

Email: info@IndianCreekWatershedAssociation.org  

Cumulative effects are discussed in section 4.13 of the EIS.
COMPANIES AND NGOs
CO71 – Indian Creek Watershed Association

CC:
- U.S. Environmental Protection Agency, Region 3
  - Mr. Jon M. Capacasa, Director, Water Protection Division
  - Barbara Rudnick, NEPA Team Leader
- US Forest Service—George Washington and Jefferson National Forests
  - Joby Timm, Forest Supervisor
  - Jennifer Adams, Special Project Coordinator
- U.S. Army Corps of Engineers, Huntington District
  - Mike Hatten, Regulatory Permits – Energy Resources
  - Christopher L. Carson
- West Virginia Department of Environmental Protection
  - Randy Huffman, WVDEP
  - Scott Mandriola, Division of Water and Waste Management
  - Wilma Reip [401 Certification Program]
  - Nancy Dickson [Stormwater Permit]
  - Wendy Radcliff
- West Virginia Dept. of Health and Human Resources—Compliance and Enforcement Program
  - Meredith Vance
- West Virginia Department of Natural Resources
  - Robert Fala, Office of Land and Streams
  - Danny Bennett
- WV Bureau for Public Health
  - William Toomey, Unit Manager, Source Water Assessment and Wellhead Protection Program
  - Environmental Engineering Division
COMPANIES AND NGOs
CO72 – Preserve Monroe (on behalf of Paula L. Mann)

CO72-1

Dec. 21, 2016

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

RE: Draft Environmental Impact Statement, Docket No. CP 16 – 13 - 000

Dear Ms. Bose,

I am a landowner adjacent to the route of the Mountain Valley Pipeline; I am within a few hundred feet of the proposed pipeline. I am concerned about this pipeline being built because of two things, one is because of health problems I experience which would be severely impacted and worsened by the construction which will produce diesel fumes being sent into the air, diesel fuel spills and other chemicals used in construction of this pipeline. And I am concerned about the herbicides which will be used to maintain the pipeline route after construction. All of these will severely impact my health problems causing them to become worse and can be life threatening to me especially if containment’s are to get into my drinking water which I get from the well on my property.

My second concern is my organic dairy goat farm, I have dairy goats, I am part of the Monroe County Organic District, and if the water that my goats have access to become contaminated with diesel fuel, herbicides or any other chemicals then my farm and the milk I get from the dairy goats will no longer be organic. And being organic I would be unable to use water hauled in to people because that would have chemicals added. I raise an organic garden which I water from my well if the water becomes contaminated with chemicals then I can no longer use it to water my garden.

These are very grave concerns because my life and the life of my farm depend on clean air and clean uncontaminated water. It is stated in the DEIS that the MVP will mitigate all these things, this is simply not true once these condiments have touched the ground they are absorbed into the soil and you get rain and it ends up in the water supply and there is no way to clean it up.

I am also concerned about the building this pipeline over Peters Mountain, this mountain contains very steep terrain and if this pipeline is built it will result in huge land slide, I have walked the proposed pipeline route on this mountain and I know firsthand what the terrain is like and I also know the small two or three foot fences used for holding back the slides will not work on this steep and rocky mountain sides. I have seen where these fences have been used in the construction of other pipelines and they do not hold back the rock and soil when it rains hard it is just pushed over and the rock and soil wash right over on and down the hillsides into stream and creeks.

Another grave concern is the water supply that comes from Peters Mountain that supplies Monroe county with its public drinking water. This water would be in grave danger from the building of this pipeline which is bound to contaminate the water from runoff from soil erosion, chemicals, diesel fuel spill of which we have done experienced by the contamination of the Peters Town water supply by another pipeline that was built over Peters Mountain.

CO72-2

Air quality issues associated with construction are discussed in section 4.11.1 of the EIS. See the response to CO55-5 regarding herbicides (which would not be used without landowner consent).

CO72-3

Organic farms are discussed in section 4.8 of the EIS. Mountain Valley developed a OFPP to reduce impacts on organic farms.

CO72-4

Steep slopes and landslides are addressed in section 4.1 of the EIS. See the response to IND177-1 regarding landslides and Mountain Valley’s revised Landslide Mitigation Plan.

CO72-5

Water supplies are discussed in section 4.3 of the EIS.
COMPANIES AND NGOs
CO72 – Preserve Monroe (on behalf of Paula L. Mann)

All the above are grave concerns and these are only a few, others are the crossing of the Appalachian Trail, the destroying of the beautiful views of Peters Mt. from all over Monroe County and the views from atop of the mountain. The effect that this will have on tourism not only in our county but also the state.

Sincerely,
Paula L. Mann
3413 Ellison Ridge
Greenville, WV 24945

See the responses to FA11-4 and FA11-5 regarding the ANST. Mountain Valley proposes to cross under the ANST via bore. Visual impact analysis of KOP is included in section 4.8 of the EIS. Tourism is addressed in section 4.9.
PUBLIC COMMENTS PROCESSING

Attn: Docket No. CP16-10-000
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, NE
Washington, DC 20426
Submitted online at: https://fercuniform.ferc.gov/eFiling.aspx

RE: Request for Public Input on Draft Environmental Impact Statement for Mountain Valley Project by Mountain Valley Pipeline, LLC, Docket No. CP16-10-000

Dear Reviewer,

The Student Chapter of The Wildlife Society at Virginia Tech (VT WTS), founded in 1963, serves as the professional organization for students studying wildlife conservation and natural resources at Virginia Tech. We share the parent chapter’s dedication to excellence in wildlife stewardship through science and education. We support the parent chapter’s mission to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

As diligent proponents for the use of sound science in decision-making, VT WTS would like to emphasize the importance of the Draft Environmental Impact Statement (DEIS) for the proposed Mountain Valley Project (MVP). Responsible stewardship of wildlife resources requires critical scientific examination of the MVP. In accordance with the National Environmental Policy Act of 1969, as amended (NEPA), the Federal Energy Regulatory Commission (FERC) must prepare a DEIS demonstrating sufficient avoidance and mitigation of detrimental impacts to wildlife resources during the construction and operation of the MVP.

FERC cannot authorize the currently proposed DEIS due to its insufficient methods for management, monitoring, and mitigation of MVP’s impacts to wildlife and their habitats. These methods as proposed would jeopardize effective professional stewardship of wildlife resources and the long-term persistence of local wildlife populations.

The biological surveys indicated in the DEIS lack sufficient explanation to discern the methods used to assess wildlife and associated habitat. To determine whether the biological surveys conducted by FERC meet professional peer-reviewed standards, detailed information regarding survey design, methods, and results should be included within the DEIS and made accessible to
COMPANIES AND NGOs
CO73 – The Student Chapter of the Wildlife Society at Virginia Tech

See the response to FA11-2 regarding pending data. Courts have held that plans do not need to be completed at the NEPA stage, if they are done before construction is allowed.

Surveys were designed and conducted by Mountain Valley’s professional consultants in coordination with permitting agencies and are subject to review and verification by permitting agencies.

The tri-colored bat is discussed in section 4.7 of the EIS along with other special status species and their habitats. Federally listed species are discussed in additional detail in our BA.

Amphibians, including salamanders, are discussed in sections 4.5 and 4.7 of the EIS.

The public. Both pre- and post-construction surveys will require robust study designs to provide sufficient insight into impacts to wildlife and associated habitat.

Without detailed survey design information, future efforts to mitigate MVP’s impacts to wildlife will not include a scientific standard for comparison. This missing information will create a significant hindrance to professional wildlife managers and result in improper management of a public resource by jeopardizing the persistence of wildlife populations.

Furthermore, all missing or incomplete surveys (DEIS p. 4-183, 4-191) must be completed and incorporated into the DEIS prior to approving the MVP. Excluding these surveys from consideration during the public comment period does not accurately represent necessary information to stakeholders or permit authorities.

To prevent conflict of interest and promote objective results, reliable third-party groups should complete biological surveys instead of FERC, MVP, or Equitrans employees. Especially regarding wetland restoration, citing FERC’s own experience with other wetland restoration projects (DEIS p. 4-161) does not represent an objective scientific opinion or a reliable restoration estimate. Incorporating research from other sources would improve FERC’s mitigation propositions and provide the public and permit authorities with confidence in reviewing MVP’s impacts to wildlife resources.

The DEIS indicates that species proposed or under review for listing under the Endangered Species Act of 1973, as amended (ESA), will be regarded as listed species (DEIS p. 4-182) and therefore qualify for official consultations as required in ESA Section 7(a)(2). The tri-colored bat (Perimyotis subflavus) has been petitioned for listing under ESA Threatened status due to severe population declines across its range. Virginia Department of Conservation and Recreation (VDCR) discovered tri-colored bats in two caves expected to be impacted by the MVP, Slussers Chapel Cave and Canoe Cave (DEIS p. 4-158 to 4-159). The DEIS indicates the need for consultation with the Virginia Department of Game and Inland Fisheries (VDGIF) regarding tri-colored bats (DEIS p. 4-192). We not only emphasize the importance of consultation with VDGIF, but also stress the Section 7 legal obligation to consult with the U.S. Fish and Wildlife Service (FWS) regarding MVP impacts to tri-colored bats. These consultations should occur prior to approval of the MVP, and their findings should be incorporated into a revised DEIS subject to another public comment period for reasons stated above.

The DEIS fails to evaluate the scope of MVP impacts to amphibians, especially woodland salamanders. This omission inappropriately assesses wildlife resources in southwestern Virginia’s globally-recognized hotspot for salamander diversity. An ongoing long-term study in Jefferson National Forest along Craig Creek Road, near a proposed area for MVP impacts, has observed significant impacts to salamander populations following any silvicultural forest disturbance. These results should be considered when implementing mitigation measures, and precautions should be exercised to prevent MVP impacts to the active research area and a sufficient buffer surrounding it.

MVP construction and operation will significantly impact multiple species of woodland salamanders, and therefore pre- and post-impact studies will be necessary to ensure effective
Management of these wildlife resources. A third party unaffiliated with MVP approval should perform these studies. A revised DEIS providing for sufficient pre- and post-impact amphibian studies should be submitted for another public comment period prior to approval of the MVP.

Due to the above considerations, we strongly urge FERC to submit an extensively revised DEIS addressing the above concerns and to open another public review and comment period on the new DEIS prior to authorizing the MVP.

Considering the above revisions with high priority, VT TWS would like to bring attention to the following positive aspects of the DEIS, and encourages their elaboration and implementation in future revisions of the DEIS.

Communication with FWS, VDGIF, VDCR, and other associated natural resource agencies will be the strongest asset to the success of this project. These organizations' policies reflect current scientific data and professional peer-reviewed practices, making them essential resources for effective mitigation of impacts to wildlife.

Extensive habitat loss has caused declines in pollinator species nationwide. Therefore, we strongly support the proposed use of native seed mixes to promote the growth of pollinator habitat along the MVP corridor. We suggest that the DEIS provide for post-treatment monitoring so that invasive species do not colonize the affected area and to ensure that pollinator habitat is effectively established along the MVP.

Collocating the MVP route with existing corridors will reduce habitat fragmentation and protect surrounding landscapes. We urge MVP to maximize opportunities to use existing corridors and avoid impacting intact ecosystems, especially those of high biological significance and conservation concern. Landscapes currently free from fragmentation occur infrequently in the eastern United States, and since undisturbed wilderness and management areas provide crucial resources for many species' survival, we strongly advocate for MVP placement that completely avoids otherwise undisturbed habitat.

Thank you for considering the recommendations of aspiring wildlife professionals and for incorporating sound science into DEIS decision-making. Please contact Allison Moser, President of VT TWS, at allvm7@vt.edu or (571) 420-2654 if you require further information or have any additional questions.

Sincerely,

Allison M. Moser
President

On behalf of the Student Chapter of the Wildlife Society of Virginia Tech
CO74 – Western Montgomery County Landowners Association

1. INTRODUCTION

Part of the north slope of Brush Mountain in the Mount Tabor area is classified by the U.S. Forest Service as Category 4J (Urban-Suburban Interface) and also an inventoried Roadless Area (IRA). That area is shown by diagonal purple stripes and letters A-B-E-F-G-A in Figure 1. To the northeast of the IRA lies the Brush Mountain Wilderness (bounded by points B-C-D-E-B and continuing to the east). We will first describe the four proposed amendments to the Forest Plan in the DEIS and why they pose dangers to the forest and how it can be enjoyed by all citizens. We will then describe why the IRA should be converted to a Wilderness Study Area. Finally, we will show how the proposed pipeline that prompted the amendments will cause irreversible catastrophic damage to the water supply in the Mount Tabor Area of Montgomery County.

Figure 1 The Mount Tabor Area Portion of the Jefferson National Forest

The comment is descriptive in nature.
COMPANIES AND NGOs
CO74 –Western Montgomery County Landowners Association

2. DANGERS OF THE PIPELINE TO THE JEFFERSON NATIONAL FOREST
All routes considered for the Mountain Valley Pipeline go through two parts of the Jefferson National Forest. One part of the forest crossed is on Peter’s Mountain at the border between West Virginia and Virginia. The other part crossed is in the Craig’s Creek Area just north of the Mount Tabor Area. To come through any part of the forest, FERC has requested four amendments to the Forest Service Land and Resource Management Plan (LRMP) for the Jefferson National Forest:

Proposed Amendment 1: In brief, to change the designation of the parts of the Jefferson National Forest that the pipeline would pass through from Category 4J (Urban-Suburban Interface), Category 6C (Old Growth Forest), and Category 8A1 (Mix of Successional Habitats) to Category 5C (Designated Utility Corridor). The Category 5C Utility Corridor would be drastically enlarged to 500 feet wide.

Proposed Amendment 2: In brief, The LRMP would be changed to allow MVP to violate existing restrictions and standards on soil conditions and riparian corridor conditions.

Proposed Amendment 3: In brief, The LRMP would be changed to allow removal of old-growth tree in the construction corridor of the MVP.

Proposed Amendment 4: In brief, The LRMP would be changed to allow MVP to cross the Appalachian National Scenic Trail (ANST) on Peter’s Mountain with a “Scenic Integrity Objective” degraded from High to Moderate with the Moderate stage to be reached only within ten years.

Those amendments are an outrageous attack to significantly downgrade basic forest quality standards and long-standing principles! Our response to each amendment is:

CO74-2 The comment is descriptive in nature.

CO74-3 See the response to comment FA8-1 regarding Amendment 1.

CO74-4 See the response to comment FA10-1 regarding Amendment 2.

CO74-5 See the response to comment FA10-1 regarding Amendment 3.

CO74-6 See the response to comment FA10-1 regarding Amendment 4.
Figure 2  Kelley’s Knob Before and Conceivably After a Pipeline Passes Through the Viewshed
(Courtesy of the Appalachian Trail Conservancy)