

# INDIVIDUALS

## IND149 – Thomas Bouldin

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the stream and departing from it—an opening that will endure for 15 years or more before forest trees will have begun to re-establish. The permanent easement will create a permanent opening in the tree line, destroying all trees whose roots previously helped stabilize stream banks and hillsides. The 75'-wide crossing will destroy existing channel structures, collapsing groundwater feeds, seeps, or springs that feed through the streambed. All these impacts are potentially serious, none is 'short-term' and some are definitely not temporary. **The DEIS is wrong and uninformed on this issue.**

IND 149-17

(2) **Cumulative Impacts from Multiple Crossings:** Despite no mention in the DEIS, cumulative impacts within a watershed will intensify the damage suffered at any given crossing. In the Lick Creek drainage, for example, there are at least three crossings of Lick Creek identified in less than a mile. In addition, there are 24 other crossings of tributaries of Lick Creek listed in the DEIS appendix, although no attention is given to the issue of cumulative impacts. Some of these tributaries run essentially parallel to Lick Creek at the main crossing site, others enter downstream of the crossing within about mile. Perturbation that might be relatively harmless in a single crossing, could prove disastrous for this fragile watershed that is crossed multiple times. Unfortunately, the DEIS does not enumerate any such impacts, it is difficult to say exactly what may occur, much less assess potential impacts.<sup>28</sup>

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(3) **Damage to Structural Elements of the Streambed:** it is clear that a trench 12' wide and 8' or 9' deep will have structural ramifications for the streambed. By redefining channels, eliminating deeper areas, flattening rises and so forth, the installation will necessarily change the directions in which the stream's waters move. Some of these changes can easily result in new stresses on banks that have been weakened or made vulnerable to erosion through the construction process, and have been stripped of the vegetation and root structures which secured them to some degree from high water events. These changes involve both changes in habitat and changes in sedimentation. The estimation of such impacts is possible only with on-site observation and detailed examination of the existing structures. The DEIS contains not one on-site report to be used as an example of the Commission's concerns for this critical area of study.

IND 149-19

(4) **Thermal Changes:** Among the permanent impacts on streams in the project area, thermal changes figure prominently. In the case of trout streams, increases in water temperatures can render a coldwater stream unsuitable for trout. Other species can also be negatively affected by increased temperatures when hot weather and low stream flows interact to reduce available oxygen. The DEIS does not mention the reduction of the forest canopy required by clearing for the construction easement and the permanent ROW and its effect on the watershed. In the deep valley of Lick Creek—which is currently about 90% forested, the 27 crossings will open a large area of the numerous streams to more sunshine

<sup>28</sup> A thorough discussion of this failure to consider cumulative impacts and the implications of this failure on the validity of FERC judgments can be found in Docket CP16-10, #Document 20161017--5077.

IND149-17 Cumulative impacts are discussed in section 4.13 of the EIS.

IND149-18 See the response to IND149-16 and sections 2.4, 4.3, and 4.4 of the EIS.

IND149-19 Trout streams and thermal modification of aquatic habitats are discussed in section 4.6 of the EIS. As stated in section 4.6.2, "Clearing of trees and other riparian vegetation would be minimized to include only what is necessary to construct and operate the projects safely. Mountain Valley and Equitrans would minimize impacts on riparian vegetation by narrowing the width of its standard construction right-of-way at waterbody crossings to 75 feet, and by locating as many ATWS as possible at least 50 feet from waterbody banks."

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than they have absorbed in at least 40 or 50 years since the last timbering was done in the valley. Again, the role of cumulative impacts is clearly a danger: a single warm spot in the stream would be far less of a concern than 27 such areas. But the authors of DEIS either know nothing about the effects of thermal changes on stream biology—or they have chosen to suppress that information—and they also fail to acknowledge publicly the fact that the interconnected streams in a watershed will magnify any negative effects. The closest the DEIS comes to addressing this issue is to acknowledge that the re-growth of riparian vegetation may take up to several years (DEIS, pg 4-177). “Several” indeed. **Essentially, this DEIS reifies MVP’s version of science by asserting, with no evidence, that all environmental impacts are temporary and insignificant.**

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(5) **Long-term Effects of Sedimentation:** Sedimentation seems to be one impact the authors of the DEIS did conceive of—but only long enough to dismiss it as temporary, lasting no more than the 24 or 48 hours it takes to lay the pipe. Then—in an undetermined but brief time—the muddy water is gone and all is well. This position is unscientific and inaccurate on a number of levels. First, sediment from the trenching will not simply be stirred up river mud but rather a mix of liquefied soil, rock dust, stone chips, and possible toxic elements of fuel and lubricants or explosives needed to blast into bedrock. This 'sediment' will be carried downstream—how far downstream depends both on stream flow rates at the time the work is done and on the structure of the stream itself. For several miles downstream of the main crossing site, Lick Creek has a number of deeper pools where sediment may very likely settle out to some degree. But the turbid discoloration of dissolved soil will probably move downstream much further. While the DEIS acknowledges this problem and even provides a textbook-derived description of the variables involved in measuring such damage (see DEIS, pg 4-108), it does not report the necessary data, nor the results of any calculations of how far sediment may travel downstream of any site discussed or delineated in the document.

**If all these stream crossings involved only the ROW, the sediment flow would be renewed 27 times as work progressed from one crossing to the next. But the actual situation on Lick Creek is probably much worse: the majority of the crossings, in fact, involve points where access roads or ATWS impact the flow of the creek.** Damage originating in these spaces will continue off and on throughout the construction sequence—the last trucks driving across the stream when MVP is finishing 'clean-up' operations on the ROW at the head of the area. Thus sedimentation from direct impacts on the streambed by heavy machinery will continue for a period of 17 to 20 months. Again, not a temporary impact at all (more on this in moment).

As already noted, other concerns for long-term sedimentation impacts involve changes in channel structures which direct water against vulnerable banks. Such increases in erosion are more likely where riparian banks are suddenly stripped of cover and where soils are already of a sort that water-sourced erosion is problematic. There are no tables of soil types examining soils at stream crossings, and no discussion of the issue before

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A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. See also the response to comment FA11-15 regarding sedimentation and turbidity modeling. Trucks would not drive through the streams, rather access roads would have bridges.



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announcing that all is well—I assume because no one at FERC realized the problem could exist or because the responsible parties refuse to acknowledge their significance.

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(6) **Increased Turbidity:** Integral to the concern for sedimentation impacts is the problem of turbidity—the opaque cloudiness that drifts downstream of construction. Turbidity can both complicate feeding and reproductive behaviors for fish and benthic fauna dependent on visual cues, and can create water quality issues for humans. The DEIS does mention this problem, but does not provide any significant discussion of its dimensions, nor any analytic data to assess probable impacts, although studies have indicated that increased turbidity can increase the costs of water processing for Public Service Districts and for private water sources as well.<sup>29</sup> It is noteworthy that the authors of the DEIS have made no mention of construction impacts on water resources affecting humans.

IND149-21

A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. Project impacts regarding public water supplies are discussed in section 4.3 of the EIS.

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(7) **Impacts on Spawning Areas and Reproductive Success:** Among the enduring effects of pipeline installation on our streams, the effects on populations of fish and other organisms in the stream are perhaps the easiest to note. But they did not merit more than a passing mention in the DEIS. Obviously one source of damage is the act of construction itself: clearing, trenching, reconfiguring and 'restoring' the area of the crossings will kill not only benthic insects and crayfish, but whatever else happens to be in the way.

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Section 4.6 of the EIS was devoted to fisheries and aquatic resources and aquatic resources are also discussed in section 4.7 and in our BA.

And, yes, it is true that this can be seen as an unfortunate, permanent impact on individual organisms but a purely temporary impact on a total population. **Unless something happens that undermines reproductive success. Sedimentation at the wrong time of year can do that—smothering eggs, fry, and other early life stages of organisms downstream of the crossing.** On Lick Creek, smallmouth bass are most likely to build their nests in those deeper, slower pools mentioned above: the place in the stream where sediment is most likely to settle out. Extended sedimentation accumulating from multiple crossings and extending the period of extreme turbidity can amplify the impact. Since access road/ATWS activity may well extend over a period of 17-20 months and/or during reproductive periods, there is serious potential for damage to successful age-class recruitment for two reproductive cycles. A two-year disruption in the population dynamics of resident organisms could result in a serious impact for various species of fish, crayfish, insects, and certain forms of useful bacteria.

The productivity of these organisms is an important indicator of stream health, and increased sedimentation can pose a serious threat. If in responding to this statement of concern, FERC's managers want to say "show us the numbers" (as they did in responding to realtors' concerns), I can only say that the details of research into this issue are the responsibility of the lead agency, not the affected public. The responsibility lies with the

<sup>29</sup> See <sup>29</sup> See the article "Costs of Water Treatment Due to Diminished Water Quality: A Case Study in Texas." at <http://www.agecon2.tamu.edu/people/faculty/mccarl-bruce/papers/535>

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regulatory powers to ensure that their decisions are founded upon empirical evidence required by NEPA regulations. **According to paragraph 1500.1 (b), the DEIS must show "evidence that agencies have made the necessary environmental analyses"— that is, 'agencies' NOT the public. For FERC to ignore the existence of an obvious problem does not make that problem either temporary or trivial.**

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(8) **General Cumulative Effects:** The New York scientists conclude with reference to research showing a correlation between intrusions of roads, pipelines and other linear features and a general decline in water quality. They remark with anxiety about a 44% increase in the rate of stream crossings from 2.28 to 3.29 crossings per square mile as indicative of a serious problem. Using Lick Creek as an example, between the end of County Route 4 and the ROW crossing about 2 miles upstream, there are currently perhaps five places where the road crosses Lick Creek. (MVP will build Access Road SU-200 extending Route 4 to the pipeline.) In addition to the gravel extension of Route 4, there are also the remnants of two logging roads along either side of the stream and at least six ATV tracks leading to (and probably across) the creek. Let us call that a total of 11 crossings in an area of about 0.5 square mile—a rate of 22 crossings per square mile. Let us now add 27 new crossings which involve a 25'-wide access road and a 50'-wide permanent clearing to the scene: we now have at least 38 crossings, a rate of 76 per square mile. While that figure would probably give the New York scientists apoplexy, it appears FERC/MVP and the authors of the DEIS never considered that these crossings would be so densely clustered.

And why should they? Even before they got started, it appears that the applicant was prepared to assert that any impacts would be minor—and temporary. In relation to SU-200, you may wish to define the impact as temporary because the damage is done by a truck. In fact, the damage to the streambed, and to water quality for those living in the Lick Creek valley, may well be long lasting—precisely because it was done by a truck, over and over again, for months.

### FERC's Reductive Understanding of Socio-economic Context

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The materials in the DEIS suggest that the FERC manager responsible for the document's design and development has an understanding of the socio-economic contexts of the application that is as limited as their understanding of stream biology and the potential impacts of stream crossings. **Section 1508.4 of the National Environmental Policy Act defines the concept of the 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."**

IND149-23

Cumulative impacts are discussed in section 4.13 of the EIS.

IND149-24

Socioeconomics are discussed in section 4.9 of the EIS. See the response to FA11-12 regarding need. Generally, pipelines at the end of their life cycle are either removed at the company's expense or abandoned in place (so there is no need for them to be "tended").

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Such an analysis requires a great deal more than a data dump of statistics about demographics in the Appalachian counties of West Virginia and Virginia coupled with the economic promises and projections supplied by the applicant. The "socio-economic environmental impacts" portion of the Environmental Impact Statement must consider two general sets of issues: the ways in which the socio-economic environment may be impacted by the proposed project—both for better and for worse—and also the ways in which the project has been and may be affected by the socio-economic context in which it arises. Thus the discussion of the socio-economic environment will be exactly analogous to discussions of the 'natural' environment, where we must be concerned with both the impacts of environment on the installation of the pipeline, and the effects of the installation of the pipe on the natural world. This DEIS provides evidence that the FERC staff has not reflected on this conceptual issue at all or has chosen to exclude a systemic analysis for the complications that would necessarily arise.

There is a great deal missing from the DEIS's conception of the discussion of socio-economic issues. For example, a major aspect of the socio-economic discussion should focus on the structural origins of the proposal. This would involve a general discussion of the energy needs of the country, a discussion of the place of Marcellus shale gas fields in the energy economy, the evolution of fracking as the technology that makes extraction of the deep shales possible, and the role of the proposed Mountain Valley Pipeline in this system. Part of the purpose of this section would be to examine the extent to which the proposal is motivated by current energy needs, but it must also examine the extent to which the motivating forces behind the proposal are financially-defined needs of the proposing corporations. The omission of a discussion of EQT/MVP profit motive undermines any number of subsequent discussions in the DEIS.

A responsible socio-economic analysis must also proceed on a more concrete level of structure as well. In such an analysis, the DEIS would have to address the role of regulatory procedures in motivating and instigating the development of infrastructure. Here the DEIS would address the issues raised by some commentators that FERC's own procedures have led to an overbuilding of infrastructure,<sup>30</sup> and that current policies have encouraged the expansion of industrial investment at the unwarranted expense of "natural" elements of the environment.<sup>31</sup>

Of course, the socio-economic analysis must also deal with conditions at the other end of the pipeline, as it were: the impacts of the project on social and economic conditions during the course of the pipeline's operation. The analysis must be a great deal more thorough than that presented in the DEIS. It will have to do far more than repeat the applicant's inflated promises of construction employment, jobs that will last only an estimated 10 to 18 months, and 75% of which will go to people other than local residents. The analysis will have to deal far more rigorously than this DEIS with such claims as the number of operational hires that can be attributed to the project, given the fact that only half of these positions are in the direct control of the applicant, and that

<sup>30</sup> <http://www.appalmd.org/2016/09/12/new-study-proposed-interstate-natural-gas-pipelines-not-needed/>

<sup>31</sup> This is the general tenor of argument from many commenters to both dockets for the MVP Application.

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there is no detailed demonstration that the other half of these jobs—or their \$65,000 salaries—will materialize.<sup>32</sup>

It is also crucial that the socio-economic analysis recognize and deal with the implications of what comes next—that is, what happens when the gas runs out. This is an issue on at least two levels: there is the obvious physical/economic issue of who will bear the costs of tending to the decommissioned pipeline.<sup>33</sup> This issue has been raised repeatedly but does not play much of a role (if any) in the evaluative calculus of the DEIS. There is an analogous but far broader issue of concern: the fate of the economic and social structures of the affected counties when the gas plays out.<sup>34</sup> In both cases, the corporate applicants have indicated they intend to simply walk away from what they have made (or un-made). **FERC must now decide whether they will authorize such abandonments, that being the intended concomitant of approving the project. Appalachian communities are all too familiar with the experienced reality of boom/bust extractive economics. It is imperative that the DEIS identify and evaluate the structural and immediate causes of these agonies prior to announcing authoritatively that there will be no negative economic impacts from the MVP.**

In its current form, the socio-economic discussions in the DEIS are utterly inadequate to support any conclusion as to the wisdom of approving the pipeline proposal. Other than the Key-Log Economics study which FERC's DEIS dismisses out-of-hand, there is no research-based demonstration of the potential costs of the proposal currently available. **Regrettably, FERC has systematically refused to make public any data that would allow a reasoned assessment of how much is at stake: there is no estimate of the value of the properties threatened by the project, no indication of the replacement value of water resources and systems placed in harm's way, no tables of the value of threatened forestland, streams, and wildlife habitat, of lost 'environmental service' so contemptuously denied by the British Parliamentary sources quoted by MVP in attempting (and failing) to refute the Key-Log study.<sup>35</sup> To approve the project on the grounds that only good things can happen is not the bureaucratic embodiment of wisdom, not even of common sense.**

### CONCLUSION

I trust that this discussion has made it clear that releasing the Draft of the Environmental Impact Statement for the Mountain Valley Pipeline on September 16, 2016 was premature. The

<sup>32</sup> The figures on employment can be found the FTI study mentioned earlier, as well as in Resource Report 5.

<sup>33</sup> This has been a significant issue sense very early in the pre-filing phase, and it remains a major black-mark against the project and against weak regulatory concern that there has been no significant change required in the company's position. For an early statement of the problem see Docket PF15-3, Document #20150720-5046.

<sup>34</sup> For a fuller discussion see Docket PF15-3, Document #20150616-5168. **The potential for exploitation and abuse of vulnerable populations in Appalachia warrants a far more detailed examination of Environmental Justice than has been allotted by FERC in this DEIS.**

<sup>35</sup> All these areas of potential cost and damage were identified in the comment just referenced. It is disappointing to discover how little weight was given that comment by FERC in preparing to evaluate the Applicant's claims of the socio-economic benefits promised by the Mountain Valley Pipeline project.

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The draft EIS issued by the FERC on September 16, 2016 was not premature; it was the result of two years of research. We will not be producing a supplemental draft EIS. We produced a final EIS that addresses new information and comments on the draft.

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Commission lacked the data to make responsible choices or persuasive presentations on the impacts of the project. The Commission's environmental consultants and staff exhibit in this DEIS a serious lack of basic scientific and empirical knowledge of the exigencies of the natural world, as well as of the socio-economic implications of the project for affected communities and residents. Without that knowledge, they are ill-equipped to even approximate documenting a catalog of the potential environmental impacts associated with the MVP project. The result is a document which is an embarrassment to the Commission, an insult to the public, and a major impediment to the effective evaluation of the application. The DEIS must make possible the responsible consideration of potential environmental impacts of the Mountain Valley Pipeline. My understanding is that the guidelines provided by the National Environmental Policy Act carry the expectation that agencies will consider these impacts with full integrity. This DEIS does not fulfill that mandate.

FERC's only recourse at this point is to announce the intention to re-write the entire DEIS with responsible data, responsible arguments, and responsible intentions to honor the scientific research needed for meaningful comparisons and evaluations of alternatives to the proposed plan. Once the draft has been rewritten, the evaluation process itself can begin, with cooperating agencies and the public being granted the time needed to read the collected materials, and to assess them. Critically.

Respectfully submitted,

Thomas Bouldin and Susan Bouldin  
Pence Springs, West Virginia

Cc: Ted A. Boling, Associate Director for NEPA, Council on Environmental Quality  
Shawn M. Garvin, Regional Administrator, U.S. EPA, Region 3  
Jeffrey D. Lapp, Office of Environmental Programs, U.S. EPA, Region 3  
Barbara Rudnick, NEPA Team Leader, U.S. EPA Region 3  
Colonel Philip M. Secrist III, Army Corps of Engineers, Huntington District  
Ginger Mullins, Chief, Regulatory Division, Army Corps of Engineers, Huntington District  
Michael Hatten, Regulatory Branch Chief, Army Corps of Engineers, Huntington District  
Jon M. Capacasa, Director, Water Protection Division, U.S. EPA Region 3  
Scott G. Mandirola, Director, Division of Water and Waste Management, WVDEP  
Tony Tooke, Regional Forester for the Southern Region, USDA Forest Service – Region 8  
Joby P. Timm, Forest Supervisor, George Washington and Jefferson National Forests  
Jennifer Adams, Special Project Coordinator, Jefferson National Forest  
Angie Rosser, Executive Director; Autumn Bryson, Program Director, WV Rivers Coalition  
Ben Luckett, Staff Attorney; Ryan Talbott, Staff Attorney, Appalachian Mountain Advocates

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IND150 – Tina L. Smusz

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October 30, 2016

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

Dear Ms. Bose and Members of the Commission:

I am writing to protest all four of the proposed amendments to the Land and Resource Management Plan for the Jefferson National Forest which would result in devastation of both previously protected federal land and the Appalachian National Scenic Trail, as well as private lands, public and private roadways, and water sources contiguous to or crossed by the proposed multi pipeline corridor. Any areas downstream from that corridor are at risk for contamination of soil and groundwater both during and after the useful lifetime of the pipelines. The damage caused by this massive corridor would extend into perpetuity as explained below.

**Amendment One:** Amending the Forest Service LRMP to reallocate 186 acres to the Management Prescription 5C–Designated Utility Corridors expanding the right-of-way to a 500-foot-wide “Utility Corridor”

This obviously would ultimately impact not only the Forest Service land but extend to all property on the proposed route through Virginia. The “exceptions” in this amendment - to keep Rx4A for the Appalachian Trail and avoid the Peters Mountain Wilderness do very little to protect either of these from pollution and degradation resulting from multiple pipelines traversing the area in close proximity.

A 500’ wide corridor would not abruptly reduce in size as it crosses private land. The amendment is worded in a nebulous manner suggesting that any type of fuel (all have flammable and toxic properties) or other utilities such as electricity and water could be carried through the additional lines. I question the safety of any material transported through areas of known high seismic activity, unstable karst terrain and steep, rocky slopes which increase the chance of leaks and pipeline ruptures. These same areas are minimally accessible to Fire Crews, Emergency Medical Services and Hazardous Materials teams. A small number of volunteer fire departments cover the area in reference. Volunteer fire departments rely on local residents, many of whom have other jobs far removed from their firehouse. Accessible water sources to quell fires are also sorely lacking in this rural area. (See prior FERC submissions which detail these problems by Pamela L Ferranti under CP16-10 – Emergency Responders, and by Tina Smusz Docket Number PF15-3 – Harmful impacts of the proposed Mountain Valley Pipeline...)

Serious long-term public health threats will result if FERC approves an expanded pipeline corridor. There are no plans by Mountain Valley Pipeline or EQT for decommissioning the pipelines or providing financial support for this endeavor in the future. Supplies of easily accessible shale gas obtained by hydraulic

IND150-1

See the response to comment FA8-1 regarding Amendment 1. Safety is addressed in section 4.12.

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fracturing are dwindling, making profitable extraction a time-limited proposition for investors. It is therefore possible that these proposed pipelines will be in use for a much shorter time than expected. Abandoned pipelines result in permanent grave threats to the national forest, wilderness areas, private property, roads and water sources. What entity is responsible for monitoring downstream household water supplies for toxins?

Multiple fuel lines within an expanded corridor compound the hazards, costs and complexities of decommissioning. Costs of decommissioning and costs of responding to contaminants leaching into water supplies or serious erosion on slopes or roadways will ultimately fall on local, state and federal government. Remediation would be critically delayed at the expense of the health of both the public and the forest. The lack of decommissioning plans is a flagrant violation of NEPA's requirement for evaluation of full life cycle effects on the environment. FERC should demand MVP produce detailed plans for future pipeline decommissioning including sources of financing for this effort.

Two major consequences of the lack of a decommissioning plan include impairment of future land use and ground settling. Unfortunately, either option for decommissioning - abandonment in place versus pipeline removal, poses additional hazards. Pipeline removal can cause environmental impacts similar to those of construction, and expose adjacent soil and downstream groundwater to the heavy metals and radioactive substances residing in the sludge which accumulates in the lining of fracked gas pipelines. Additional harmful impacts of removal would result from the fill material used to close the large exposed cavity. Where would this enormous amount of fill material come from and what would it be? Obviously, coexisting utilities (electricity, water, etc.) planned for this widened corridor would directly complicate efforts to safely decommission any abandoned fuel lines within the corridor.

Pipeline abandonment in place also results in soil and groundwater contamination. Soil contamination occurs as a result of leaks of contaminants left inside abandoned-in-place pipe which are released due to corrosion. In-pipe contaminants may include: hydrocarbon condensates; lead which may deposit as radioactive <sup>210</sup>Pb, a transitional product of radon (<sup>222</sup>Rn) decay with a half-life of 22 years; heavy metals (such as mercury & arsenic); other naturally occurring radioactive elements; and unidentified fracking chemicals. Leaks are extremely likely in areas of extensive near-surface bedrock where the proposed pipeline would have only 18 inches of protective soil cover. Water conduits form along abandoned pipelines both at the surface from pipeline collapse and from subsurface channels along the pipeline exterior surface, both of which cause soil erosion. Water conduits increase groundwater contamination. Within-pipe contaminants are mobilized over time in areas where the pipeline is under stress, i.e., waterways, roads, railway and other utility crossings.

A widened corridor would result in an exponential increase in the number of above-ground facilities and apparatuses for both construction and operation of the pipeline. These would necessarily infringe on additional forest service land and private property during construction, operation and later decommissioning.

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IND150-2 **Amendment Two:** LRMP would be amended to allow construction of the Mountain Valley Pipeline to exceed restrictions on soil conditions and riparian corridor conditions as described in LRMP standards FW-5, FW-9, FW-13, FW-14 and 11-017, provided that mitigation measures or project requirements agreed upon by the Forest Service are implemented as needed.

This amendment is in flagrant violation of the Forest Service’s Mission “To sustain the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” “Needs of present and future generations” is clearly not represented by an excess fossil fuel supply which will benefit wealthy private investors who are already designating a portion for foreign export. Who polices MVP to enforce compliance with the “mitigation measures,” and who determines the degree of damage that mandates the need for implementation of these? There is no timeline specified for completion of the remedial work by MVP. MVP ceases to exist as an entity upon completion of the pipeline thereby guaranteeing that no group other than the USFS would be left to perform the mitigation measures. This amendment gives open license for MVP to inflict decades, if not centuries, of harm on our hitherto thoughtfully protected national forest. It is now common knowledge that our forests serve as CO2 sinks to combat global warming which is the grim consequence of increased burning of fossil fuel. “Natural Gas,” the term proffered by MVP, is primarily methane which is the leading contributor to global warming. “Exceeding restrictions on soil conditions and riparian corridor conditions” constitutes a betrayal of the public’s trust in the United States Forest Service to protect our national forest lands for the good of all citizens.

IND150-3 **Amendment 3:** The LRMP would be amended to allow the removal of old growth trees within the construction corridor of the Mountain Valley Pipeline.

“Old growth trees” are anchored within healthy forest ecosystems. This amendment fails to convey the true picture which is that old growth trees do not exist in isolation and they would not be selectively culled. Entire swaths of intact forest including its old growth trees would be felled. This activity results in destructive fragmentation of the forest. The health of the forest rests on avoidance of fragmentation, e.g., utility corridors which take out swaths of trees should be avoided at all costs due to permanent harm resulting in loss of plant and animal biodiversity, increase in invasive plants and pests, and impairment of water quality. The oldest trees and their enveloping forests are not rapidly replaceable and they are essential for preserving a healthy environment in general.

IND150-4 **Amendment Four:** The LRMP would be amended to allow the Mountain Valley Pipeline to cross the Appalachian National Scenic Trail on Peters Mountain. The Scenic Integrity Objective for the Rx 4A area and the Trail will be changed from High to Moderate. This amendment also requires the SIO of Moderate to be achieved within five to ten years following completion of the project to allow for vegetation growth.

This amendment permanently downgrades the scenic quality of this portion of the Appalachian National Scenic Trail (ANST) from its current High Scenic Integrity Objective (SIO) to Moderate. Given that the entity Mountain Valley Pipeline dissolves after pipeline construction is completed, the amendment effectively places the sole burden on the Forest Service for reclamation to this lower SIO. Large trees

IND150-2 See the response to comment FA10-1 regarding Amendment 2. Monitoring and oversight responsibilities for Mountain Valley, the FERC, FS, and BLM are described in the POD, Environmental Compliance Management Plan, Appendix M that would apply to the construction, operation, and maintenance of the project on NFS lands.

IND150-3 See the response to comment FA10-1 regarding Amendment 3.

IND150-4 See the response to comment FA10-1 regarding Amendment 4.



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plus a protective, perennial understory of shrubs currently help protect the physical integrity of the highly traveled ANST which is prone to erosion through this mountainous area. Neither trees nor shrubs at this elevation can possibly achieve significant growth within the 5-10 year time frame noted in the amendment. It is too much to ask that a national treasure, the ANST, should have a portion permanently scarred in the interest of facilitating a polluting, for-profit, fossil fuel industry. The entire project, particularly if a much wider 500' corridor is approved, could harm our area's tourist trade for years to come. Numerous view sheds from popular trail overlooks will show an extensive scar across our beautiful countryside ultimately resulting in lost revenue from decreased numbers of ANST day hikers and through hikers who currently bolster our local rural economies.

Respectfully,

Tina L. Smusz, MD, MPH  
5555 Mount Tabor Rd.  
Catawba, VA 24070

# INDIVIDUALS

## IND151 – Elizabeth Reeder

20161101-5060 FERC PDF (Unofficial) 11/1/2016 10:10:08 AM

Elizabeth Reeder, Jumping Branch, WV.

IND151-1 I am writing to demand that FERC issue a Revised DEIS with a new comment period. The current DEIS is incomplete and contains inaccurate and misleading information on critical environmental issues. MVP has posted thousands of pages of new and revised files after the DEIS was issued. The public is not being given a reasonable chance to review and respond to this new information. It is FERC's duty to give the public full information and the opportunity to review it.

IND151-1

See the response to comment FA11-2 regarding pending information in the draft EIS.

# INDIVIDUALS

## IND152 – Roger S. Brown

20161101-5086 FERC PDF (Unofficial) 11/1/2016 12:12:37 PM

Roger S. Brown, Union, WV.

1 November 2016

Dear Madam/Sir:

IND152-1

A striking feature of this DEIS is its tendency to present rosy scenarios throughout despite obvious dangers. For example, on p. 4-371 one reads: "Basically, once the pipeline is installed, and the right-of-way is restored and revegetated, it would hardly be noticed, and should not adversely affect the culture, landscape, or environment of the Peters Mountain region. This presupposes no significant mishaps in the construction phase, quite a leap of faith.

IND152-2

At the top of p. 4-49 the DEIS acknowledges the possibility of discovering "a significant previously unknown karst feature" (singular!). The following quotation makes clear what an understatement that is. In 2010 Fred Ziegler, a geologist in Monroe County, WV with impeccable credentials said, "Monroe County, the king of karst, has 450 known caves and more than that that haven't been discovered yet." I submit that MVP's prospective "karst specialist," so called, would be unable to avoid/minimize/mitigate/contain the multifarious obstacles and hazards that would be encountered. The fact of the matter is: a project of this type and magnitude is incompatible with the kind of karst we have in Monroe County. Prudence and common sense dictate: don't go there.

Roger S. Brown  
526 Gates Rd.  
Union, WV 24983  
304-772-5862

ccs: U.S. EPA, Region 3  
WV DEP

IND152-1

As described in section 2.4 of the EIS, third-party compliance monitors, under the direction of the FERC staff, would conduct daily construction monitoring, and would have stop-work authority. FERC staff would also conduct occasional on-the-ground inspections, in addition to the third-party monitors. Our experience, with thousands of pipelines, is that most rights-of-way are eventually restored and revegetated without major damages to the environment.

IND152-2

Impacts and mitigation measures for karst terrain is addressed in section 4.1 of the EIS.

# INDIVIDUALS

## IND153 – Bruce Zoecklein

20161101-5135 FERC PDF (Unofficial) 11/1/2016 2:39:30 PM

Bruce Zoecklein, Blacksburg, VA.  
November 1, 2016

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

Joby Timm, Supervisor□  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway□  
Roanoke, VA 24019

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

IND153-1

I writing to comment on the proposed actions of the Forest Service in response to the right-of-way application submitted by Mountain Valley Pipeline (MVP). They want to be able to build and operate their pipeline across the Jefferson National Forest.

I strongly oppose granting MVP's request for a right of way change to the Land Resource Management Plan for the forest. I am opposed to the designation of a utility corridor in the Jefferson National Forest which I understand would be required if the application is approved.

Our national forests are not given to us by our parents but are on lone to us by our children. The national forest if for all Americans, not for a for-profit private corporation. The forest is a complex ecosystem that supports a rich and diverse animal and plant system, provides value water shed, recreation, athetic and economic benefit to our region. The forest is a major economic engine generating tourism revenue from hunting, fishing, hiking, biking etc., and promoting the health and well- being of local residence.

We must preserve unspoiled and pristine environment for future generations and, therefore, land management is vital to our region. The Jefferson National Forest land contains old growth trees, grasslands that support many species, critical habitats for threatened and endangered species, and many water bodies.

All of the proposed amendments to the Jefferson National Forest management plan are all very unsettling. It is hoped that public input is taken seriously and not be ignored.

Plan Amendment 1 Proposal. management prescription (Rx) 5-C Designated Utility Corridors from these Rx's: 4J, 6C, and 8A1. This would allow for

IND153-1

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

# INDIVIDUALS

## IND153 – Bruce Zoecklein

20161101-5135 FERC PDF (Unofficial) 11/1/2016 2:39:30 PM

IND153-1 cont'd	<p>a 500 feet corridor, (except across the Appalachian Trail and Peter's Mountain Wilderness).</p> <p>A 500-foot right of way would create a waste land pipeline alley through not simply national forest but also private land! Naturally, there is a direct correlation between what the Forest Service does with it's land and what would occur with adjacent private lands. Beyond the degradation of the forest, this could put private farms out of business. It is simply not economically viable to farm small sub-plots of divided land.</p> <p>The impact of a 500 foot-wide utility corridor should pose significant conflicts with the LRMP to say nothing of the impacts to private landowners, local communities and the entire region. Such a corridor would open the door for additional pipelines and added degradation of the forest and surrounding lands. If this were amendment were to be allowed the result would have a large and negative impact on adjacent land owner by putting farms out of business.</p>	
IND153-2	<p>A proposed Federal legislation (House Resolution 2295) would allow streamlining any environmental reviews. This would mean that landowners, cultural areas, historic districts would be ignored!</p> <p>The Project only Amendment 2 - Proposed to permit exceedance of soil and riparian corridor conditions</p> <p>This proposal is also not acceptable. Buffer zones must be maintained to minimize siltation. With the steep slopes of our mountains (Peters Mountain, Sinking Creek Mountain, and Brush Mountain) there will be problems with the water sheds of these regions. This could damage drinking water sources. It could also detrimentally impact habitats. For example, Slussers Chapel Cave is home for rare a millipede and isopods which would undoubtedly be negatively impacted.</p> <p>At the base of Brush Mountain, Slussers Chapel conservation site would be negatively affected by wash resulting from soil erosions. Buffer zones should remain intact to minimize water siltation.</p>	IND153-2 See the response to comment FA10-1 regarding Amendment 2.
IND153-3	<p>Proposed Amendment 3 - Remarkably, this amendment would allow the removal of old growth trees within the construction corridor.</p> <p>Old growth forests possess a unique ecological features mainly due to the fact that they have not been disturbed. Old growth forests are unique. They are our rare natural recourse that cannot be replaced, having taken hundreds of years to develop. It is our responsibly to retain these for subsequent generations.</p>	IND153-3 See the response to comment FA10-1 regarding Amendment 3.
IND153-4	<p>Proposed Amendment 4 - This proposes crosses the Appalachian National Scenic Trail (ANST) at Peter's Mountain. This is not acceptable.</p> <p>There is an alternate route that is much less damaging than this proposal. The hybrid Alternative Route 1A crosses the Jefferson National Forest for 1.6 miles vs. the 3.4 miles that MVP desires.</p> <p>James Lovelock's Gaia hypothesis advances that the earth is influenced by life to sustain life. In other words, there is a connection between man and his natural environment is essential for life. I agree.</p>	IND153-4 See the response to comment FA10-1 regarding Amendment 4. Section 3 of this final EIS has been revised to discuss the Hybrid 1A Alternative.

# INDIVIDUALS

## IND153 – Bruce Zoecklein

20161101-5135 FERC PDF (Unofficial) 11/1/2016 2:39:30 PM

IND153-4  
conf'd

Our national forest land is part of our common heritage and part of our mental and physical wellbeing. We have a responsibility to ourselves and those yet unborn to preserve our natural environment. We cannot damage or fragment this wonderful resource for any purpose, but particularly for short-term economic gain.

Please preserve our region and this legacy for your grandchildren and my own.

Respectfully Submitted,

Dr. Bruce Zoecklein

Blacksburg, VA

# INDIVIDUALS

## IND154 – Suzanna Osborne

20161101-5165 FERC PDF (Unofficial) 11/1/2016 3:16:18 PM

IND154-1

suzanne osborne, roanoke, VA.  
it is the worst example of government interference. The pipeline is going to benefit companies and investors the most, not the folks who live and work in the area. follow the money I always say, and true to nature, those that support this boondoggle, have the most to gain. While the landowner and community want to protect their land and safety, for god's sake. There is no way this venture is going to not have serious hazards. Can you say "3 mile island" The supervision is not at arms length. It is my hope that someone in the department of review of these filings will do the right thing and not bend to the pressure of money or advancement. you never go wrong telling the truth and you will always sleep better at night.

IND154-1

See the response to comment IND2-1 regarding safety. The Commission would determine need and benefits in their project Order.

# INDIVIDUALS

## IND155 – Kaki Comer

20161102-5001 FERC PDF (Unofficial) 11/1/2016 8:02:15 PM

Kaki Comer, Moneta, VA.

IND155-1 In this moment in our country, we are irrefutably transitioning away from fossil fuels. We are contracting to build the largest clean energy infrastructure project in the US, increasing our large and small-scale alternative energy projects, and steadfastly moving away from oil and gas. Why then, has this pipeline project proceeded when it will become obsolete by the time it is finished being built. We cannot put people and the planet at risk for an era and way of life that we are adamantly fighting to abolish. I didn't even have to get into the EIS more than a couple pages to see the evident devastation and destruction this pipeline would cause to both the local environment and biodiversity, but to the citizens who call this place home and on whose livelihood depends.

IND155-1 Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy. Pipelines are proposed because there is a market demand for natural gas. The EIS concludes that the MVP would not destroy the local environment. As addressed in section 4.12, this project presents a low risk to communities.

To name a few specific points of the project (of the many) that I oppose:

IND155-2 1. The crossing of the Jefferson National Forest and other Core Forest Areas for the Mountain Valley Project. FERC mentions the "Long-term impact" of "crossing 245 miles of forest, 0.3 mile of shrublands, and 3.6 miles of grasslands. The removal of forest would contribute to edge effects and habitat fragmentation within core forest tracts. In West Virginia, the MVP would pass through 24 core forest areas, and result in permanent impacts on about 865 acres within those forest core tracts. In Virginia, the MVP would pass through 17 high to outstanding ecological core areas, with permanent impacts on about 195 acres of forest within those core tracts."

IND155-2 As stated in the EIS, in considering the total acres of forest affected, the quality and use of forest for wildlife habitat, and the time required for full restoration in temporary workspaces, we conclude that the projects would have significant impacts on forest.

IND155-3 PERMANENT IMPACTS FOR A TEMPORARY AND FLEETING WAY OF LIFE.  
2. The residences which lie within just feet of Mountain Valley Project Construction Work Areas  
3. The seemingly unimportant fact that about 67 percent of the MVP pipeline route, and all of the EEP pipelines, would cross areas susceptible to landslides--A HIGHLY UNSTABLE AND IRRESPONSIBLE TERRAIN TO INSTALL AN UNATTENDED PIPELINE.

IND155-3 Landslides are addressed in section 4.1 of the EIS. Impacts on residences are addressed in section 4.8; with site-specific mitigation plans provided in appendix H of the EIS.

IND155-4 4. The alternatives suggested in the report seem half-investigated and unreasonable considering the vast network of pipelines that already exist in the region  
Without going into further detail, I will say that allowing this pipeline to be constructed is a huge step backwards in a progression toward a cleaner, more sustainable future. It is a symbol of corruption in business and the ignorance when it comes to listening to the local stakeholders. The roughly 1000 comments received on the project cannot be the voice of the hundreds of thousands of people with live in the area and will be affected by the pipeline. Proper consultation with stakeholders has fallen vastly short and lack of transparency in issues of oil and gas development has never been more apparent.

IND155-4 Section 1.4 of the EIS highlights stakeholder involvement. Section 3 of the EIS discusses alternatives considered.



# INDIVIDUALS

IND156 – Patricia Curran Leonard

20161101-0009 FERC PDF (Unofficial) 11/01/2016

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

FILED  
SECRETARY OF THE  
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October 29, 2016

2016 NOV -1 A 9 36

FEDERAL ENERGY  
REGULATORY COMMISSION

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Pros and Cons V

ORIGINAL

In an article by *Yale Climate Connections*: **5 Key Issues**

<http://www.valeclimateconnections.org/2015/05/pros-and-cons-of-fracking-5-key-issues/>

This article had very sound analysis of the hydraulic fracturing industry:

“We are only just beginning to understand what we are doing to our local geologies, and this is dangerous. The 2014 *Annual Reviews of Environment and Resources* paper notes that “between 1967 and 2000, geologists observed a steady background rate of 21 earthquakes of 3.0 Mw or greater in the central United States per year. Starting in 2001, when shale gas and other unconventional energy sources began to grow, the rate rose steadily to [approximately] 100 such earthquakes annually, with 188 in 2011 alone.” New research on seismology in places such as Texas and Oklahoma suggests risky and unknown changes. It is just not smart policy to go headlong first – at massive scale – and only later discover the consequences.”

Where in the EIS are the comprehensive research analysis that acknowledges the evidence of these earthquakes that hydraulic fracking has caused? Geologists are putting out report after report about how the pressured water fracking has contributed to seismic activity near these sites. Allowing the MVP project to move forward would directly contribute to increasing this very serious byproduct of the fracking industry.

Please do not permit MVP to transport gas that is a limited resources. MVP is a for-profit private equity firm trying to create a pipeline that is NOT a public need or use.

Pat Curran Leonard 4500 Wilson Mill Road Colerain, VA 24085 540.920.5194

IND156-1

IND156-1

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

**INDIVIDUALS**  
**IND157 – Patricia Curran Leonard**

20161101-0016 FERC PDF (Unofficial) 11/01/2016

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

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SECRETARY OF THE  
FEDERAL ENERGY REGULATORY COMMISSION  
2016 NOV -1 A 9 43  
FEDERAL ENERGY REGULATORY COMMISSION

October 22, 2016

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

ORIGINAL

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Use of pesticides/herbicides

IND157-1

EIS 4-148: "Mountain Valley does not propose the wide-scale use of pesticides and/or herbicides, but would consider their use on a local scale based on the preference of the FS, which may require the use of herbicides on NFS managed lands"

The EIS states in many sections that every 3 years the removal of the 50 feet across path would be maintained but several times a year the 10 foot wide maintenance of the grasses or shrub growth would be maintained but I could not locate how that would be done along the route outside of the Jefferson National Forest.

What is the method for maintaining the 10 foot wide area several times per year and then the larger 3 year maintenance plan? If the use of pesticides/herbicides are going to be used, what are the chemicals and how much will be used? Where are the study results in the EIS of the impact of chemicals if used would have on drinking water? What impact would those chemicals have on species like honey bees? What if any impact would the use of chemicals have on birds and the eggs of nesting bird species?

Please do not approve the for profit MVP proposal that is NOT a public use.

Pat Curran Leonard      4638 Dilons Mill Road      Callaway, VA 24065      540-929-5184

IND157-1

See the response to comment LA1-7 regarding herbicides. The Applicants would maintain the 50-foot wide permanent right-of-way, and the 10 feet centered over the pipeline via mowing.

# INDIVIDUALS

IND158 – Patricia Curran Leonard

20161101-0008 FERC PDF (Unofficial) 11/01/2016

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 NOV -1 A 9 36  
FEDERAL ENERGY  
REGULATORY COMMISSION

October 28, 2016

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Pros and Cons IV

IND158-1

In an article by *Yale Climate Connections*: **5 Key Issues**

<http://www.yaleclimateconnections.org/2015/05/pros-and-cons-of-fracking-5-key-issues/>

This article had very sound analysis of the hydraulic fracturing industry:

“In places such as Pennsylvania, Ohio, and Colorado, the drilling rigs have popped up near where people have their homes, diminishing the quality of life and creating an industrial feel to some of our communities. This is poor planning at best, and sheer greed at its worst. It seldom involves the preferences of the local residents.

Finally, it’s also the case that relatively low impact fees are being charged and relatively little funding is being set aside to mitigate future problems as wells age and further clean-up is necessary. It is the opposite of a sustainable solution, as well production tends to drop sharply after initial fracking. Within just five years, wells may produce just 10 percent of what they did in the first month of operation. In short order, we’re likely to have tens of thousands of sealed and abandoned wells all over the U.S. landscape, many of which will need to be monitored, reinforced, and maintained. It is a giant unfunded scheme.”

Again, the issue here is expressing how I feel about the MVP putting a 42 inch pipeline in my backyard. “poor planning at best, and sheer greed at its worst” This project has demonstrated a miss-use of eminent domain as a way to take property that will only be used for that sheer greed and not for a public use/utility.

Please do not permit MVP to transport gas that is a limited resources. MVP is a for-profit private equity firm trying to create a pipeline that is NOT a public need or use.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

ORIGINAL

IND158-1

The MVP does not involve fracking. It is a transportation pipeline. The FERC does not regulate the exploration and production of natural gas; that is the purview of the states.

# INDIVIDUALS

IND159 – Patricia Curran Leonard

20161101-0007 FERC PDF (Unofficial) 11/01/2016

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

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Pros and Cons II

In an article by *Yale Climate Connections*: **5 Key Issues**

<http://www.yaleclimateconnections.org/2015/05/pros-and-cons-of-fracking-5-key-issues/>

This article had very sound analysis of the hydraulic fracturing industry:

"Research from Cornell has suggested that leaked methane – a powerful greenhouse gas – from wells essentially wipes out any greenhouse gas benefits of natural gas derived from fracking. And at other points in the life cycle, namely transmission and distribution, there are further ample leaks. Falling natural gas prices will only encourage more energy use, negating any "cleaner" benefits of gas. Finally, there is no question that the embrace of cheap natural gas will undercut incentives to invest in solar, wind, and other renewables. We are at a crucial juncture over the next few decades in terms of reducing the risk of "tipping points" and catastrophic melting of the glaciers. Natural gas is often seen as a "bridge," but it is likely a bridge too far, beyond the point where scientists believe we can go in terms of greenhouse gas levels in the atmosphere."

This article again emphasizes that we are at a critical point and FERC has a very serious and comprehensive job to do. Please research everything you can about the energy industry and especially the hydraulic fracturing industry. Research – un-bias scientific research, needs to be the priority of FERC. Do not rush to form an opinion. Ask MVP for clarifying details at each step of the process. Have experts conduct analysis (ensuring they are not being funded by the fracking industry) so that a completed picture of all of the ramifications of this project are known.

Please do not permit MVP to transport gas that is a limited resources. MVP is a for-profit private equity firm trying to create a pipeline that is NOT a public need or use.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

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October 26, 2016

ORIGIN

IND159-1

IND159-1

See the response to comment IND2-3 regarding hydraulic fracturing. See the response to comment LA5-1 regarding preparation of the EIS.

# INDIVIDUALS

IND160 – Patricia Curran Leonard

20161101-0010 FERC PDF (Unofficial) 11/01/2016

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

FILED  
SECRETARY OF THE  
COMMISSION

October 25, 2016

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FEDERAL ENERGY  
REGULATORY COMMISSION

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

ORIGINAL

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Pros and Cons I

In an article by *Yale Climate Connections*: **5 Key Issues**

<http://www.yaleclimateconnections.org/2015/05/pros-and-cons-of-fracking-5-key-issues/>

This article had very sound analysis of the hydraulic fracturing industry:

“First, it is not the case that a new natural gas facility coming online always replaces a legacy coal-fired power plant. It may displace coal in West Virginia or North Carolina, but less so in Texas and across the West. So fracking is no sure bet for improving regional air quality. Second, air quality dynamics around fracking operations are not fully understood, and cumulative health impacts of fracking for nearby residents and workers remain largely unknown. Some of the available research evidence from places such as Utah and Colorado suggests there may be under-appreciated problems with air quality, particularly relating to ozone. Further, natural gas is not a purely clean and renewable source of energy, and so its benefits are only relative. It is not the answer to truly cleaning up our air, and in fact could give pause to a much-needed and well thought-out transition to wind, solar, geothermal, and other sources that produce fewer or no harmful airborne fine particulates.”

That is one of my concerns with the fracking industry that our resources are being diverted from real renewable energy sources. The amount of water it takes to produce the gas out of the rock is costly, requires a high volume and the by-products that remain become a problem wastewater that needs to be disposed of. The gas in each well is limited. FERC should review analysis of un-biased publications on the hydraulic fracturing industry.

Please do not permit MVP to transport gas that is a limited resource. MVP is a for-profit private equity firm trying to create a pipeline that is NOT a public need or use.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

IND160-1

IND160-1

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

# INDIVIDUALS

IND161 – Patricia Curran Leonard

20161101-0015 FERC PDF (Unofficial) 11/01/2016

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

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Pros and Cons III

FILED  
SECRETARY OF THE  
FEDERAL ENERGY  
REGULATORY COMMISSION  
2015 NOV -1 A 9:41  
FEDERAL ENERGY  
REGULATORY COMMISSION

October 27, 2016

ORIGINAL

IND161-1

In an article by *Yale Climate Connections*: **5 Key Issues**

<http://www.yaleclimateconnections.org/2015/05/pros-and-cons-of-fracking-5-key-issues/>

This article had very sound analysis of the hydraulic fracturing industry:

"This April, yet another major study, published in the *Proceedings of the National Academy of Sciences*, confirmed that high-volume hydraulic fracturing techniques can contaminate drinking water. There have been numerous reports by citizens across the country of fouled tap water; it is a fact that some of the tap water has even turned bubbly and flammable, as a result of increased methane. Well blowouts have happened, and they are a complete hazard to the environment. The companies involved cannot be trusted, and roughly one in five chemicals involved in the fracking process are still classified as trade secrets. Even well-meaning disclosure efforts such as [FracFocus.org](http://FracFocus.org) do not provide sufficient information. And we know that there are many who cut corners out in the field, no matter the federal or state regulations we try to impose. They already receive dozens of violation notices at sites, with little effect. We've created a Gold Rush/Wild West situation by green-lighting all of this drilling, and in the face of these economic incentives, enforcement has little impact."

The issue of water has been discussed with drinking water and water used in the production of the gas. I worry about how all of the mitigation and safety and promises that MVP has put in the EIS, how will these processes be overseen by an independent agency? It seems to me that the hydraulic fracturing industry is moving too fast to be thorough of such a critical project?

Please do not permit MVP to transport gas that is a limited resources. MVP is a for-profit private equity firm trying to create a pipeline that is NOT a public need or use.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-928-5184

IND161-1

See the response to comment IND152-1 regarding the FERC's third-party compliance monitoring program. See the response to comment IND2-3 regarding hydraulic fracturing.

CP 16-10-000 Oct 23, 2016

# THE ROANOKE TIMES

IND 162-1

## Questions and answers about the pipeline

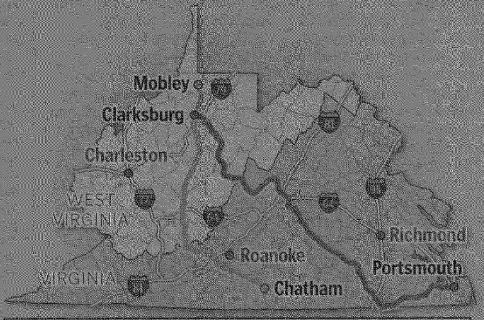
By Bruce Zoecklein

Zoeklein is professor emeritus and former head of the Energy-Geography Institute Group at Virginia Tech. He lives in Blacksburg.

In our society one thing is certain. It doesn't matter if you are rich or poor, as long as you have money. To some, the Mountain Valley Pipeline (MVP) project represents what is wrong with America. That is, economic gain for a few at the expense of the majority. The following is a review of several claims offered by MVP and their supporters.



Bruce Zoeklein



Proposed pipelines: Mountain Valley Atlantic Coast

The Roanoke Times

### The MVP will have no environmental or safety consequences, correct?

Lawsuits and fines for environmental recklessness in other states against EQT, one of the MVP parent companies, are worrisome. They have an established environmental track record. Why should their actions be any differ-

ent in Virginia? MVP has admitted that more than 7000 acres of forested land would be lost as a result of this proposal. Given the report authored by Dr. F. Kastning regarding the karst geology of southwest VA, one wonders why this project has not

been stopped in its tracks. Karst land is composed of sinkholes, springs and caves. Professor Kastning, one of this country's leading authorities on karst soil, reported unequivocally that the proposed

See ZOECKLEIN, 6

ORIGINAL

Page 1 of 2

FILED  
STATE DEPT OF THE  
COMMISSION  
OCT 23 2016  
A 9 48  
FEDERAL ENERGY  
REGULATION COMMISSION

IND162-1

The newspaper article contains incorrect information. Pipeline safety is addressed in section 4.12 of the EIS. There are many existing large diameter pipelines throughout the county that cross mountainous terrain including the Rockies, Sierra, and Cascades. The FERC is funded by the United States Congress, "which has no relationship to the number of approved pipelines or quantity of gas being transported" (Delaware Riverkeeper et al. v FERC No. 16-416 D.D.C Mar. 22, 2016). The FERC regulates the interstate transmission of natural gas, non-federal hydropower, and oil and gas rates, in accordance with the Federal Power Act and the Natural Gas Act. All comments provided at the sessions to take comments on the draft EIS are public, and transcripts of the comments were placed into the public records for the proceeding through the FERC eLibrary system, which is accessible through the internet. The format used in the sessions allowed for the most number of speakers within the timeframe.



IND162-1  
cont'd

## ZOECKLEIN: If you live here, you'll be touched by the pipeline

FROM 1

pipeline cannot be safely built in most of southwest Virginia due to karst land, steep mountain slopes, and the potential for serious erosion.

Additionally, there is the question of whether MVP has sufficient insurance in case of an accident involving the pipeline or compressor stations. They have formed a limited liability company to shield themselves.

A county could be economically devastated by one significant accident, such as occurred in San Bruno, California in 2010 where 40 homes were destroyed and 8 people lost their lives. Citizens are only now getting their day in court six years after that event. Between 1994 and 2013

there have been 5,623 "significant incidents" (costing more than \$5K each), \$6,700,203,540 in losses, 1,397 injuries and 362 deaths.

**The proposed 42 inch high-pressure pipeline will operate at 1,440 PSI for 300 plus miles over steep mountainous terrain. Such an undertaking has never been done before! What could possibly go wrong?**

The Federal Energy Regulatory Commission (FERC) will ultimately decide the fate of this proposal. This agency is funded by the oil and gas industry and created for their benefit. They have denied only one pipeline proposal.

FERC's draft review of the MVP project just released sug-

gested that the impacts to the environment would be "limited." Limited? Their report has caused a limited degree of conflict in the same sense the Pacific Ocean has a certain limited amount of water!

It should be noted that the people doing the environmental review for FERC are paid by MVP. There are only two meetings in our region to discuss the draft report and the environmental impacts of this proposal — Franklin County High School Nov. 2 and Sheraton Hotel, Hershberger Rd., Roanoke, Nov. 3. Both begin at 5 p.m. Comments may be offered — not publicly — but to a stenographer instead of in an open, public forum.

One can only speculate as to the justification for such a

format. It is as if FERC personnel believe that the citizens of this region are in a long-term — yet effective — IQ reduction program and, therefore, should be OK with such an arrangement.

Remarkably, Virginia law allows a for-profit company to take a private citizen's land for their economic gain under the faint veil of 'public' utility. In John Locke's second treatise on civil government he wrote about the interconnection of property, government and revolution. The heart of his argument rests in the idea of the right of government, which he believed clearly resided in the governed, not the governor. More recently, along with Massachusetts, Virginia spearheaded the American Revolution and was the first to adapt

a declaration of citizen rights in their constitution. That declaration established that the role of government is to protect the rights of citizens. It allows that government (and it's agencies) are legitimate only if they are controlled by the people who live under them.

If you live in this region, breathe the air, drink the water and appreciate the scenic beauty — you will be impacted by this proposal. Communicate with local, state and Federal Energy Regulatory Commission personnel and express your views. Attend the environmental comment meetings. Get involved!

**Next Sunday:** More questions and answers about the Mountain Valley Pipeline.



# INDIVIDUALS

## IND163 – Mark Blumen

20161102-5067 FERC PDF (Unofficial) 11/2/2016 11:36:36 AM

Mark Blumen, Alderson, WV.

IND163-1

A coalition of 26 conservation and community groups is calling on the Federal Energy Regulatory Commission (FERC) to revise or supplement its draft environmental impact statement (DEIS) for the proposed Mountain Valley Pipeline. In a 15-page letter sent to FERC today, the groups say the agency has continued a pattern of failing to disclose key information to the public about the considerable impacts to the public and the environment of numerous proposed interstate fracked-gas pipelines.

Mountain Valley Pipeline, LLC, proposes to construct over 300 miles of 42-inch-diameter pipeline from Wetzel County, West Virginia to Pittsylvania County, Virginia. The company also plans to construct three huge compressor stations in Wetzel, Braxton, and Fayette counties, West Virginia. The Mountain Valley Pipeline would move fracked gas from the Appalachian Basin to the existing Transcontinental (Transco) Pipeline in Pittsylvania County for transport to markets in the Northeast, Mid-Atlantic, and Southeastern United States. The Transco Pipeline also feeds into the Dominion Cove Point Pipeline, which could lead to natural gas exports to India and Japan through the recently approved Cove Point LNG export terminal.

"It's clear that FERC published the DEIS before it had all the information required to thoroughly analyze this massive pipeline," said Ben Luckett, staff attorney with Appalachian Mountain Advocates. "FERC even acknowledges it still needs more information about impacts on drinking water sources as well as important streams and wetlands. The public must have access to this crucial information if its review of FERC's analysis is to have any meaning."

The groups point to the Environmental Protection Agency's recent comments concerning several other gas pipelines as evidence of a pattern of FERC inhibiting meaningful public participation. The comments show that FERC regularly allows pipeline companies to withhold critical information about their projects until after the public comment period has ended. EPA has raised these concerns about the proposed PennEast Pipeline, Atlantic Sunrise Pipeline, Sabal Pipeline, Constitution Pipeline, and Leach Xpress Pipeline. FERC is repeating this pattern in its review of the Mountain Valley Pipeline.

"In one project after another, FERC releases an analysis that says the company may supply significant information later in the process, or not at all," said Kate Boyle, Director of Campaigns for Appalachian Voices. "That is precisely what has happened with the Mountain Valley Pipeline, and it deprives affected landowners and citizens of the opportunity to provide meaningful feedback during the public comment period."

The groups also highlight EPA's recent comments on another pipeline project. The EPA called FERC's review of greenhouse gas emissions and climate change "very concerning" in light of recent federal guidance issued by the Council on Environmental Quality in August. That letter was

IND163-1

See the response to comment FA11-2 regarding pending information in the draft EIS. As stated in section 1.2 of the EIS, the MVP cannot be used to export LNG because Mountain Valley did not obtain permission from the FERC or DOE for export. The public comment period for the draft EIS did not end until December 22, 2106, allowing plenty of time for the public to comment on additional information filed by Mountain Valley in October 2016. The MVP has nothing to do with Leach Xpress Project, and comments by the EPA on the Leach Xpress Project are not applicable to the MVP. As stated in section 1.2.3 of the EIS, the EIS is not a decision document; the Commission will make a determination about need and benefits in the project Order.

# INDIVIDUALS

## IND163 – Mark Blumen

20161102-5067 FERC PDF (Unofficial) 11/2/2016 11:36:36 AM

IND163-1  
cont'd

highly critical of FERC's environmental review of the Leach Xpress Pipeline proposed in Ohio, Pennsylvania, West Virginia and Kentucky. EPA requested a "headquarters level meeting" before FERC took any further action. The groups say the DEIS for the Mountain Valley Pipeline is equally deficient.

"In its comments on the Leach Xpress Pipeline, EPA faulted FERC for minimizing the project's climate impacts by comparing its greenhouse gas emissions to statewide emissions, and glossing over emissions from production, transport, and combustion of the natural gas," said Anne Havermann, General Counsel for Chesapeake Climate Action Network. "The Mountain Valley Pipeline DEIS is even worse as it compares the project's emissions to global emissions. As EPA and the recent federal guidance state, this is not an appropriate way to consider the impacts of greenhouse gas emissions."

The conservation groups further faulted FERC for failing to determine if there is any actual public need for the project.

"It is simply unconscionable that FERC is pushing projects that would damage our land and water, take private property, and destroy our public recreational lands without even determining if they are truly necessary," said Laurie Ardison, Co-Chair of Protect Our Water, Heritage, Rights. "This is a clear case of valuing corporate profits over the public welfare."

"FERC continues its trend of failing to adequately review fossil fuel projects when it released the Mountain Valley Pipeline DEIS without adequate information," said Kirk Bowers, Virginia Chapter, Sierra Club. "The release of the DEIS circumvents the NEPA review process, and deprives affected landowners and review agencies of the opportunity to respond to the threats the pipeline poses during the review process. FERC must end its practice of approval without proper review, and should put a hold on the MVP DEIS review until all information is complete and submitted by the pipeline developer."

The letter was signed by Allegheny Defense Project, Appalachian Mountain Advocates, Appalachian Voices, Chesapeake Climate Action Network, Friends of Nelson, Friends of the Lower Greenbrier River, Greenbrier River Watershed Association, Heartwood, Indian Creek Watershed Association, Mountain Lakes Preservation Alliance, Natural Resources Defense Council, Ohio Valley Environmental Coalition, Preserve Giles County, Preserve Greenbrier County, Preserve Monroe, Preserve Montgomery County Virginia, Preserve Newport Historic Properties, Protect Our Water, Heritage, Rights (POWHR), Save Monroe, Sierra Club, Summers County Residents Against the Pipeline, The Border Conservancy, West Virginia Chapter of the Sierra Club, West Virginia Highlands Conservancy, West Virginia Rivers Coalition, and Wild Virginia.

Contacts: Ben Luckett, Appalachian Mountain Advocates: (304) 645-0125

Anne Havermann, Chesapeake Climate Action Network: (240) 396-1984

# INDIVIDUALS

## IND163 – Mark Blumen

20161102-5067 FERC PDF (Unofficial) 11/2/2016 11:36:36 AM

Kate Boyle, Appalachian Voices: (434) 293-6373

Laurie Ardison, Protect Our Water, Heritage, Rights: (30

# INDIVIDUALS

## IND164 – John Snyder

20161103-5002 FERC PDF (Unofficial) 11/2/2016 9:18:00 PM

IND164-1

John Snyder, Summersville, WV.

The DEIS implies that all cultural resource identification tasks in connection with compliance with Section 106 of the National Historic Preservation Act of 1966 have been completed and the consultation with the various State Historic Preservation Officers (SHPOs) is also complete. My e-mail correspondence this date (November 2, 2016) with the West Virginia SHPO staff garnered the following reply: "The consultants are still conducting cultural resource survey work for the Mountain Valley Pipeline project. So the Section 106 process is still in the identification stage and not yet complete. Consequently, we have not yet completed our comments regarding National Register eligible and listed properties." As a resident of Nicholas County, through which the proposed project would pass, and as a historic preservation professional with 35+ years of experience in Section 106 compliance and a genuine concern for the effects of this project on historic resources, I hereby declare my intent as a consulting party as set forth in 36 CFR 800.2(c)(5).

In addition, I note that the U.S. Department of Transportation (USDOT) is named in the DEIS as a cooperating party. I ask specifically whether any permits or licenses will be required from any agency within USDOT, i.e. FHWA or the Surface Transportation Board, for any action of this undertaking such as the crossing of an interstate highway or railroad subject to the jurisdiction of those agencies.

IND164-1

Section 4.10.9.3 of the draft EIS stated "The entire process of compliance with Section 106 of the NHPA has NOT (emphasis added) yet been completed for the MVP." We deny the commentor's request for consulting party status. The commentor has not demonstrated a legal or economic relationship to the undertaking (under 36 CFR 800.2(c)(5)). However, in accordance with Part 800.2(d), the FERC will consider the commentor's views on project related effects on historic properties. We believe that our existing procedures provide the commentor with sufficient opportunities to comment on cultural resources information, provided in section 4.10 of the EIS, without having consulting party status. Table 1.5-1 in the EIS lists permits that must be obtained by Mountain Valley. We are not aware of any permits that would need to be issued by the DOT.

# INDIVIDUALS

## IND165 – Lynda Majorsly

20161103-5017 FERC PDF (Unofficial) 11/3/2016 12:15:20 AM

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

From: Lynda Majors, Registered Intervenor

Date: November 3, 2016

Re: CP16-10 Mountain Valley Pipeline-DCR Proposal for Avoidance of Slussers Chapel Conservation Site

IND165-1

I am adamantly opposed to the Mountain Valley Pipeline project. However, for the purposes of analysis, if FERC decides that the pipeline project is necessary and since the Mount Tabor Variation is now the preferred alternative in an attempt to avoid the Mount Tabor Sinkhole Plain, then the DCR Proposal for Avoidance of Slussers Chapel Conservation Site must be analyzed (Submittal # 20160909-5315). This proposed variation should be limited to a ROW of 50 feet, and the USFS Land Resource Management Plan (LRMP) prescription should also be limited to 50 feet, which would discourage future collocation opportunities for utilities, and would be the least environmentally damaging route, because it would be **outside the boundaries of the conservation site**.

As I mentioned in my letter of September 15, 2016 FERC submittal # 20160916-5026, I live next to Slussers Chapel Cave within the Slussers Chapel Conservation Site. Due to the intimate connection between my well water supply and the water flowing into the cave system I am very alert to the health of the conservation site.

Friday, September 29, after several days of unseasonably heavy rain I took pictures of water flowing into Slussers Chapel cave, water flowing down the steep slope to the cave in a rushing torrent of whitewater,



IND165-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

# INDIVIDUALS

IND165 – Lynda Majorsly

20161103-5017 FERC PDF (Unofficial) 11/3/2016 12:15:20 AM

IND165-1  
cont'd



Individual Comments



# INDIVIDUALS

## IND165 – Lynda Majorsly

20161103-5017 FERC PDF (Unofficial) 11/3/2016 12:15:20 AM

IND165-1  
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and the erosion damage that has occurred despite measures taken by the Cave Conservancy of Virginia to stabilize the slopes and control erosion. Notice that that netting in the last 2 pictures has been washed aside and the fast flowing water has continued to erode the banks and streambed.

Again, please refer to my last letter when I talked about the seasonal flooding events usually occurring in the dormant growing seasons. This is a very important point. The pictures that I am using here show flooding that is mild with a narrow clear stream flowing down to the cave because vegetation is green and still absorbing the moisture in September.

In the late fall, winter, or early spring, when vegetation is minimal, the flood water is silt laden, roiling, and can cover bank to bank in the sinkhole plain before descending into the cave opening. If the Mount Tabor Variation as proposed is approved, Brush Mountain will be stripped bare of trees and vegetation in a 125 foot wide swath from top to bottom, and there will be no "mitigation" of this erosion and sedimentation damage. One good hard rain event during construction, in any season, on the denuded side of Brush Mountain will destroy the cave ecosystem with massive erosion and siltation. This cannot be mitigated once it happens.

This conservation site is not like our roads that will be damaged by construction of the pipeline. We have been told that the roads "will be as good as or better **after** construction of the pipeline is completed". The conservation site is a living system, with many rare, threatened and globally rare species. **The DCR proposed variation would avoid the Slussers Chapel Conservation Site in its entirety.**

A statement in MVP's response to DCR's 'Karst and Cave Information' pertaining to the Slussers Chapel and Old Mill Conservation Sites is as follows: "...no permanent changes to the local surface water hydrology will result from the project." This statement by MVP to FERC is uninformed, and a refusal to acknowledge the professional opinion of the DCR and the "on the ground knowledge" of the local residents.

# INDIVIDUALS

IND165 – Lynda Majorsly

20161103-5017 FERC PDF (Unofficial) 11/3/2016 12:15:20 AM

IND165-1  
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If FERC allows the Mountain Valley Pipeline project to proceed on the Mount Tabor Variation without evaluating the DCR Proposal for the Avoidance of Slussers Chapel Conservation Site it will be a deliberate environmental crime as this will be the willful destruction of the Slussers Chapel Conservation Site in spite of warnings from the DCR and concerned citizens in the community.

Thank you for your attention in this matter.

Sincerely,

Lynda Majors



# INDIVIDUALS

## IND166 – Tim Ligon

20161103-5049 FERC PDF (Unofficial) 11/3/2016 10:30:59 AM

November 3rd, 2016

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

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

Joby Timm, Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

IND166-1

I am writing in reference to the September mailing request for comments on the proposed actions of the US Forest Service in response to the right-of-way (ROW) grant application submitted by Mountain Valley Pipeline (MVP) to construct and operate a natural gas pipeline across the Jefferson National Forest (JNF). I oppose the granting of the ROW changes to the Land Resource Management Plan (LRMP) for this forest, including the designation of a utility corridor in the JNF, which would be required if the application is approved.

I had the privilege of section hiking the entire Appalachian Trail (AT) over a period of 24 years; a journey completed in August of 2015. Anyone who traverses the entire 2180 miles of the AT will experience a trail with incredible diversity in terms of terrain, wildlife, flowers and vistas just to name a few. I enjoyed all aspects of the AT but nothing surpassed the experience of the trail through the U.S. Forests. It was not uncommon to walk through several miles of undisturbed forests that contained pristine streams, mountain top vistas where one could see miles without any sign of civilization all while surrounded by abundant wildlife securely living within a protected corridor. It is becoming exceedingly rare to experience these same things today due to urbanization, electric transmission lines, communication towers and pipeline corridors.

Forest Service land was established to protect our heritage and preserve a small piece of what our founding fathers enjoyed so long ago. These lands provide an opportunity to get away from the artificial urban environment and connect with the incredible nature that surrounds us. Our National Forest support countless numbers of species, crucial habitats for threatened and endangered species and numerous pristine rivers, creeks and lakes. Every citizen of the United States has a responsibility to protect these rare and diminishing environments for future generations just as they have been protected for our generation. It is beyond comprehension that any government, organization or individual would permit the degradation of our National Forest Lands.

The proposed amendments to the JNF are extremely concerning and should not be allowed under any circumstance. Consideration of public input is of the utmost important and must not be ignored by the Bureau of Land Management or USFS.

IND166-1

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

# INDIVIDUALS

## IND166 – Tim Ligon

20161103-5049 FERC PDF (Unofficial) 11/3/2016 10:30:59 AM

IND166-1  
cont'd | **Plan Amendment 1** – Proposed: management prescription (Rx) 5-C Designated Utility Corridors from these Rxs: 4J, 6C, and 8A1. The land allocation would be 500 feet, except as it crosses the Appalachian National Scenic Trail (ANST) and Peter’s Mountain Wilderness. Creating a 500-foot ROW is the first step to the inevitable Utility Corridor or commonly known as “pipeline alley” through the JNF. The environment impact from this ROW is beyond comprehension and at a scale never experienced previously. Unfortunately, this 500-foot ROW will not stop with our National Forest Land but will expand to private land as the rest of the story unfolds in the future.


IND166-2 | **The Project only Amendment 2** – Proposed to permit exceedance of soil and riparian corridor conditions. Both Sinking Creek and Craig’s Creek will undoubtedly experience damage to its riparian banks with the construction. The buffer zones were established to minimize siltation of the associated waterbodies. Additionally, exceedance of soil conditions both ascending and descending Peters Mountain, Sinking Creek Mountain, and Brush Mountain will undoubtedly cause siltation of the waterbodies below, resulting in damage to critical habitats and drinking water resources. Moreover, on the decent from Brush Mountain, the Slussers Chapel Conservation Site would be negatively affected by exceedance of soil conditions. The State owned Slussers Chapel Cave contained within this area has a B3 significance ranking for a rare millipede and isopods. **Amendment 2 should be restated to more accurately articulate its purpose and that is: The MVP construction practices and mitigation plans cannot meet the soil and riparian requirements established by the USFS to protect the sensitive environment contained within specified land tracks. Therefore, we request the USFS to change those rules so we can be in compliance regardless of the damage that will result.**

IND166-3 | **Proposed Amendment 3** – This amendment would allow the removal of old growth trees with the construction corridor. The old growth trees contained in these areas are the heart and soul of the forest lands. Some of these trees have been around for over a hundred years as the result of the USFS protection. Ancient woodlands have developed unique ecological features because they have remained undisturbed for so long. It is incomprehensible that we would allow these trees to be destroyed for a pipeline where most of its product will end up overseas.

IND166-4 | **Proposed Amendment 4** – This proposes crossing the ANST at Peter’s Mountain and the Scenic Integrity Objective (SIO) for the Rx 4A area and the ANST will be changed from High to Moderate. This amendment also requires the SIO of Moderate to be achieved within five to ten years following completion of the project to allow for vegetation growth. **Stated differently, this amendment allows the pipeline to cross the ANST on Peters Mountain because we really don’t care about the impact of this crossing in one of the more scenic/pristine areas of the ANST in SW Virginia. Furthermore, the construction damage will be severe enough that we need the USFS to change their rules again so that we can meet the SIO requirements.**

It is hard to comprehend how any of the four amendments were ever conceived. I request (plead) that the FERC, USFS and BLM reject all four amendments outlined above.

Respectfully Submitted,

  
Tim Ligon  
Blacksburg, VA

IND166-2      See the response to comment FA10-1 regarding Amendment 2.  
See the response to comment CO74-7 regarding Craig Creek and  
Brush Mountain.

IND166-3      See the response to comment FA10-1 regarding Amendment 3.

IND166-4      See the response to comment FA10-1 regarding Amendment 4.

# INDIVIDUALS

IND167 – Alden W. Dudley Jr.

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

FILED  
SECRETARY OF THE  
COMMISSION

25 Oct 2016

2016 NOV -2 A 8:19

ORIGINAL

FEDERAL ENERGY  
REGULATORY COMMISSION RE: DOCKET CP16-10-000

Dear Ms Bose:

IND167-1

The MVP pipeline would not carry oil. Nor is this an LNG project. The pipeline would transport natural gas in a vapor state. Pipeline safety is discussed in section 4.12 of the EIS. See also the response to comment IND2-1 regarding safety. As indicated in section 4.9 of the EIS, it is unlikely that the projects would significantly affect housing prices or the ability of homeowners to obtain loans.

IND167-1

I have lived in ten states and visited all fifty at least twice. My love of travel has also taken me to 70 countries. I am a retired academic physician who directed laboratories at universities and VA Medical Centers. When at the Cleveland Clinic our sons were undergraduate and medical students at Duke University. We would drive down I-77 to Wytheville, up I-81, then south to Durham, NC using various routes to explore the area. We fell in love with the pastoral beauty and were not surprised to learn I-81 from Bristol to Winchester is rated By AAA as second in beauty only to the Pacific Coastal Highway. If only we could retire to this area – heaven.

My Dad worked for Mobil Oil for 41 years from 1931 to 1972. One of his major assignments was to determine the route for the Colonial Pipeline from Houston, TX to Linden, NJ to ship refined liquid products (gas of three grades, diesel, kerosene, heating fuel, etc.) at a speed of about 4 MPH under moderate pressure. It was about 1960, ocean-going tankers were much smaller, and demand was growing. He drove through and flew over all of the states east of the Mississippi. He took the pipeline northeast to Shreveport, LA, but then curved eastward to get around the mountains. Construction would be cheaper and much safer for crewmen. Two pipes would be in the ditch in Houston and product would be offloaded at large inland cities so only one pipe would make it to the northeast. One branch of the pipeline was funneled off to Roanoke to get to I-81! The pipes were welded together with ease. If they leaked, the product was potentially flammable, but not explosive.

When my 1995 assignment to consolidate the Laboratory Services of all eight VA Medical Centers in the New York City area was completed in 2000, we asked my Dad where we should retire. Should it be Charlottesville, Lexington, Roanoke, Asheville, Charlotte, Spartanburg, or Greenville, SC? He knew our preference for mountains, moderate four season climate, natural beauty, wild animals, birding, gardens, sports, symphony, opera, theater, ballet, and museums. His answer was immediate and simple, "Roanoke in a heart beat." We spent a nine day week looking for the right place to buy or build in six counties. Our preferred site was not yet for sale. An ad for Chief of Staff at the Salem VA appeared in the New England Journal of Medicine. I was selected and served from 9/22/01 to 9/22/03. Our site on Sugar Loaf Mountain became available in 2002 and we have lived here since 8/22/03. We see from West Salem to McAfee's Knob, to Tinker, to Eagle Rock, to and beyond the Peaks of Otter, the top of downtown Roanoke, and Vinton. Our three acres are traversed by an 8" East Tennessee Gas line under low pressure so a minimal threat.

My wife of 54 years, Mary Adams Dudley, PhD, died 03/01/14. I still grieve her loss and described her many contributions in a full page obituary in the Roanoke Times March 5-8, 2014. As she weakened, she began telling me to find my childhood sweetheart whom she met briefly at two high school reunions. Unbeknownst to me, careful observation led Mary to admire Gretchen. Mary's final comments were,

# INDIVIDUALS

IND167 – Alden W. Dudley Jr.

IND167-1  
cont'd

"Find Gretchen. She needs you." I did find Gretchen in the middle of mesquite and rocks in the center of Texas, we married 10/15/14, and have celebrated our second anniversary.

The readers got to meet Gretchen Link Dudley on 9/7/16 when she reported in an op-ed her problems with water in Texas even though she lived 100 miles from fracking country. Her experience suggests Greenbrier and Homestead will no longer be able to serve local water. Lakes Moomaw, South Holston, and Claytor are at high risk of contamination and near-total drainage. Smith Mountain Lake is at some risk from the 2,100+ fracking wells in the six counties on the western edge of Virginia (Virginia Dept of Mines, Minerals, and Energy). The New River will also soon be contaminated. West Virginians are already moving to Roanoke to get away from their contaminated wells and streams.

Then came MVP with its proposal to go up and down steep slopes with rocky or fragile soil to push under high pressure explosive, radon-containing, liquid natural gas (LNG) to Norfolk for sale to Europe and India. Norfolk is building a new pier to store large volumes of LNG to pump under high pressure onto supertankers of extraordinary volume. Unaware of the potential catastrophe, our Governor and legislators (at least one sleeping with a highly paid energy company board member) support this "growth in our economy".

Until 1944 natural gas was stored in above ground tank farms (bulk terminals) like we see on US 460 in Blue Ridge and off Starkey Rd in Roanoke. We have occasional petroleum tank truck crashes on I-581 or I-81 and they immolate the driver and truck, but only them. Cleveland, OH had four LNG tanks above ground in October 20, 1944. One riveted seam leaked cold LNG that found a sewer with gas and exploded in the sewers. The heat exploded a second tank minutes later and that exploded the third and fourth in a flash. Half of the energy went north over Lake Erie, taking cars and people with it. The other half flattened one square mile of the city to include two factories, 70 homes, and many underground utilities. Manhole covers were found miles away, just under 200 people were killed, and 600 survivors left homeless. The blast was calculated to be 1/6<sup>th</sup> of the Hiroshima Atomic Bomb ([Wikipedia.org/wiki/Cleveland\\_East\\_Ohio\\_Gas\\_explosion](http://Wikipedia.org/wiki/Cleveland_East_Ohio_Gas_explosion)).

Our neighbors in Appomattox had the misfortune of a 30" LNG pipeline with a pressure of 800 pounds per square inch (psi) corroding and exploding in 2008 with flames over 300 ft high. That left a hole 20 feet deep and 2,250 ft in diameter (almost one half mile) in farmland that exploded two houses and damaged 100 others. Williams and Transco companies were fined \$1,000,000 for improper pipeline maintenance. Excuse me?

MVP proposes a 42" LNG pipeline with twice the capacity of a 30" line to be flowing under 1400 psi, almost twice the pressure in Appomattox. Cut off valves must be installed every 20 miles leaving gas the volume of Cleveland's gas. Further, the MVP proposal stipulates Transco will "co-lay" another 42" pipeline to repeat the damage a few nanoseconds after the first pipe blows. Behind the first wave of air will be a vacuum sucking the second wave to the periphery and well beyond. We will have had our apocalypse. A hole over a mile wide. Instant incineration of all adults, children, pets, animals, vegetation, homes, schools, stores, industry, and government offices over an area 3-5 miles in diameter. As in Cleveland, women wearing black and white checked dresses will be found dead with charred skin

# INDIVIDUALS

IND167 – Alden W. Dudley Jr.

IND167-1  
cont'd

where the black patches had been and white fabric melted to the skin where it reflected away the flash. Dams destroyed and reservoirs gone. Maybe that will put out a small portion of the fires. Thousands of people killed in hill country; tens of thousands near cities; more than that within cities. Radon over the blowhole and downwind like Chernobyl over all of Belarus. Our reputation as an environment friendly state will never recover. Forget tourists and retirees. Forget breweries that can no longer get potable water. In fact, forget economic development.

This article sounds heretical and outlandish. But certainty of a big bang is not only possible; it is predictable. Pipeline companies speak proudly of "only 0.03% events per year per thousand miles of pipeline." At that rate, the 800 mile Trans-Alaska Pipeline from Prudhoe Bay on the Arctic Ocean to Port of Valdez near Anchorage on the Pacific Ocean should have one leak every three years. During 39 years of usage the industry admits to one explosion at a pump station killing one employee and injuring several others, six major spills with some covering several acres (converting them from heat reflecting snow to heat absorbing black oil), and thousands of patches over smaller sites of erosion with or without small spills ([en.Wikipedia.org/wiki/Trans-Alaska\\_pipeline\\_system](http://en.Wikipedia.org/wiki/Trans-Alaska_pipeline_system)). By 2006 the pipe thickness was eroded more than 50% and shipping of oil was down 50% because of less availability and decreased flow rate because of pipe weakness. There have long been more than 500 leaks each year (Brad Knickerbocker, Christian Science Monitor, August 6, 2006).

The Exxon Valdez tanker leakage of millions of barrels of oil into the Bay of Alaska in 1986 led to creation of the federal Bureau of Ocean and Energy Management. The Alaskan branch of this agency studied 1,577 spills (about forty per year) through 2011 that were greater than one barrel in volume ([boem.gov/uploadedfiles/BOEM/BOEM/\\_Newsroom/Library/Publications/113104](http://boem.gov/uploadedfiles/BOEM/BOEM/_Newsroom/Library/Publications/113104)). Since all spills start as pinholes through which highly viscous crude oil under low pressure spits and sputters, most are caught before they reach one barrel in volume. The Colonial Pipeline leak last month caught attention because it cut off supply for most of Tennessee and environs. The smaller 30" pipe explosion in Appomattox caught our attention in 2008 for its proximity. On Sept 9, 2010 a 30" NLG pipe exploded in San Bruno, CA in the hills two miles west of the San Francisco Airport. It registered as a 1.1 earthquake, created a rocky hole 40 feet deep, 167 feet long, and 26 feet wide, killed 8 people, shot flames 1,000 feet into the air, took 60-90 minutes to cut off the valve, was an eight alarm fire (25 fire engines, four air tankers, two attack planes, and one helicopter with special fire-fighting equipment) that burned over 12 hours destroying 38 houses and several streets. Over 70 lawsuits were filed against PG&E Directors and Board Members and regulatory agencies. Federal inspectors found the affected pipe to have defective welds, serious erosion areas, and to have easily detectable faults that had been ignored. On April 1, 2014 PG&E was found guilty by a federal jury of many safety violations, obstruction of justice, and illegally moving more than \$100 million in designated safety funds to executive compensation and bonuses. ([en.Wikipedia.org/wiki/2010San\\_Bruno\\_pipe\\_explosion](http://en.Wikipedia.org/wiki/2010San_Bruno_pipe_explosion))

By industrial 0.03% admitted leaks, the 301 mile MVP line should have only one "event" every ten years. By Alaska Pipeline experience, there should be 500 events X 301/800 miles or 188 leaks/year. But Alaska is under low pressure and Virginia under high pressure. Alaska has thick, lowly flammable crude oil; Virginia has highly explosive radioactive LNG. Even if there is only one leak/month instead of 15, where



# INDIVIDUALS

IND167 – Alden W. Dudley Jr.

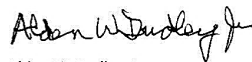
IND167-2 would you prefer to raise your family? Will you be able to afford your home insurance? Will you be able to afford a retirement center if you cannot sell your home?

If MVP comes through Virginia, I will be looking to relocate as soon as possible, even though my home is over five miles from the path. Its real estate value would still be at risk. And Smith Mountain and Leeville Lakes? The path goes east of Rocky Mount through Glade Hill, Union Hall, and Penhook. Both lake dams are in jeopardy. Franklin county real estate values have already started to decline and home insurance rates to climb. National insurance companies know what happens around pipelines. Banks are retracting home improvement loan approvals; they know what happens around pipelines. How much more evidence do we need to realize the MVP proposal is homicidal? When the big bang happens, guess who will declare bankruptcy and compensate no one? They may have some sense of guilt, but their personal fortunes will remain untouched. All of this for a pipeline that is not even necessary.

IND167-3 How will an infuriated public get revenge or compensation? Class action suits will be filed against all persons that supported the pipeline. The Governor and State Legislature pushed for and enacted an illegal exemption from eminent domain laws for governmental agencies only to grant special privileges for Dominion Power, Appalachian Power, and several pipeline groups for now and the future. The federal Senators and Representatives claim not to be taking a position, but some of them created the untouchable Federal Energy Regulatory Commission (FERC). They also supported House Bill HR1900, "Natural Gas Pipeline Permitting Act" that, "requires FERC to approve or deny a Certificate of Public Convenience or Necessity no later than 12 months after providing public notice of the application." This was supported by 98% of Republicans, including Goodlatte, Griffith, and Hurt, and 13% of Democrats. The Senate took it one step further with S2012, "North American Energy and Security and Infrastructure Act of 2016". This bill requires all agencies to approve an application within 90 days of FERC awarding a Certificate of Public Convenience and necessity. It was supported by Sen Kaine and Warner and Rep Goodlatte, Griffith, and Hurt (passed in the House along party lines).

The several corporations constituting the MVP group will also be held accountable. That includes Roanoke Gas Company Directors and Board Members, such as Maryellen Goodlatte, recipient of 15,435 shares of RGCO shares (value on 10/25/16 of \$377,540) and likely a similar amount in cash for attending committee and board meetings. Directors and Board Members of Con Edison of New York and other partners should also be sued in federal court in Virginia since the pipeline crosses state lines. And then there are the members of FERC who rubber stamp applications so they can retire to high-paying jobs in the industry. The Governor, Legislators, Senators, Representatives, Commissioners, and energy executives add up to a lot of people. But does a group that large have enough equity to compensate all families killed and maimed?

Sincerely,



Alden W Dudley Jr  
5909 Winnbrook Dr  
Roanoke, VA 24018-7903

IND167-2 See the response to comment IND28-3 regarding bankruptcy and financial responsibility.

IND167-3 These comments are merely your opinions, are not based on facts, and are not relevant to environmental issues resulting from the construction and operation of the MVP.

# INDIVIDUALS

IND168 – Cathy Helms

ORIGINAL

October 28, 2016

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 NOV - 2 A 3:20  
FEDERAL ENERGY  
REGULATORY COMMISSION

RE: Draft Environmental Impact Statement  
Docket No. CP16-10-000

IND168-1

The EIS concluded that the projects would have limited adverse impacts on most environmental resources, except for clearing of forest. Impacts on water resources, and measures to reduce those impacts, are discussed in section 4.3 of the EIS.

IND168-1

I'm penning my opposition to the  
Mountain Valley Pipeline.

Monroe County nor any other county in  
West Virginia need nor want a  
pipeline of this magnitude (nor any  
other size) destroying our state and  
County's natural resources, as well  
as human life.

Realistically, there is absolutely no  
way you can guarantee that the  
construction process of the pipeline  
would not devastate our valuable  
resource - water. Geologist discovered  
Monroe County to be an area of karst  
(an area of irregular limestone in  
which erosion has produced fissures)  
(a narrow crack; or split in a rock face);

# INDIVIDUALS

IND168 – Cathy Helms

Kimberly Bose, Secretary  
October 28, 2016  
Page 2

IND168-1  
cont'd

sinkholes (occurring in limestone regions and formed by solution or by collapse of a cavern roof); underground streams, and caverns. Do you honestly believe such an unwanted hindrance could be constructed without incomprehensible and unrecoverable results?

IND168-2

Every household in Monroe County would be in jeopardy of illness or death, as would the pipeline construction workers. Heavy equipment digging down into karst terrain is "just an accident waiting to happen" and an unnecessary demise of a machinery operator. Peter's Mountain doesn't need to be tortured and wounded by dozing or erosion and it absolutely doesn't need to be littered with broken machinery within the bowels of its existence.

IND168-2

Karst terrain is addressed in section 4.1 of the EIS. The Applicants would be required to remove all equipment following construction.



# INDIVIDUALS

IND168 – Cathy Helms

Kimberly Rose, Secretary  
October 28, 2016  
Page 3

IND168-3

See the response to comment IND2-1 regarding safety.

IND168-3

I have looked at the intended pipeline route map and have discovered it would closely border my mother's property near Lindside. My mother is 82 years old, on oxygen and requires wheelchair assistance whenever traveling. According to the area of evacuation map, the intended evacuation area hugs closely to her backdoor. What type of warning would be implemented so she and others in the area would have time to safely escape?

Would someone be like Paul Revere and ride a fast steed announcing the pipeline had a leak?!; will a horn blast like they use for tornadoes and will it ring loud enough to be heard County wide? This is yet another area of high concern. Don't try to argue the pipeline would be closely monitored. That, too, is an unrealistic statement.

# INDIVIDUALS

IND168 - Cathy Helms

Kimberly Rose, Secretary  
October 28, 2016  
Page 4

Down through history greed has always been the evil force behind our dark times.

Please look at the whole picture and envision the pristine beauty of this County as life giving, since time began, being marred by the lunacy of man's greed. My ancestors, the Native American, honored the earth for its life giving attributes. They are wise in their understanding that the earth is a nurturing entity for our existence.

Be wise and stop man's evilness of greed and preserve our life. Destroying the earth, destroys us.

Respectfully,  
Cathy Sizemore Helms  
4210 Turkey Creek Rd.  
Union, West Virginia  
24983-8518  
Monroe County

# INDIVIDUALS

## IND169 – Maya Bohler

20161104-5001(31766248)

Maya Bohler, Roanoke, VA.

IND169-1

The proposed natural gas line would cross numerous watersheds, rivers, streams, springs, wetlands and riparian areas. It would travel through more than 50 miles of National Forest property. These are highly sensitive environmental areas at the headwaters of many of our rivers in Virginia. It would impact the nationally known and highly popular recreational features including the George Washington Forest, the Blue Ridge Parkway, the Great Eastern Trail, and the iconic Appalachian Trail.

Piping gas through a mountainous earthquake zone is a very high-risk proposition. There is no precedent for a 42" pipeline crossing terrain like ours. This extreme size compounds the danger in the event of pipe failure.

As a resident of Roanoke and avid hiker in our beautiful mountains, I want to preserve the pristine beauty of our state. I also strongly believe that our efforts and investment should be directed towards clean energy and getting away from fossil fuels.

Stopping proposed pipelines is one step in the right direction.

IND169-1

The MVP pipeline route would cross about 3.5 miles of the Jefferson National Forest. The MVP pipeline would not cross either the George Washington National Forest or the Great Eastern Trail. The crossings of the ANST and Blue Ridge Parkway are discussed in section 4.8 of the EIS. Earthquakes are discussed in section 4.1 and water resources in section 4.3. See the response to comment LA1-4 regarding existing 42-inch-diameter natural gas pipelines.

# INDIVIDUALS

## IND170 – Maya Bohler

20161104-5002(31766249)

Maya Bohler, Roanoke, VA.

IND170-1

MVP will not bring jobs and economic benefits to the region. Workers are generally transient employees with specialized skills that follow pipeline construction from state to state. For every \$1 spent by the pipeline company, our region will lose \$3 (Key-Log Economics, 2016) as a result of lost property values, tax revenues, road/infrastructure damage, slowed tourism, aesthetic view shed loss, watershed loss, etc. (see their report at [www.keylogeconomics.com](http://www.keylogeconomics.com)).

IND170-1

As explained in section 4.9 of the EIS, if the projects are authorized, construction would result in temporary jobs. The KeyLog study did not provide facts to back-up its conclusions.

# INDIVIDUALS

IND171 – Maya Bohler

20161104-5003(31766250)

Maya Bohler, Roanoke, VA.

IND171-1

Pipelines are not safe. There have been reports of thousands of explosions, leaks, and water pollution. The proposed route of the MVP is in an ecologically fragile region with porous karst formations, steep grades, and many endangered species. The damage to the region would be an ecological disaster. FERC has failed to show that the project is needed to meet demand for natural gas and failed to adequately consider environmental threats.

IND171-1

See the response to comment IND2-1 regarding safety. Impacts on water resources, and measures to reduce those impacts, are discussed in section 4.3 of the EIS. Karst and steep terrain is discussed in section 4.1 of the EIS, and endangered species in section 4.7, and safety in section 4.12. The Commission will make a determination about need and benefits in the project Order.

# INDIVIDUALS

## IND172 – Mark Blumen

20161104-5047(31766443)

Mark Blumen, Alderson, WV.

ATTENTION FERC

IND172-1

LAST EVENING I SPENT 2 HOURS DRIVING FROM HOME AND BACK TO THE FERC COMMENT LOCATION ON THE DEIS IN PETERSTOWN WV,.

THE METHOD AND FREQUENCY OF SUCH MEETINGS , DESIGNED TO BE AT GREAT EST DISTANCES , CREATES AN ECONOMIC BARRIER FOR THE LOW INCOME , POOR , ELDERLY ,AND SICKLY , THE HARDSHIPS ENCOUNTERED BY THOSE UNABLE TO MAKE THESE MEETINGS DUE TO THE DRIVING DISTANCE , ROUTES THRU THE RAINY MOUNTAINS AT NIGHT , DOES NOT GIVE THE PUBLIC FAIR ACCESS.

MVP IS REQUIRED TO MAIL COPIES TO PUBLIC LIBRARIES, YET THE SUMMERS COUNTY LIBRARY DOES NOT HAVE A COMPLETE RECORD OF ALL INFORMATION AVAILABLE. AS PER AN AFFLICTED NEIGHBOR WITH THE PIPELINE DISEASE, THAT IS PLANNED TO RUN NEAR HIS HOME, DEFINITELY IN THE BLAST ZONE AND TO MAKE MATTERS WORSE THERE IS NO INDEX TO ALL THE INFORMATION.

THIS KIND OF ECONOMIC INJUSTICE MUST BE STOPPED. THESE MEETING DURING THE WORK WEEK ON EVENINGS BEGINNING JUST AS PEOPLE ARE GETTING OUT OF WORK AND THEN MAKING THEM HAVE TO DRIVE, FOR SOME MUCH MORE THAN A HOUR IS UNJUST! THEN THERE IS THE INCOMPLETE DRAFT EIS CD THAT ARRIVES IN THE MAIL BUT THOSE THAT CANNOT AFFORD A COMPUTER WITH A CD DRIVE. SOME COMPUTERS THESE DAYS DONT HAVE A PORT, OR THE RECIPIENT DOES NOT UNDERSTAND HOW TO WORK A COMPUTER IS JUST ANOTHER FORM OF DISCRIMINATION. THERE ARE WAYS TO MAKE THIS INFORMATION AND ACCESS EASILY AVAILABLE BUT FERC WITH ITS NEW NO OPEN MEETINGS POLICY IS ANOTHER INJUSTICE.

IS THIS THE AMERICAN WAY?

IT APPEARS TO MANY THAT THE PATH FERC HAS CHOSEN IS MEANT TO LIMIT INPUT AND PUBLIC PARTICATION.

IND172-1

The sessions to take comments on the draft EIS were public. They were spaced about equal driving distance for people living along the pipeline route. Copies of the draft EIS were sent to public libraries in the project area; including libraries in Summers County, West Virginia. Hard copies were made available to those who requested them. Economic justice is addressed in section 4.9 of the EIS. See also the response to comment LA2-1 regarding the draft EIS comment sessions.

# INDIVIDUALS

IND173 – Brian Carroll

20161104-5053(31766990)

Brian Carroll, Roanoke, VA.

MVP

Good Afternoon

IND173-1

I would like to thank you for the opportunity to say my peace on this issue! First I believe it is important to state that, a corporation must be prepared before undertaking a project of this scope, It is arguable that the participants in this project had prepared anything more than preliminary engineering and economic studies. I would suggest that the participant's reliance upon the regulatory process to do their work (regulatory malaise) has cast a pall over this project from the start.

MVP officials and planners were unaware and unprepared for the opposition they experienced. This lack of preparedness made representatives look like bumbling fools and discounted the realities of their messages. Institutional complacency translates into higher institution costs due to delays and an increased cost of capital for projects.

All that having been said, regulatory certainty is the only way in which projects of this cost and scope will be undertaken, realistically, the process for approval has become a policy failure its application remains uncertain as in the case of the keystone pipeline and the process irregularities generate economic uncertainties so burdensome large scale power projects become just bigger NIMBY targets.

If the public need is truly there (the responsibility of the project originator to prove in addition to the economic viability), then the approval by FERC should not be so time consuming! I believe the need is there and the economic benefit will far outweigh the local disturbance experienced, but I also believe this process was bungled from day one!

A process needs to be designed to mitigate the inordinate time required to locate and construct a power generation or transmission facility. This process is needed whether the facility is natural gas, coal, or nuclear, the process must be based upon clearly defined and predictable rules and established time lines. This process must be created to facilitate the restoration and development of the nation's large scale power infrastructure!

A proactive mechanism must be created to reduce land use conflict for the transmission of all energy types with defined corridors and identifiable community and state participation. This mechanism must also facilitate the surety of cross border interchange of energy between NAFTA participants as needed!

I support this project, and hope for rapid and professional conclusion to this deliberation! I also hope for an equally responsible and vigilant construction process and the demonstrated operational expertise touted at the initiation of this project.

Best Regards

Brian Carroll

IND173-1

The Commission would make a determination about need and benefits in the project Order.

# INDIVIDUALS

## IND174 – Renee D. Godard

20161104-5073(31767395)

Renee D Godard, Eagle Rock, VA.

IND174-1 | The environmental analysis for the MVP has been inadequate. The number of streams the pipeline will cross and the relatively shallow depth the pipeline is problematic. The impact on natural water resources for both the natural environment and drinking water sources for people. The large microbreweries Deschutes and Ballast Point came to the area because of our water quality. This pipeline makes our water quality vulnerable and has the potential to impact the economy of our region.

IND174-2 | The pipeline should not cross national forest land. The pipeline fractures habitat and makes already vulnerable populations more vulnerable. National forest land was not intended for private enterprise which has the potential to negatively impact the long term functioning of the forest.

IND174-3 | This region will not benefit from the gas being transported but the private company will benefit greatly. The pipeline needs to be reconsidered. We need to diversify our energy portfolio not make long term commitments to fracking as a source of energy.

IND174-1

We disagree. The EIS is adequate to comply with NEPA. Impacts on water resources, and measures to reduce those impacts, are discussed in section 4.3 of the EIS.

IND174-2

The FS will decide if the pipeline can cross NFS lands.

IND174-3

The Commission would make a determination about need and benefits in the project Order.



# INDIVIDUALS

IND175 – Amber O. Akers

20161104-5082(31767479)  
Amber O Akers, Rocky Mount, VA.

IND175-1 | I am writing to express my sincere dismay at the thought of this gas pipeline coming near my house. I am listed in the "blast zone". This is a total crazy idea when it doesn't benefit me in any way or the other fine folks of Franklin County. It is my understanding that it only benefits the gas company and people in Europe???

IND175-2 | This is totally nuts! Why the hell would anyone in our beautiful FC even agree to this? Why would I want this near my land that my husband and I have worked so hard for 30 years to obtain. This will only hurt my property value immensely and puts me and my kids and my future grandchildren at risk of being killed in the blast zone. My property value will drop so much that I wouldn't even be able to sell it! If I did sell it, it would only be at a tiny fraction of what it should be worth! We already have a damn industrial park coming up the road and if that isn't bad enough now I may die from this pipeline! Who the hell would want any property that comes near anything as dangerous as this pipeline? It is crazy to think that someone could come in and just TAKE my property!!

IND175-3 | Let them put the damn thing in Europe! Franklin County is a highly historical area with new artifacts being found all the time! I am trying to protect my property so I can pass my land down to my kids and future grandchildren but I certainly wouldn't want to endanger them by putting them in this blast zone.

IND175-4 | It is also my understanding that you can then come and put yet another pipe in the future also whenever you see fit! I am furious about this! Take it somewhere else!!!!!!!!!!!!!!!!!!!!!!!!!!!! LEAVE FRANKLIN COUNTY!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

- IND175-1 See the response to comment IND2-1 regarding safety.
- IND175-2 See the response to comment CO2-1 regarding benefits of the project.
- IND175-3 See the response to IND2-3 regarding export.
- IND175-4 See the responses to comment IND12-1 regarding property values.
- IND175-5 Cultural resources are addressed in section 4.10 of the EIS.
- IND175-6 Any additional pipelines, taps, or compressor stations would require an amendment or new application, with a new or separate NEPA review by the FERC staff and additional permitting by other local, state, and federal agencies.

# INDIVIDUALS

## IND176 – Jacqueline Lucki

20161107-5000 FERC PDF (Unofficial) 11/4/2016 5:54:42 PM

Jacqueline Lucki, Bent Mountain, VA.

IND176-1 Your environmental study (on which you spent millions to gloss up the outside of the book so that it might distract the public from the gross inaccuracies contained within) is an insult to the citizens of southwest Virginia who are expected to swallow these lies. It is a well known fact that pipelines cause irreparable devastation to the environment - poisoning the water, destroying wildlife, plants and the air we breathe. Not to mention the

IND176-2 almost monthly explosions which result in death or dismemberment of OUR CITIZENS!! This is a travesty which Virginians will fight to the end.

IND176-1 The EIS does not contain gross inaccuracies; of which you failed to identify any. See the response to comment LA5-1 regarding preparation of the EIS. The EIS discusses impacts on water resources in section 4.3; wildlife in section 4.5; air quality in section 4.11; and safety in section 4.12.

IND176-2 See the response to comment IND2-1 regarding safety.

# INDIVIDUALS

## IND177 – Justin Raines

20161107-5003 FERC PDF (Unofficial) 11/5/2016 7:08:07 AM

Justin Raines, Walkersville, WV.

IND177-1 The DEIS states that 78% 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 is critical in evaluating the impacts of pipeline construction and must be included in a supplemental EIS.

IND177-1

As listed in table 2.4-2 of the EIS, Mountain Valley provided a revised *Landslide Mitigation Plan* in March 2017. Section 4.1 of this final EIS has been revised to discuss the revised plan.

# INDIVIDUALS

## IND178 – Chris Resa

20161107-5005 FERC PDF (Unofficial) 11/6/2016 4:40:35 PM

IND178-1

chris resa, glade hill, VA.  
As a concerned Virginian, I would like to have documentation showing that there is a need for natural gas in Virginia. The proposed Mountain Valley Pipeline will adversely effect the environment, economics, and safety of Virginia's citizens. The forest damage, property value loses, and air and water pollution are significant issues that need to be addressed. Who stands to benefit from this pipeline? Not Virginians.

IND178-1

The Commission would make a determination about need and benefits in the project Order. The EIS addresses impacts on forests in section 4.4, water in section 4.3, property values in section 4.9, air quality in section 4.11, and safety in section 4.12. See the response to comment CO2-1 regarding benefits of the project.

# INDIVIDUALS

## IND179 – Maya Bohler

20161107-5008 FERC PDF (Unofficial) 11/6/2016 9:19:25 PM

Maya Bohler, Roanoke, VA.

Comments on FERC's Draft Environmental Impact Statement for proposed MVP and the Forest Service's Plan Amendments:

- IND179-1 The draft environmental impact statement for the proposed MVP is inadequate. It does not address in depth the following issues:  
- Steep slopes, sinkholes and caves, endangered species, potential hazards to water quality, erosion and sediment, impacts on private and public water supplies. The steep slopes the pipeline would traverse would defy efforts to restore vegetation.
- IND179-2 - There are public safety issues: How can we be sure that leaks will not pollute the water? That an earthquake will not damage sections of the pipeline? We know that there will be leaks, and there will be earthquakes, which could mean a disaster in the porous karst terrain of our mountains.
- IND179-3 - The MPV pipeline would plow through or pass below two recreational assets considered by many to be national treasures - the Appalachian Trail and the Blue Ridge Parkway. Using the lure of these natural treasures, we are trying to attract business to the area. Why would we, at the same time, be willing to spoil our protected areas and beautiful vistas?
- IND179-4 - It is very short-sighted to invest millions of dollars in a project with a life span of about 10 years that would impact the landscape in a negative way forever. We know that fossil fuels are being phased out. Fracking is another disaster and would be encouraged further by building this pipeline. It would be better for the local economy and for the planet to invest these millions of dollars in renewable energy which has the potential to create jobs for people who live here and work here, not for transient workers who move with the pipeline, passing through the area for a short time while it is being built.
- IND179-1 The EIS is not inadequate; and complies with NEPA. Steep slopes, sinkholes, and caves are addressed in section 4.1 of the EIS. Erosion and sedimentation are addressed in sections 2.0 and 4.2; water quality and water supplies in section 4.3; and revegetation in section 4.4.
- IND179-2 Earthquakes are evaluated in section 4.1 of the EIS. Section 4.3 of the final EIS has been revised to state that: "In the case of a natural gas leak within a waterbody or groundwater, the gas itself would not impact water quality as it is not miscible and would bubble up through the water and into the atmosphere."
- IND179-3 Impacts and proposed mitigation measures for the ANST and the Blue Ridge Parkway are discussed in section 4.8 of the EIS.
- IND179-4 As stated in section 2.7 of the EIS, the useful life of the projects is expected to be about 50 years. Renewable energy alternatives are mentioned in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

# INDIVIDUALS

IND180 – Charles W. Maus

20161104-0015 FERC PDF (Unofficial) 11/04/2016

Charles W. Maus  
2563 Split Rail Road  
Shawsville, Virginia 24162  
540.381.0790  
[cwmaus@hughes.net](mailto:cwmaus@hughes.net)  
October 24, 2016

ORIGINAL

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

SUBJECT: FERC CP16-10 Mountain Valley Pipeline – VA Slussers Chapel and Mill Creek Areas Re; VA Department of Conservation and Recreation September 19, 2016 Proposal


Dear Secretary Bose,

This letter is to note my support to conduct an assessment of the subject proposal to consider avoiding the potential negative impacts to sensitive Slussers Chapel – Mill Creek karst environs. In addition to considering the subject, I would like to echo others in emphasizing the need for attention to karst area storm water / trench drainage design and pipeline construction management / inspection.

Prior to my 2003 retirement, I held several positions that exposed me to karst area pipeline and structures construction and operations problems. These and my lay hobby of karst terrain exploration, documentation and conservation education has shown me the critical need for experience driven construction and associated inspection / overview.

It is my hope that, if constructed, this large diameter pipeline's construction will be an opportunity for the industry and the regulatory agencies to set new high standards.

Thank you for your consideration to this matter,

  
Charles W. Maus,  
Citizen Intervener

FILED  
SECRETARY OF THE  
FEDERAL ENERGY  
REGULATORY COMMISSION  
2016 NOV - 4 P 4: 31

IND180-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

IND180-1

# INDIVIDUALS

IND181 – Patricia Curran Leonard

20161104-0020 FERC PDF (Unofficial) 11/04/2016

ORIGINAL

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

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Gas-fired power plant NOT A PUBLIC UTILITY

In an article in the Richmond Times Dispatch titled: Gas-fired power plant proposed for Charles City County, there are many areas that describe the very thoughts I have had about the Mountain Valley Pipeline project:

"Usually we look at it from a lot of different perspectives with regard to the need for the project, the impact on reliability, the public interest in the project," said Andy Farmer, a spokesman for the commission, whose staff will evaluate construction plans, the company's financial statements and other information before making a recommendation to the commission. "This is not a utility, so we're not looking at rate impact, we're looking more in the case of how it would impact the reliability and need."

FERC – take a look how this board commission has approached this local Virginia project. They are taking their project first to the people in the community. They are asking for public input, they are keeping all of the FACTS about what the economic impact will be to their community right out in front. The Charles City County Board of Commissioners has looked at a lot of different perspectives. They have evaluated the need. With everything I have read in the EIS, FERC has taken a position based in the oil and gas industry sided positions, studies, mitigation plans, and are basing their recommendation about this project on this very bias set of research.

FERC – take a look at unbiased data, take your time and evaluate this project the correct way, the way you would do it if a 42 inch pipeline was forced on or near your property. Please take a look at the article yourself at:

[http://www.richmond.com/business/article\\_6078be49-0275-549a-801b-b1709d6dbef9.html](http://www.richmond.com/business/article_6078be49-0275-549a-801b-b1709d6dbef9.html)

Do not approve the MVP pipeline project. This is NOT a public utility nor is it a public good.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

October 30, 2016

FILED  
SECRETARY OF THE  
COMMISSION  
2016 NOV -4 P 4: 31  
REGULATORY COMMISSION

IND181-1

See the response to comment LA5-1 regarding stakeholder comments. Section 1.4 of the EIS details public participation in our environmental process. The Commission would make a determination about need and benefits in the project Order.

IND181-1

**INDIVIDUALS**  
**IND182 – Patricia Curran Leonard**

20161104-0021 FERC PDF (Unofficial) 11/04/2016

**ORIGINAL**

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

FILED  
SECRETARY OF THE  
COMMISSION  
October 31, 2016  
2016 NOV -4 P 4: 33  
FEDERAL ENERGY  
REGULATORY COMMISSION

FERC  
Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project – Using the Coach as the Referee

IND182-1  
IND182-2  
IND182-3

It is very clear after reading many parts of the EIS that FERC is rendering a decision on the EQT's MVP project based on research from within the oil and gas industry. I have done my own research and found opposing studies and research that highlight the lack of NEED for natural gas, the sheer number of natural gas projects is now tilting to over-load, the water crises that the process of hydraulic fracturing brings to alarming proportions. The economic impact by MVP would have the public believe that this pipeline will provide communities a positive effect but in EVERY article and my own local research, the only benefit of these projects will go to EQT and their shareholders. In fact, there are many articles that prove there will be a negative impact in the billions of dollars if the MVP is allowed to build the pipeline.

“The report, commissioned by POWHR, Protect Our Water, Heritage, Rights, estimates the total cost to an eight-county region in southern West Virginia and southwest Virginia is between \$8 billion and \$8.9 billion in present value terms.

That figure includes between \$65.1 million and \$135.5 million in the short term as construction strips forests and other productive land bare and as private property values will decline due to the dangers and inconvenience of living near the pipeline's route.”

FERC – please read the full article below. The EIS is like using the coach to referee the game. Why is FERC so bias towards the oil and gas industry. Your mission statement states you are an independent agency working towards the public safety. But, the EIS is a document filled with FERC rendering a decision by only taking what MVP has fed you with promises of mitigation plans and use of EQT Foundation funding but where is the evidence? Where are those mitigation vetting research? Where have those mitigation plans been analyzed? Why does FERC discredit all other sources of information and not include those in the EIS?

Do not approve this money making EQT business proposal. This is NOT a public need or utility.

[http://www.register-herald.com/news/study-pipeline-could-cost-communities-billions/article\\_b0c9856a-7d38-5d59-a2d8-35ce95797416.html](http://www.register-herald.com/news/study-pipeline-could-cost-communities-billions/article_b0c9856a-7d38-5d59-a2d8-35ce95797416.html)

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

IND182-1      See the response to comment IND47-1 regarding preparation of the EIS. The document is based on independent research.  
  
IND182-2      The Commission would make a determination about need and benefits in the project Order. The MVP is a transportation pipeline; the project does not involve fracking which is an exploration and production methodology that is regulated by the states, not FERC.  
  
IND182-3      See the response to IND137-1 regarding the KeyLog report.



# INDIVIDUALS

## IND183 – Bruce Zoecklein

20161107-5173 FERC PDF (Unofficial) 11/7/2016 2:11:55 PM

November 1, 2016

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

Joby Timm, Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway  
Roanoke, VA 24019

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

IND183-1

I writing to comment on the proposed actions of the Forest Service in response to the right-of-way application submitted by Mountain Valley Pipeline (MVP). They want to be able to build and operate their pipeline across the Jefferson National Forest.

I oppose granting their request for a right of way change to the Land Resource Management Plan (LRMP) for the forest. Further, I am opposed to the designation of a utility corridor in the Jefferson National Forest (JNF) which I understand would be required if the application is approved.

The Federal Energy Regulatory Commission (FERC) is an arm of the oil/gas industry operating under the guise of a federal agency. It is my hope that the Forest Service actually considers public interest.

Our national forests are not given to us by our parents but are on lone to us by our children. The national forest if for all Americans, not for a for-profit private corporation. The forest is a complex ecosystem that supports a rich and diverse animal and plant system, provides value water shed, recreation, athetic and economic benefit to our region. The forest is a major economic engine generating tourism revenue from hunting, fishing, hiking, biking etc., and promoting the health and well- being of local residence.

We must preserve unspoiled and pristine environment for future generations and, therefore, land management is vital to our region. The Jefferson National Forest land contains old growth trees, grasslands that support many species, critical habitats for threatened and endangered species, and many water bodies.

IND183-1

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

# INDIVIDUALS

## IND183 – Bruce Zoecklein

20161107-5173 FERC PDF (Unofficial) 11/7/2016 2:11:55 PM

IND183-1  
cont'd

All of the proposed amendments to the Jefferson National Forest management plan are all very unsettling. It is hoped that public input is taken seriously and not be ignored. The 1992 film A River Runs Through It was hugely popular because it reminded people of the great outdoors where they find peace, tranquility and recreation. At the time of film's release no one would have guessed the our national forests could possibly be sacrificed for the sake of a for-profit company and their economic gain. James Lovelock's Gaia hypothesis advances that the earth is influenced by life to sustain life. In other words, there is a connection between man and his natural environment is essential for life. Many agree.

**Plan Amendment 1 Proposal.** management prescription (Rx) 5-C Designated Utility Corridors from these Rx's: 4J, 6C, and 8A1. This would allow for a 500 feet corridor, (except across the Appalachian Trail and Peter's Mountain Wilderness).

A 500-foot right of way would create a waste land pipeline alley through not simply national forest but also private land! Naturally, there is a direct correlation between what the Forest Service does with it's land and what would occur with adjacent private lands. Beyond the degradation of the forest, this could put private farms out of business. It is simply not economically viable to farm small sub-plots of divided land.

The impact of a 500 foot-wide utility corridor should pose significant conflicts with the LRMP to say nothing of the impacts to private landowners, local communities and the entire region. Such a corridor would open the door for additional pipelines and added degradation of the forest and surrounding lands. If this were amendment were to be allowed the result would have a large and negative impact on adjacent land owner by putting farms out of business.

A proposed Federal legislation (House Resolution 2295) would allow streamlining any environmental reviews. This would mean that landowners, cultural areas, historic districts would be ignored!

To assess the threat posed by erosion in our mountainous region, the U.S. Department of Agriculture weighed seven key variables influencing rain-induced erosion: slope gradient, slope length, soil type, rainfall amount, vegetation condition, and truck and equipment traffic. Their computer model predicted soil loss in tons per acre per year during construction and before as follows:

- 10 percent slope — expected erosion is 34 tons of soil per acre per year.
  - 20 percent slope — expected erosion is 105 tons of soil per acre per year.
  - 30 percent slope — expected erosion is 183 tons of soil per acre per year.
- This is total unacceptable

IND183-2

**The Project only Amendment 2** - Proposed to permit exceedance of soil and riparian corridor conditions

This proposal is also not acceptable. Buffer zones must be maintained to minimize siltation. With the steep slopes of our mountains (Peters Mountain, Sinking Creek Mountain, and Brush Mountain) there will be problems with the water sheds of these

IND183-2

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

# INDIVIDUALS

## IND183 – Bruce Zoeklein

20161107-5173 FERC PDF (Unofficial) 11/7/2016 2:11:55 PM

IND183-2  
cont'd regions. This could damage drinking water sources. It could also detrimentally impact habitats. For example, Slussers Chapel Cave is home for rare a millipede and isopods which would undoubtedly be negatively impacted.  
At the base of Brush Mountain, Slussers Chapel conservation site would be negatively affected by wash resulting from soil erosions. Buffer zones should remain intact to minimize water siltation.

IND183-3 **Proposed Amendment 3** – Remarkably, this amendment would allow the removal of old growth trees within the construction corridor.

Old growth forests possess a unique ecological features mainly due to the fact that they have not been disturbed. Old growth forests are unique. They are our rare natural recourse that cannot be replaced, having taken hundreds of years to develop. It is our responsibly to retain these for subsequent generations.

IND183-4 **Proposed Amendment 4** - This proposes crosses the Appalachian National Scenic Trail (ANST) at Peter's Mountain. This is totally unacceptable.

There is an alternate route that is much less damaging than this proposal. The hybrid Alternative Route 1A crosses the Jefferson National Forest for 1.6 miles vs. the 3.4 miles that MVP desires.

Please preserve our region and this legacy for your grandchildren and my own. Our national forest land is part of our common heritage and part of our mental and physical wellbeing. We have a responsibility to ourselves and those yet unborn to preserve our natural environment. We cannot damage or fragment this wonderful resource for any purpose, but particularly for short-term economic gain.

Submitted,

Bruce Zoeklein

Blacksburg, VA

IND183-3 See the response to comment FA10-1 regarding Amendment 3.

IND183-4 See the response to comment FA10-1 regarding Amendment 4. Section 3 of this final EIS has been revised to discuss the Hybrid 1A Alternative.

# INDIVIDUALS

## IND184 – Timothy L. Dye

20161107-5225 FERC PDF (Unofficial) 11/7/2016 3:31:09 PM

Timothy L. Dye, Rocky Mount, VA.

IND184-1

I have property on 1.78 acres in Franklin County, VA. My wife & I bought this house not only as a place for us to raise a family but as an investment. I feel like FERC & the MVP are threatening both of these areas. We finished off the basement, raised the septic & removed and improved the drainage pipe at the end of our driveway. We had a security system installed, updated the flooring throughout the house and had work done on landscaping including the removal of trees that were close to the house. If the pipeline comes through our property then all of these home improvements will just turn out to be expenses and we're still paying off these projects with no chance of getting a return. That is unless the MVP allocated sufficient funds in their business plan to allow for compensating the property owners of the land required in the way to implement their business project.

IND184-2

A well mannered surveyor from the MVP showed up on my property on August 30, 2016 and said that although the most efficient alternative pipeline route would be to run the pipeline through my house, he was going to try & avoid that and proceeded to place flagged stakes on my property. I do not know how likely this project will actually end up going through my property. And, I do not know what easement or resettlement payments are being offered. However, if the project does move forward across my property due to court imposed rulings then I am asking to be compensated in such a satisfactory manner that the return on my investment is worth the loss in value and quality of life by living in the "potential impact radius".

Tim Dye  
1338 Bonbrook Mill Rd  
Rocky Mount, VA 24151  
540-482-0087 (home)

IND184-1

Landowner issues are discussed in section 4.9 of the EIS. The EIS stated that FERC urges Mountain Valley to reach mutual agreements with landowners for its easements. In negotiations with the company, the commentor can try to find a route across the commentor's property that avoids the commentor's house. If an agreement is not possible, and if the Commission authorizes the project, the company can use eminent domain. In such a case, a court would decide compensation.

IND184-2

See the response to comment IND2-1 regarding safety.

# INDIVIDUALS

## IND185 – Dwayne Milam

20161108-5017 FERC PDF (Unofficial) 11/7/2016 7:10:51 PM

IND185-1

I am writing today to express my dissatisfaction with the handling of the so called "Draft Environmental Impact Statement" for CP16-10-000. As FERC must be aware, there is a limited amount of time for the public to comment on this document, as well as attend meetings sponsored by FERC at only six locations from the 17 counties crossed by the MVP... all prior to December 22nd. Additionally alternate routes have been proposed which effects entirely new groups of families and communities. As of this writing, there have been three significant Friday "document dumps" since the formal DEIS was filed in September 16, 2016...which included 2,671 pages. On 10/24/16 over 100 files and thousands of pages were submitted, 10/21/16 included 1,002 pages and on 10/28/16 another 248 pages were added to the original DEIS. There is also an unknown number of documents missing from the most recent version of the DEIS (which one presumes will be added at a later date). These additional documents have resulted in significant revisions to the initial DEIS. Meanwhile the time for the public to comment continues to lapse.

If FERC indeed wants public comments on the DEIS, why is the DEIS so incomplete and why are there limited meetings scheduled? The so-called "draft" should have all major parts included and should not require well over 2,000 pages of revisions...in addition to an unknown number of documents that will be added at a later date and/or be significantly revised. How is the public, and more importantly the families and communities directly impacted by the MVP to make sense of these non-descriptive file names? How will the "working" public then include these thousands of electronic pages into a readable document and then provide relevant comments of their concerns in the allocated time frame? As FERC must be aware, the DEIS has been issued prematurely and contrary to the stated purpose of gathering public input has instead made public comments even more difficult. The public does not have a private staff, nor virtually unlimited financial resources to print, compile and attend scattered public meetings thru-out the MVP route in the designated comment period as issued by FERC. It appears this is the goal of the DEIS, to stifle public concerns and provide a low level of information to limit valid comments regarding this project.

Dwayne Milam

Alderson WV

IND185-1

The public had 90 days to comment on the draft EIS. See the response to comment LA3-1 regarding the comment period. See the response to comment LA2-1 regarding the draft EIS comment sessions. See the response to comment FA11-2 regarding pending information in the draft EIS. The final EIS summarizes supplemental data filed after the draft EIS was issued.

**More questions and answers about the pipeline**

**By Bruce Zoeklein**

Zoeklein is professor emeritus and former head of the Enology-Grape Chemistry Group at Virginia Tech. He lives in Blacksburg.

*Second part of a two-part series.*

Much has been written about the Mountain Valley Pipeline, some of which may even be true.

**MVP will bring jobs and economic benefits-correct?**



**Bruce Zoeklein**

Pipeline construction is a specialized business; welders, for example, are generally transient employees with specialized skills that follow pipeline construction from state to state. For every \$1 spent by the pipeline company, our region will lose \$3 (Key-Log Economics, 2016) as a result of lost property values, tax revenues, road/infrastructure damage, slowed tourism, aesthetic view shed loss, watershed loss, etc. (see their report at [www.keylogeconomics.com](http://www.keylogeconomics.com))

**We need additional gas pipeline capacity-correct?**

A Department of Energy (DOE) report stated we already have adequate pipeline capacity (Natural gas infrastructure DOE Feb. 2015). Additionally, a study conducted by Synapse Energy Economics (2015) concluded that with minor modifications, the current gas line infrastructure could supply the region at least through 2030.

The Federal Energy Regulatory Commission (FERC) requires a "public need" for permitting a pipeline. However, the only need required is the demonstration of contracts for gas transport. As such, pipeline investors have reasons to celebrate! Lines deliver more than gas, they deliver large profits, estimated to be as much as 14 percent of their investment. Profit is guaranteed by the State Corporation Commission. No wonder you hear so many great things about this pipeline!

**Using gas does not contribute to global climate change-correct?**

Though gas produces half the carbon dioxide of its equivalent in coal, its main component, methane, is a powerful greenhouse gas. Methane goes into the atmosphere from pipeline leaks and compressor station blowdowns. The pipeline could trigger new greenhouse gas pollution equal to a doubling of the state's current power plant emissions (Chesapeake Climate Action Network, 2015). Additionally, pipeline construction would remove more

10/30/2016

THE ROANOKE TIMES 3

FIL IND186-3  
 SECRETAR cont'd  
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FEDERAL ENERGY REGULATORY COMMISSION

IND186-1

IND186-4

RIC...

IND186-2

IND186-3

CP 16-10-000  
 1/14 Valley Pipeline

**Gas or water pipelines do not pollute the air**

**Meier-correct?**  
 Methane and other hydrocarbons can escape from pipelines via water condensates and can enter ground water. MVP proposes to build compressor stations on 10 relief plots to move the gas. Hydrocarbons released to the atmosphere during compressor station blowdowns are a health concern and an explosion or major pipeline leak would be disastrous for air quality and our aquifers (see Compendium of Scientific, Medical and Media Findings and harms of fracking gas <http://compendhealthny.org/compendium>).

**Can the gas in the pipeline will benefit citizens of our local counties such as Montgomery-correct?**

Local access to gas will cost about \$5,000 per connection. There is reason to believe that much of the gas proposed across Virginia is destined for foreign export. Europe's gas deposits are four-fifths of the U.S., yet 10 nations have a ban on fracking. I wonder why? There are 25 pipelines proposed for the east, a total of 5 in Va. However, the assumption that shale gas will be cheaper in the future if these lines are built is grossly exaggerated (Drilling Deeper, Post Carbon Institute 2015).

MVP's latest plan calls for a 500 foot-wide path through the Jefferson National Forest to create what they are calling a "Utility Corridor." With 97 stream/river crossings, 53 miles over karst soil, three endangered species threatened, etc. our citizens should carefully decide if this pipeline is acceptable. After all, this land was not given to us by our parents but loaned to us by our children.

The Federal Clean Water Act delegates power to state governors to protect local communities and watersheds from the harmful intrusion of polluters. The Virginia DEQ is under control of our governor and must issue water permits to pipeline companies before construction can begin. This is what Governor Cuomo did in New York to stop the proposed Constitution pipeline. Our governor claims not to have this power, but that is not true.

They say nothing goes faster than the future. If the citizens of this region do not insist that their voices are heard, it may be too late. Communicate with local, state and Federal Energy Regulatory Commission personnel and express your views! Attend the environmental comment meetings at the Franklin County High School Nov. 2 and/or the Sheraton Hotel, Hershberger Rd., Roanoke, Nov. 3. Both begin at 5 p.m.

Luck is the residue of design, therefore, the best way to predict the future is to create it!

- IND186-1 See the response to IND137-1 regarding the KeyLog report.
- IND186-2 See the response to FA11-12 regarding need.
- IND186-3 GHGs and fugitive emissions are discussed in section 4.13.
- IND186-4 See the response to comment IND2-3 regarding export. See the response to comment CO2-1 regarding benefits of the MVP. See the response to comment FA8-1 regarding the 500-foot-wide utility corridor on FS-managed lands.

# INDIVIDUALS

## IND187 – Ann Devine-King

20161109-5002 FERC PDF (Unofficial) 11/9/2016 6:44:20 AM

Ann Devine-King, Morgantown, WV.

IND187-1 I have concerns over the proposed Mountain Valley Pipeline and the DEIS released by FERC.

It's not clear that the environmental impacts have been adequately analyzed. The DEIS indicated that GHG emissions at 40 million tons per year will be produced. What will be the combined impact of existing emissions in addition to these pipeline produced emissions?

IND187-2 Importantly, the DEIS has not documented whether there is a realistic need for the pipeline that might justify the adverse impact. This is a critical requirement of the DEIS process.

IND187-3 In addition, the DEIS fails to provide essential information concerning impacts of the project and that makes it very difficult for me and the public to make informed comments. Impacts not fully disclosed or analyzed include: landslide hazards and mitigation plans, endangered-species habitats, historic impacts, and many site-specific impacts. The DEIS also fails to analyze indirect impacts associated with additional gas drilling and fracking, stimulated by the MVP.

IND187-4 I request that FERC prepare and circulate a Supplemental DEIS that fully analyzes the need for the pipeline, the greenhouse gas impacts, and provides complete information on environmental impacts.  
Thank you.

IND187-1 As stated in section 4.13 of the EIS, the GHG emissions from the construction and operation of the MVP and the EEP would be negligible compared to the global GHG emission inventory.

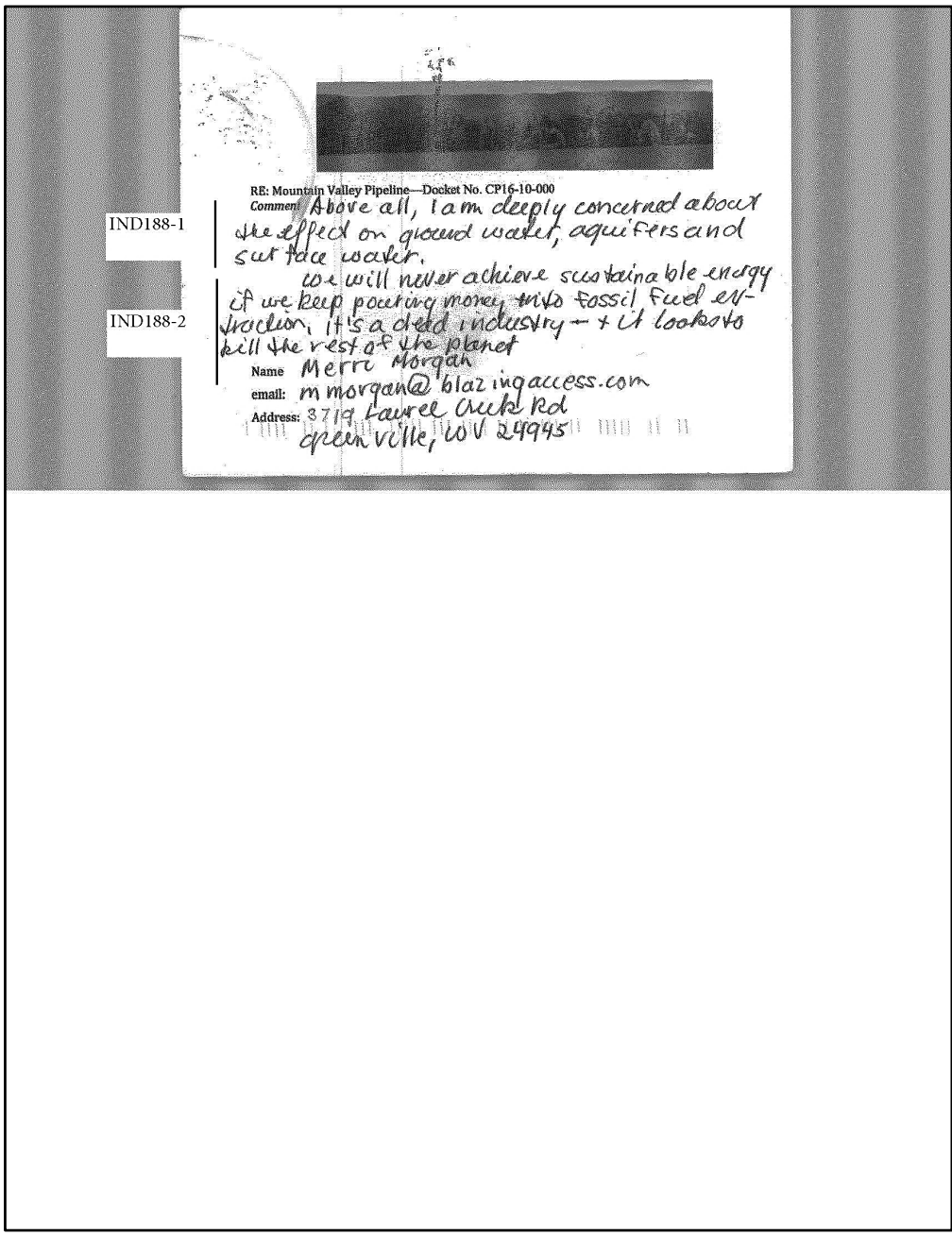
IND187-2 The Commission would make a determination about need and benefits in the project Order.

IND187-3 The EIS addresses landslides in section 4.1, endangered species in section 4.7, and historic sites in section 4.10. See the response to comment IND2-3 regarding hydraulic fracturing.

IND187-4 See the response to comment FA11-2 regarding pending information in the draft EIS. Instead of a supplemental document, the FERC addressed comments on the draft in this final EIS.

# INDIVIDUALS

IND188 – Merri Morgan



IND188-1

IND188-2

IND188-1

Impacts on water resources, including groundwater, aquifers, and surface water, and measures to reduce those impacts are discussed in section 4.3 of the EIS.

IND188-2

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



# INDIVIDUALS

## IND189 – Howdy Henritz

20161109-5054 FERC PDF (Unofficial) 11/9/2016 11:52:31 AM

Howdy Henritz, Greenville, WV.  
November 9, 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

IND189-1

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 SHOUD BE DENIED.

IND189-2

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.

IND189-3

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.

IND189-4

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.

- IND189-1      Opposition to FS LRMP Amendment 1 is noted.
- IND189-2      Opposition to FS LRMP Amendment 2 is noted.
- IND189-3      Opposition to FS LRMP Amendment 3 is noted.
- IND189-4      See the response to comment FA10-1 regarding Amendment 4.

# INDIVIDUALS

## IND189 – Howdy Henritz

20161109-5054 FERC PDF (Unofficial) 11/9/2016 11:52:31 AM

IND189-5

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. Mr. Timm said he would look into that possibility.

WHAT RIGHT DOES THE FOREST SERVICE OR FERC HAVE TO MAKE A DECISION THAT COULD DETERMINE IF I HAVE ACCESS TO A CLEAN WATER SUPPLY, NONE I SAY!

Sincerely  
Howdy Henritz  
916 Casey Creek La  
Greenville, WV 24945

IND189-5

See the response to comment CO33-1 regarding hydrogeologic studies.

# INDIVIDUALS

## IND190 – Timothy Detwiler

20161110-5147 FERC PDF (Unofficial) 11/10/2016 2:10:00 PM

Timothy Detwiler, Monongahela, PA.

We are commenting on the H-318 Cline Minor Route Variation on page 3-87 Equitrans Expansion Project in the Environment Impact Statement Draft. The variation route would be far shorter and affect far fewer cherry forested lands than the proposed route. The proposed route affects three landowners (Sawyers, Detwiler and Cline) with the variation affecting two landowners (Detwiler and Riverview Golf Course). Your route would collocate with your existing Applegate line then turn and follow a Sunoco right of way. We must tell you Sunoco has had considerable problems with the crossing of Rippel Road and Raccoon Run with the very steep topography (numerous slides) and with the landowners of that property. The environmental impact would be significantly less on the variation route since there is less forested land and the land is not suitable for development and as the owners would be much more lineate on the use of that property then the proposed route because it is prime real estate for housing. We must also tell you Sunoco paid a premium price for their agreement.

Thank you very much for your consideration of this variation route.

IND190-1

IND190-1

Equitrans adopted the New Cline Variation into its proposed route.

# INDIVIDUALS

IND191 – Linda L. E. Emrich

20161108-0015 FERC PDF (Unofficial) 11/08/2016

ORIGINAL

CP16-10

Federal Energy Regulation Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

FILED  
SECRETARY OF THE  
11/02/2016  
2016 NOV -8 P 4:34

Linda L.E. Emrich  
414 Sixth Ave.  
Hinton, WV 25951

IND191-1

Our beautiful God's Creation of Life on Earth is being seriously threatened by the for-profit fossil fuel corporations. Our world economy is based on how fast and how cheaply the natural resources can be harvested, with the onset of Climate Change, the fossil fuel corporations are on "GO FOR THE PROFITS OF DOOM" mode. Money is a moving paper fantasy that is supposed to be a tool, not the ultimate desired end goal. For the corporate culture and the big city empire, numbers of money is the life support system. If a corporation does not make a profit, it goes bankrupt and life must evolve around the crash of the economy and the loss of life supporting habitat (i.e. forests, life supporting rivers, lakes, oceans, oxygen rich atmosphere) as no one is responsible for what a bankrupt corporation leaves in its wake. Many of the world populations, these days, have never witnessed the beauty of nature, our National Parks and State Parks, our shrinking wilderness and small farms. The majority of people do not know where their food comes from or oxygen either. An old WV farmer once asked me "Do you know the difference between city folks and country folks?" The answer is that country folk come in to eat and go out to pee, while city folk come in to pee and go out to eat! I moved from NYC, where I was born, so that I could become a farmer and would not have to devote my life to trying to make a lot of money to survive. MVP would put my whole life investment and my child's beautiful life supporting home on the line for the benefit of what? Of whom? Certainly not the local Human Beings, the Great Blue Herons, the Pileated Wood Peckers, the Wild Turkey, the Black Bear, the Mountain Lions, the Scarlett Tanagers, the White Tailed Deer, the Yellow Lady Slippers, the Rue Anemones or any other plant, insect, reptile, mammal, amphibian, reptile or bird species that have their life regenerating roots in the natural top soil of the forest or the ground water, replenished by the rain dispersion through the tree canopy allowing it to filter gently on to the ground rather than washing away the topsoil in a heavy gush of undispersed rain run off.

My late husband, Dr. John Edward Elliston, Ph.D., did break through scientific research on the American Chestnut Tree blight by isolating viruses that would attack and weaken the blight fungus. Some of the American Chestnut Trees that he planted are thriving on our daughter's farm in Pence Springs, WV, 0.08 miles from where the proposed 75' MVP right of way would go, endangering her oxygen and well water supply. This year we saw a Green Heron in front of her house, being less than 1 mile from the Greenbrier River. Near the mouth of the river, above Hinton, three Great Blue Herons are regularly seen, Bald Eagles, Golden Eagles, Scaup and Mallard Ducks, Canada Geese, naturally regenerating species diversity here in Summers County, WV has yet to be documented before the EIS is completed. My mother, Dr. Leona S. Emrich, Ph.D. taught Biology, Botany, Bio-Chemistry and Field and Natural History at William Paterson

IND191-1

The draft EIS was not incomplete. The EIS addresses vegetation in section 4.3, wildlife in section 4.5, and safety in section 4.11.

# INDIVIDUALS

IND191 – Linda L. E. Emrich

20161108-0015 FERC PDF (Unofficial) 11/08/2016

IND191-1  
cont'd

College in Wayne, NJ., she said, "The best way to make a species extinct is to destroy its life supporting habitat." Then, when she moved to Hinton, WV, she said "Oh, it is so beautiful here and you still have the indigenous species." The draft EIS statement is incomplete until the diverse wildlife of eastern West Virginia and the western part of Virginia is taken into account, considered and protection of life supporting habitat becomes a higher priority than numbers of dollars.

Our family has invested everything into Summers County, WV in an attempt to escape the cities and surrounding megalopolis. This is a very good region to live in should one continue to hope to adapt quickly enough to survive the unpredictable and extreme weather conditions that herald the onslaught of climate change. There is no where else for the living to go without some corporation designing paperwork to make a profit. Why can't EQT spare our naturally regenerating life supporting habitats by building their storage and transport pipelines in the coalfields where Mountain Top Removal and Strip Mining have destroyed the life supporting ability of the ruined mountains and most everyone who cared has moved away. Where the streams and ground water have already been polluted, the forests cut and bulldozed, the top soil, that holds the seeds for the natural regeneration of God's beautiful Creation of Life on Earth, is already gone. Run the gas pipeline there and the only vegetation that would be at risk in the case of an explosive "incident" would be some scraggly invasive species of grasses.

IND191-2

EQT and the Corporate Culture want to build this huge gas pipeline through Greenbrier, Summers, Monroe and Fayette Counties, the Mountain Valley Pipeline, FERC Docket CP-16-10. The proposed route goes through the beautiful pristine and sensitive, species diverse headwaters of our mountain streams and rivers, our wells, our oxygen producing most remote life supporting habitats left on planet Earth. The presence of such a monstrous amount of natural gas is a constant threat of instant incineration to all life within a 2,000 foot blast field (in the case of an "incident") and the ensuing fire and oxygen deprivation in the area would extend the threat to the surrounding communities much farther than the EQT right of way. Now I understand that for a corporation to survive it has to make a profit, but when I am told to forget life on this planet and give up the safety of my beautiful home and gardens, I must say NO! Money only works because people believe in it, you can't eat gold, breathe or drink money. When oxygen and clean water are displaced by fossil fuel wastes, Creation will evolve into some anaerobic life forms, I guess but money got made and that is what is MOST important, right? To EQT it is. Their human representatives admitted early on in this process that they would not be

IND191-3

hiring from the local work force and that there would be no gas service benefits to our state and local communities. This particular corporation has a bad record for fatal "incidents" in other areas where they are operating smaller pipelines than the proposed MVP. Any guarantee for safety that the EQT Corporation may offer tempts the fates to show us how irresponsible the for profit corporations are, while subjecting us all to post traumatic paperwork stress syndrome as pipeline "progress" continues. I implore you to JUST SAY NO TO EQT and the

IND191-4

Mountain Valley Pipeline FERC Docket CP16-10. Leave the fossil fuels in the ground and support

IND191-2

The landscape crossed by the MVP pipeline route is not pristine. The region contains roads, mines, wells, pipelines, powerlines, cities, churches, rural residences, farms, fences, and other existing infrastructure. See the response to comment IND2-1 regarding safety.

IND191-3

As stated in section 4.9 of the EIS, local workers would comprise about 25 percent of the workforce during construction. See the response to CO2-1 regarding benefits of the MVP.

IND191-4

Renewable energy alternatives are discussed in section 3 of the EIS. See the response to comment IND2-3 regarding hydraulic fracturing.

# INDIVIDUALS

IND191 – Linda L. E. Emrich

20161108-0015 FERC PDF (Unofficial) 11/08/2016

IND191-4  
cont'd

renewable energy resources while protecting and preserving our life supporting naturally  
regenerating habitats on Earth.

Got Oxygen? Water For Life! Ban Fracking NOW! Protect and preserve our National Forests!

Linda L.E. Emrich Summers County, WV

# INDIVIDUALS

## IND192 – Georgia Haverty

20161110-5022 FERC PDF (Unofficial) 11/10/2016 8:23:23 AM

- IND192-1 Georgia Haverty, Pembroke, VA.  
I am strongly opposed to the Mountain Valley Pipeline (MVP). The MVP as currently proposed runs through the middle of my property, Doe Creek Farm, which is a 400 acre cattle farm, U-pick apple orchard, dog boarding kennel, and wedding venue.
- IND192-2
- The Virginia Department of Historical Resources has recently determined that the entire farm is eligible for historic designation under Agriculture and Architecture, Period of Significance, 1883-1966.
- IND192-2
- The water supply comes from one mountain spring which has been the sole water source for the farm since the 1800's. Construction of this pipeline may destroy the spring and therefore all businesses; not to mention two family homes.
- IND192-3
- The numbers of customers and guests near the proposed pipeline have defined Doe Creek Farm as a High Consequence Area (HCA). This means entire wedding parties, and families and children who take field trips to pick apples and enjoy the farm experience are now within a blast zone.
- IND192-4
- If customers stop booking weddings or coming to pick apples because of the pipeline, a High Consequence Area won't matter, but again, businesses will be destroyed.
- IND192-5
- If businesses are destroyed, 2 families will be displaced. Unfortunately, property values will plummet with the pipeline installation so moving will not be possible.
- THESE CONSEQUENCES ARE UNMITIGATABLE.

IND192-1 Section 4.10 of the EIS was revised to provide a discussion of Doe Creek Farm.

IND192-2 Impacts on water resources and measures to reduce those impacts are discussed in section 4.3 (see also the response to comment IND2-2).

IND192-3 See the response to comment IND2-1 regarding safety.

IND192-4 Impacts and mitigation on tourism are discussed in section 4.9 of the EIS.

IND192-5 See the responses to comment IND12-1 regarding property values.

# INDIVIDUALS

## IND193 – Georgia Haverty

20161110-5023 FERC PDF (Unofficial) 11/10/2016 8:45:18 AM

Georgia Haverty, Pembroke, VA.

IND193-1 | I am strongly opposed to the DEIS amendments which include plans for a much larger "utility corridor" within the Jefferson National Forest than the 50-foot MVP right of way. These amendments will irreparably harm the Jefferson National Forest. These include:

- Creating a 500-foot wide "utility corridor", degrading the forest and view sheds.

IND193-2 | • Relaxing restrictions that protect soil and riparian conditions.

IND193-3 | • Cutting down currently-protected old growth forests.

- Permitting the MVP to cross the Appalachian National Scenic Trail, while downgrading scenic integrity and restoration.

IND193-4 | These are all unmitigatable actions. In addition to the harm done to the forest, the "utility corridor" and harm it poses if approved will of course extend to privately held lands.

IND193-1 | Opposition to FS LRMP Amendment 1 is noted.

IND193-2 | Opposition to FS LRMP Amendment 2 is noted.

IND193-3 | Opposition to FS LRMP Amendment 3 is noted.

IND193-4 | Opposition to FS LRMP Amendment 4 is noted.



# INDIVIDUALS

## IND194 – Robert S. Emmett

20161114-5000 FERC PDF (Unofficial) 11/10/2016 11:14:31 PM

Robert S Emmett, Blacksburg, VA.

IND194-1

From reading the language of the FERC filing documents closely and learning about the proposed Mountain Valley Pipeline Project, it's pretty clear that FERC is bent on approving this supposed "3.5 billion" USD project. It's going to cost the region many times that figure and net EQT, a known polluter with over 100 citations for its PA fracking wells, between 8-20% return on its investment. MVP is poison to our neighbors-- it will carry a fossil carbon fuel derived from fracking shale formations. It's poison at every stage: long-term energy dependency that has and will damage private wells, public lands, and farms. I imagine FERC may be staffed by people with a conscience, and I'd appeal to them to look at EQT's record and its financial status. If anything goes wrong with this pipeline extension, why would a company with such a low investment rating by creditors not simply seek bankruptcy protection, leaving state and local governments to pay the bill? I am assuming that FERC actually exists to regulate energy development applications and not to validate through a sham process a foregone conclusion. Surely here in the Appalachian region we've seen a century of energy extraction with a century of exploitation of our people, land, and waters, and the record of federal regulators has been very spotty. You ought to reject the MVP project out of moral decency, but as a bureaucratic agency, the point is to follow the procedures. So I guess this is written as a protest to be read by FERC's employees and other citizens: the MVP proposal is a pack of lies. We don't need these fake estimates of "jobs" that in reality are "job hours" calculated on construction to be done by temporary workers brought in from other EQT projects: no investment in the region, with all the costs of its damage to our water, soil, and viewshed born by the region's residents, and all the profits siphoned off by this shell entity EQT Midstream as an investment vehicle for a parent company and its financial backers. Reject the Mountain Valley Pipeline application. It is NOT in the public interest.

IND194-2

IND194-1

See the response to comment IND28-3 regarding bankruptcy and financial responsibility. Impacts on water resources, including private wells, were addressed in section 4.3 of the EIS.

IND194-2

Impacts on soils in 4.2; impacts on viewsheds in 4.8. The EIS is not a decision document. The Commission would decide if the project is in the public interest in its future Order. No decision has been made yet. See the response to comment IND13-2 regarding benefits to the local communities. See also the response to comment IND191-3 regarding local jobs.

# INDIVIDUALS

## IND195 – Bruce W. Zoecklein

20161114-5001 FERC PDF (Unofficial) 11/11/2016 11:55:15 AM

Bruce W Zoecklein, Blacksburg, VA.  
Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

This communication is submitted in regard to the Mountain Valley Pipeline (MVP) and is written to express concerns regarding the draft DEIS report.

IND195-1

I am an Emeritus Professor at Virginia Tech. As a scientist with over 40 years of experience I have had the responsibility to review data to determine the validity of conclusions derived from that data. As such, I can state, without question, that the DEIS draft published by FERC supporting the Mountain Valley Pipeline (MVP) should be withdrawn or re-written as a result of omissions, factual errors, and lack of scientific justification used to reach the conclusions stated.

FERC's DEIS draft concluded that the MVP would result in "some adverse environmental impacts, but the majority of the impacts would be reduced to less-than-significant levels." This is a subjective statement not supported by scientifically-derived information. It remains a mystery how FERC could declare such a conclusion, when at that time, the "final" route was not yet known and surveys remained to be completed!

Numerous written statements have been submitted by qualified professionals in the field of environmental science. FERC has accepted MVP's unsubstantiated dismissal of most of the citizen comments, without credible analysis or justification. The only logical conclusion that can be derived from this report is that the Federal Energy Regulatory Commission is an arm of the oil/gas industry. The number of flaws in DEIS report support that view. This communication deals with just one of many issues-sedimentation and water quality.

Stream / River Sedimentation and Water Quality. A major concern is sedimentation and water quality. MVP proposes to cross some 97 streams and large rivers in VA and WV by simply burying the pipeline a few feet into the river bottom. The depth of the trench is critical due to flooding events.

In a well cited error, MVP proposed crossing the Greenbrier River. They reported that floods would remove no more than 46.5 inches of the 48 inches of soil with which they planned to cover the pipe in the stream bottom. Their claim was evaluated by independent evaluators who found MVP underestimated flood-stage flows by a 600-1800%.

Had MVP built to their initial plan, a flood similar to what occurred this year would have completely exposed the pipe to flood waters and flood debris. It is likely that could have resulted in multiple catastrophic pipeline ruptures. Yet- FERC issued the DEIS, presumptively with full knowledge of this faulty analysis!

IND195-1

See the response to comments LA5-1 and IND47-1 regarding preparation of the EIS. Section 4.3 of the final EIS has been revised to include updated scour analysis information provided by Mountain Valley in October 2016 and analyzed by FERC staff.

# INDIVIDUALS

## IND195 – Bruce W. Zoecklein

20161114-5001 FERC PDF (Unofficial) 11/11/2016 11:55:15 AM

IND195-2

The DEIS also ignored numerous threats that the MVP presents to public water supplies and water quality due to erosion and sedimentation. The proposed line will cross steep mountain slopes where it is difficult, if not impossible, to effectively control erosion. From Monroe WV to Roanoke VA over half of the pipeline spans slopes of 20% grade or more!

To assess the threat posed by erosion in our mountainous region, the U.S. Department of Agriculture weighed seven key variables influencing rain-induced erosion. These include the following: slope gradient, slope length, soil type, rainfall amount, vegetation condition, and truck and equipment traffic. Their modelling predicted soil loss in tons per acre per year during construction as follows:

- 10 percent slope – expected erosion is 34 tons of soil per acre per year.
- 20 percent slope – expected erosion is 105 tons of soil per acre per year.
- 30 percent slope – expected erosion is 183 tons of soil per acre per year.

This is totally unacceptable. MVP and FERC claim that mountainside erosion and sedimentation to local streams will be effectively controlled, but offer no credible support or proof that their construction techniques will be any more effective than the numerous examples of failed pipeline construction methods that have damaged ecosystems elsewhere.

IND195-3

For example, the ecological restoration failure of the Columbia Gas pipeline in the Jefferson National Forest (Giles County, VA) illustrates the problem. Rainstorms during construction caused severe erosion with sedimentation in streams downhill. Remediation techniques such as grass on shallow soils has led to further erosion. More than 2 years later restoration efforts are a failure, and erosion and stream sedimentation continues.

MVP's own report: Hydrologic Analysis of Sedimentation, prepared at the request of the U.S. Forest Service, predicts that construction and operation of the MVP along just 40 miles of its length upstream could deposit more than 9,000 tons of sediment annually into the new River, the James River, and the Roanoke River. Totally unacceptable.

There are 53 miles of the MVP that go over karst-type soil. Over half the line will be on 20% slope grade or more. One of the country's leading experts on this type of soil, Dr. E. Kastning, has reported that this pipeline cannot be safely built due to the nature of the soil and the mountainous terrain. Yet, this scientist's recommendation and warnings have not been adequately addressed in the DEIS report. To make matters worse, the route in Giles County is directly over a maximum seismic zone which is the location of the largest earthquake to ever occur in VA. This was not adequately addressed by FERC.

In 2006, during construction of a 20-inch gas pipeline the US Fish & Wildlife Service, the Virginia Department of Conservation and Recreation, and the construction company attempted to use state-of-the-art erosion

IND195-2

Appropriate erosion and sedimentation controls would be installed to prevent sediment migration from cleared or disturbed areas during storms in accordance with the FERC's Plan for MVP, and Equitrans' project-specific Plan for EEP (which is based on the FERC standard). As discussed in section 2.4 of the EIS, third-party compliance monitors would be on-site each construction day to verify that MVP had the proper erosion and sediment controls in place.

IND195-3

MVP's Hydrologic Analysis of Sedimentation report, prepared for the FS, provides estimates of sedimentation based on ECD effectiveness. If approved, Mountain Valley would use our third-party compliance monitoring program which would increase the effectiveness of ECDs. See the response to comment IND62-1 regarding Dr. Kastning's report.

# INDIVIDUALS

IND195 – Bruce W. Zoecklein

20161114-5001 FERC PDF (Unofficial) 11/11/2016 11:55:15 AM

IND195-3  
cont'd

control measures (TRC et al. 2009). Hourly turbidity monitoring was undertaken (USGS 2009). Despite of this attention, slopes failed occurred., resulting in the killing of hundreds of endangered mussels species in Indian Creek and North Fork of the Holston River (Dinkins 2011).

Sediment problems could also occur in higher elevation watersheds where small streams transported sediment to the larger streams. By crossing the severe slopes of the Appalachian Mountains in VA and WV, MVP will cause similar erosion, sedimentation, and degradation of water quality that will negatively impact aquatic organisms, possibly including some endangered fish and freshwater mussels. Sediment could end up in the Spring Hollow Reservoir which is part of the water supply for the Roanoke Valley, and in Smith Mountain Lake. The lake is a critical hydroelectric project. Where sediment could reduce water quality, stimulate nuisance plant growth, and create expensive management problems.

Sedimentation and water quality are but two issues that were not adequately addressed in DEIS. The DEIS draft published by FERC supporting the Mountain Valley Pipeline should be withdrawn or re-written for it lacks the scientific justification used to reach the conclusions stated.

Dr. Bruce Zoecklein

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# INDIVIDUALS

## IND196 – Suzie Henritz

20161114-5006 FERC PDF (Unofficial) 11/12/2016 8:11:21 AM

Suzie Henritz, Greenville, WV.  
November 3, 2016

Kimberly Bose  
Ferc  
888First St., NE, Room 1A  
Washington, DC 20426

Docket # CP16-10-000

Dear Ms. Bose;

I have multiple concerns regarding the recently released DEIS for the MVP project.

IND196-1

The pipeline would cross primarily undeveloped, rural agricultural and forested lands, including hundreds of streams and wetlands and several major rivers, to deliver up to 2 billion cubic feet per day of gas from fracking operations in the Appalachian Basins Marcellus and Utica shale formations to the Southeastern and Mid-Atlantic markets to be shipped overseas. Although it would have a major impact on West Virginia, there will be no gas provided for the citizens- only destruction of property and water sources.

FERC has not demonstrated a need for the pipeline or public benefits as part of the NEPA process. FERC's failure to comply with NEPA's "purpose and need" requirement is especially problematic because MVP would have significant adverse impacts to public lands and would require the taking of private property through the use of eminent domain.

IND196-2

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 recreational resources such as the Appalachian Trail. FERC has said that MVP can submit the missing information before construction begins. This is UNJUST. The public cannot rely on FERC's assurances that such impacts will be successfully mitigated. We, the people, are not collateral damage, along with our land, to the whims of private corporations and federal government agencies who seek only to enrich themselves in the name of greed- at the expense of the people and the environment.

IND196-3

Monroe County is NOT SAFE for building a pipeline - not only because of the dangers to the environment but also it's too risky for the pipeline itself. We have karst, which poses severe constraints on

IND196-4

engineering, construction and potential collapse. Hydrogeology is another concern. Increased risk of groundwater contamination during and after pipeline construction, when surface water from steep slopes enters karst aquifers at the base of those, groundwater recharge areas are vulnerable.

IND196-5

Many people in Monroe County depend on springs and wells for our water source- once these are contaminated we have nothing. It has been said "Your dirty money can't fix our clean water-ever". WATER IS LIFE which is something you people don't seem to understand. You might try drinking gas. How does that work for you?

IND196-1

The Commission would address need in its project Order.

IND196-2

See the response to comment FA11-2 regarding pending information in the draft EIS. All relevant information provided by Mountain Valley in response to conditions included in the draft EIS were incorporated into the final EIS. Any additional information that was designated to be provided prior to construction was filed on our e-Library system and available to the public except for any critical energy infrastructure information or privileged and confidential information (such as reports identifying the location of sensitive cultural resources).

IND196-3

See the response to LA1-4 regarding construction in karst.

IND196-4

Impacts on water resources and measures to reduce those impacts are discussed in section 4.3 (see also the response to comment IND2-2).

IND196-5

The project would be authorized if the Commission determines that the project is in the public interest and is an environmentally acceptable action. The FERC staff works with applicants, agencies, and other stakeholders during its review to refine the route and develop acceptable mitigation. Companies sometimes withdraw their applications before the Commission makes a decision. Many projects that have been authorized by the FERC have not been built. The reasons are varied, but include environment, market, and regulatory causes.

# INDIVIDUALS

## IND197 – Mark Blumen

20161114-5007 FERC PDF (Unofficial) 11/12/2016 11:05:16 AM

Mark Blumen, Alderson, WV.  
Dearest FERC

IND197-1

This MVP /EQT project when announced sounded like a great idea for all WV and VA that could have used gas as an alternative to other dirtier fuels. As the picture became sharper we learned that there would be no advantage to this pipeline running past and thru our farms , fields , forests , and homes! Yes in very close proximity to 117 homes ( a distance of 50 ft or more ) while the explosion distance is about 3/5th of a mile across. Would any of the investors , FERC employees , members of the supporting group be able to sleep at night if this bomb were that close to their homes ? YES this is a NIMBY project .But the NIMBY light shines on the investors and members of FERC that would not want it in their own backyards !Not to speak of the lose of property value and difficulty getting insurance on your structures and land . Since there will be no taps or benefit to anyone in WV and there is such a significant outcry from almost everyone that has commented . Dare I say hundreds if not a thousand or more and most say to YOU- FERC , DON'T BUILD THIS DISASTER waiting to happen . We the public have given you FERC and MVP thousands of reasons not to build this ! We have given you even more reason to completely pull the plug on this stupid for CORPORATE profit venture . This will only cause great HARDSHIP and COST to the communities and Families effected and those live close to the pipe. You will be give Terrorist that want to harm this country and its people hundreds of new opportunities to create grief and havoc to this nation!  
We must in this new era respect the wishes of the masses and not allow greed to overshadow righteousness.

IND197-1

See the response to comment IND2-1 regarding safety. See the response to comment IND12-1 regarding property values. See the response to comment CO2-1 regarding benefits of the project. Terrorism is discussed in section 4.12 of the EIS.

# INDIVIDUALS

## IND198 – Dave Miller

20161114-5008 FERC PDF (Unofficial) 11/12/2016 11:09:58 AM

IND198-1

Dave Miller, Richmond, VA.

Please be notified of an important archaeological discovery directly in the path of the proposed 42 inch gas pipeline crossing through Newport, Virginia. This archaeological discovery is being categorized by Ancient-Origins.net as possibly being the oldest civilization in the world now found in the Appalachian Mountains. Please see the article published October 14, 2016:

<http://www.ancient-origins.net/opinion-guest-authors/lost-tribe-clover-hollow-oldest-civilization-world-found-appalachian-mountains-021025>

IND198-1

The author of the non-scholarly article is assigning anthropomorphic meaning to natural rock features and striations that were likely due to multiple erosional events over the last many millennia.

# INDIVIDUALS

IND199 – Robert M. Jones (on behalf of Mr. and Mrs. Curtis K. Cook)

20161114-5051 FERC PDF (Unofficial) 11/11/2016 10:12:16 AM

To: Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
From: Robert M. Jones, Ph.D. -- Registered Intervenor — on Behalf of the Cooks  
Date: 11 November 2016  
Re: Mountain Valley Pipeline LLC, Docket No. CP-16-10-000

IND199-1

We understand that the Department of Conservation and Recreation has asked that the Mountain Valley Pipeline would avoid Slussers Chapel Conservation Site and route the MVP up on top of Brush Mountain. This idea would be much better for protecting peoples water. Our home is on Mt. Tabor road at the end of Slussers Chapel Cave and our water comes from that cave. We can't afford to have our water cut off or polluted by the pipeline coming through here. There are many caverns near us and we have two sinkholes on our property. Blasting here would be very bad. We have had the bad experience of losing our water in the past. There was drilling above us and they drilled through the cavern and our water disappeared into the cavern. That was a very frightening time and we had to drill a new well. The same thing could happen here if there was blasting or drilling. We do not want any pipeline in this area but If the pipeline goes this way, we are in favor of the Department of Conservation and Recreation idea to stay away from Slussers Chapel Conservation Site and to go a safer way on Brush Mountain. We hope you will help us save our water.

Yours truly,  
Mr and Mrs Curtis K. Cook  
2455 Mt Tabor Road

IND199-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.



# INDIVIDUALS

## IND200 – Robert M. Jones (on behalf of Virginia East)

20161114-5052 FERC PDF (Unofficial) 11/11/2016 10:16:06 AM

To: Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
From: Robert M. Jones, Ph.D. -- Registered Intervenor — on Behalf of Virginia East  
Date: 11 November 2016  
Re: Mountain Valley Pipeline LLC, Docket No. CP-16-10-000

IND200-1

My name is Virginia East and I am a long-time resident of Montgomery County, Virginia. I am very concerned about the Mountain Valley Pipeline pipeline that is proposed to be built through the Mount Tabor Area. I have friends who live on the "Mt Tabor Variation" and I am aware that there is great concern for the safety of their water supply if this pipeline is a built in this area. The nature of the land in the Mt Tabor Sinkhole Plain makes it possible and even probable that a pipeline caused accident would pollute or disrupt the water supply to many people in this area. This is very disturbing, and frankly, unacceptable.

A possible solution has been offered by the Virginia Department of Conservation and Recreation. They suggest that the pipeline should avoid the very environmentally important Slussers Chapel Conservation Site. This would provide much needed protection for people's water. As an alternative, the DCR suggests that the pipeline should follow a route along the ridge of Brush Mountain.

I definitely support the DCR recommendation to avoid Slussers Chapel Conservation Site and instead, route the pipeline across Brush Mountain. This would be the best solution to a difficult and dangerous circumstance

Please consider this solution,

Virginia East

IND200-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

# INDIVIDUALS

## IND201 – Robert M. Jones (on behalf of Kandy Davis)

20161114-5055 FERC PDF (Unofficial) 11/11/2016 10:18:44 AM

To: Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
From: Robert M. Jones, Ph.D. -- Registered Intervenor — on Behalf of Kandy Davis  
Date: 11 November 2016  
Re: Mountain Valley Pipeline LLC, Docket No. CP-16-10-000

IND201-1

My name is Kandy Davis and I live in Blacksburg VA. I am writing to comment on the route of the Mountain Valley Pipeline in the Mount Tabor area of Montgomery County VA. I have followed the newspaper articles about this pipeline and I also have spoken about it with a friend who lives on the Mt Tabor Variation. I am very concerned about the damage that would likely occur to this environmentally sensitive area if the pipeline is allowed to be built here. Residents of this area depend on their wells for water and I am concerned that their water may be polluted or lost during pipeline construction.

Recently, I have learned that that it is possible for the pipeline to take a different, less destructive path. The Virginia Department of Conservation and Recreation proposed in a September 9, 2016 letter that the pipeline could go along a route that would avoid and protect Slussers Chapel Conservation Site and much of the Mount Tabor Sinkhole Plain as well. It would also avoid people, their homes and their properties. This "avoidance" route would be constructed across Brush mountain.

I certainly prefer that no pipeline would come here at all. However, the path suggested by DCR is certainly the safest for all concerned. Therefore, I support the DCR proposed route ask that would be chosen as the new route for the Mountain Valley Pipeline

Sincerely,

Kandy Davis  
1001 Oak Point Court  
Blacksburg VA

IND201-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

# INDIVIDUALS

## IND202 – Robert M. Jones (on behalf of Anna Davis)

20161114-5056 FERC PDF (Unofficial) 11/11/2016 10:36:39 AM

To: Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
From: Robert M. Jones, Ph.D. -- Registered Intervenor — on Behalf of Anna Davis  
Date: 11 November 2016  
Re: Mountain Valley Pipeline LLC, Docket No. CP-16-10-000

IND202-1

My family has lived on the same land since the 1870's and I hate to see the Mountain Valley Pipeline come through this area. My home is near Mt Tabor Road and I am very much against this pipeline! I am very concerned for my friends and neighbors in this area who live on the pipeline route. First of all, this is a beautiful place and I would not like to see any of that ruined. Many large trees would be cut and there would be gashes across the mountains. Also, this area has many sinkholes and caves and that is a bad place to build a pipeline. Peoples water and wells could be ruined. This pipeline would also have a bad effect on peoples homes and property values. The Slussers Conservation Site is very important to the water supply of many people in this area. It should not be disturbed or polluted by pipeline construction. Because of that, the Department of Conservation and Recreation asked MVP to go around that area and put the pipeline at the top of Brush Mountain. That is the best way to go if there there is any pipeline here. For that reason, I am for the DCR route and ask that it will be chosen over the current Mt Tabor Variation.

Thank you,

Anna Davis  
Blacksburg, Va

IND202-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

# INDIVIDUALS

## IND203 – Pamela L. Ferrante

20161114-5110 FERC PDF (Unofficial) 11/12/2016 7:13:04 PM

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: November 13, 2016

Re: Docket No. CP16-10 Mountain Valley Pipeline (MVP) – Draft Environmental Impact Statement (DEIS) – Impact on Mill Creek Springs Natural Area Preserve.

I disagree with MVP statement in the DEIS supplemental filings:<sup>1</sup>

*“by incorporating the Mount Tabor Variation, the October 2016 Proposed Route does not impact the TNC and VDCR Mill Creek Springs Natural Area Preserve.”*

There will be a profound negative impact on The Nature Conservancy (TNC) and Virginia Department of Conservation and Recreation (VDCR) Mill Creek Springs Natural Area Preserve. It is obvious MVP does not understand the integrated karst ecosystem in this area, particularly along the proposed Mount Tabor Variation pipeline route. FERC has received many papers clearly describing the caves, sinkholes, seasonal dry creek beds, and other geologic features, all evidence of karst terrain in this area.<sup>2,3,4,5</sup> **Why has this information been ignored when establishing the Mount Tabor Variation route?**

The VDCR recommended MVP to avoid the Slussers Chapel and the Old Mill Conservation Sites, and the Mill Creek Springs Natural Area Preserve because of serious concerns of environmental impacts on this fragile karst ecosystem.<sup>6</sup> Although the construction of the proposed Mount Tabor Variation route does not involve the Mill Creek Springs Natural Area Preserve directly, it will continue to cross the Slussers Chapel and the Old Mill Conservation Sites. In fact, the length of the route within these two conservation sites will exceed that of the original proposed corridor according to VDCR report.<sup>7</sup> There will also be additional contact with these fragile ecosystems, compounding the environmental impact as this new variation route follows the eastern edge of the former and northern edge of the latter (Figure 1).

<sup>1</sup> FERC submittal #20161027-5212, p. 27/248

<sup>2</sup> FERC submittal #20160908-5025

<sup>3</sup> FERC submittal #20160915-5081

<sup>4</sup> FERC submittal #20161011-5062

<sup>5</sup> FERC submittal #20161103-5017

<sup>6</sup> FERC submittal #20160317-5126

<sup>7</sup> FERC submittal #20160520-5051

IND203-1

IND203-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

IND203-1  
cont'd

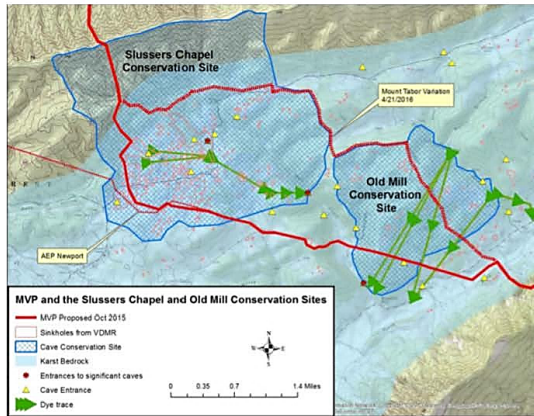


Figure 1. Proposed Mount Tabor Variation route as it crosses both the Slussers Chapel and the Old Mill Conservation Sites.<sup>8</sup>

The proposed Mount Tabor Variation route now places the pipeline closer to Slussers Chapel Cave. This mile-long cave is located at the bottom a large sinkhole valley that is clearly depicted on topographical maps. The pipeline is now aligned precariously uphill and upstream from the cave opening. Revealing photographs have documented water flowing from this uphill location into the sinkhole valley to the mouth of the cave during heavy rains.<sup>9, 10</sup> Dye trace studies have also shown water flows from Slussers Chapel Cave to the primary spring at Mill Creek Springs Natural Area Preserve.<sup>11</sup> The construction of the pipeline and the permanent, mandatory treeless zone along the path will increase silt contamination from water flowing into Slussers Chapel Cave. This presents not only a serious environmental threat to the integrity of Slussers Chapel Cave but also the extensive interconnecting cave system and consequently Mill Creek Springs Natural Area Preserve.

The Mount Tabor Variation route continues to lie on soluble rock with a number of sinkholes not identified on topographic maps as it traverses the lower flank of Brush Mountain.<sup>12</sup> Many

<sup>8</sup> FERC submittal #20160520-5051

<sup>9</sup> FERC submittal #20161011-5062

<sup>10</sup> FERC submittal #20161103-5017

<sup>11</sup> Fagan, J. and Orndorff, W., Karst Hydrology Investigations in the Cambrian Elbrook and Conococheague Formations of Pulaski and Montgomery Counties, Virginia, Proceedings from Second Appalachian Karst Symposium 2008. VDCR, Division of natural Heritage karst Program, 2008, p. 8

<sup>12</sup> Submittal #20160713-5029

IND203-1  
cont'd

sinkholes along this area are clearly aligned, attesting to the likelihood of extensive ground water flow paths along subsurface karst conduits. This route will also cross Mill Creek and other smaller streams and tributaries along the watershed on this face of Brush Mountain that drain into these subterranean passages. DCR states that these streams are extremely flood prone and will be subject to high erosion both during and subsequent to construction.<sup>13</sup> Pollution of Mill Creek and these smaller streams will affect Mill Creek Springs Natural Area Preserve.

The proposed Mount Tabor Variation route will also be close to the newly discovered Thundercroft Cave. This large cave with a 30-foot ceiling has not been studied extensively and construction of a pipeline in this area will very likely affect this cave system. Thundercroft Cave is more than likely associated with the well-integrated aquifer underlying the entire area wherein groundwater is conveyed to the primary spring in Mill Creek Springs Natural Area Preserve (Figure 2).<sup>14</sup>

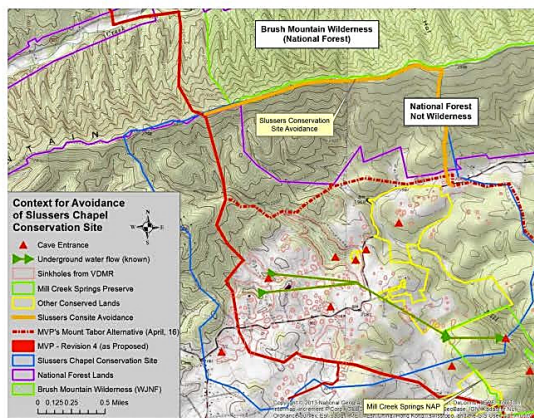


Figure 2. The proposed Mount Tabor Variation route showing the interrelationship of the Slussers Chapel Conservation Site and the Mill Creek Springs Natural Area Preserve.<sup>15</sup>

<sup>13</sup> Submittal #20160909-5315

<sup>14</sup> Submittal #20160520-5051

<sup>15</sup> Submittal #20160909-5315

# INDIVIDUALS

IND203 – Pamela L. Ferrante

20161114-5110 FERC PDF (Unofficial) 11/12/2016 7:13:04 PM

IND203-1  
cont'd

Conclusion:

While I oppose the construction of a pipeline in its entirety because of the inevitable environmental damage, I also recognize that FERC may approve the project against the concerns of many citizens. I am equally concerned about the potential environmental impact on the area in and around the Slussers Chapel and Old Mill Conservation Sites and Mill Creek Springs Natural Area Preserve from the proposed Mount Tabor Variation route. Because of the very valid concerns listed above and by other concerned citizens, **I support the Virginia Department of Conservation and Recreation Slussers Chapel Conservation Site Avoidance Concept.**<sup>16</sup>

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<sup>16</sup> Submittal 20160909-5315

**INDIVIDUALS**  
**IND204 – Barry and Judy Sink**

20161109-0042 FERC PDF (Unofficial) 11/09/2016

CP-11610

Chairman Norman Bay  
888 First Street NE  
Washington DC 20426

**OFFICE OF  
EXTERNAL AFFAIRS**  
**2016 NOV -9 P 5:29**  
**FEDERAL ENERGY  
REGULATORY COMMISSION**

November 3, 2016

Chairman Bay,

IND204-1

As a resident of Franklin County Virginia and part of the propose Mountain Valley Pipeline, I am very disappointed in the "Public" hearing held at the local high school. This as advertised as a public hearing but yet we were told to speak our piece to a room with 3 people, the stenographer, a representative from your organization, and a gentleman from the Federal Land agency. How can that be considered a public hearing? As residents and concerned citizens of this county, we have a right to hear and share our concerns with each other. Were the representatives from your organization running scared? We all know that the concerns and issues shared last night will not be heard by you or your commissioners, they will be trashed. We also know that Mountain Valley has padded your pockets to swing your vote their way. We are here to tell you, we are a determined group of citizens and we will NOT give up the fight.

God created this earth as a gift to us. The only thing He asked of us in return was to be good stewards. That is one who manages a large estate. What bigger and better estate to manage than the earth we live on? Being a good steward means taking care of what we have been blessed with, beautiful mountains, clear, clean rivers and streams and clear air to breathe.

If the MVP is given permission to enter our beautiful county then you are not being a good steward as you would be destroying all that God has given us and you. Have you ever been to Franklin County, Virginia? I doubt it and on that note I invite you to leave your cushy office in Washington, put on your hiking boots and come visit our county. See what it is that will be destroyed if you approve this monster.

The 42 inch propose pipeline will only destroy acres of working farm land, homes, families, churches and in some areas, entire communities. The land will be polluted with the harsh chemicals from fracking, from the fuel used in the large machines. The land will no longer be useable for livestock, crops or even human habitation. Is this being a good steward?

IND204-2

The fresh water streams and rivers that feed into our beautiful Smith Mountain Lake will be polluted and contaminated with these poisonous chemicals, land erosion, even contaminated by work boots bringing in dangerous bacteria. Wild life and aquatic ecosystems will be destroyed. The little snail darter, which is on the endangered list and lives in our little stream, will be impacted. The wild life that visits our property will no longer find shelter, food or water. Smith Mountain Lake will no longer be a playground for this area but a stinky, smelly, pool of water of no use to anyone.

Our wells will be contaminated. No longer will we be able to survive on our small parcel of land without out fresh clean water to drink. Again, is this being a good steward?

IND204-1

See the response to LA2-1 regarding the draft EIS comment sessions. See also the response to comment IND2-3 regarding hydraulic fracturing. Row crops could still be grown in agricultural areas following installation of the pipeline, as described in section 4.8 of the EIS. As stated in section 4.12.3 of the EIS, communities currently reside alongside the more than 300,000 miles of natural gas transmission lines in the United States.

IND204-2

Impacts on water resources and air quality as well as measures to reduce those impacts are discussed in sections 4.3 and 4.12 of the EIS, respectively.



# INDIVIDUALS

## IND204 – Barry and Judy Sink

20161109-0042 FERC PDF (Unofficial) 11/09/2016

1

IND204-2

The air we breathe will also be compromised by the toxic fumes from the excavation, drilling equipment. Not to mention the fumes from the pipeline itself. Are you aware that persons living near a pipeline have more health issues than those who do not? Are you willing to accept and take responsibility for these health issues? You ask "why not move?" The answer is we cannot afford to move. And no one will buy. Would you buy our home knowing that the 42" pipeline is 300 feet from your front door?

So I ask you again. Are you being a good steward? If you put your stamp of approval on this monster, YOU are NOT being the good steward God asks you to be. You cannot, in good conscious say yes to something that would create such devastation.

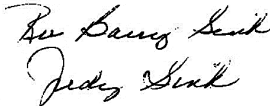
Stand up for what is right and say NO to Mountain Valley Pipeline!

Respectfully,

Judy and Barry Sink

1881 Brick Church Road

Rocky Mount VA 24151

Handwritten signatures of Barry Sink and Judy Sink. Barry's signature is written above Judy's signature.

# INDIVIDUALS

IND205 – Thomas P. Epling

20161114-5111 FERC PDF (Unofficial) 11/14/2016 9:09:47 AM

October 28, 2016

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

Dear Secretary Bose,

IND205-1

It is my understanding that the Federal Energy Regulatory Commission (FERC) has released a draft environmental impact statement (DEIS) for the Mountain Valley Pipeline (MVP). This DEIS has failed to address a critical impact that must be addressed in order for this project to be considered for construction.

The DEIS does not adequately assess the impacts of construction of the MVP on aquatic life in its path. MVP has not submitted the results of their analysis on sedimentation and turbidity due to wet stream crossing methods that are to be employed during construction. Conclusions regarding the effects of turbidity and sedimentation on fisheries and aquatic life in the path of the MVP are not adequately provided in the DEIS.

I hope that your agency will continue to act on behalf of the citizens of the United States by insuring that the environment is duly protected during construction of this project, or by denying the project, if MVP is unable to protect the environment effectively.

Thank you for your consideration.

IND205-1

Impacts and mitigation on water resources is discussed in section 4.3 of the EIS. Impacts and mitigation on aquatic wildlife is discussed in section 4.6 of the EIS. See the response to comment FA11-15 regarding sedimentation and turbidity at waterbody crossings.

# INDIVIDUALS

IND205 – Thomas P. Epling

20161114-5111 FERC PDF (Unofficial) 11/14/2016 9:09:47 AM

Sincerely,

Thomas P. Epling  
298 Shay Lane  
Cass, WV 24927  
(304)456-4387  
eplings@icloud.com

# INDIVIDUALS

IND206 – Thomas P. Epling

20161114-5112 FERC PDF (Unofficial) 11/14/2016 9:13:04 AM

October 28, 2016

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

Dear Secretary Bose,

IND206-1

It is my understanding that the Federal Energy Regulatory Commission (FERC) has released a draft environmental impact statement (DEIS) for the Mountain Valley Pipeline (MVP). This DEIS has failed to address a critical impact that must be addressed in order for this project to be considered for construction.

The DEIS states that MVP plans to cross the Elk, Gauley and Greenbrier Rivers using the open-cut wet crossing method. Open-cut wet crossings use no water diversion and are hence the most invasive crossing methods available. It is imperative that FERC require MVP to minimize impacts during river crossings including reducing the construction area to a minimum. FERC needs to require additional analysis of crossing methods by MVP in order to reduce impacts.

I hope that your agency will continue to act on behalf of the citizens of the United States by insuring that the environment is duly protected during construction of this project, or by denying the project, if MVP is unable to protect the environment effectively.

Thank you for your consideration.

IND206-1

Mountain Valley now proposes to cross the Elk, Gauley, and Greenbrier Rivers using dry methods and the final EIS has been updated accordingly.

# INDIVIDUALS

IND206 – Thomas P. Epling

20161114-5112 FERC PDF (Unofficial) 11/14/2016 9:13:04 AM

Sincerely,

Thomas P. Epling  
298 Shay Lane  
Cass, WV 24927  
(304)456-4387  
eplings@icloud.com

# INDIVIDUALS

IND207 – Thomas P. Epling

20161114-5114 FERC PDF (Unofficial) 11/14/2016 9:15:26 AM

October 28, 2016

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

Dear Secretary Bose,

IND207-1 It is my understanding that the Federal Energy Regulatory Commission (FERC) has released a draft environmental impact statement (DEIS) for the Mountain Valley Pipeline (MVP). This DEIS has failed to address a critical impact that must be addressed in order for this project to be considered for construction.

The DEIS identifies 94 karst features, or caves, in the path of the MVP. FERC has requested route variations in order for the MVP to avoid some of these features. Results of a study to determine the interconnection between karst and water resources has not been completed. FERC must issue a supplemental EIS with the final route and results showing these connections before concluding that the pipeline construction will not significantly impact karst geology.

I hope that your agency will continue to act on behalf of the citizens of the United States by insuring that the environment is duly protected during construction of this project, or by denying the project, if MVP is unable to protect the environment effectively.

Thank you for your consideration.

IND207-1

Section 4.1 of this final EIS has been revised to discuss karst features.

# INDIVIDUALS

IND207 – Thomas P. Epling

20161114-5114 FERC PDF (Unofficial) 11/14/2016 9:15:26 AM

Sincerely,

Thomas P. Epling  
298 Shay Lane  
Cass, WV 24927  
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eplings@icloud.com

# INDIVIDUALS

IND208 – Thomas P. Epling

20161114-5115 FERC PDF (Unofficial) 11/14/2016 9:17:24 AM

October 28, 2016

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

Dear Secretary Bose,

IND208-1

It is my understanding that the Federal Energy Regulatory Commission (FERC) has released a draft environmental impact statement (DEIS) for the Mountain Valley Pipeline (MVP). This DEIS has failed to address a critical impact that must be addressed in order for this project to be considered for construction.

The DEIS states that 78% of the pipeline route is highly susceptible to landslides. 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) in order to mitigate hazards from potential landslides. This information is critical in evaluating the impacts of pipeline construction and must be included in a supplemental EIS.

I hope that your agency will continue to act on behalf of the citizens of the United States by insuring that the environment is duly protected during construction of this project, or by denying the project, if MVP is unable to protect the environment effectively.

Thank you for your consideration.

IND208-1

As discussed in section 2 of the EIS, Mountain Valley filed a revised *Landslide Mitigation Plan* with the FERC in March 2017.



# INDIVIDUALS

IND208 – Thomas P. Epling

20161114-5115 FERC PDF (Unofficial) 11/14/2016 9:17:24 AM

Sincerely,

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eplings@icloud.com

# INDIVIDUALS

IND209 – Thomas P. Epling

20161114-5117 FERC PDF (Unofficial) 11/14/2016 9:19:21 AM

October 28, 2016

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

Dear Secretary Bose,

IND209-1

It is my understanding that the Federal Energy Regulatory Commission (FERC) has released a draft environmental impact statement (DEIS) for the Mountain Valley Pipeline (MVP). This DEIS has failed to address a critical impact that must be addressed in order for this project to be considered for construction.

The DEIS claims that the construction of the MVP will result in no net loss of wetlands. In contradiction, the DEIS later 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. If MVP has not supplied FERC with adequate information to assess impacts in the DEIS, then a supplemental EIS must be issued when MVP provides this information to FERC.

I hope that your agency will continue to act on behalf of the citizens of the United States by insuring that the environment is duly protected during construction of this project, or by denying the project, if MVP is unable to protect the environment effectively.

Thank you for your consideration.

IND209-1

An updated discussion of permanent fill in waterbodies and wetlands is included in section 4.3 of the EIS. See the response to comment IND196-2 regarding the prior to construction recommendation.

# INDIVIDUALS

IND209 – Thomas P. Epling

20161114-5117 FERC PDF (Unofficial) 11/14/2016 9:19:21 AM

Sincerely,

Thomas P. Epling  
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# INDIVIDUALS

## IND210 – Louisa S. Gay

20161114-5194 FERC PDF (Unofficial) 11/14/2016 12:55:01 PM

November 14, 2016

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

Dear Ms. Bose and Members of the Commission,

IND210-1

The DEIS was released prematurely, and it appears the applicant will be permitted to self-regulate (setting the "fox to guard the hen house"). FERC has concluded that the applicant can and will mitigate everything from steep slopes, side slopes, landslides, poor soils, karst features, forests, waterbody crossings, wetlands, TES, and Mother Nature (as if severe weather events never occur in this geographic area).

In many sections of the DEIS there is omitted data, with the FERC recommendation that:

**Prior to the end of the draft EIS comment period, Mountain Valley should file with the Secretary:**

- *documentation of...*
- *additional information on the...*
- *alignment sheets and copies of USGS 7.5-minute topographic quadrangle maps illustrating the new route, and updated environmental information associated with the route change.*
- *either a plan for the avoidance of ...or copies of agreements with*
- 

Additionally, there are the "**prior to construction**" comments:

- ***Prior to construction**, Mountain Valley should file with the Secretary, for review and approval by the Director of OEP, a revised Landslide Mitigation Plan which includes: ...*
- ***Prior to construction**, Mountain Valley should file with the Secretary the results of its fracture trace/lineament analysis for the MVP.*
- ***Prior to construction**, Mountain Valley should file with the Secretary the results of quantitative modeling for turbidity and sedimentation associated with wet open-cut crossings of the Elk River, Gauley River, and Greenbrier River. The analysis should address the duration, extent, and magnitude of turbidity levels and assess the potential impacts on resident biota. The analysis should also include a discussion on the physical and chemical characteristics of the sediments, the estimated area affected by the transport and redistribution of the sediments, and the effect of the suspension and resettlement on water quality; as well as an assessment of the effectiveness of the proposed turbidity curtains.*

The phrase, "**Mountain Valley should file with the Secretary,**" and "**prior to construction,**" was used 44 times. Perhaps the best course of action would have been for FERC to require the data first and then issue the DEIS.

IND210-1

We disagree. The draft EIS was not released prematurely. We have been working on the project for over two years. The FERC is the main federal regulating agency for the interstate transportation of natural gas; the Applicant does not regulate itself. See the response to comment IND196-2 regarding pending information in the draft EIS. See the response to IND147-1 regarding FERC staff recommendations.

# INDIVIDUALS

## IND210 – Louisa S. Gay

IND210-1 cont'd | The phrase, “**prior to construction**,” is disturbing, and there is no ambiguity, it is an approval. The 90-day comment period is not over and in many instances data has not yet been acquired because surveying is not complete (primarily in Roanoke County).

IND210-2 | Mr. Roger Brown of Union, WV, aptly stated FERC has a “facile acceptance of MVP’s claims”,<sup>1</sup> and “apparently critics bear the burden of proof while proponents do not.” I concur, as do many other intervenors. Nevertheless, we are hopeful that FERC will listen and provide the same courtesy that they have extended to the applicant. Any intervenor willing to comment with specific detail should have equal rank as the applicant.

Public input should hold sway with FERC, as Timothy Spisak from the Bureau of Land Management so capably stated when testifying before the House Natural Resources Committee on May, 25<sup>th</sup> of 2015:

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 mitigation 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.<sup>2</sup>

The **value of public participation** cannot be stressed enough. The Government agency (FERC) should be the **trustee** of the environment, assuring that there are benefits without degradation, risk to health or safety, or other undesirable or unintended consequences, and preservation of historic, cultural and natural aspects of our heritage. **The DEIS appears devoid of these issues raised through public participation.**

IND210-3 | **FERC is responsible for the scope and accuracy of the analysis.** The finest example of flawed data, which was discovered by a retired English teacher Thomas Bouldin, is river scour in West Virginia.<sup>3</sup> This calls into **question the accuracy of the data submitted by MVP and FERC’s review of said data.** Even though the scour rates have been recalculated, it does not instill confidence in the process, which is necessary for the public to accept what MVP and FERC are selling.

IND210-4 | Since the release of the DEIS there have been additional data downloads. This puts the public at a disadvantage when trying to compare / locate pertinent information. In addition, it shortens the comment period; October 28<sup>th</sup> to Dec 22<sup>nd</sup> is **50 days**.

<sup>1</sup> Submittal #20161028-5144

<sup>2</sup> Hearings and Testimony of the 114<sup>th</sup> Congress / HR2295-5.20-15

<sup>3</sup> Submittal #20160502-5052

IND210-2 | See the response to comment LA5-1 regarding stakeholder comments.

IND210-3 | See the response to comment IND47-1 regarding preparation of the EIS.

IND210-4 | See the response to comment LA3-1 regarding Mountain Valley’s October 2016 filings. Based on our experience with restoration, we conclude that the replanting of trees in formerly disturbed areas would not significantly enhance or expedite the return of forest habitat. Typically, in areas with adequate rainfall and stable soils, tree saplings readily colonize disturbed areas within 2 or 3 growing seasons.

# INDIVIDUALS

## IND210 – Louisa S. Gay

IND210-4 cont'd	<b>Areas of concern include, but are not limited too:</b>	
IND210-5	<ul style="list-style-type: none"><li>Forest land will not be replanted with trees even though a 150' Construction ROW minus a 50' Permanent ROW leaves 100' available for the replanting of trees.</li><li>In that very same ROW there is no long-term plan for the prevention of exotic and invasive plant species, beyond two years. As a landowner that lives beside an established ROW, two years is not sufficient and should be changed to the lifetime of the pipeline, because invasive species are problematic. To suggest that the problem will be resolved in two years is naïve as disturbance of the topsoil sets the stage for opportunistic invaders.</li></ul>	IND210-5 Based on our experience with restoration, we conclude that invasive species monitoring for two growing seasons is adequate.
IND210-6	<ul style="list-style-type: none"><li>Waterbody crossings do not contain an accounting of potential <i>cumulative impacts</i> (i.e., <i>sedimentation</i>), e.g., the crossing of multiple small UNT's (intermittent and ephemeral) in the Mount Tabor Sinkhole Plain and Variation. This data (sedimentation) is also missing for most UNT waterbody crossings in WV and VA.</li></ul>	IND210-6 A revised discussion of sedimentation and turbidity due to waterbody crossings can be found in section 4.3 of this final EIS. See also the response to comment FA11-15 regarding sedimentation and turbidity modeling.
IND210-7	<ul style="list-style-type: none"><li>No pipeline abandonment plan. This pipeline will become the next EPA RCRA site if the company is not required to set aside money for its future removal.</li></ul>	IND210-7 Section 2.7 of the EIS provides an overview of future plans and abandonment.
IND210-8	<ul style="list-style-type: none"><li>A Blanket Certificate will allow MVP to add its fourth compressor station, which we anticipate they will do (aka, segmentation).</li></ul>	
IND210-9	<ul style="list-style-type: none"><li>Landslides are a concern over 78% of the pipeline route, yet the annual rainfall and <b>significant storms have not been discussed in relation to exacerbation of landslide potential</b>. As noted in several submittals, West Virginia and Virginia are prone to frequent flooding (20160620-5052, 20160630-5208, and 20160915-5157).</li></ul>	IND210-8 A Blanket Certificate cannot be used to propose a new compression station; that must be done through an amendment or new application.
IND210-10	<ul style="list-style-type: none"><li>The identification and evaluation of alternatives for meeting the purpose of the proposed action <b>have not been met</b>. FERC must, "objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated."<sup>4</sup> One reasonable alternative, <b>Hybrid Alternative 1 A</b>, which would substantially meet the applicants purpose and need, <b>is not discussed in the DEIS</b>. "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant. 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."<sup>5</sup></li></ul>	IND210-9 See the response to comment IND92-1 regarding flooding.
IND210-11	All reasonably foreseeable direct and cumulative impacts should be included in the DEIS for review and because of missing data, the public and other involved agencies, both State and Federal, are unable to ascertain whether the analysis is appropriate and provide their comments. The DEIS was prematurely released and another should be issued when all the data is assembled in one place.	IND210-10 Section 3 of this final EIS has been revised to provide a discussion of the Hybrid 1A Alternative route.
		IND210-11 See the response to comment IND196-2 regarding pending information in the draft EIS.

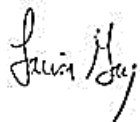
<sup>4</sup> CEQ NEPA Regulations, 40 C.F.R. § 1502.14

<sup>5</sup> A Citizens Guide to the NEPA, Dec 2007, p. 16

**INDIVIDUALS**  
**IND210 – Louisa S. Gay**

20161114-5194 FERC PDF (Unofficial) 11/14/2016 12:55:01 PM

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Louisa Gay". The signature is written in a cursive style with a large initial "L".

Louisa Gay

# INDIVIDUALS

IND211 – Pat Curran Leonard

20161110-0006 FERC PDF (Unofficial) 11/10/2016

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

FILED  
SECRETARY OF THE  
COMMISSION

November 2, 2016

FERC

2016 NOV 10 P 4: 29

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

## Re: Opposition to the Mountain Valley Natural Gas Pipeline

**Project – Study: Pipeline could cost communities billions** By Daniel

Tyson REGISTER-HERALD REPORTER, May 23, 2016

[http://www.register-herald.com/news/study-pipeline-could-cost-communities-billions/article\\_b0c9856a-7d38-5d59-a2d8-35ce95797416.html](http://www.register-herald.com/news/study-pipeline-could-cost-communities-billions/article_b0c9856a-7d38-5d59-a2d8-35ce95797416.html)

This article states:

"FERC's procedures and its track record show a blatant disregard for established economic principles as well as clear evidence that pipelines reduce property values, discourage business development, and diminish the capacity of the natural environment to provide clean water, beautiful scenery, and other valuable services to people," said Spencer Phillips, the study's lead author.

Where in the draft EIS does it say who will purchase my property after the 42" gas pipeline is constructed? Many in the community can not sell their properties now even before the pipeline has been approved. Where is the EQT Foundation commitment for funding the loss of property values, loss to business development, and cumulative impact assessment of what the cost will be to the community over the lifetime of this project?

"Phillips said studies by real estate valuation service Integra Realty Resources show property value loss is certain.

"We estimate a one-time loss in property value of between \$42 million and \$53 million," he said during a press conference last week. "That's for people in the right of way and people in the evacuation zone, which is about 1.4 miles wide for a pipeline of this size and operated at the pressure that's expected."

Do not approve this not needed project. This is a business trying to make money on the backs of rural mountain communities of the Appalachian region.

Pat Curran Leonard

4638 Dillons Mill Road

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IND211-1

IND211-1

As discussed in section 4.8 of the EIS, Mountain Valley would negotiate an agreement to purchase an easement from affected landowners. See the responses to comment IND12-1 regarding property values.



# INDIVIDUALS

IND212 – Pat Curran Leonard

20161110-0007 FERC PDF (Unofficial) 11/10/2016

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

FILED  
SECRETARY OF THE  
COMMISSION

November 1, 2016

FERC

2016 NOV 10 P 4: 29

ORIGINAL

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

FEDERAL ENERGY  
REGULATORY COMMISSION

202-502-6652

Re: Opposition to the Mountain Valley Natural Gas Pipeline Project –No Economic Benefit

**In my research by an article titled: *Community and Conservation Groups Condemn FERC's Review of Proposed Mountain Valley Pipeline***

by DUANE NICHOLS on SEPTEMBER 28, 2016

<http://www.frackcheckwv.net/2016/09/28/community-and-conservation-groups-condemn-ferc%E2%80%99s-review-of-proposed-mountain-valley-pipeline/>

IND212-1

This article states: "In preparing its draft Environmental Impact Statement, the Federal Energy Regulatory Commission (FERC) relied heavily on gas company data to assess the public need for the project, the groups say. A report released earlier this month concludes there is enough existing gas supply in Virginia and the Carolinas to meet demand through 2030. The groups also fault the agency for dismissing clean energy alternatives."

This is one of my many concerns I have with the draft EIS. The data that was relied on is backed or has been authored by the oil and gas industry. Where is fair and un-bias perspective from FERC? The citizens along the proposed route deserve research independent of what the oil and gas industry is putting out for needs.

What is the current infrastructure now of U.S. power plants that have turbines that run off of natural gas? For my power company – Appalachian Power – they converted one coal burning turbine to natural gas in October, 2016. One. That is the only power that runs on natural gas. Where is there a need for this pipeline to reach all of the infrastructure to power our electric grid?

FERC – it is your responsibility to provide independent analysis of the true need for natural gas – how much infrastructure is online today that will be powered by natural gas?

Do not approve this business for profit project that is not a public need.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND212-1

See the response to comment IND47-1 regarding preparation of the EIS. The Commission would determine need in its Project Order.

**INDIVIDUALS**  
**IND213 – Pat Curran Leonard**

20161110-0008 FERC PDF (Unofficial) 11/10/2016

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

FILED  
SECRETARY OF THE  
COMMISSION

November 3, 2016

2016 NOV 10 P 4: 29

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

FERC

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

**Re: Opposition to the Mountain Valley Natural Gas Pipeline –  
Name a pipeline that equals the proposed MVP**

IND213-1

The draft EIS was filled with examples of other projects that FERC has approved that were natural gas transportation lines. But where in the report is there a true comparison of the MVP proposed pipeline and one that is currently in operation now?

I would like the EIS to name in great detail:

The name of the buried 42 inch natural gas pipeline (or is it a mixed use gas) pipeline? That runs for 301 miles through mountain terrain, karsts geology, sink holes and caves, through streams and waterways, through Natural Forests, close to human dwellings (as close as MVP is putting the route to residence homes – where is this example in the EIS? How long has this project been flowing? How much volume is that pipeline running?

I would like to see the safety record of this pipeline. The property value assessment, the cumulative impact assessment for that pipeline so that the true impact of the MVP project can be compared to a project that FERC has approved.

Is there a comparative project that is apples to apples or in this case pipeline to pipeline? If there is not such a pipeline, why is the Appalachian Region being targeted for an un-tested, risky, and potential dangerous proposal?

IND213-2

There is no need for this gas in the Appalachian Region. The infrastructure is not in place to run on natural gas. Do not approve this for profit business that is only out to make money on the backs of rural community citizens.

IND213-1

The MVP is not a “mixed-use” pipeline. It would transport only natural gas. See the response to comment LA1-4 regarding other 42-inch natural gas pipelines.

IND213-2

The Commission would determine need in its project Order.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

# INDIVIDUALS

## IND214 – Louisa S. Gay

20161115-5030 FERC PDF (Unofficial) 11/15/2016 9:25:54 AM

Nov 15, 2016

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

Dear Ms. Bose and Members of the Federal Energy Regulatory Commission:

Over four months have passed since the devastating June 23, 2016 flash floods in West Virginia. These floods received national news coverage for several days. Within 10 days following these floods, at least two submittals expressing several concerns over the MVP Proposed routing through the affected areas of West Virginia were filed with you. A dominant concern was that route surveys completed prior to the floods would likely no longer be valid in the aftermath of the floods. This would be due to the fact that landscapes, streambeds and courses of stream channels would have undergone changes under the forces of heavy rains and very powerful, high-volume flood waters. The FERC was urged in these submittals to require that Mountain Valley re-survey much of the Proposed route and conduct a thorough review of stream crossings, depth of scour measurements and areas vulnerable to landslides.

The point was made that these floods served as a “test case” for the MVP route. For example: Had the pipeline been completed one month prior to the floods, would Mountain Valley’s design criteria and construction methods have been sufficient to maintain the pipeline’s integrity across all slopes and stream crossings? Would the region-wide power outages, road washouts, bridge washouts and landslides have allowed MVP’s emergency response plans to have been successfully executed had the pipeline’s integrity been compromised? Would access to the Stallworth Compressor Station in Fayette county have been maintained? In the months that have passed since the flash floods, we Virginians have not seen an Environmental Information Request (EIR) from the FERC to Mountain Valley requesting updated surveys and stream assessments.

Therefore, concerns must be raised again with particular emphasis on the fact that **116.2 miles of MVP’s Proposed route runs through six West Virginia counties that received Federal Disaster designations a few days following the floods.** These six north-to-south counties are Webster, Nicholas, Fayette, Greenbrier, Summers and Monroe. **The 116.2 miles of pipe through these Disaster-status counties constitute over 38% of the entire 303.4-mile Proposed route** (DEIS Table 2.1-2, updated for Oct 2016 proposed route). The Sept. 2016 DEIS makes no specific mention of Mountain Valley having re-surveyed any portion of its routing through these counties in response to the effects of the flash floods. Yet, the magnitude of the forces exerted by those flood waters was such that at least some ground truths directly observed and measured in Mountain Valley’s pre-flood surveys will be no longer valid for design and construction. If ground truth field investigations in such a large portion of its Proposed route are not updated, Mountain Valley’s due diligence responsibilities with respect to its work could be called into question.

1

IND214-1

IND214-1

We disagree. Other 42-inch-diameters have been constructed in the United States(see the response to comment LA1-4 for examples.) There are more than 300,000 miles of existing interstate natural gas transmission pipelines within the United States. Some of those existing pipelines cross karst terrain, steep slopes, rivers, and wetlands. Erosion control is discussed in sections 2 and 4.1 of the EIS. Karst is discussed in section 4.1.

FLASH FLOODING AND ITS EFFECTS

IND214-2 Flash flooding is listed in the DEIS among nine “geologic hazards” in the opening paragraph of section 4.1.1.5 (p. 4-21). While the remaining eight topics are discussed in this section, **flash flooding is never discussed as a distinct topic of investigation or concern.** No discussion of past histories of flash flooding in the region is offered, and no mention is made at all of the June flash floods. Furthermore, the report does not discuss the number and frequency of, for example, 100-year storms in watersheds through which the pipeline is routed. It also fails to discuss elapsed time intervals between occurrences of such storms. How many 100-year storms have occurred in recent years? How many have occurred in past history?

As is well-known among residents of West Virginia and southwest Virginia, flash flooding events are commonly associated with **landslides**. Landslides are discussed in the DEIS as related to several factors. Precipitation, and rainfall quantities and intensities are among those factors given. The DEIS also notes that construction could alter the surface and near-surface drainage along the pipe trench which could increase pre-existing landslide hazard potentials on natural slopes (p. 4-29). About 201.7 miles of the pipeline are routed through areas rated in the DEIS as having a high incidence of and high susceptibility to landslides. Of this total, **over 35% of these miles (71.3 miles) run through the six Disaster-status counties** (Table 4.1.1-10, p. 4-30).

THE MEANING OF THE FERC’S CHOICE

The absence of flash flooding discussions, and the report’s failure to recognize that the Disaster-status counties are marked by high landslide susceptibility, are signals that the DEIS has not sufficiently studied and accounted for flash floods and their associated effects along the Proposed route. These deficiencies provide no comfort to the estimated 141,607 West Virginians living in the six Disaster-status counties. Of the total population living in counties crossed by the Proposed route, **the residents of these six counties constitute nearly 24%** (Table 4.9.1-1, p. 4-269). Many are still recovering from and adjusting to the aftermath of the June flash floods. Many others are assisting them and assisting others living in the flash flood Disaster-status counties outside of Mountain Valley’s Proposed route.

All of these West Virginians know that the pipeline Mountain Valley has proposed is an unprecedented construction project on a massive scale. Dr. Ernst Kastning also recognized the unprecedented nature of this project: “No gas pipeline as large as 42 inches in diameter has been constructed across the Appalachian fold belt. Existing large pipelines run over land to the west and east of these mountains, but not across them” (Submittal 20160713-5029, p. 24).

The flash floods of June 23, 2016 have presented the FERC with a perhaps unprecedented choice. The FERC could choose to allow the deficiencies in the DEIS, briefly outlined above, to remain unaddressed. And, it could allow pre-flood field survey ground truth observations and measurements to remain without thorough review and without validation along 38% of the Proposed route. In making such a choice, **it is crucial that the FERC understand the core meanings imbedded in that choice.** Such a choice means that the FERC thinks it is entirely

IND214-2 Section 4.3 of the EIS describes measures to protect groundwater resources.

IND214-3 Recreational use, including a discussion of the ANST and the BRP, are provided in section 4.8 of the EIS.

IND214-4 See the response to comment IND92-1 regarding flooding.

# INDIVIDUALS

## IND214 – Louisa S. Gay

20161115-5030 FERC PDF (Unofficial) 11/15/2016 9:25:54 AM

IND214-2  
cont'd

reasonable to build a massive pipeline in federal Disaster areas so recently devastated by flash floods; it means the reasonableness of this choice remains firmly held to by the FERC even though the natural forces that brought calamity across a rugged landscape are the **very same forces** that would threaten the structural integrity of Mountain Valley's pipeline. More profoundly, such a choice also means that the FERC thinks residents of the six Disaster-status counties will view as entirely reasonable the construction of the pipeline through their region.

These core meanings carry such a choice to a level perhaps unprecedented for the FERC: **It would be unprecedented for the FERC to approve such a pipeline across such a landscape where residents have suffered such a calamity.**

West Virginians know that the June 23, 2016 flash floods were not the first and will not be the last flash floods to come. They know, culturally, that threats of flash floods of varying intensities and durations lurk in their landscape. They know, as do Virginians, Dr. Ernst Kastning and the DEIS itself that the pipeline construction will likely only exacerbate potentials for landslides and debris flows.

If the FERC chooses to approve the Proposed route, residents of the six Disaster-status counties will know, at best, that they have been treated with callous disregard. They will know, at worst, that they have been treated with **reckless disregard**. We Virginians will know it also.

With deep concern and sincerity,

Virginians writing on behalf of West Virginians

# INDIVIDUALS

## IND215 – Louisa S. Gay

20161115-5042 FERC PDF (Unofficial) 11/15/2016 10:35:21 AM

November 15, 2016

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

Dear Ms. Bose and Members of the Commission,

IND215-1

I have previously submitted letters to FERC, insisting that crossing the Mount Tabor Sinkhole Plain (MTSP) was ill advised.<sup>1,2,3,4,5,6</sup> A linear construction project, such as a large pipeline, is not suitable for an area that is dense with karst features. MVP's Engineers, Draper & Aden, recommended avoidance of the area due to undocumented karst features as well as the density of karst features. They cautioned further, "there is potential for negative impact to karst resources and water resources, as well as potential instability risk to the pipeline."<sup>7</sup>

Because there are hundreds of people in the Mount Tabor Valley that are reliant upon well-water, and there is no PSA that serves the area, nor is there ever likely to be, any "potential impact to subsurface water as a key natural resource,"<sup>8</sup> is disturbing to its residents.

With every posting to the record of PF15-3 and CP16-10, **the VDCR has consistently recommended avoidance of Slussers Chapel, Blake Preserve (The Nature Conservancy), and Old Mill Conservation sites.**<sup>9,10,11,12,13</sup> The VDCR recently suggested a slight "avoidance scenario"<sup>14</sup> to the MVP "*Mount Tabor Variation*," that would avoid the Slussers Chapel consite altogether and minimally impact the Old Mill

<sup>1</sup> Submittal # 20151127-5115

<sup>2</sup> Submittal # 20160106-5113

<sup>3</sup> Submittal # 20160201-5201

<sup>4</sup> Submittal # 20160325-5118

<sup>5</sup> Submittal # 20160620-5052

<sup>6</sup> Submittal # 20160714-5027

<sup>7</sup> Submittal 20151023-5035(30974910), CP16-10: Draft Resource Report 6. Seismic Hazards and Young Faults Report for MVP, Oct, 16, 2015; Preliminary Screening Analysis Karst, Water Supply and Geologic Hazards Jan 23, 2015

<sup>8</sup> Ibid.

<sup>9</sup> PF 15-3 Submittal # 20150420-5031 (30501643)

<sup>10</sup> PF 15-3 Submittal # 20160420-0068 (3050549)

<sup>11</sup> Submittal # 20160520-5051 (31472765)

<sup>12</sup> Submittal # 20160520-5051 (31472765)

<sup>13</sup> Submittal # 20160909-5315 (31679600)

<sup>14</sup> Ibid.

IND215-1

See the response to comment CO6-1 regarding the Mount Tabor Variation.

# INDIVIDUALS

IND215 – Louisa S. Gay

20161115-5042 FERC PDF (Unofficial) 11/15/2016 10:35:21 AM

IND215-1  
cont'd

consite by traversing the Brush Mountain ridge on USFS land, which is not in a "Wilderness" area.<sup>15</sup>

Both the original Proposed Route and the Mount Tabor Variation (MTV) will have a negative impact on the Slussers Chapel Cave (SCC) because the routes would cross:

the center of the Slussers Chapel Conservation Site, including several tributaries to the sinking stream that enters Slussers Chapel Cave and/or Mill Creek, which sinks into the system as well. These tributaries are first and second order streams that are extremely flood prone, lying along the lower, southeastern slopes of Brush Mountain. Such slope areas will be difficult to revegetate and will be subject to high erosion both during and subsequent to construction.<sup>16</sup>

Mill Creek itself is located in a steep ravine and its flow, while perennial, can be very minimal at times. But continuing down the creek bed a remarkable Spring erupts from a cave just underneath a cliff. This is Mill Creek Spring Cave (see figure 1). Mill Creek Cave (MCC) has a mapped length of 2,300 feet heading NW from its mouth, and it has an impressive flow. SCC drains into MCC; therefore, any impingement upon the water quality and quantity to it will also affect the MCC within the Blake Preserve.

SCC is approximately 1 mile in length heading SSE, while Mill Creek Cave is 0.44 miles heading NW, and both caves are linked by dye tracing (Fagan and Orndorff, 2004).<sup>17</sup> Using a topographical map, I posit that they are indeed the same cave, with its connection as yet undiscovered. The portion yet to be discovered I estimate to be less than 500 feet in length or about 7% of the combined length of both caves. Both the SCC and the MCC are of third order significance (B3) and are owned by the Cave Conservancy of the Virginias and the Nature Conservancy respectively. Both caves very likely support the habitat of the endangered Ellett Valley Millipede (*Pseudotremia cavernarum*). An additional significant cave in close proximity to SCC is Thundercroft Cave. Anecdotal information has Thundercroft Cave and SCC linked by dye tracing. These three large linked cave systems are within the Slussers Chapel Consite; hence, MVP should avoid any impingement in this area as stated by the VDCR.

## Summary

I oppose the construction of this pipeline in its entirety because of the inevitable environmental damage; however, after reading the DEIS I recognize that FERC may approve the project against the concerns of many citizens. Choosing pragmatism over

<sup>15</sup> Submittal # 20160909-5315 (31679600)

<sup>16</sup> Ibid.

<sup>17</sup> Fagan, J. and Orndorff, W., Karst Hydrology Investigations in the Cambrian Elbrook and Conococheague Formations of Pulaski and Montgomery Counties, Virginia, Proceedings from Second Appalachian Karst Symposium 2008. VDCR, Division of natural Heritage Karst Program, 2008, p. 8

# INDIVIDUALS

IND215 – Louisa S. Gay

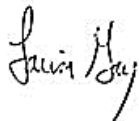
20161115-5042 FERC PDF (Unofficial) 11/15/2016 10:25:21 AM

IND215-1  
cont'd

ideology, I advocate the VDCR "avoidance scenario," which routes the pipeline on the Brush Mountain Ridge top through the National Forest.

On this ridge top there is a "relatively high-standard Forest Road seasonally gated. Public motor vehicle use is allowed every fall primarily for hunter access. Road is also popular year-round for hikers, fitness walkers."<sup>13</sup> The forest, once cleared for a construction ROW of 150 feet, if replanted can grow back to the edge of the 50-foot permanent ROW. **But the Slussers Chapel Conservation Site and its caves, once destroyed, will never recover.**

Respectful Submitted,



Louisa Gay

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<sup>13</sup> Submittal 20161115 5013 (31779155); USFS, p. 20



**INDIVIDUALS**  
**IND216 – Pat Curran Leonard**

20161114-0026 FERC PDF (Unofficial) 11/14/2016

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

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SECRETARY OF THE  
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November 8, 2016

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FERC

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[customer@ferc.gov](mailto:customer@ferc.gov)

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

**Re: Opposition to the Mountain Valley Natural Gas Pipeline –  
GAS GOING TO INDIA**

**In an article from the Roanoke Times dated Friday, November 4, 2016  
Authored by Duncan Adams titled: WGL Midstream  
acquires larger stake in Mountain Valley  
Pipeline project**

[http://www.roanoke.com/business/wgl-midstream-acquires-larger-stake-in-mountain-valley-pipeline-project/article\\_cdaa8c18-9567-5e52-ae61-5c2293273e2.html](http://www.roanoke.com/business/wgl-midstream-acquires-larger-stake-in-mountain-valley-pipeline-project/article_cdaa8c18-9567-5e52-ae61-5c2293273e2.html)

The DEIS does nothing to address why is this applicant putting in a pipeline. While FERC is required to decide whether this applicant is meeting a prepared checklist of requirements, that does not address the cumulative impacts of this project.

For example – once the applicant has been approved, construction begins, ends, and gas flows, the gas can go anywhere. As stated in the article at the link above, WGL Midstream has purchased an additional 3 percent interest making the total interest of a 10 percent stake in MVP.

If I may quote the author: "Two years ago, WGL Midstream and Vege Energy Partners signed a 20-year natural gas sales agreement with a U.S.-based subsidiary of GAIL Ltd., a natural gas company in India, to supply natural gas for export through the Dominion Cove Point liquefied natural gas export facility in Maryland."

.... And when EQT Corp. and NextEra Energy first sought customers for the natural gas that the Mountain Valley Pipeline would transport, a related "open season" document noted that the Transco pipeline system could offer "deliveries to Cove Point LNG."

Once FERC approves this project they lose control of where the gas will end up. EQT is a business and they are going to market to make money. There will be nothing that prevents that gas to be exported and sold on the world market. Today, there is not sufficient infrastructure to support the amount of gas that will be forced through the pipe, forced through my backyard, forced through the heart and communities of the rural Appalachian Region. This is not a public utility or a public good. FERC should call it what it is in the DEIS – a profit making endeavor to be built on the resources along the pipeline route.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

IND  
216-1

IND216-1      Cumulative impacts are addressed in section 4.13 of the EIS.

IND  
216-2

IND216-2      See the response to IND2-3 regarding export.

# INDIVIDUALS

## IND217 – Pat Curran Leonard

20161114-0023 FERC PDF (Unofficial) 11/14/2016

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

November 5, 2016

FERC  
Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

FILED  
SECRETARY OF THE  
COMMISSION  
2016 NOV 14 P 2:22  
ORIGINAL

### Re: Opposition to the Mountain Valley Natural Gas Pipeline

IND  
217-1

I am writing to express my opposition to the EQT MVP. FERC – your decision has dire consequences. Your decision whether to permit the MVP proposal will decide whether I live my days in a blast zone.

IND217-1

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

IND  
217-2

In all of my research and discovery regarding hydraulic fracturing, I have concluded this project is a for-profit business that has no benefit for me. The fact is that this pipeline will negatively impact the environment, personal property, and personal wellness is not disclosed in the draft EIS.

IND217-2

See the response to comment IND36-2 regarding eminent domain. See the response to FA11-12 regarding need.

This project is not a public utility and eminent domain should not be used.

IND  
217-3

The proposed pipeline is slated to be built approx. 500 feet from my property line.

IND217-3

See the response to comment IND2-3 regarding export.

The first time I went to a vetting meeting that was held at the Harvester last year, I had expressed my concerns with members of the MVP. One concern I asked about is where is this gas going to be considered a public use? I told the engineer I heard the gas could go anywhere including the open market, overseas and possibly China. The engineer replied “yea I wish they wouldn’t do that.”

IND  
217-4

I would like to know where has a 42 inch mixed use gas or natural gas pipeline running through mountain terrains for 301 miles close to residences, commercial properties, and even schools, has been pushing the amount of gases proposed, without incident. What are the property values, the ability to sell homes along that area, the safety record, the infractions, and what if any change has the home owners policy been along that route for those in the blast and evacuation zones? Because the data in the EIS and what other independent research is conflicting. *Please name the report where the cumulative Impact Analysis has been done on a similar pipeline* (as stated in this paragraph.)

IND217-4

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

IND  
217-5

The EIS takes what MVP is providing them about pipeline effects on drinking water, flooding/erosion/sink holes in mountain terrains, and the safety issues from mitigation plans are not vetted properly.

IND217-5

See the responses to comments IND12-1 and IND 12-2 regarding property values and insurance.

IND  
217-6

I expect FERC to do the independent research, weigh the pros and cons, scrutinize the data coming from the applicant, do an independent, un-bias, exhaustive fact-finding study of this project. Keep the communication public and open.

IND217-6

Cumulative impacts are addressed in section 4.13 of the EIS. See the response to comment IND47-1 regarding preparation of the EIS.

Do not ignore the people who are in opposition to this project. I disapprove this profit making business who is putting our community at risk for sheer greed, not a public use.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

# INDIVIDUALS

IND218 – Pat Curran Leonard

20161114-0027 FERC PDF (Unofficial) 11/14/2016

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

November 12, 2016

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SECRETARY OF THE  
COMMISSION

FERC

2016 NOV 14 P 2:21

Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Roanoke Gas

On page 2 of the DEIS in the introduction FERC states:

“The draft EIS addresses the potential environmental effects of the construction and operation of the proposed facilities. For the MVP those facilities include:

- about 301 miles of new 42-inch-diameter pipeline extending from the new Mobley Interconnect in Wetzel County, West Virginia to the existing Transcontinental Gas Pipe Line Company LLC (Transco) Station 165 in Pittsylvania County, Virginia;
- 3 new compressor stations (Bradshaw, Harris, Stallworth) in West Virginia totaling about 171,600 horsepower (hp);
- 4 new meter and regulation stations and interconnections (Mobley, Sherwood, WB, and Transco);
- 2 new taps (Webster and Roanoke);
- 5 pig launchers and receivers; and
- 36 mainline block valves.”

The tap in Roanoke, VA tap is proposed to benefit a Natural Gas local business named Roanoke Gas. I found it interesting reading Roanoke Gas history on their website:  
<http://www.roanokegas.com/aboutus/history.html>

I read a continual theme throughout that weather plays a critical role on the need and cost of natural gas: “Weather continued to play a very important role in the overall earnings picture for the Company. With only 3,458 heating degree days during the 1991 fiscal year, it was a full five percent warmer than the previous warmest winter on record, which occurred in 1974. With the large percent of gas sales devoted to residential heating, the Company had always remained very dependent on winter weather for good earnings.”

It is very interesting that the major beneficiary of the MVP pipelines are gas companies. With the warmest winters on record year after year, why are we increasing the use of this fossil fuel when the use of gas to heat homes is declining? As stated in other articles, Transco and other pipeline companies are going to export this gas to the highest buyer.

Weather is getting warmer. Please do not add this pipeline or any new pipelines that enhances the amount of fossil fuels on our environment. Do not approve the MVP application for this total for-profit business that is not a public good and not a public utility.

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IND  
218-1

IND218-1

See the response to IND2-3 regarding the fact that the MVP is not designed for the export of natural gas. Natural gas consumption within the United States has increased each year since 2010 (EIA, 2016).

# INDIVIDUALS

## IND219 – Pat Curran Leonard

20161114-0028 FERC PDF (Unofficial) 11/14/2016

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

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SECRETARY OF THE  
COMMISSION  
2016 NOV 14 P 2:21  
FEDERAL ENERGY  
REGULATORY COMMISSION

November 4, 2016

FERC  
Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

202-502-6652

### Re: Opposition to the Mountain Valley Natural Gas Pipeline

IND  
219-1

After reading the EIS since it was released, I feel FERC has not provided a fair and un-bias assessment of the proposal. It was like sending in the coach to referee the game. I say that because many of the mitigation plans and EQT Foundation funding has not been disclosed. EQT is a private equity firm. EQT is a business that is trying to make money. How are you allowing the taking of property for right away easements by means of eminent domain when this project is not a public utility. Can you guarantee my electric rates will benefit? Can you even guarantee the gas will benefit my community?

IND  
219-2

EQT is a business taking their product to market (which is exactly where this gas will go) this product will go anywhere in the world who will pay for it. Can be used for anything, energy, weapons, good/evil so how is this project a benefit to the communities who will be hurt the most? This project potentially will lessen my property value, will potentially prevent the sale of my property, will potentially increase my homeowners insurance, and because EQT decided to put a pipeline so close to my home, the risk of it being blown up becomes a reality that I have to live with until I die.

IND  
219-3

FERC – keep your meetings open and public, keep your communications open and public. I say that because I learned in last week’s Franklin county Board of Supervisors meeting that a person stated the board was communicating with MVP using their private emails rather than the county email system.

I also read a letter from Rep. Goodlatte of Virginia along with other representatives to the leadership at FERC to keep all meetings public and open. Why would you not keep this vetting open and un-bias?

Do not approve this for-profit business that has no benefit to me rather this project has but me and my property at risk that we did not ask for and not for a public good.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

IND219-1

See the response to comment IND47-1 regarding preparation of the EIS. See the response to IND2-3 regarding the fact that MVP is not designed for the export of natural gas. See the response to FA11-12 regarding need. See the response to comment IND36-2 regarding eminent domain.

IND219-2

See the response to comment IND2-1 regarding safety. See the responses to comment IND12-1 regarding property values.

IND219-3

See the responses to comments LA2-1 and IND83-4 regarding the public comment sessions.

# INDIVIDUALS

## IND220 – Pat Curran Leonard

20161114-0029 FERC PDF (Unofficial) 11/14/2016

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

FERC

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CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

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November 10, 2016

2016 NOV 14 P 2:21

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

IND  
220-1

Re: Opposition to the Mountain Valley Natural Gas Pipeline – The Red-Cockaded Woodpecker

On DEIS page 4-183 it states: “The Applicants informally consulted with the FWS regarding federally listed species and designated critical habitat. The Applicants also communicated with the FS, the PGC, the PADCNr, the WVDNR, the VDCR DNh, and the VDGIIF. Based on these consultations and a review of the FWS’ Information for Planning and Conservation (IPaC) database and other publicly available information, the Applicants identified 22 federally listed or otherwise sensitive species as occurring or possibly occurring in the project areas. Tables 4.7.1-1 and 4.7.1-2 list the federally threatened, endangered, and other federal species of concern that are known to occur or could occur within the MVP and EEP areas. None of the identified species have designated Critical Habitat in the MVP or EEP areas.”

While I am not a scientist, I do not even see where the DEIS has looked at the Red-Cockaded Woodpecker. This woodpecker is on the Virginia endangered list and its habitat is along the MVP route. We have seen this woodpecker in our area – again, we are not scientists but it is FERC’s job to look at all endangered species that this project is proposed to impact.

List of Virginia Endangered Species:

[https://en.wikipedia.org/wiki/List\\_of\\_endangered\\_species\\_in\\_Virginia](https://en.wikipedia.org/wiki/List_of_endangered_species_in_Virginia)

“Historically, this woodpecker’s range extended in the southeastern United States from Florida to New Jersey and Maryland, as far west as eastern Texas and Oklahoma, and inland to Missouri, Kentucky, and Tennessee. Today it is estimated that there are about 5,000 groups of red-cockaded woodpeckers, or 12,500 birds, from Florida to Virginia and west to southeast Oklahoma and eastern Texas, representing about 1% of the woodpecker’s original population. They have become extinct (extirpated), in New Jersey, Maryland, and Missouri.”

[https://en.wikipedia.org/wiki/Red-cockaded\\_woodpecker](https://en.wikipedia.org/wiki/Red-cockaded_woodpecker)

FERC – please look at all endangered species along the MVP proposed route. Do not approve this business for profit applicant that in only for greed and money not for public use or utility.

Pat Curran Leonard

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IND220-1

Red-cockaded woodpeckers are not known to occur in any of the counties that would be impacted by the MVP. According to the FWS’ Environmental Conservation Online System, the red-cockaded woodpecker is located in the eastern portion of Virginia. In addition, none of the state agencies identified the red-cockaded woodpecker as a species which could be impacted by the MVP. Downy and hairy woodpeckers are similar in appearance to the red-cockaded woodpecker and are commonly found in western Virginia.

# INDIVIDUALS

IND221 – Pat Curran Leonard

20161114-0024 FERC PDF (Unofficial) 11/14/2016

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

FERC

Docket Number: PF15-3-000,  
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2016 NOV 14 P 2: 22

FEDERAL ENERGY  
REGULATORY COMMISSION

November 6, 2016

ORIGINAL

## Re: Opposition to the Mountain Valley Natural Gas Pipeline – Cumulative Effect Analysis

On page 711 of the DEIS it states:

The current environment of the project area reflects a mixture of natural processes and human influences across a range of conditions. Current conditions have been affected by innumerable activities over thousands of years, as explained below. The CEQ issued an interpretive memorandum on June 24, 2005, regarding analysis of past actions, which stated: "agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions."

The next several paragraphs in the DEIS minimizes the cumulative effects of what the MVP pipeline impact will do to the rural communities of the Appalachian region.

Where are the cumulative effects of similar projects? When conducting an analysis this should be of equal impact and scope of the MVP proposal. If none exists, it should be stated.

Further reading of the DEIS only addresses cumulative EA on Table 4.7.3-1 regarding sensitive species in the Jefferson National Forest. I did not find any additional analysis on any other cumulative EA for water quality, gas released into the air, erosion and sediment, loss of property value, loss of economic impact on the rural community, safety and emergency response.

Please do not approve this for profit no benefit to the species that will feel the pain of the MVP proposed pipeline.

Pat Curran Leonard

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IND  
221-1

IND221-1

Cumulative impacts are addressed in section 4.13 of the EIS. Projects similar to the MVP are discussed in section 4.13.1 of the EIS. Resource specific effects, such as water resources, air quality, socioeconomic resources, are addressed in section 4.13.2 of the EIS.

**INDIVIDUALS**  
**IND222 – Pat Curran Leonard**

20161114-0025 FERC PDF (Unofficial) 11/14/2016

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

November 9, 2016

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REGULATORY COMMISSION

ORIGINAL

FERC  
Docket Number: PF15-3-000,  
CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Gray Bats

On page 40-423 of the DEIS regarding Gray Bats it states:

“The MVP does not overlap the counties in which gray bats and Virginia big-eared bats are known or are expected to be found; and no further surveys are required for these species. Mist net, acoustic, and portal surveys for special status bat species confirmed the presence of northern long-eared bats and associated roost trees throughout both West Virginia and Virginia. Although no Indiana bats were observed during mist net and acoustic surveys, we are assuming presence of Indiana bats between MPs 0 and 10.3 based on documentation of a pregnant female Indiana bat occupying summer habitat in the vicinity during an unrelated study in 2010 (FWS 2013b).”

While I am not a scientist with expertise in gray bats, I am very upset why you have not looked for all endangered species along the entire route of the pipeline. What are the dates of those surveys? Are they recent studies on bat populations? Before you allow MVP to destroy the breeding and hibernation of bats in our area, FERC needs to do a thorough analysis about all endangered species along the MVP proposed pipeline.

In the early part of summer, we were working outside getting water to our garden at night. We heard a peep coming from the ground. Once we got a light on the ground we saw a small baby gray bat with eyes still shut. This bat we assumed had fallen out of the bat house above. We left it alone hoping mama bat would hear the baby and take it back to the next overnight. The next morning it was still there and we found another little peep getting heated by the summer sun. We built a bat box and moved the babies into the box and placed it high in the air with a pathway into the nest.

We did not look up to see whether the bat was endangered we took action to help. Bats are important to eat all of the bugs that need managing in rural communities. This is how we maintain our organic farming. We need to give bats the best support we can to help their population.

FERC – take the time to address all bats along the entire pipeline route. Do not make assumptions with bats. Do not permit MVP to construct this for profit pipeline that is NOT for public use or good.

Pat Curran Leonard      4638 Dillons Mill Road      Callaway, VA 24065      540-929-5184

IND  
222-1

IND222-1

The statements regarding bats are noted. Section 4.7.1.1 of the final EIS has been revised to indicate that state agencies did not request additional bat surveys. The section has also been revised to indicate the dates that species surveys were conducted. As stated in section 4.7.1 of the EIS, the threatened and endangered species evaluated for the projects was developed in consultation with the appropriate state agencies.

# INDIVIDUALS

IND223 - Warren H. Cooper Jr.

20161114-0016 FERC PDF (Unofficial) 11/14/2016

To: Mountain Valley Pipeline, LLC  
97 Cambridge Place  
Bridgeport, WV 26330  
Attn: Kevin Wagner

Date: Oct 31, 2016  
Sent via Overnight.  
USPS Mail

FERC Docket #  
CP16-10-000

From: Warren H. Cooper, Jr  
70 Norris St.  
Rocky Mount, VA 24161

ORIGINAL

FILED  
SECRETARY OF THE  
OCT 31 11 14 P 2016  
FEDERAL ENERGY REGULATORY COMMISSION

RE: Tax map # 044001810, Franklin County, VA  
VA-FR-5491 TRACT #

Dear Mr. Wagner

I am in receipt of your two (2) certified, Oct. 21, 2016 letters requesting surveying activities on my land in the Wirth, VA community referenced above on Nov. 7, 8, and 9, 2016.

One letter was received on Oct. 21, 2016 [fourteen (14) calendar days prior to Nov. 7] on first attempt. The second letter was received on Oct. 28, 2016 [ten (10) days prior to Nov. 7] on first attempt.

1) You do not have a permit to operate in the State of Virginia from the Federal Energy Regulatory Commission (FERC).

2) Surveys are required prior to construction, not prior to permit issuance.

3) The Supreme Court of Virginia will decide what if any rights you have in this matter and not Mountain Valley Pipeline (cont on pg 2)

IND223-1

IND223-1

It noted that the commentor does not grant survey permission. Landowner rights are discussed in section 4.9 of the EIS.



# INDIVIDUALS

IND223 - Warren H. Cooper Jr.

20161114-0016 FERC PDF (Unofficial) 11/14/2016

IND223-1  
cont'd

page 2

TO: Mountain Valley Pipeline  
FROM: Warren H. Cooper, Jr.  
RE: TRACT # VA-FR-5491

Date: Oct 31, 2016  
Sent by: USPS  
overnight mail.  
FERC DOCKET #  
CP 16-10-000

For the previously stated reasons, your request  
is respectfully denied. Your request is respectfully  
denied for the third time.

Sincerely,  
Warren H. Cooper, Jr.  
Warren H. Cooper, Jr.

cc: US Senator Mark Warner  
cc: US Senator Tim Kaine  
cc: US Congressman Robert Hurt  
cc: Senator Bill Stanley  
cc: Delegate Charles Ponder  
cc: Kimberly Bose, FERC

# INDIVIDUALS

## IND224 – Pat Curran Leonard

20161114-0030 FERC PDF (Unofficial) 11/14/2016

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

November 11, 2016

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FERC

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CP16-10-000 or CP16-13-000  
[customer@ferc.gov](mailto:customer@ferc.gov)

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – A disenfranchised process

IND  
224-1

Less than one week before we were to stand in front of FERC and state are “opinions” of the proposed MVP pipeline, we were given parameters of that so called public forum.

First, we were told in the newspaper that a public forum was not going to happen rather, FERC was providing “sessions” that we could be in front of a FERC official with a Stenographer. Then we were told we each had 3 minutes. Then the night before the meeting in Franklin County, VA “session” we were told we only had 3 minutes and our comments could only be about the Draft Environmental Statement.

How convenient for FERC. We showed up, at 5:00 were handed a number, were seated by an MVP Consultant and instructed to enter one of two classrooms, without anyone else, not allowing the press to enter even if requested. As I sat between #7 and #9 citizens, I heard their stories from an older gentleman that had no help in sorting out the paperwork that MVP had sent him. He had questions and no one to help him work through the language of the documentation. He felt it was wrong (the value MVP was proposing for an easement) but he did not know what resources he had to get important questions addressed. “Do you think they can help me?” he asked. On the other side another older gentleman stated his property had been for sale for two years and he had one interested person only look and he never heard from them again. He felt this pipeline has pushed any prospect of buyer away from his area because the pipeline was going right through his land. He did not know if he could get it all out in 3 minutes.

My #8 was up. I had a page and one-half of summaries that was not inclusive but I tried to keep it at the “3-minutes” that I and my fellow citizens were allowed. The stories that others had were so much more distraught than mine. I wish they could be supported and could find the resources to get through the bureaucracy and ridiculous FERC website just to find the docket relating to MVP’s application.

FERC – this process for public feedback is a disgrace. It is a process that disenfranchises the citizens you are supposed to represent and protect. The entire process makes me feel as though FERC objective is to approve every application for a pipeline and answer only what is required by FERC legally. The process feels scripted, that FERC is only checking off boxes and keeping any objection to their applicants proposals squelched into a hollow pile of docket claims that feels like a mere formality with no true representation of the people that will suffer along the pipeline route.

Pat Curran Leonard

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IND224-1

See the response to comment LA2-1 regarding the public comment sessions.

# INDIVIDUALS

IND225 – Pat Curran Leonard

20161114-0031 FERC PDF (Unofficial) 11/14/2016

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

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FEDERAL ENERGY  
REGULATORY COMMISSION

November 7, 2016

ORIGINAL

## Re: Opposition to the Mountain Valley Natural Gas Pipeline - BEES - they are fighting for their life

IND  
225-1

The DEIS does not address the cumulative impact of the loss of honey bees because of the construction and 50 foot wide path that is proposed to become the MVP gas pipeline. In the attached Sierra Club document, honey bees are struggling without a pipeline to take out their flowering tree pollens.

Bee-procalypse is a condition that the hives on our property have been struggling with over the past two years. We had eight functioning hives in the beginning of the 2016 season and now our hives have been cut in half. We will have to invest additional money and time next Spring to get our hives back to the level they were. But, we worry about the pipeline proposed to run 500 feet from the hives. The loss of the flowering trees will take away much needed pollen. Also, bees need lots of clean water to keep their hives thriving. After reading the areas of construction and the use of the amount of water from local streams and waterways, this is a concern of interrupting an already sensitive species resource.

The Sierra Club points to a link of bees being exposed to pesticides as being a reason for bee-procalypse. Exactly what are the pesticides that MVP would propose to use to keep weeds down along the 50 foot wide path or more often the 10 foot wide path that will be used to maintain the pipeline route.

Please do not approve the MVP for-profit pipeline proposal. This is a business trying to get gas to the market as fast as they can. There is no benefit to the communities along its path and those that will bear the burden of this project.

Pat Curran Leonard

4638 Dilons Mill Road

Callaway, VA 24065 540-929-5184

IND225-1

As stated in section 4.4.2, Mountain Valley does not propose the wide-scale use of pesticides and/or herbicides, but would consider them for localized use, only after a request from a landowner or land management agency. In addition, the EIS has been updated to reflect that the FS may require herbicide use on NFS lands. As stated in section 4.4.2.2 of the EIS, in partnership with the Wildlife Habitat Council, Mountain Valley would promote growth of ground cover species that flower for long durations throughout the growing season in an attempt to create new habitat for native and domestic pollinators such as bees and butterflies.

# INDIVIDUALS

## IND226 – Roberta C. Johnson

20161115-5123 FERC PDF (Unofficial) 11/15/2016 2:41:13 PM

### FEDERAL ENERGY REGULATORY COMMISSION, (FERC/DEIS-D0272) Mountain Valley Project and Equitrans Expansion Project, Draft Environmental Impact Statement (September 2016)

Notes from a limited review through Section 4.3

by Robert K. and Roberta C. Johnson (October 28, 2016 – edited 11/1/16)

SUBMITTED 2x by two different people - Robert K. Johnson (20161116-5038)

IND 226-1  
IND 226-2

#### EXECUTIVE SUMMARY

**Page ES-3**  
What is the DEIS publication date? FERC has said the end of the comment period is Dec. 22. It is supposed to be 90 days after “publication” of EPA’s notice in the Federal Register.

**Page ES-5**  
[The estimate and types of total wetlands appear to be grossly underestimated. See comments on “Wetlands” below Pages 4-119 to 4-129.]

IND226-1 The draft EIS was published and released to the public on September 16, 2016.

IND226-2 The estimate of wetlands affected is accurate and based on on-the-ground delineations where survey permission was granted.

IND 226-3

#### 1.0 INTRODUCTION

**Page 1-1**  
Will FERC issue a “Blanket Certificate”, as requested by MVP, that would allow all future “construction, operation and abandonment of certain eligible unspecified facilities” and allow “open access transportation services and pre-granted abandonment approval”. [There should be no “blanket” approval for any pipeline facilities or actions related to the pipeline! At the very least, this needs to be clearly explained and defined.]

IND226-3 The Commission has not yet made a decision about issuing Blanket Certificates to Mountain Valley.

IND 226-4

**Page 1-15 (1.3.2.2)**  
Neither the status of the COE permit application nor the timeframe for action is provided.

**Page 1-18 (1.3.2.4)**  
The DEIS recognizes here that DEQ and COE could deny the required 401/404 wetlands permits (original application made Feb 2016)

IND226-4 Information regarding the COE permit application can be found in table 1.5-1 of the EIS.

IND 226-5

#### 2.0 DESCRIPTION OF THE PROPOSED ACTION

**Page 2-2 (Table 2.1-1) Proposed Facilities...**  
Right now no compressor stations are listed in VA [What about the future? Near the Roanoke River? In a Tier III\* watershed? These would be unacceptable.]

IND226-5 Mountain Valley is not proposing a compressor station in Virginia.

IND 226-6

**Page 2-33 (Table 2.4-1) Summary of Proposed Modifications...**  
MVP requests siting the pipeline closer than 15’ when paralleling certain waterbodies and also wider than acceptable right-of-ways in some wetlands— only the latter is labeled “Not Acceptable” by FERC. [Paralleling trout streams and sensitive waters is also “unacceptable” at 15’ -- and perhaps at any distance. Furthermore, factors such as removal of tree canopy must also be taken into consideration. This is particularly true of the Tier III\* Bottom Creek watershed on Poor and Bent Mountains in Roanoke County, VA.] (See Tables 2.4-1 and 4.3.2-12) Only Mill Creek--a tributary of Bottom Creek and a designated Virginia Wild Natural Trout Stream\*\*-- is listed in Table 4.3.2-12 as a waterbody that would be paralleled within 15’ (in this case 10.7’). Existing MVP corridor maps of the Bottom Creek watershed show additional paralleling tributaries\*\* closer than 15’ -- as well as many unacceptable wetlands crossings. Note: This and other sections reference “Appendices” They are not on the hard copy or on the disk, and instructions were not provided to locate them. The online 2,671 pages of appendices, once located, have no Table of Contents, are not easily searched and appear to contradict conclusions in the DEIS (as pointed out in other comments below).

IND226-6 Paralleling waterbodies within 15 feet were re-examined due to re-routes proposed by Mountain Valley in October 2016. Updates to the text and tables, as necessary, can be found in section 4.3 of the final EIS. Due to the number of pages in the appendices, these sections were not included in the hardcopy. However, the appendices are available on the CD provided by the FERC to the environmental mailing list as well as in the FERC’s eLibrary system.

\* “Tier III” is the designation in Virginia for “Exceptional State Waters” (known as “Outstanding National Resource Waters” for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities.

[If Bottom Creek’s watershed is degraded, the Tier III portion will be degraded as well]

\*\* Virginia Water Quality Standards #9VAC25-260-450 designates “Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries” as Class II “Wild Natural Trout Streams” whose quality under The Clean Water Act “shall be maintained and protected to prevent permanent or long-term degradation or impairment” (Virginia Antidegradation Policy #9VAC25-260-30).

# INDIVIDUALS

## IND226 – Roberta C. Johnson

20161115-5123 FERC PDF (Unofficial) 11/15/2016 2:41:13 PM

IND 226-7	<p><b>2.0 Description of Proposed Action (Cont.)</b> <b>Page 2-57 (2.7)</b> [This section essentially provides an open door for future expansion and abandonment of pipeline facilities. The public comments solicited by FERC are for an open-ended project that could be significantly different from what is proposed here. Without knowing the ultimate scope of this project, it is impossible for the public to provide comprehensive comments on the potential impacts of the project.]</p>	IND226-7	Section 2.7 of the final EIS has been revised to state that any expansion or abandonment would require an amendment to the existing application, or a new application which would be reviewed by the FERC staff, and additional permitting by other local, state, and federal agencies.
IND 226-8	<p><b>3.0 ALTERNATIVES</b> <b>Page 3-76 (Table 3.5.3-1) Status of Minor Route Variations Reported by Stakeholders...</b> Why does this table not appear to include reported “unresolved” routing issues for all Poor Mountain/Bent Mountain stakeholders? (Approx. MP 238.25 –244.5) [Other landowners have submitted requests which should appear in this table even if survey has not been accomplished. They’re still “unresolved.”]</p>	IND226-8	To the best of our knowledge, table 3.5.3-1 identifies all applicable stakeholders, who requested modifications of the pipeline route across their properties.
IND 226-9	<p><b>4.0 ENVIRONMENTAL ANALYSIS</b> <b>4.1 Geology</b> <b>Page 4-4 (Table 4.1.1-1) Elevations along the Mountain Valley Pipeline</b> Note: Poor Mountain in Roanoke County, VA is the highest and one of the steepest elevations crossed by the proposed MVP. [Considering the sensitivity of the watershed here, this route poses unacceptable risks.]</p>	IND226-9	Steep slopes are discussed in section 4.1 of the EIS.
IND 226-10	<p>Soil Liquefaction <b>Page 4-27 (Table 4.1.1-9) Flood Zone and Class of Pipe...</b> The table lists the flood zone of the Roanoke River crossing in Montgomery Co. as being 1,446 ft. – [this distance, which represents the length of pipe exposed to flooding, should be a major concern.] Also, no flood zone crossings are mentioned for Roanoke County, where Bottom Creek and Mill Creek actually had major flooding during the Flood of 1985, which took out bridges and roads on Bent Mountain.</p>	IND226-10	As stated in the text preceding table 4.1.1-9, the table was provided to characterize areas where soil liquefaction could potentially affect the pipeline and therefore not every waterbody crossing/flood zone crossing is listed within this table.
IND 226-11	<p>Landslides <b>Page 4-30 to 4-32 (Tables 4.1.1-10&amp;-11) Landslide Incidence and Susceptibility... and Areas of Landslide Concern...</b> Table 4.1.1-10 lists 4.3 miles of “High Incidence Susceptibility” to landslides in Roanoke County, yet Table 4.1.1-11 does not cover any Roanoke Co. milepost designations as having “Areas of Landslide Concern.” [This is a contradiction and needs to be corrected.]</p>	IND226-11	Table 4.1.1-10 summarizes the potential for landslides to occur as categorized by Godt, 2014 and reflects the probability of development of a landslide. Table 4.1.1-11 identifies specific areas and landslide features that were identified by Mountain Valley as either recently sliding or being potentially prone to sliding in the near future and were evaluated via desktop and field review. Although a general area may be characterized as having a high potential for landslides that does not mean that these features would develop a landslide or that a landslide would occur.
IND 226-12	<p><b>4.3 Water Resources</b> Aquifers <b>Page 4-70 (Table 4.3.1-1) Aquifers Crossed...</b> This table, with regard to Roanoke County, is incomplete (MP 236.1 to 239.2), incorrect (Bedrock at MP239.2 to MP244.4), and disagrees (in part) with Table 4.1.1-3 on page 4-8.</p>	IND226-12	Table 4.3.1-1 of the final EIS has been revised to include the aquifers in Roanoke County. Discrepancies between tables 4.3.1-1 and 4.1.1-3 have been eliminated.
IND 226-13	<p>Groundwater in Karst Terrain <b>Page 4-74 (Table 4.3.1-2) Springs and Swallets...</b> This table listing springs and swallets in karst topography is incomplete, as noted by FERC. [Since it does not include anything in the Roanoke Valley and only 4 listings in Montgomery County (all within less than a mile), the table is clearly deficient and, therefore, meaningless. There are known caves and karst topography in both Roanoke and Montgomery Counties, and there are obviously far more springs and swallets that need to be identified in the karst regions of both counties.]</p>	IND226-13	Table 4.3.1-2 of the final EIS has been updated to include additional springs and swallets as survey data becomes available.

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IND 226-14 | Water Supply Wells, Springs, and Swallets

**Page 4-80**

"All private domestic water supply wells within 150 ft. of the construction work areas" have not been identified, and the DEIS "recommendation" by FERC is that all wells, springs, swallets and other drinking water sources be identified. [*This has not been done as yet, and should be required not "recommended."*]

**Page 4-80 to 4-81**

IND 226-15 | Preconstruction evaluation of water supplies along the route does not require MVP to test for hydrocarbons, volatile organic compounds, and total metals (as it *does* for the Equitrans project). Why? [*This needs to be done for complete baseline data.*]

IND 226-16 | Groundwater Use

**Page 4-83**

As indicated on Page 4-90, the Wild Natural Trout Streams\*\* of Bottom Creek (including the Tier III\* section of Bottom Creek and all of its tributaries\*\*) must be protected. [*The DEIS should, therefore, clearly specify here (not just imply this in Table 4.3.2-10) that surface water withdrawals and hydrostatic wastewater discharges are "prohibited" in the entire Bottom Creek watershed on Poor and Bent Mountains due to the potential thermal and chemical effects on trout and other sensitive species. Furthermore, a "General Permit" for the discharge of hydrostatic test water should not be allowed anywhere for a project of this magnitude.*]

IND 226-17 |

**Page 4-84**

Due to shallow bedrock in some areas, blasting will likely be "necessary to achieve required trench depth"; therefore, this will most likely occur on Poor Mountain in Roanoke and Montgomery Counties due to its shallow metamorphic bedrock. This could "result in diminished well yields and increased turbidity," [*Correspondingly, it could also affect spring outputs and water supplies to the tributaries\*\* that are the headwaters of Tier III\* Bottom Creek, and this could be a long-term impact.*]

IND 226-18 | Surface Waters

**Page 4-89**

Regarding permanent fill material along access roads that would be sited in 44 wetlands (as currently estimated), FERC "recommends" that MVP supply "reasonable alternatives to the use of culverts and permanent fill." [*FERC should not allow any permanent access roads within waterbodies\*\* or through wetlands --- particularly those that filter the water for Tier III\* watersheds --like that of Bottom Creek on Poor & Bent Mountains*]

IND 226-19 | Surface Water Use Classifications

**Page 4-90**

This section recognizes that Bottom Creek in Montgomery County, Virginia is the only Tier III\* waterbody that is downstream from the Mountain Valley Pipeline anywhere along the proposed 300 mile corridor. The DEIS states that the MVP would cross Bottom Creek in Roanoke County about 3 miles above the Tier III segment (and not along an impaired segment), and further states that impacts to the "Wild Natural Trout Streams\*\*\* in its watershed would be minimized or avoided. [*What has been "minimized" here is the impossibility of protecting Bottom Creek's watershed on Poor and Bent Mountains and, consequently, Tier III Bottom Creek itself.* The construction of the MVP from MP238.25 to MP244.5 would *actually* be

\* "Tier III" is the designation in Virginia for "Exceptional State Waters" (known as "Outstanding National Resource Waters" for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities."

[*If Bottom Creek's watershed is degraded, the Tier III portion will be degraded as well.*]

\*\* Virginia Water Quality Standards #9VAC25-260-450 designates "Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries" as Class ii "Wild Natural Trout Streams" whose quality under The Clean Water Act "shall be maintained and protected to prevent permanent or long-term degradation or impairment" (Virginia Antidegradation Policy #9VAC25-260-30).

IND226-14 | See the response to comment IND147-1 regarding FERC staff recommendations.

IND226-15 | The FERC staff have determined that the water sample analysis proposed by Mountain Valley (in addition to our recommendation) and Equitrans are adequate to protect drinking water sources.

IND226-16 | Locations of hydrostatic testwater withdrawals are presented in table 4.3.2-8. Section 4.3.2 of this final EIS has been revised to state that Mountain Valley would ensure that base flows are maintained in the source streams during the water withdrawals for hydrostatic testing process. Hydrostatic testing withdrawals would also be subject to the conditions of permits as identified in table 1.5-1. Further, our Procedures require that Mountain Valley maintain adequate flow rates to protect aquatic life, provide for all waterbody uses, and provide for downstream withdrawals of water by existing users. In addition, since issuance of the draft EIS Mountain Valley has changed many hydrostatic test water sources to municipal water.

IND226-17 | As stated in sections 2, 4.1, and 4.2 of the EIS, Mountain Valley would first attempt to rip bedrock. Any required blasting would be conducted in accordance with all federal, state, and local regulations. Charges would be kept to the minimum needed to break up and dislodge the rock. Mountain Valley would conduct pre- and post-blast surveys for wells and structures within 150 feet of blasting activities.

IND226-18 | See the response to comment IND209-1 regarding the permanent fill of wetlands.

IND226-19 | See the response to comment FA11-15 regarding waterbody crossings and sedimentation and turbidity modeling. As discussed in section 4.3 of the EIS, hydrostatic test water discharges would be tested prior to discharge to overland locations. As stated in section 2.4.1 of the EIS, "our Procedures" refers to the FERC's Wetland and Waterbody Construction and Mitigation Procedures which are available for review on the FERC website:  
<http://www.ferc.gov/industries/gas/enviro/guidelines.asp>.

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19  
cont'd

## Surface Water Use Classifications

Page 4-90 (Cont.)

*an assault* on Tier III Bottom Creek, its watershed, and on a major source of Roanoke Valley's drinking water for many reasons:

- the number of stream crossings in just 6.25 miles (A total of 39 per Appendix F-1),
- the miles of paralleled named and unnamed tributaries\*\* (est. at >3mi.),
- the extensive area that will be permanently deforested and maintained (est. at >160 acres),
- the blasting that will occur on steep slopes with shallow metamorphic bedrock, and the certainty of erosion on the steep slopes of Poor Mountain (>60-70° per Appendix K),
- the resulting sedimentation,
- the potential discharge of hydrostatic testing effluent,
- the number of wetland crossings (A total of 18 per Appendix G-1 with others yet to be surveyed),
- the construction activities that could result in rerouting, diminished yields, and increased turbidity of the *multitude* of springs in the corridor, and
- the adverse effects on rare and threatened species.

(See Pages 4-98 through 4-129 in these "Notes" for further details.)

This section makes a point of saying that the MVP would not cross the "impaired section" of Bottom Creek. [*However, while stream data isn't available on the upper reaches of Bottom Creek and its tributaries\*\*, it is highly likely that these waters, like those further downstream, are impaired due to temperatures that exceed the standards for trout streams. MVP must assume that this is the case unless and until baseline data shows otherwise. Regardless, any vegetation removal in the pipeline corridor will exacerbate temperature impairment downstream, and the effect will be long-term due to maintenance of the pipeline corridor.*]

Explicit measures for the protection of Bottom Creek and its tributaries\*\* that are stated here include the use of dry open-cut crossings and time-of-year restrictions for in-stream construction. First of all, dry open-cut crossings are standard for the whole project and offer no "extra" protection for the high quality waters discussed here. Second, the "time-of-year restrictions" (according to Appendices F-1&5) are only applied to 4 out of the 39 crossings in this watershed – *this needs to be corrected to include all crossings since Tier III\* Bottom Creek and all of its named tributaries (e.g., Mill Creek) and unnamed tributaries are "Wild Natural Trout Streams."* (See #9VAC25-260 below)\*\* All of these waters are also habitats for rare and threatened species including the orangefin madtom (that is currently listed only at MP242.9 on Mill Creek -- See Appendices F-1&5) and 3 other rare species including the big-eye jumprock, the riverweed darter, and the Roanoke darter (none of which are listed in the DEIS or its appendices and *this needs to be corrected to include all crossings (named & unnamed)*). (The Bottom Creek Tier III Nomination Package lists these species – See FERC e-library for CP16-10-000.) Finally, the measures offered by MVP for the protection of Bottom Creek and its watershed imply temporary, short-term impacts from the pipeline construction. [*The combination of permanent increases in water temperature and sedimentation alone will actually cause long-term impacts on the brook and rainbow trout fisheries\*\* of the Tier III\* Bottom Creek watershed. The resulting water quality degradation and the loss of stream uses is a violation of the antidegradation policy (Sec. 316(a) of the Clean Water Act) and cannot be allowed.*]

This section of the DEIS also indicates that, in order to avoid impacts to Tier III\* Bottom Creek and its tributaries\*\* (which are all Wild Natural Trout Streams), MVP "would implement measures in its Procedures." What are these "Procedures" and why haven't they been included with the DEIS for public review? [*This needs to be done.*]

\* "Tier III" is the designation in Virginia for "Exceptional State Waters" (known as "Outstanding National Resource Waters" for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities. [*If Bottom Creek's watershed is degraded, the Tier III portion will be degraded as well.*]

\*\* Virginia Water Quality Standards #9VAC25-260-450 designate "Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries" as Class II "Wild Natural Trout Streams" whose quality under The Clean Water Act "shall be maintained and protected to prevent permanent or long-term degradation or impairment" (Virginia Antidegradation Policy #9VAC25-260-30).

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IND 226- 20	Surface Water Protection Areas and Public Supply Intakes <b>Page 4-92 (Table 4.3.2-4) Public Water Supply Intakes within Three Miles</b> The intake for the Spring Hollow Reservoir is only 0.8 miles from the pipeline crossing of the Roanoke River. <i>[This poses an unacceptable risk for contamination of a major public water supply for the Roanoke Valley.]</i>	IND226-20	See the response to comment IND147-4 regarding contingency plans for public surface water supplies.
IND 226- 21	Sensitive Waterbodies <b>Page 4-98 (Table 4.3.2-8) Waterbodies Crossed ...in Areas of Shallow Bedrock</b> The table is inaccurate. Milepost 238.3 in Roanoke County (listed on this table) is a crossing that is not part of the "Bottom Creek" watershed. Also, There are no listings here for actual crossings of Bottom Creek or its unnamed tributaries** on Poor Mountain (which is known to have shallow metamorphic bedrock). These crossings are numerous in Roanoke County, and the watershed begins around MP238.25. The table omits data found in Appendices F-1 and M. Of particular note, is the 4.8 mile section (MP234.2 – 239) in Roanoke County on Poor Mountain that is identified as an area of shallow bedrock (M) where waterbodies would be crossed (F-1) and is the 2 <sup>nd</sup> longest distance in the 301 mile proposed MVP corridor.	IND226-21	Comment noted.
IND 226- 22	Designated Flood Zones <b>Page 4-100 (Table 4.3.2-9) FEMA 100-year Floodplains Crossed</b> The table incorrectly lists the Blackwater River as being in West Virginia when it is actually in <u>Virginia</u> . Furthermore, there are no other Virginia listings. This table is also inaccurate and incomplete as suggested by the absence of the Roanoke River and Bottom Creek (both in Virginia)-- which experienced historic flood levels as recently as 1985. <i>[They should be included in the table.]</i>	IND226-22	As noted in this final EIS, the currently proposed route (filed October 14, 2016 and further adjusted in December 2016) would not cross the Blackwater River. While the Roanoke River and Bottom Creek may have experienced historic flood levels, these two streams in the areas that would be crossed by the MVP pipeline are not designated 100-year floodplains by FEMA.
IND 226- 23	Water Appropriations <b>Page 4-101</b> Deals with withdrawal and discharge of waters for hydrostatic testing. <i>[FERC should make it clear that sensitive waters sources will not be used; and, should specifically exclude sources in the Tier III* Bottom Creek watershed.]</i>	IND226-23	As stated in section 4.6.2 of the EIS, Mountain Valley would not withdrawal water from and discharge into exceptional value waters or waters that provide habitat for federally listed threatened and endangered species.
IND 226- 24	General Impacts and Mitigation <b>Page 4-108</b> This section states that "in almost all cases, ... impacts would be limited to the period of in-stream construction." This, however, overlooks numerous long-term effects on the high quality Wild Natural Trout Waters** of the Tier III* Bottom Creek watershed – which, as pointed out above, is also home to 4 rare and threatened species of fish. Long-term effects include increased water temperatures (due to cutting trees and maintaining the corridor) and increased turbidity along with sedimentation (due to increased runoff and erosion of steep slopes and flood-prone stream banks). Other potential impacts include increased nutrient loading, decreased DO levels, and the potential of spills. Both acute and chronic toxic effects to riparian and aquatic organisms are likely. <i>[This is not acceptable.]</i>	IND226-24	Impacts on Bottom Creek are discussed in sections 4.3 and 4.6 of the EIS. Longer term impacts would be minimized as the riparian zone would regenerate except for a 30-foot-wide zone where some vegetation maintenance would occur. In the event of a leak, natural gas rises up and is dispersed into the atmosphere, there is not a spill in the sense of a liquid pipeline. Given that, and that methane is non-toxic, there is no evidence of chronic toxic effects to organisms.
IND 226- 25	Project-Specific Impacts and Mitigation <b>Page 4-110</b> This section addresses in-stream blasting with all crossing types. <i>[In order to protect the Tier III* Bottom Creek watershed and all of its "Wild Natural Trout Streams," no blasting should be allowed with regard to stream crossings here, and the pipeline should be rerouted as necessary.]</i>	IND226-25	Re-routing is not needed nor feasible to avoid all trout streams. As stated in sections 2, 4.1, and 4.2 of the EIS, Mountain Valley would first attempt to rip bedrock. Any required blasting would be conducted in accordance with all federal, state, and local regulations.

\* "Tier III" is the designation in Virginia for "Exceptional State Waters" (known as "Outstanding National Resource Waters" for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities.

[If Bottom Creek's watershed is degraded, the Tier III portion will be degraded as well.]

\*\* Virginia Water Quality Standards #9VAC25-260-450 designates "Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries" as Class II "Wild Natural Trout Streams" whose quality under The Clean Water Act "shall be maintained and protected to prevent permanent or long-term degradation or impairment" (Virginia Antidegradation Policy #9VAC25-260-30).



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## IND226 – Roberta C. Johnson

Project-Specific Impacts and Mitigation (Cont.)

IND 226-26 **Page 4-112**  
 MVP will “minimize impacts on first-order streams” by adhering to its “Procedures.”  
*[Again, what are these “Procedures,” and why haven’t they been included with the DEIS for public review? This needs to be done. Note: Bottom Creek and its tributaries\*\* on Poor and Bent Mountains in Roanoke County are, by FERC’s definition, first-order streams that are the source of a Tier III\* waterbody and a Roanoke Valley public water supply (Spring Hollow Reservoir) and need to be recognized as such.]*

IND 226-27 **Page 4-113 Table 4.3.2-12 Locations Paralleling Waterbodies within 15 Feet**  
 This table lists waterbodies where the pipeline runs parallel within 15’. In Roanoke County, Virginia, it includes one section (of an estimated total of >3 miles of such placements) of just one of Bottom Creek’s unnamed tributaries\*\* *[This Table needs to be updated or survey completed, since MVP Appendix-B maps and the terrain indicate more than just the one at UNT/Mill Creek MP243.3 . Regardless, due to the sensitivity of Tier III\* Bottom Creek’s watershed, the pipeline should not be allowed to parallel Bottom Creek, Mill Creek (a tributary of Bottom Creek), or any of their tributaries within 15’ (and ideally not at all—See Page 4-114 below); FERC should specify this.]*

IND 226-28 **Page 4-114**  
 States that no ATWS sites will be “within 100 feet of a stream” and no sections will “parallel any waterbodies” within the Jefferson National Forest. *[The same standards should be applied to all of the Tier III\* Bottom Creek watershed and its Wild Natural Trout Streams\*\* on Poor and Bent Mountains in Roanoke County, Virginia.]*

IND 226-29 **Conclusion (Surface Water Resources)**  
**Page 4-116**  
 The conclusion here that there will be “no long-term impacts on surface waters” is incorrect. As noted in the above comments (See Pages 4-90 and 4-108 in these “Notes”), long-term impacts will occur, and the pipeline project will consequently violate the Clean Water Act.

IND 226-30 **Wetlands**  
**Page 4-117**  
 It is acknowledged that MVP was unable to survey all parcels. That is clearly the case in Roanoke County, VA. On Bent Mountain alone, with its shallow metamorphic bedrock and abundant water, all 3 wetland types are represented in abundance. Wetland scientists have referred to this area as a “beaver magnet” because of the numerous wetlands. Therefore . . .

IND 226-31 **Page 4-118 (Table 4.3.3-1) Wetland Impacts Associated with the MV Project**  
*[ ... totals for palustrine emergent (PEM), palustrine scrub-shrub(PSS) and palustrine forested(PFO) wetlands appear to be grossly underestimated. Accurate wetlands delineation and assessment are needed.]*

IND 226-32 **Sensitive Wetlands**  
**Page 4-119**  
 This page states that “no protected wetlands’ have been identified”. Aren’t all wetlands protected by law? *[Many landowners are upset that a for-profit company will be allowed to destroy wetlands that the owners are forbidden to touch. Wetlands are essential for filtering nutrients and for preventing erosion, not to mention for providing habitats for diverse plant and animal populations. On Bent Mountain in Roanoke County, VA, the wetlands are particularly important to the health of the Tier III\* Bottom Creek watershed.]*

\* “Tier III” is the designation in Virginia for “Exceptional State Waters” (known as “Outstanding National Resource Waters” for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities.  
 [If Bottom Creek’s watershed is degraded, the Tier III portion will be degraded as well.]  
 \*\* Virginia Water Quality Standards #9VAC25-260-450 designates “Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries” as Class ii “Wild Natural Trout Streams” whose quality under The Clean Water Act “shall be maintained and protected to prevent permanent or long-term degradation or impairment” (Virginia Antidegradation Policy #9VAC25-260-30).

IND226-26 As stated in section 2.4.1 of the EIS, “our Procedures” refers to the FERC’s Wetland and Waterbody Construction and Mitigation Procedures, which are available for review on the FERC website: <http://www.ferc.gov/industries/gas/enviro/guidelines.asp>.

IND226-27 The waterbody table listing where the pipeline would parallel the stream within 15 feet has been updated with new information in section 4.3.2 of the final EIS.

IND226-28 It is not feasible to apply FS standards, which cover the 3.5-mile crossing of the Jefferson National Forest (about 1 percent of the total route), to the remainder of the MVP pipeline, which cross non-federal public and private lands, due to the wide range of conditions encountered along the broader project.

IND226-29 We stand by our conclusion as explained in section 4.3.2 of the EIS.

IND226-30 Comments noted.

IND226-31 The estimation of the amount of impacts (in acres) to wetlands has been updated in the final EIS using the best available information. Our cooperator for the development of this EIS, the COE, will verify the Applicants’ data regarding wetlands.

IND226-32 Impacts on wetlands are regulated by the COE under the CWA. The sub-section mentioned is for “Sensitive Wetlands”, that is those designated as having exceptional value or high quality, typically as identified by state agencies.

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## IND226 – Roberta C. Johnson

IND 226-33 Wetlands Crossed by the Project  
**Page 4-119**  
 This section states that MVP is required to finish the field survey for wetlands, *[but the results should do more than “result in a change in the overall total wetland impacts.” The quantity of wetlands on Bent Mountain in Roanoke County, Virginia (A total of 18 crossings per Appendix G-1 -- with others yet to be surveyed) should mandate the rerouting of the pipeline.]* These wetlands are an integral part of the health of all of the tributaries of Tier III\* Bottom Creek as well as a water supply of Roanoke Valley. Note: every tributary in the watershed of Bottom Creek on Poor and Bent Mountains is classified as a Wild Natural Trout Stream.\*\*

IND226-33 Mountain Valley attempted to route the pipeline to avoid sensitive resources, such as wetlands, where possible, and this process would be demonstrated to the COE, as part of its permitting process under the CWA Section 404(b)(1) guidelines.

IND 226-34 Environmental Consequences  
**Page 4-120**  
 Again, the estimates of wetland acres are underestimated, and clearly, wetlands delineation on Poor and Bent Mountains in Roanoke County is incomplete/inaccurate. (Appendix G-1 doesn't include any Palustrine Forested Wetlands for Virginia, when known PFO wetlands are in the MVP corridor on Bent Mountain) Furthermore, traversing these wetlands will cause permanent long-term impacts and will impair the health of the entire Tier III\* Bottom Creek watershed in Roanoke and Montgomery Counties. These impacts will result from trenching that creates a “French Drain Effect,” adding fill for building access roads, cutting trees in forested wetlands (causing an increase in the temperature of Wild Natural Trout Streams\*\*), compaction, and other factors. Restoration to “pre-construction conditions and wetland functions” will, in fact, not be possible.

IND226-34 The estimation of the amount of impacts to wetlands has been updated in the final EIS using the best available information. Our cooperator for the development of this EIS, the COE, will verify the Applicants’ data regarding wetlands. Restoration of wetlands and compensatory mitigation for unavoidable impacts (such as a conversion from PFP to PEM wetland type) is discussed in section 4.4 of the EIS.

IND 226-35 Aboveground Facilities  
**Page 4-120**  
*[Due to the abundance of wetlands and the sensitivity of the watershed of Tier III\* Bottom Creek and its “Wild Natural Trout Stream”\*\* tributaries, no aboveground facilities (such as compressor stations), should ever be located in Roanoke County on Poor Mountain, Bent Mountain, or the Bent Mountain Plateau.]*

IND226-35 The discussion regarding aboveground facilities and wetlands has been updated in the final EIS.

IND 226-36 Yards  
**Page 4-121**  
*[Since many surveys have not been completed as yet on Poor and Bent Mountains in Roanoke County, Virginia, yards and additional temporary workspaces (ATWS) will need to be relocated where they are found to be closer than 50 feet to wetlands (preferably no closer than 100 feet as in the Jefferson National Forest). One such yard or workspace location on the Bent Mountain Plateau is approximately between MP241.3 and MP241.6 where known wetlands (of all three types) exist.]*

IND226-36 We reviewed the location of ATWS near wetlands as discussed in sections 2.3 and 4.3 of the EIS and find them acceptable.

IND 226-37 Access Roads  
**Page 4-121**  
 The number of wetlands affected by temporary and permanent access roads is underestimated here, since surveys are not complete in Roanoke County, Virginia. *[As to FERC’s “recommendation” that MVP file “site-specific plans, a detailed analysis of all reasonable alternatives...for the use of permanent fill and culverts in waterbodies and wetlands for access roads”; this should be a “requirement.” On Poor and Bent Mountains in Roanoke County, Virginia access roads should not be allowed in any wetlands of the sensitive watershed of Tier III\* Bottom Creek and its “Wild Natural Trout Streams.”\*\*]*

IND226-37 The amount of wetlands (in acres) that would be affected by access roads and the associated discussion has been updated in section 4.3 of the final EIS.

*[Access roads should also not be permitted through property that is in a conservation easement.]*

\* “Tier III” is the designation in Virginia for “Exceptional State Waters” (known as “Outstanding National Resource Waters” for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities.  
*[If Bottom Creek’s watershed is degraded, the Tier III portion will be degraded as well]*  
 \*\* Virginia Water Quality Standards #9VAC25-260-450 designates “Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries” as Class ii “Wild Natural Trout Streams” whose quality under The Clean Water Act “shall be maintained and protected to prevent permanent or long-term degradation or impairment” (Virginia Antidegradation Policy #9VAC25-260-30).

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## IND226 – Roberta C. Johnson

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IND 226-38 | Project-Specific Impacts  
**Page 4-122 (Table 4.3.3) Mountain Valley Project Wetland Impacts**  
This table does not accurately reflect the total acreage of wetlands that would be impacted, since the wetland rich area of Poor and Bent Mountains in Roanoke County, Virginia has not been totally surveyed.

IND 226-39 | Avoidance and Minimization  
**Page 4-125**  
Many wetlands on the Bent Mountain plateau have not been previously indicated on available maps. [Therefore, after surveying is completed in Roanoke County, MVP should be required to demonstrate that they have readdressed the “sequencing” steps that are required by federal and state agencies: 1) avoid, 2) minimize impacts, or 3) replace wetlands or provide compensatory mitigation if “unavoidable.”]

IND 226-40 | General Impacts and Mitigation  
**Page 4-127**  
[This entire section is a testament to the fact that the pipeline should not cross wetlands, especially those of the sensitive watershed of Tier III\* Bottom Creek and the Wild Natural Trout Waters\*\* that are its tributaries on Poor and Bent Mountain (in Roanoke County, Virginia).] The DEIS correctly states that the impacts on wetlands would be both temporary and permanent and “may include changes in temperature, biochemistry, or water chemistry; sedimentation or release of hazardous materials (e.g. fuels, lubricants); addition of nutrients; and turbidity.” The DEIS goes on to say that “construction clearing activities and disturbance of wetland vegetation could also temporarily affect the wetland’s capacity to buffer flood flows and/or control erosion” and that in forested wetlands “regeneration to pre-construction conditions may take 30 years or longer”. The pipeline route traverses all 3 three wetland types on Bent Mountain in more than 18 crossings (See Appendix G-1 – before completion of surveys) from MP238.25 to 244.5.

IND 226-41 | Conclusion (Wetlands)  
**Page 4-129**  
Again, the estimates of wetland acres impacted are incorrect (due to incomplete surveys). On Poor and Bent Mountains alone, MVP has yet to identify and delineate all of the numerous wetlands in the pipeline corridor. The conclusion that “impacts to wetlands would not be significant” is false, based on all the comments included in the above sections (see Pages 4-127 through 4-129) and in the previous comments above on “Environmental Consequences”.

This Conclusion makes another reference to MVP’s “Procedures”, which have not been provided for review. [These need to be made available.]

\* “Tier III” is the designation in Virginia for “Exceptional State Waters” (known as “Outstanding National Resource Waters” for EPA). There are only 30 in Virginia, and the Bottom Creek segment meets all 3 criteria for identification: exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities.”

[If Bottom Creek’s watershed is degraded, the Tier III portion will be degraded as well.]

\*\* Virginia Water Quality Standards #9VAC25-260-450 designates “Bottom Creek from its confluence with the South Fork Roanoke River upstream including all named and unnamed tributaries” as Class ii “Wild Natural Trout Streams” whose quality under The Clean Water Act “shall be maintained and protected to prevent permanent or long-term degradation or impairment” (Virginia Antidegradation Policy #9VAC25-260-30).

IND226-38 | The amount of wetlands that would be affected (in acres) and the associated discussion has been updated in section 4.3 of the final EIS. Due to access constraints it is possible that not all wetlands will be delineated until after certification, if the Commission approves the projects.

IND226-39 | Our cooperator for the development of this EIS, the COE, who is responsible for CWA permitting including “sequencing,” will verify the Applicants’ data regarding wetlands.

IND226-40 | See the response to IND226-33.

IND226-41 | See the response to IND226-34.

# INDIVIDUALS

## IND227 – RoxAnne Lane Christley

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IND227-1

RoxAnne Lane Christley, Roanoke, VA.

I'm feeling feisty today so thought I'd jump into the "to build or not to build" the Mountain Valley Pipeline discussion. I'm a mom of a couple of millennials in the Roanoke Valley and I'm worried about their future. It's no secret that we've lost a lot of companies over the last few years and it doesn't seem to improving much. We need a viable community where families can enjoy a comfortable lifestyle, a good education for their kids, and be supported by decent salaries then we must have the infrastructure to provide the livings. Natural gas is a big part of the equation as it provides a ready source of energy for manufacturing and other types of businesses that will be attracted to the area. We have so much to offer new businesses that may consider moving to our region in recreation, scenic views, excellent medical care, educational opportunities, as well as a good cost of living but right now those big employers are no longer our strength. Speaking as a mother I know the difficulty that young adults have finding good jobs now and new positions to aspire to as they progress in their chosen fields.

It truly is about economic development for our area - where the population is getting older and established businesses are either closing or moving. We need to rejuvenate with new businesses - especially manufacturing - that would provide a healthy number of jobs at various levels. Natural gas can help attract those. I hope that FERC does approve the MVP and that we will see a new job boom in our local area for ourselves and for our kids.

IND227-1

The statements are noted.

**INDIVIDUALS**  
**IND228 – Gerald W. Roller**

20161114-0044 FERC PDF (Unofficial) 11/14/2016

**FEDERAL ENERGY REGULATORY COMMISSION**  
**NATIONAL ENVIRONMENTAL POLICY ACT REVIEW FOR THE**  
**MOUNTAIN VALLEY PROJECT & EQUITRANS EXPANSION PROJECT**  
**DOCKET Nos. CP16-10-000 & CP16-13-000**

FILED  
SECRETARY OF THE  
COMMISSION  
2016 NOV 14 P 2:15  
FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

**PUBLIC SESSION COMMENT FORM**

Comments can be: (1) left at the sign-in table, (2) mailed to the addresses below, or (3) filed electronically by following the instructions provided below.

Please send one copy referenced to Docket No. CP16-10-000 & CP16-13-000 to the address below.  
**For Official Filing:**  
Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A  
Washington, DC 20426  
To expedite receipt and consideration of your comments, the Commission strongly encourages electronic filing of any comments to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's Internet web site at [www.ferc.gov](http://www.ferc.gov) under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account, which can be created on-line.

COMMENTS: (Please print; use and attach an additional sheet if necessary)

(REGARDING NOV 3 Meeting @ Shenandoah Hotel, Roanoke, VA)

The PRE-CONFERENCE WAS ONE OF CONFUSION OVER  
WHERE TO WAIT; LACK OF "LET COME" IN FRONT OF LINE ETC.  
Once the room was decided then persons could  
have been first come - first served in a much more  
"fair" and orderly way. For example: persons there  
early were in the hallway entrance furthest from  
the door to your meeting room. I.E BETTER PRE CONF INFORMATION  
Thankyou for your work.

Commentor's Name and Mailing Address (Please Print)

Gerald W. Roller  
1020 Clearfield Rd. SW  
Roanoke, VA 24015

IND  
228-1

IND228-1

The statements regarding the public comment sessions are noted.

# INDIVIDUALS

## IND229 – Bob Johnson

20161116-5034 FERC PDF (Unofficial) 11/16/2016 10:52:13 AM

IND229-1 My name is Bob Johnson, and I live at 9964 Patterson Drive, Bent Mountain, VA. I am a retired VDEQ Environmental Engineer, a member of the Environmental Committee of Preserve Roanoke/Bent Mountain, and an Intervenor with respect to the proposed MVP project.

Today I would like to focus on the section of the proposed pipeline corridor through Roanoke County Virginia where it traverses Poor and Bent Mountains and, specifically, where Bottom Creek, its headwaters, and tributaries are located. The DEIS incorrectly concludes that impacts to Bottom Creek and its headwaters are short-term and can be minimized or avoided. It is imperative that the following facts be reconsidered and the pipeline rerouted accordingly: (Many of the comments are in response to the “Environmental Analysis”, Section 4 of the DEIS.)

1. A segment of Bottom Creek is a Tier III stream and **all** of its headwaters and tributaries are designated as “Wild Natural Trout Streams”, populated by brook and rainbow trout. The DEIS does not indicate this.

IND229-2 2. Approximately 10 percent of all fish species native to Virginia are found in the Bottom Creek watershed. Three rare species of fish (the big-eye jumprock, the riverweed darter, and the Roanoke darter) whose existence is well-documented in Bottom Creek (see the Tier III nomination package) are not listed in the DEIS under known or potentially occurring sensitive species or elsewhere in the document.

IND229-3 3. Tier III Bottom Creek, with its exceptional environmental setting, exceptional recreational opportunities, and exceptional aquatic communities, is the only Tier III waterbody downstream from the proposed 300-mile pipeline. It is highly sensitive to chemical and temperature pollution, turbidity, and sedimentation, as are all of its headwaters and tributaries.

IND229-4 4. According to available maps and Appendices, the pipeline will cross Bottom Creek and/or its tributaries at least 39 times and will parallel these waterbodies for approximately 3 miles. The main body of the DEIS fails to recognize this or consider the consequences. Further, in light of the sensitivity of these waters, paralleling them should be prohibited, as it is with waters of the Jefferson National Forest.

IND229-1 Bottom Creek is discussed in sections 4.3 and 4.6 of the EIS, and is identified as a wild trout stream in appendix F. See the response to FA11-17 regarding Bottom Creek and Tier III status.

IND229-2 Rare species are discussed in section 4.7 of the EIS. The Roanoke logperch is discussed in that section as well as our BA.

IND229-3 See the response to IND229-1.

IND229-4 Cumulative impacts are discussed in section 4.13 of the EIS.

# INDIVIDUALS

## IND229 – Bob Johnson

20161116-5034 FERC PDF (Unofficial) 11/16/2016 10:52:13 AM

IND229-5	<p>5. Bottom Creek is listed as an impaired stream due to temperatures that exceed the standards for trout streams. Although the proposed pipeline is not slated to cross the impaired downstream segment, it must be assumed that the upper reaches are also impaired until and unless baseline data shows otherwise. No data is currently available on the headwaters. Regardless, the loss of stream bank cover and the permanent removal of the tree canopy and native vegetation along the pipeline corridor would exacerbate the water temperature impairment of Bottom Creek and presumably its headwaters in perpetuity. This would be a violation of the antidegradation policy of the Clean Water Act (Sec. 316(a)). Further, the combination of increased water temperature, turbidity, and sedimentation would disrupt the trout fisheries of these waters, diminishing “stream uses”, which is also a violation of the antidegradation policy of the Clean Water Act. This cannot be allowed.</p>	IND229-5	<p>Section 4.3.2 of the final EIS was updated with new information regarding instances where Mountain Valley proposes to parallel a waterbody within 15 feet.</p>
IND229-6	<p>6. Poor Mountain is the highest and one of the steepest elevations along the proposed pipeline corridor. Because of the shallow metamorphic bedrock extending for over 4 miles along this part of the corridor, blasting will be necessary, and with slopes exceeding 60 degrees, there will be a high potential for subsequent long-term erosion and other effects.</p>	IND229-6	<p>As stated in sections 2, 4.1, and 4.2 of the EIS, Mountain Valley would first attempt to rip bedrock. Any required blasting would be conducted in accordance with all federal, state, and local regulations.</p>
IND229-7	<p>7. The eastern slopes of Poor Mountain and Bent Mountain contain numerous wetlands because of the shallow bedrock and the abundance of springs and streams. MVP has yet to survey much of this area, and, therefore, the extent of the wetlands crossed is grossly underestimated. How can conclusions be drawn about environmental impacts when such critical information is lacking?</p>	IND229-7	<p>The amount of wetlands that would be affected (in acres) and the associated discussion of wetland impacts has been updated in section 4.3 of the final EIS. Due to access constraints it is possible that not all wetlands will be delineated until after certification, if the Commission approves the projects.</p>
IND229-8	<p>8. The wetlands on Poor and Bent Mountains are potential habitats for the endangered bog turtle. Since the bog turtle has been found nearby on an adjacent part of the Blue Ridge Plateau, MVP is wrong to imply that the pipeline will not cross suitable habitat for this reptile. FERC needs to require, not just recommend, that MVP complete comprehensive wetland surveys on Poor and Bent Mountains, with particular attention to bog turtle habitat. It is also possible that piratebush, a globally rare plant species used in cancer research, may be present in the corridor on the slopes of Poor Mountain since it is found at a nearby location with similar geology, topography, and elevations. MVP should be required to specifically survey for this plant species.</p>	IND229-8	<p>The bog turtle is discussed in section 4.7 of the EIS.</p>

# INDIVIDUALS

## IND229 – Bob Johnson

20161116-5034 FERC PDF (Unofficial) 11/16/2016 10:52:13 AM

- IND229-9 | 9. The DEIS indicates that measures to minimize impacts to Bottom Creek and its headwaters would include the “use of open-cut-crossings” and “time-of-year restrictions” for in-stream construction. This implies that the effects would be short-term. As noted above, they would not.
- IND229-10 | 10. The Bottom Creek watershed is a major source of drinking water for the Bent Mountain community and the Roanoke Valley (i.e., Spring Valley Reservoir). The proposed project puts both private and public drinking water supplies at risk due to potential spills, reduced water quality, and changes in flow.
- IND229-11 | 11. The DEIS references “MVP Procedures”. These are not included with the DEIS and need to be made available for review before any further steps are taken. In addition, there reportedly have been addendums and changes to the DEIS, including alterations to the pipeline route and MP locations, which the public has not had ready access to. This is unconscionable and stymies substantive and meaningful comments on the pipeline project.

- IND229-9 | We stand by our conclusion as explained in section 4.3.2 of the EIS.
- IND229-10 | Water supplies are discussed in section 4.3 of the EIS.
- IND229-11 | Water supplies are discussed in section 4.3 of the EIS.



# INDIVIDUALS

## IND230 – Jean Carlon

20161116-5057 FERC PDF (Unofficial) 11/16/2016 12:28:37 PM

IND230-1 | Jean Carlon, Wardensville, WV.  
Calling for FERC to reject the Mountain Valley Pipeline application. Need has not been established per the DEIS, and, furthermore, the DEIS fails to provide full and public information regarding environmental impacts. All possible hazards, both direct and indirect, must be disclosed, including damage to wildlife habitat, damage to water sources and water quality, landslide hazards, earthquake risk and site-specific impacts.

IND230-1 See the response to FA11-12 regarding need. The EIS discloses impacts and proposed mitigation measures for water resources in section 4.3, wildlife in section 4.5, landslides in section 4.2, and earthquakes in section 4.1.

**INDIVIDUALS**

**IND231 - Fedessa G. Williams**

IND  
231-  
1

Norman C. Bay and Commissioners.

Please do not build RE: Docket CP 16-10-000  
Mountain Valley Pipeline.

I am a widow feeding for myself, I just learned that this pipeline will be within feet from my home, going on RT 220 and on the property of 2 neighbors property.

To my knowledge it is not needed. I feel very uncomfortable about this.

Could this just be a money gain for some mighty people?

I will be praying to God everyday that the project will never be.

OFFICE OF  
EXTERNAL AFFAIRS  
2016 NOV 14 11:33 AM  
FEDERAL ENERGY  
REGULATORY COMMISSION

Respectful  
Fedessa Williams

IND231-1

See the response to FA11-12 regarding need. See the response to comment IND2-1 regarding safety.

IND231-2

*This just happened we don't need more*

# Explosion shuts down pipeline

Officials already are making plans as eyes turn toward gas prices.

By Jay Reeves and Jeff Martin  
Associated Press



Associated Press

A flame continues to burn Tuesday after a Monday explosion at Colonial pipeline in Alabama. The blast, which sent flames and thick black smoke soaring over the forest, happened near where the pipeline ruptured in September.

HELENA, Ala. — A fatal explosion that sparked a geyser of fire has shut down a vital pipeline supplying gasoline to millions of people across the Southeast, raising fears of another round of gas shortages and price increases after the pipeline's second accident and shutdown in two months.

Continuing fires in the drought-stricken area of central Alabama hampered officials' efforts to fully assess the damage Tuesday afternoon.

The accident happened when a dirt-moving track hoe struck the pipeline, ignited gasoline and sparked a blast Monday, killing one worker and injuring five others, Georgia-based Colonial Pipeline said. Flames and thick black smoke continued to soar Tuesday, and firefighters built an earthen berm to contain the burning fuel.

Four of the injured remained hospitalized, Colonial spokesman Bill Berry said at a Tuesday news conference in nearby Helena, Alabama.

The company said it hoped to restart the pipeline as early as the weekend. As much as 168,000 gallons of gasoline could have burned, spilled, evaporated or remained in the pipeline, the company said.

The explosion happened not far from where the Colonial pipeline sprung a leak and spilled 252,000 to 336,000 gallons of gasoline in September. After the leak, the company used one of Colonial's two main lines to move gasoline as it made repairs, but it still led to days of dry pumps and higher gas prices in Alabama, Georgia, Tennessee and the Carolinas while repairs were made.

The contractors were working on repairs related

gasoline ignited and spread fire to the pipeline, the U.S. Pipeline and Hazardous Materials Safety Administration said Tuesday.

The nine-member crew was using the track hoe to excavate the pipeline as part of preparation work so that permanent repairs from the September leak could be made, Colonial Pipeline executive Gerald Beck said. The machine struck the pipeline, touching off the explosion, he said.

The Colonial pipeline provides nearly 40 percent of the region's gasoline and usually runs at or near full capacity. Together Colonial's two lines carry more than 2 million barrels of fuel a day.

By mid-day Tuesday, Colonial Pipeline said it was able to restart the second of its two main lines, which carries diesel fuel and jet fuel.

The severity of the gasoline shortage will depend on how long the gasoline pipeline remains closed, AAA spokesman Mark Jenkins said.

After the September leak, Colonial said it made up some of the gasoline shortfall by sending gas through

diesel and jet fuel. The company has not said whether it will do so again.

"We would encourage drivers not to panic, so don't run to the gas station and start filling up every gas can you can," said AAA spokeswoman Tamra Johnson.

Plagued by a severe drought, the section of Alabama where the explosion happened has been scarred by multiple wildfires in recent weeks, and crews worked to keep the blaze from spreading.

Pete Valenti, deputy fire chief in Helena, said the pipeline was spewing a geyser of flame several hundred feet into the air when crews arrived.

"There was a hole in the pipeline. Product was just shooting out," he said.

From 3,000 feet in the air, a flame could be seen still burning in a haze of smoke Tuesday. An AP photographer flew over the site that morning and also saw trucks parked near the pipeline covered in gray ash.

Photographer Brynn Anderson said the blackened earth and a large area of charred trees are surround-

the past two months, this can be very impactful to us."

Gasoline prices before taxes and fees soared Tuesday more than at any time since 2008. Early in the day, prices jumped 15 percent but finished the day up 4.6 percent at \$1.4841 a gallon after the company said it hoped to reopen the pipeline Saturday afternoon. But Barclays analysts said the outage could last longer.

Throughout the Mid-Atlantic, wholesalers made plans for trucks to pick up supplies in ports such as Baltimore and in northern New Jersey.

Alabama Gov. Robert Bentley and Georgia Gov. Nathan Deal temporarily eased limits on the hours that truckers carrying gasoline may drive. Other governors took similar action following the September leak, which allowed truckers to transport more gasoline by highways, making up for some of the shortage.

"It's a very fragile system," said Andre LeBlanc, vice president of Petroleum Marketing Group, which supplies more than 1,400 gas stations, from Maine to Tidewater

The Washington Post

IND231-2

The incident in Alabama involved a gasoline pipeline rather than a natural gas pipeline.