

INDIVIDUALS

IND337 – Iris Moye

20161207-0048 FERC PDF (Unofficial) 12/07/2016

10-14-16

IND337-2

To continue on with the Mountain Valley Pipeline discussion: More and more landowners are being bullied into Giving up their land to the Pipeline. This is going to cause a lot of people to go off the deep end and perhaps create havoc in many locations.

For some time now, I have been writing to FERC regarding the many areas of “only bad things can come of this pipeline” type of thought. Now I read that FERC is not paying attention to the People, and is white washing the effects of the said pipeline; also they are leaning toward Okaying the pipeline, and are going to allow eminent domain to take over. BUT, I also have proof that several experts on this case have come out and said that the proposed pipeline is dangerous and about all that is not needed. Synapse Energy Economics, Inc. A leading international research and consulting firm released a study which examined the pipeline situation in Virginia, and provided statistics that showed, neither pipeline proposed for our state is needed.

Greg Buppert, an attorney for the Southern Environmental Law Center, has written extensively about this: creating a corridor 125 Feet wide, in five neighboring counties, forcing our neighbors to negotiate away full use of their land. If they decline, the companies would merely seize the easements in court. Add the Atlantic Coast pipeline and it would Scar more than 800 miles across farms, forests, mountains and meadows.

We are told that the pipelines are needed to keep lights on and homes heated. This is a blatant lie!!! In 2015, the department of energy reported that using the existing pipelines in the region would reduce the need for new ones, through at least 2030.

IND337-3

And to add, there have been many reports of explosions and injuries generated by pipelines. Families have died, and whole neighborhoods have changed. There have been reports of as many explosions as one a week for the past 5 years. We don't even have our Governor's assistance with our fight for the beautiful State of Virginia, because he is all for going forward and full speed ahead.

IND337-4

We don't need anyone telling us that we need clean energy source. Natural gas is not clean, Due to leaking along the route of the pipeline, there are serious emissions that are as polluting as coal.

You can look for your electric bill to go up and up. This would be due to the cost of the pipelines themselves. And where will all of the new jobs supposedly generated by the pipelines go? They will leave as soon as the pipelines are built in each area and will move on to the next project. (possibly in Idaho, or Texas or where ever.)

Perhaps it is time we dismantle the FERC, and elect some people to a board that truly loves Virginia, and all of its beauty and its residents.

IND337-2

You do not have to give up your land. Mountain Valley only seeks an easement for its pipeline. No decision has yet been made by the FERC about the projects. See the response to comment FA11-12 regarding need. Safety is addressed in section 4.12. See the response to comment IND1-3 regarding eminent domain.

IND337-3

See the response to comment IND2-1 regarding safety.

IND337-4

Natural gas is one of the cleanest burning fossil fuels. Welded steel underground pipelines rarely leak. Emissions are discussed in section 4.13 of the EIS. See the response to comment IND281-2 regarding jobs in Virginia. Commissioners are not elected; but appointed by the President. The U.S. Senate is currently in the process of confirming two new Commissioners.

INDIVIDUALS

IND337 – Iris Moye

20161207-0048 FERC PDF (Unofficial) 12/07/2016

IND337-5

It has been stated that the MVP will have little or no environmental or safety concerns. But, they (Mountain Valley Pipeline) has ADMITTED that more than 7000 acres of forested land would be lost as a result of this project. Further, we know that Karst Land is composed of sinkholes, springs and caves, and we know that a pipeline cannot be safely built in most of Southwest Virginia.

Finally, the Federal Energy Regulatory Commission, who will make a decision on the pipeline, has stated that the impact would be limited. We are smart enough to know that FERC is funded by the oil and gas industry and was created for their benefit. And the people doing the environmental study are paid by Mountain Valley Pipeline. It is time for our illustrious governor to man up and tell it like it is, and for the FERC to take the proper steps to see to it that this proposal goes no further.

Remember, even though that is a law in Virginia that says a for profit company may take a private citizen's land for their economic gain under the guise of "Public Utility" we look to a statement by John Locke on eminent domain, that he believes the right of the government resides in the GOVERNED, not the GOVERNOR.

Submitted by:

Iris Moye
5436 Wades Gap Road
Boones Mill, VA 24065

(540) 420-3375

IND337-5

Sinkholes and karst are discussed in section 4.1 of the EIS. There are existing natural gas pipelines in Virginia. Section 4.4 of the EIS stated that the projects would have significant impacts on forest. The FERC is funded by the U.S. Congress. It is also the U.S. Congress that conveys the power of eminent domain.

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
FEDERAL ENERGY REGULATORY COMMISSION
2016 DEC -7 A 11:24

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 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)

IND
338-1

Additional comments are attached on separate paper
Army property is a major cultural Resource.
Pic # 1 is an ancient archer-astronomical device Bird is on
the front of the device. This device can tell you the time
of day and time of year solstices and Equinoxes. Refer to # 6
Pic # 2 is an example of the Summer Solstice pattern of
Sunlight inside the chamber.
Pic # 3 is of the fall equinox
Pic # 4 is of a Rock art sculpture of many animals
refer to # 5. found on my property
These pictures are only a few examples and need to be viewed
in person to see and let me
explain what they are and
what they mean.
Commentor's Name and Mailing Address (Please Print)
Alan Daniel O'Hara
4235 Twin Mountains Dr
Vinton Va 24179
540-890-5397

IND338-1

As requested by the FERC, Mountain Valley filed a response to the commenter's letter on February 17, 2017 (Attachment Cultural Resources 16 Accession number 20170217-5199). As stated in Mountain Valley's response, the commenter's property would not be located within the APE. Therefore, cultural resources on the commenter's parcel would not be impacted.

INDIVIDUALS

IND338 – Alan Daniel O'Hara

Subject: clock speech

From: Alan O'Hara (ado24018@hotmail.com)

To:

Date:

Adney Gap Rd

1425 Adney Gap Rd

Calloway Va 24067

Home phone 540-890-5397

IND338-1
cont'd

Good evening ladies and gentleman my name is Alan O'Hara and I am a property owner here in Franklin County and I am very concerned about where the MVP(mountain Valley Pipeline) has been recently rerouted across the entrance to my property . The MVP recently rerouted to go around a sensitive Archaeological site that they discovered. On my property very close to where the pipeline has been changed, it is now going ^{to} but another sensitive, important archaeological find at risk. ON my land I have found a possible national treasure. It is an ancient archeo-astronomical device that is able to tell a specific time of day(the solar noon) and certain times of the year (the equinoxes and solstices) using the sunlight. I believe that this device will also tell the 18.3 yearly cycles of the moon using the moonlight. In simple terms this device is a calendar and a clock. Everyday the sun rises at a different location and everyday the sun is either higher or lower in elevation than it was the day before. The ancient people that created this device new the movements of the celestial bodies and were able to create my device with somewhat accuracy. At sunrise or at exactly the middle of the day (solar noon) sunlight enters and displays a sunlight image at specific points somewhere inside one of the two chambers. Different times of year and day and different locations inside the chambers, create sun or moonlit images . How this device works took someone with some knowledge of geometry and the movements of the sky to have the accuracy that this device displays its images throughout the year. This device is very old and fragile and blasting anywhere even near it will cause shockwaves that could easily destroy or throw it out of alignment. There are other devices around the world that are very similar to mine and do pretty much the same things. This ancient time telling device is the only one of its kind on the east coast of America and is very unique and we have one here in Franklin county and it needs to be protected. I have tonight pictures of the device and some of the more important images that are displayed inside the chambers of the device.

My archaeological site is only a small part of a much larger archaeological Archaic Indian area that the MVP is aware of. I have found archaeological evidence spread out by 3/4 mile by 1/2 mile at the bottom of Bent Mountain where the pipeline is trying to go through. There are artifacts that are 1000 to 10000 years old found. An Archaeological survey by the pipeline has been going on in this small area for several months now and they know what is there. I have landowners permission for my archeologist and myself to do our own study in this whole area and our conclusion is that the pipeline should not be given a permit to at least go through this sensitive ancient Archaic Indian site that has just been recently discovered for what it is and it needs to be studied for years before anything like the pipeline should allowed to go through.

All my life I have looking for something incredible and I have found it and now it is at risk of being destroyed. If there is anyone here today that knows someone who could assist in my research of my device or the surrounding area. Or wishes to know more about what I have please contact me at 540-890-5397 or email ado24018@hotmail.com. I also have on display some of my finds at my store called Blue Mountain Gems in the Forum shopping mall in Roanoke. Thank you for letting me speak here tonight and God Bless.

INDIVIDUALS

IND339 – Linda Quinn

20161207-0050 FERC PDF (Unofficial) 12/07/2016

Mountain Valley Pipeline Project: CP16-10-000

ORIGINAL ✓

My name is Linda Quinn and I live at 199 Rockfish Bay Drive in Union Hall, Virginia. In addition to my general concerns related to the actual need for the project and the validity of a privately owned corporation using eminent domain to acquire land for the primary purpose of transporting fuel for exportation, I believe the proposed MVP is a risk to the health and safety of not only my family, but also my surrounding community.

IND339-1

My home is located on the Blackwater River Channel of Smith Mountain Lake. According to the "Water Body Crossing Tables" (October 2015 Mountain Valley Pipeline Resource Report 2-A), the route of the proposed pipeline crosses at least 50 tributaries emptying into the Blackwater River and Smith Mountain Lake. During the construction phase of the proposed project, the disturbed ground would release sediment known to contain heavy metals and radon into the waterways. The regular maintenance of the pipeline would also result in weed treating chemicals flowing into the creeks, streams, river, and ultimately Smith Mountain Lake. In addition to recreational purposes, water from the lake is being piped to neighboring communities for drinking water. The aquifer that supplies water for our personal well, and those of our neighbors, may be impacted by the water quality of the lake.

The proposed pipeline route between Rocky Mount and Union Hall, follows Route 40, a heavily traveled roadway. Assuming that the proposed pipeline construction requirements would be based on current population density, it is highly likely that the wall of the pipe would be a thinner grade rather than the more substantial 4. An incident along Route 40 could easily result in tragic loss of life. The proposed pipeline route crosses from the north side of the road to the south side of the road in the vicinity of the intersection of Route 40 and Brooks Mill Road (Route 834). Rockfish Bay Road runs off of Kemp Ford Road (Route 945) which intersects Route 40 east of the Brooks Mill Road intersection. Kemp Ford Road provides the only access into or out of our subdivision, as well as for those residing along Sterling Circle, Niver, Sandy Pointe, Balsalm, Woodcutter, Music Lane, Dillard's Hill, and Standiford. Emergency services for our area are provided by Glade Hill Volunteer Fire, Glade Hill Rescue, (West of Union Hall in Glade Hill) and possibly Cool Branch (east of Union Hall in Penhook). The closest medical facility is Carilion Franklin Memorial (in Rocky Mount). In the event of a pipeline failure, danger in the blast zone area, would make sections of route 40 impassable which would obstruct our access to emergency assistance. An incident in close proximity to the Brooks Mill crossing would result in Kemp Ford area residents being blocked off from evacuation. Local fire and rescue have expressed concerns about volunteer recruitment challenges—the added burden and risks related to the possibility of a significant pipeline incident may exacerbate the situation.

IND339-2

It is FERC's responsibility to carefully consider each permit request. The Mountain Valley Pipeline is not in the best interest of Franklin County residents and is detrimental to the environment by perpetuating the use of a fuel source which is quickly becoming obsolete. I am against the Mountain Valley Pipeline and respectfully request that you deny this permit. Thank you.

Linda Quinn 10-2-2016

IND339-1

See the response to comment FA11-12 regarding need. See the response to comment IND1-3 regarding eminent domain. See the response to comment IND2-3 regarding export. See the response to comment IND2-1 regarding safety. See the responses to letter CO14 regarding Smith Mountain Lake. See the response to comment IND70-1 regarding erosion. See the response to comment LA1-7 regarding herbicides.

IND339-2

As discussed in section 4.12.1 of the EIS, the Applicants would design, construct, operate, and maintain the proposed facilities in accordance with the DOT's Minimum Federal Safety Standards in 49 CFR 192. See the response to comment IND18-2 regarding emergency response.

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 DEC -7 P 4: 22
FEDERAL ENERGY
REGULATORY COMMISSION

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

ORIGINAL

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 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)

The attached comments urge FERC to say no to MVP about crossing MP 165 to MP 230. This area has geologic hazards + environmental consequences of seismic activity, landslides, steep topography, shallow bedrock, karst terrain, soil liquefaction, flash flooding, slip-prone soils + blasting. These cumulative hazards add up to a great risk to the health + safety of all the people living between MP 165 to MP 230. Thank you

Commentor's Name and Mailing Address (Please Print)

*Shirley Hall
Rt 1 Box 240F
Lindsie, WV 24951*

IND340-1

IND340-1

Geological hazards, seismic activity, landslides, steep terrain, shallow bedrock, karst, and soil liquefaction are all topics addressed in section 4.1 of the EIS. See the response to comment CO5-1 regarding pending information in the draft EIS.

INDIVIDUALS

IND341 – Tina Smusz (on behalf of Dorothy Domermuth)

20161208-5046 FERC PDF (Unofficial) 12/8/2016 11:20:19 AM

December 9, 2016

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

Re: Docket No.CP16-10 Mountain Valley Pipeline

IND341-1

For almost 60 years I have lived, loved and worked with 150 acres on karst terrain on a site overlooking mountains and in direct view of the proposed Mountain Valley Pipeline (MVP), a fracked natural gas pipeline being proposed by EQT/NextEra company. I still own this Giles County property but now live in Montgomery County through which the pipeline will run. When an expert geology report (Kastning Report) states that the route for this pipeline renders this region as a “no-build” zone, I can only agree from my own personal experience. Gravity and the mountainous terrain leads to mud slides, loss of stabilizing vegetation and constant need of repair and stabilization. My husband and I tended our land to prevent further erosion and restore gullies. I have absolutely no faith that EQT/Next Era will do the constant repair work and tending on the 300 plus miles of the proposed pipeline. The saddest part of this project is that our beautiful area will be badly scarred and damaged for the purpose of profit of this gas which will primarily be sent overseas. This pipeline has practically no connection to the “common good” and should not be allowed.

Running a 42 inch pipeline through the heart of a village (Newport, Virginia) which is on the United States National Register of Historic Places and destroying several building is, in my opinion, unconscionable. The real danger of gas leaks, groundwater contamination, fire, explosions, property value reduction and other negative effects which are especially vulnerable in this area of karst terrain makes this project an example of corporate greed. How much wiser it would be to spend this vast expenditure on renewable energy sources.

Sincerely,

Dorothy Domermuth

1013 Evergreen Way
Blacksburg, VA 24060

Cc: US Forest Service, comments-southern-georgewashington-jefferson@fs.fed.us
US Bureau of Land Management, vcraft@blm.gov, mliberat@blm.gov
Appalachian Trail Conference, lbelleville@appalachiantrail.org

IND341-1

See the response to comment IND62-1 regarding Dr. Kastning’s report. The EIS discusses karst terrain in section 4.1. See the response to comment IND2-3 regarding export. See the response to comment IND234-1 regarding the Greater Newport Historic District. See the response to comment IND12-1 regarding property values. See the response to comment IND92-1 regarding leaks. See also the response to comment IND40-1 regarding renewable energy.

20161208-0053 FERC PDF (Unofficial) 12/07/2016

ORIGINAL

Dec 1, 2016

*To Whom it May Concern
about project docket CP16-10-000*

IND
342-1

*There are endless reasons to oppose
The MVP through WV. You've heard them
all - from the raping and pillage of our
precious environment, to the poisoning
of our people and the earth through
leakages and explosions, to the fact
that the pipeline is not even for public
use in WV. Whatever benefit the
pipeline would have would be short-term
(a few jobs mostly going to out-of-state
workers, probably not enough gas to
last 10 years at most). But the most
unconscionable fact is that right now,
at this very moment, it is already
sickening and killing people and animals
and poisoning the earth and can be
observed by anyone. It does not work!*

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -7 P 4 23
FEDERAL ENERGY
REGULATORY COMMISSION

*Sincerely
Nancy Guile
Po Box 41
Greenville WV
24945*

IND342-1

See the response to comment CO2-1 regarding benefits. See the response to comment IND92-1 regarding leaks. See the response to comment IND2-1 regarding safety. Section 4.9 of the EIS provides a discussion of jobs.

INDIVIDUALS

IND343 – Elizabeth Reeder

20161208-5064 FERC PDF (Unofficial) 12/8/2016 1:12:42 PM

Elizabeth Reeder, Jumping Branch, WV.
Dec. 8, 2016
Dear Ms. Bose,
Please see the comments that follow.

Pipeline Comments Related to Invasive Species

IND343-1

The MVP will facilitate the spread of invasive plants and the DEIS includes woefully inadequate plans to address this issue. This is of particular concern because of the ecologically pristine areas the pipeline will cross.

This facilitation of invasives occurs primarily in two ways:

1. Seeds and berries are readily moved on the tires of heavy equipment, especially in the mud and dirt they carry and drop.
2. Disturbance of the soil and opening of the canopy create ideal conditions for invasive species of plants, which spread rapidly and invade the surrounding forest.

It is so costly and difficult to eradicate invasive plants once they are established, there is no realistic hope of their containment along the pipeline corridor. The DEIS offers "monitoring" and "comparison" with surrounding areas, but is completely vague about how this will be done. It also offers "manual" and "mechanical" removal of exotic species, which DOES NOT WORK. Species such as Japanese knotweed and autumn olive cannot possibly be contained by these methods but require chemical means, repeated for more than two growing seasons. This fact is well established ("Cutting the knotweed only removes the aboveground portion and only serves to stimulate the below ground rhizome."
http://dnr.wi.gov/topic/invasives/documents/japanese_knotweed_control.pdf),

but I can confirm it from my own experience on my own property, where invasive species perfectly match the disruption caused by logging roads. I have been battling them (autumn olive in particular) chemically and mechanically for nine years and my work is not done. It should be noted that Japanese knotweed is especially fond of following streambanks, which means every stream and river crossing by the pipeline opens the possibility of launching its aggressive spread upstream and downstream. This plant is very difficult to eradicate, and some of the most effective chemicals are not meant to be used near waterways. Invasive species are considered by the National Park Service to be "among the greatest ecological challenges facing New River Gorge National River." (<https://www.nps.gov/neri/learn/nature/invasive-species.htm>) The MVP can be expected to spread that challenge across its entire route. Invasive species of plants replace native plant species, thereby reducing plant diversity and habitat quality. They are typically eaten by far fewer species than native plants are. Insects in particular, which are an important source of food for birds and other wildlife, depend on native plants. Doug Tallamy of the University of Delaware "argues that when nonnative plants replace natives, entire food webs are disrupted by the loss of specialized plant-eating insects—the most important food for animals." <https://www.nwf.org/News-and-Magazines/National-Wildlife/Birds/Archives/2015/Chickadees-And-Native-Trees.aspx>

IND343-1

As stated in section 4.4.2 of the EIS and in Mountain Valley's Exotic and Invasive Species Control Plan, all equipment would be cleaned with high-pressure washing at established equipment cleaning stations. In addition, Mountain Valley would monitor the right-of-way for at least two growing seasons. In addition, while 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 requests from landowners or land management agencies.

INDIVIDUALS

IND343 – Elizabeth Reeder

20161208-5064 FERC PDF (Unofficial) 12/8/2016 1:12:42 PM

IND343-1
cont'd

The MVP will also facilitate the spread of exotic insect pests, such as the gypsy moth. Female gypsy moths are likely to lay their tightly adhering egg masses on construction equipment, as they have been known to do on campers and trailers, as well as vehicle tires and wheels. Pipeline construction will thereby serve as a very likely means for the moth to move to new, previously unaffected locations. The DEIS does not adequately address this threat, and offers no funding for costly gypsy moth treatments. The gypsy moth is a major threat to the timber industry, as well as the aesthetic appeal of our forests. Also, the gypsy moth's particular fondness for oak makes it a threat to any wildlife that relies heavily on acorns.

Why is the MVP not required to realistically address these threats to our forests??

(As a footnote, I would like to add that MVP's expertise in even identifying invasive species is highly suspect. Table 4.4.1-4 gives an absurdly incomplete list of the known locations of invasive plant species. For example, garlic mustard, which is an extremely common and widespread invasive plant, is not listed for a single county but is simply listed as "unknown." Really??)

Submitted by Betsy Reeder, ecologist

INDIVIDUALS

IND344 – Tina Smusz (on behalf of Dorothy Domermuth)

20161208-5071 FERC PDF (Unofficial) 12/8/2016 1:02:34 PM

Mark Hileman
5555 Mt. Tabor Road
Catawba, VA 24070

December 8, 2016

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

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

Dear Ms. Bose and Members of the Commission,

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

The original 50-foot right of way for this proposed pipeline will alone spoil the experience by Appalachian Trail users in this area. A huge 500-foot wide corridor would leave a massive scar in the Jefferson National Forest that would create an even greater negative impact, especially along parts of the trail on Peters Mountain and Sinking Creek Mountain. The impact to trail users is not only related to where and how this proposed pipeline crosses the Appalachian Trail, but also how it reduces the scenic view from the trail. I have hiked along this section of the Appalachian Trail many times and know the significant damage to the view shed that this pipeline will cause.

The Appalachian National Scenic Trail is managed and protected for the public by the National Park Service, US Forest Service, Appalachian Trail Conservancy and numerous state agencies and volunteers. It has the word "Scenic" in the name for an obvious reason. Allowing these two amendments to the LRMP would seriously erode the scenic value of this iconic trail through this area of Virginia. The Appalachian National Scenic Trail needs to be protected from this type of excessive construction allowed by these two amendments.

I also oppose Proposed Amendments 2 and 3 to the LRMP. Proposed Amendment 2 would allow Mountain Valley Pipeline to violate existing Forest Service standards

IND344-1 See the response to comment FA10-1 regarding Amendment 4.

IND344-2 See the response to comment FA10-1 regarding Amendments 2 and 3.

INDIVIDUALS

IND344 – Tina Smusz (on behalf of Dorothy Domermuth)

20161208-5071 FERC PDF (Unofficial) 12/8/2016 1:02:34 PM

IND344-2
cont'd

regarding soil conditions and riparian corridor conditions. Proposed Amendment 3 would allow removal of old growth trees within the construction corridor of the pipeline. Either of these amendments would significantly reduce the recreational value of the Jefferson National Forest to the public and negatively impact the health of the forest land. The Jefferson National Forest should be protecting this land for the public and not allow any of these four amendments to the LRMP.

Sincerely,

Mark A. Hileman

cc: Jefferson National Forest Service
Bureau of Land Management
Core of Engineers
Montgomery County Board of Supervisors

INDIVIDUALS

IND345 – Robert A. and Louise W. Wey

20161208-0007 FERC PDF (Unofficial) 12/07/2016

JEFFERSON NATIONAL

1190 S. Jefferson Forest Lane
Blacksburg, VA 24060

December 2, 2016

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

subject: Mountain Valley Pipeline
Docket No. CP16-10-000
Comments on Environmental Impact Statement

RECEIVED
SECRETARY'S OFFICE
2016 DEC -1 P 4 31

Dear Ms. Bose:

We strongly oppose the Mountain Valley Pipeline project because (among other things)...

IND345-1 The pipeline's proponents are pushing for a 500-foot-wide "utility corridor" through the Jefferson National Forest and the Brush Mountain Wilderness, land which we presume is Federally protected—until now. This "corridor" would be an ugly scar through beautiful and fragile woodlands.

IND345-2 Some roads (including ours) in the affected area are "dead end." In our case, in the event of an accident (which has non-zero probability) access by fire, ambulance, and police services would be cut off for 21 households.

IND345-3 The construction would surely have long-term effects on our water table and the purity of the water supply.

IND345-4 Montgomery County will wind up with extraordinary costs but without the capability to collect compensation from the pipeline owners, resulting in higher taxes for the citizens.

The Federal Energy Regulatory Commission must NOT approve this horrible plan.

Respectfully,

Robert A. and Louise W. Wey

copy: Congressman Morgan Griffith

IND345-1 See the response to comment FA8-1 regarding the 500-foot-wide utility corridor on Jefferson National Forest lands.

IND345-2 See the response to comment IND2-1 regarding safety. See the response to comment IND18-2 regarding emergency response.

IND345-3 See the response to comment IND3-1 regarding drinking water.

IND345-4 As discussed in section 4.9.2 of the EIS, during operation of the MVP, about 34 jobs, with an average annual salary of \$67,000 each, would be supported in Virginia. Mountain Valley would pay a total up to \$7.4 million annually in property and ad valorem taxes in Virginia, including about \$1.7 million to Montgomery County (FTI Consulting, 2015b).

INDIVIDUALS

IND346 – Teresa Crispin

20161208-0006 FERC PDF (Unofficial) 12/07/2016

Teresa Crispin
4533 Preston Forest Dr.
Blacksburg, Va 24060

12/01/2016

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

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -7 P 4:30
FEDERAL ENERGY
REGULATORY COMMISSION

ORIGINAL

RE:
Mountain Valley Pipeline (MVP)
Docket No. CP16-10-000
Comments on Environmental Impact Statement (EIS)

Secretary,

IND346-1

Depending upon the final route of the 42" gas pipeline my family and home are subject to undue risk from being in the pipeline blast area / evacuation area. The current route puts us in danger. From the topography, we are prevented from a safe evacuation route in event of an issue. The community does not have the Emergency Response capability to respond to a gas pipeline issue from a 42" diameter gas pipe.

If an issue occurs, the pipeline company will not be held liable, or if by chance, they are held liable it will only be after years of court fighting, and personal and financial cost. Lawyers may win but any person or family will lose. I have directly experienced the personal hardship, lives destroyed and families ruined, resulting from the long court battles from the San Bruno, Ca pipeline explosion. The ones that lived through the conflagration and fought in Court aged quickly beyond their years. The incidents of divorce and suicide dramatically rise. We lived 15 miles from San Bruno when the pipeline exploded and had family friends in the area. What they lost cannot be recovered in a court. Even when they won, they lost.

IND346-2

The scenic nature of the Jefferson / Washington National Forest is the reason many, including my family, moved to this area. We thought naively that because it was a National Forest it would be protected. To have it marred by a permanent clear-cut is heart breaking and harmful. It will lower the value of property in the area as has been documented elsewhere from Government infrastructure projects, including pipelines. Infrastructure construction companies historically have claimed that no land

1 of 3

IND346-1

The route was finalized in October 2016. See the response to comment IND2-1 regarding safety. See the response to comment IND18-2 regarding emergency response.

IND346-2

Visual impacts on the JNF are discussed in section 4.8. While NFS-lands are not untouched; timber is harvested. See the response to comment IND12-1 regarding property values. See the response to comment IND31-5 regarding environmental justice.

INDIVIDUALS

IND346 – Teresa Crispin

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IND346-2
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devaluation will occur from Federal and State Government projects, but looking back at the highway project, pipeline project, and powerline project over the years this has not been the case. Many adjacent properties were devalued and abandoned because of these large-scale infrastructure projects. It disproportionately targets low-income disadvantaged families. Landowners were not fairly compensated for the harm. Abandoned properties along construction routes still stand as testament.

IND346-3

Significant construction, temporary and permanent construction infrastructure (staging areas for ground moving equipment and supplies), and clear-cut forestland poses short and long term issue with the environment including ground water, roads and personal safety. Groundwater issues, well water, are exacerbated by the karst structure dominating this area (Kastning Report). Ground movement weakens welds. Small leaks over long periods result in large damaging effects from chemical contamination. Leaks have been documented in all pipelines. The math works out that even with five-9's reliability after billions of cubic feet (10^9) per day over years of time significant leaked material results. There are only the potential long-term Court battles as a means of redress from future harm. Lawyers win; no one else - the Federal Government historically does not help.

The karst geology disturbed by blasting can easily destroy and / or contaminate wells. The disturbance to the ground can release sequestered radon gas into water. It may take years to discover the contamination. If you do not monitor for the contamination you can likely die from the contamination. The cost of chemical analysis of all the wells in the area is prohibitive. Most property owners cannot afford a typical EPA suite of chemical tests to meet clean water drinking standards. The standard EPA suite of drinking water chemical tests can run \$3,500 per year per well. The Federal Government authorizes MVP to build but does not help property owners with the cost to ensure water quality safety. Fighting a contaminated well issue against MVP will take an exorbitant amount of money and time that local property owners cannot sustain against MVP and its team of lawyers. Lawyers win; no one else - the Federal Government does not help.

IND346-4

MVP has not demonstrated technical competency in constructing a high-pressure 42" diameter gas line to carry 10^9 cubic feet per day in these geologic formations; a disaster for the environment. They have not built anything of this size, in this geology or of the proposed length. Nor have they demonstrated

2 of 3

IND346-3

Karst is discussed in section 4.1 of the EIS, groundwater in section 4.3.1, and forest in 4.4. See also the response to comment IND3-1 regarding drinking water.

IND346-4

See the response to comment IND28-3 regarding financial responsibility and bankruptcy. Tourism is discussed in section 4.9 of the EIS. Montgomery County, Virginia may benefit from the MVP, due to temporary jobs and tax revenues; read section 4.9.

INDIVIDUALS

IND346 – Teresa Crispin

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IND346-4
cont'd

managerial experience sufficient to ensure they could carry out such a construction project. The financial competency of MVP to execute a project of this size also remains a question. How is the Federal Government addressing these issues? If the environment is compromised how is the Government going to correct the issues? MVP, like other infrastructure companies, build high liability projects and then go out of business abandoning liability to local property owners and local governments. MVP, as other infrastructure companies historically have done, will build, dissolve as a company and absolve themselves of any responsibility. At best lawyers win; no one else.

Montgomery county Virginia will suffer as a community from MPV destruction of the environment. The MVP will result in the long-term loss of revenue from land devaluation, the mortal scaring of the National Forest and loss of tourism, and the expense to expand beyond it means Emergency Response, Public Safety and Rescue infrastructure to prepare for a catastrophic pipeline issue. These are undue harms to Montgomery County and the surrounding areas. These are undue harms to my family and our wellbeing.

This pipeline should not be built.

Teresa Crispin



INDIVIDUALS

IND347 – Joseph C. Pitt

20161208-0024 FERC PDF (Unofficial) 12/07/2016

FILED
SECRETARY OF THE
COMMISSION

2016 DEC -7 P 4 22

FEDERAL ENERGY
REGULATORY COMMISSION

27 November 2016

216 Zells Mill Road
Newport, VA, 24128

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

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

Dear Ms Bose, Members of the Commission, Director Kornze, and Supervisor Timm,

The Mountain Valley Pipeline (MVP) has recently proposed to construct and operate a pipeline across the Jefferson National Forest. I oppose granting any right of way across the Jefferson National Forest for MVP. Granting a right of way would require changes to the Land Resource Management Plan including the designation of a 500 foot wide utility corridor through the Jefferson National Forest. To change the Land Resource Management Plan to accommodate a private company's request in order for it to profit at the expense of the public is simply unacceptable.

The National Forest System was created to preserve these forests for the benefit of the public. The benefit of the public trumps any private interest. It is your sacred duty to protect these forests. That is the whole point of having protected national forests: to protect them from the greed of those who would exploit these public goods for their private interests.

Here in Giles County, Virginia, these forests are essential to the economic welfare of our citizens. Our economy largely rests on ecotourism. The destruction of the National Forest and the lasting scar that would remain would do major harm to our highly valued and appreciated viewsapes and old growth forests, resulting in serious damage to the tourist industry and our economy.

The effect of granting such a right of way therefore has multiple effects. First, the impact on the forest itself is devastating – destroying ancient trees and habitat for forest dwellers and endangered species. Second, it will do serious damage to the

ORIGINAL

076-10

IND347-1

IND347-1

The Forest Service has worked with Mountain Valley to develop project design features, mitigation measures and monitoring procedures to minimize the effects on the resources the plan amendments were designed to protect, not only for those resources on NFS lands, but also adjacent lands.

INDIVIDUALS

IND347 – Joseph C. Pitt

20161208-0024 FERC PDF (Unofficial) 12/07/2016

IND347-1 | **economy of Giles County. You must do your sworn duty and protect us and our**
cont'd | **forests.**

Sincerely yours,



Joseph C. Pitt, Ph.D.

INDIVIDUALS

IND348 – Harold M. “Rocky” Parsons, Jr.

20161208-0047 FERC PDF (Unofficial) 12/07/2016

Harold M. “Rocky” Parsons, Jr.
960 Broad Run
Sinks Grove, WV 24976
304-445-7677
wvsandrock@gmail.com

December 1, 2016

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

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -7 P 4: 21
FEDERAL ENERGY
REGULATORY COMMISSION

ORIGINAL

Re: Mountain Valley Pipeline
Docket No. CP 16-10-000

Dear Mr. Timm:

I offer the following comments concerning the proposed amendments to the Land and Resource Management Plan for the Jefferson National Forest as part of the Mountain Valley Pipeline project

I am a geologist, caver and a resident of Monroe County, West Virginia. I am retired from a 37-year career with the West Virginia Department of Environmental Protection's Office of Mining and Reclamation. I started out as a Reclamation Inspector in Mingo County, transferred to North Central West Virginia where I worked my way up to the position of Deputy Director. In that capacity, I managed a regional office that was responsible for the permit review and enforcement of all laws and regulations pertaining to all coal mining and quarry mining operations for a 37-county area of Northern West Virginia.

When I became aware of the proposed route of the Mountain Valley Pipeline across Peters Mountain, I became concerned about the impacts of such a large disturbance on the fragile karst topography and hydrology of the area. Layers of limestone and dolomite outcrop along the contour of the eastern flank of Peters Mountain. As the water runoff from precipitation events flows off the Mountain and encounters these outcrops, the water sinks into the limestone and dolomite via solution conduits and caves and enters the water table. This water resurges as large springs that serve as the source-water supply for many residents and, particularly, the primary and secondary water intakes for the Red Sulphur Public Service District (RSPSD). RSPSD provides the water supply for almost one fourth of Monroe County's population.

My experience with regulating the environmental impacts associated with mining operations has taught me that the large extent of surface disturbance necessary for the construction of a 125-foot wide pipeline corridor will, if not properly managed, result in significant problems with sediment, suspended solids and other contaminants. A disturbance of this magnitude by a mining operation would require the construction of a site-specific comprehensive drainage control system that is designed based upon the size

IND348-1

IND348-1

See the response to comment CO34-1 regarding the Red Sulphur PSD. See the response to comment IND92-1 regarding leaks. See the response to CO34-1 regarding hydrogeological studies.

INDIVIDUALS

IND348 – Harold M. “Rocky” Parsons, Jr.

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IND348-1
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of the disturbance, steepness of slope and several other factors. Trying to control erosion from such a large surface disturbance as has been proposed, using Best Management Practices, will be woefully inadequate.

Regardless of the extent of a sediment control system, the disturbance related to the construction of the pipeline will continue to produce suspended solids until the area is reclaimed, stabilized and a permanent vegetative cover is established.

On January 13, 2015, I made arrangements for representatives of Mountain Valley Pipeline to meet with representatives of the RSPSD to discuss the proposed pipeline route and what impact it would have on the recharge areas for these springs.

On May 6, 2015, I made arrangements for representatives of the Federal Energy Regulatory Commission (FERC) to meet with representatives of the RSPSD, the Town of Union and a local water bottling plant. The FERC representatives were shown a Power-Point presentation outlining the vulnerability of the recharge area for the springs that serve as the principal and secondary water sources for the RSPSD and how construction of a pipeline corridor would cause significant impacts from sediment, suspended solids and other contaminants. The FERC representatives were given a tour of the East flank of Peters Mountain showing the absence of surface streams and the presence of the springs that are so important for the citizens of Southern Monroe County.

Upon reviewing FERC's Draft Environmental Impact Statement, I was disappointed to see that NONE of the issues concerning the vulnerability of the RSPSD's recharge area have been specifically addressed. No comprehensive site-specific plans are proposed that would adequately reduce erosion, sedimentation or to provide site-specific sediment control structures.

In the summer of 2015, an event occurred that demonstrates the sensitive nature of RSPSD's recharge area. A diesel fuel spill entered a sinkhole within that recharge area and contaminated the spring that serves as the primary water source. The water plant had to be shut down, the tanks flushed and the filters cleaned. The plant remained closed for more than a week. Water from Giles County Virginia was used as a substitute source. The spill cost RSPSD a considerable amount of time, work and money. Now that the primary source water spring has been compromised, it is even more important to protect the secondary sources that are closer to the proposed pipeline route.

IND348-2

I have serious concerns about the proposed amendment to the Land and Resource Management Plan to create a 500-foot Utility Corridor through Jefferson National Forest in this location. If the Corridor is approved, it would encourage other pipeline and utility companies to funnel their pipeline rights-of-way across the same vulnerable, sensitive karst recharge area and into the National Forest's Utility Corridor, further compounding the problem of pollution having an adverse affect on RSPSD's water supply. Numerous private water supplies are also at risk.

IND348-2

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

INDIVIDUALS

IND348 – Harold M. “Rocky” Parsons, Jr.

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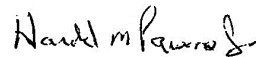
IND348-2
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It is obvious that the proposed Utility Corridor could have serious impacts, not only within the public use boundary of the National Forest, but also in RSPSD's recharge area in adjoining Monroe County, West Virginia.

I recommend that the Forest Service NOT approve the proposed amendments to Jefferson National Forest's Land and Resource Management Plan and, specifically, the 500-foot Utility Corridor.

Thank you for the opportunity to provide my comments.

Sincerely,



Harold M. Parsons, Jr.

cc: Ms. Jennifer Adams, Special Project Coordinator

Ms. Kimberley Bose, Secretary, FERC ✓

INDIVIDUALS

IND349 – Elizabeth Reeder

20161209-5035(31817417)

Elizabeth Reeder, Jumping Branch, WV.

Ms. Bose,

IND349-1

I would like to comment further on MVP's Exotic and Invasive Species Control Plan. Its language is alarmingly full of loopholes and lacks specifics; in other words, it lacks enforcement teeth.

For example, the Plan states, "If available, certified weed-free mulch, straw, and hay bales will be used to construct sediment control devices...." Shouldn't MVP be required to use such weed-free products, not use them at their convenience?

The Plan also comments on MVP's "commitment towards native restoration of the pipeline right-of-way using seed mixes tailored to meet construction specifications, budgetary targets, and stakeholder desires while also providing local wildlife with native habitat." What are these construction specifications? And stakeholder desires (profits?)? To meet budgetary targets, will cheap seed mixes including non-native species be used? And what is meant by "providing local wildlife with native habitat?" That is a very vague statement. Finally, what is a "commitment towards?" Is it an enforceable obligation, or simply a half-hearted phrase meant to appease those with legitimate concerns about invasive species?

The Plan further states that "Prior to Project mobilization, contractors shall thoroughly clean all construction equipment prior to moving the equipment to the Project area." What is meant by "thoroughly?" Is this a squirt with a hose or something more rigorous? Who is going to oversee this cleaning and specify the requirements? Are there any specific requirements?

The Plan also states that "If species or colonies of exotic or invasive species are found in numbers that are substantially greater than those existing nearby in off right-of-way locations, MVP will conduct selective spot eradications of those species...." This removal "could include hand cutting unless requested to use herbicides by a state or federal management agency." This paragraph is especially troubling. What is meant by "substantially greater?" If numbers of invasive plants are only "greater" or "somewhat greater," or "noticeably greater," does that mean they will be ignored? And why do they have to be greater in the first place? Once established, they will spread.

And, as I commented earlier, hand cutting of most invasive species DOES NOT WORK. Roots and rhizomes and seeds are left behind, and the plants continue to flourish and spread.

And, does FERC know that any state or federal agency has a plan in place to monitor the pipeline right-of-way for invasive species?

In conclusion, this Plan to control exotic and invasive species is flawed and inadequate and completely lacking in enforcement clout. It is also too short-term to be effective. FERC should reject it and insist on something that will actually work.

Thank you.

Betsy Reeder, ecologist

IND349-1

Invasive species are addressed in section 4.4 of the EIS. See also the response to comment IND343-1 regarding invasive species. The FERC would monitor Mountain Valley's invasive species program as part of its third-party monitoring program discussed in section 2.4 of the EIS and in the response to comment IND152-1.

INDIVIDUALS
IND350 – Bruce Zoecklein

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

IND350-1 | This letter is to provide a written record of my verbal statements given at the DEIS review meeting in Roanoke Virginia. Because there is justified concern that citizen's inputs were not properly recorded, this letter serves as a record of my statements made at that meeting.

As a scientist I am astounded by the lack of scientific rigour in the review in the DEIS. FERC response to the draft environmental report stating that impacts would be limited, despite independent scientists stating the opposite, is frankly ridiculous. So many unwarranted assumptions and conclusions are made that it is truly hard to take this document seriously.

Creating a cleared corridor across the headwaters and streams will send excess sediment into streams and underground water sources-potentially impacting millions of people in our region. The proposal covers 53 miles over Karst soil (cave and sinkholes). One of the country's leading experts reported that this pipeline cannot be safely built due the unstable nature of this soil and the 20% mountainous slopes. This concern was ignored. Sound methods to prevent significant sedimentation were not provided.

The fact that 3 Federally protected species will be effected-for some reason that does not matter.

IND350-2 | The rout in Giles Country, VA is directly over a maximum seismic zone, the location of the largest earthquake to ever occur in VA!

IND350-3 | MVP latest plan is to create a 500 foot- wide utility corridor through the Jefferson National Forest can only be described as absurd. MVP have not even bothered to evaluate hybrid alternative 1A-which would avoid much of the National Forrest

IND350-4 | The DEIS also does not consider green-house gas emissions up-stream and down-that is from fracking to burning. _Additionally, it only looked at the impact of the immediate route-not the region-not the cost to the rest of the state of Virginia.

IND350-5 | The pipeline will result in ¾ Billion dollar annual loss to the our region. There are 8 historic districts effected in VA that were not even evaluated in the DEIS!

There is nothing American about taking a citizen's land, against their will, by a for-profit company looking to sell gas overseas.

As a scientist I do not consider the DEIS as a worthwhile document but an attempt to rubber stamp a project that FERC apparently desires.

Dr. Bruce Zoecklein

IND350-1 | The EIS was prepared by scientists who independently checked facts. Our conclusions are based on those facts. This include evaluating reports submitted by the public. Sections 2 and 4.3 of the EIS discuss erosion control measures that would be implemented to prevent excess sediment from entering into streams. See also the response to comment IND70-1 regarding erosion. Karst terrain and steep slopes are discussed in section 4.1 of the EIS. See the response to comment IND62-1 regarding Dr. Kastning's report. As stated in section 4.7 of the EIS, we concluded that the MVP may adversely affect 3 species (Indiana bat, northern long-eared bat, and Roanoke logperch). Therefore, we are preparing a separate BA.

IND350-2 | Seismic zones are discussed in section 4.1 of the EIS. Pipelines have safely been installed and maintained in California, which has much more powerful earthquakes than Virginia.

IND350-3 | See the response to comment FA8-1 regarding the 500-foot-wide utility corridor within the Jefferson National Forest.

IND350-4 | GHG emissions are discussed in section 4.11 and 4.13 of the EIS. See the response to comment IND2-3 regarding hydraulic fracturing.

IND350-5 | As discussed in section 4.9 of the EIS, the MVP would result in many millions of dollars in economic benefits to the region, from labor expenditures, purchases of supplies, rent, and taxes. Section 4.10 of the EIS evaluates impacts on all Historic Districts that would be crossed by the pipeline. The U.S. Congress passed a law that stated that a company that obtains a Certificate from the FERC has the ability to use eminent domain. As stated in the EIS, the FERC would prefer the company negotiate mutual agreements with landowners for its easement. See the response to comment IND2-3 regarding export. See the response to comment IND196-5 regarding review of the projects.

INDIVIDUALS

IND350 – Bruce Zoecklein

Professor Emeritus,
Virginia Tech
CC: Pipeline Intervener List Serve

INDIVIDUALS

IND351 – Bruce Zoecklein

1

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.

IND
351-1

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!

IND351-1

The draft EIS did not contain factual errors, and our conclusions are based on facts. See the response to comments CO5-1 and LA5-1 regarding preparation of the draft EIS. The draft EIS would not be withdrawn, but this final EIS addresses comments on the draft. The final EIS incorporates the minor route modifications filed by Mountain Valley in October 2016. The final EIS addresses reports filed by the public. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. Water resources are addressed in section 4.3. The Greenbrier River would now be crossed using dry methods. Karst is addressed in section 4.1. See the response to comment IND62-1 regarding Dr. Kastning's report. See the response to comment IND70-1 regarding erosion.

INDIVIDUALS

IND351 – Bruce Zoeklein

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IND
351-1
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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.

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 rout in Giles Country 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 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).

INDIVIDUALS

IND351 – Bruce Zoecklein

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351-1
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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

CC: Intervener List Serve

INDIVIDUALS

IND352 – Elizabeth Struthers Malbon

December 9, 2016

Federal Energy Regulatory Commission
(FERC online: <https://ferconline.ferc.gov/>)

Neil Kornze, Director
Bureau of Land Management
1849 C Street, NW, Room 5565
Washington, DC 20240
(also Kristin Bail, Assistant Director, Resources and Planning, kbail@blm.gov)

Joby Timm, Supervisor
George Washington and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019
(also George Washington & Jefferson National Forests:
<http://www.fs.usda.gov/contactus/gwi/about-forest/contactus>)

Good Morning:

IND352-1

I am writing as a resident of the Preston Forest Subdivision of Blacksburg (Montgomery County), Virginia, to express my grave concern with the four amendments to the Forest Plan for the Jefferson National Forest that are proposed in the Draft Environmental Impact Statement (FERC/DEIS-D0272; section 4.8.2.6, pages 4-259-267) of Mountain Valley Pipeline, LLC in order to route a proposed 42"-diameter pipeline for fracked gas through the Jefferson National Forest (Docket #CP16-10-000).

As a homeowner on the originally proposed route of the MVP, I have had a series of contacts with MVP officials in oral and written presentations up to and including the DEIS, and I can tell you that my confidence in the accuracy, honesty, fairness, competence, and ability to understand complex issues of MVP officials is not high. As a small example relative to these four amendments, note this discrepancy in the DEIS: "The MVP pipeline route would cross about 3.4 miles of the Jefferson National Forest in Monroe County, West Virginia and Giles and Montgomery Counties, Virginia" (1-13). "The MVP would cross a 3.4-mile portion of the Jefferson National Forest in Giles, Craig and Montgomery Counties, Virginia" (4-516). Craig County residents might feel this supposed typographical error quite strongly.

As homeowner in a subdivision that backs up to the Jefferson National Forest, I am aware of not only the great beauty and biodiversity of the area but also the steepness of its ridges and valleys, the thinness of its topsoil, and its overall rockiness—all conditions *not* conducive to the safe and environmentally sustainable construction of a 42"-diameter underground pipeline for fracked gas by a company that has no history of success with such an endeavor and no track record (through its parent companies) of respect for environmental regulations.

IND352-1

The EIS has been corrected. The MVP does not affect any national forest system lands in Craig County, Virginia. See the response to comment FA8-1 regarding Amendment 1.

INDIVIDUALS

IND352 – Elizabeth Struthers Malbon

Malbon re Proposed Forest Plan Amendments

12/9/16

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IND352-1
cont'd

In addition, my father earned a Master's degree in Forestry. His plan to become a forest ranger was shifted by World War II, but he maintained that appreciation for the growth, development, and protection of trees in his family business as a citrus grower. During his college years, prior to the war, my father served in the Civilian Conservation Corps of the New Deal era, working to prevent erosion in the southeastern United States. Under my father's tutelage, I grew up with an appreciation of trees, forests, and all natural habitats. My father left a legacy of hundreds of trees planted with Girl Scouts and Boy Scouts. It is not accidental that I have chosen to live in a forested neighborhood adjacent to the Jefferson National Forest, or that I practice a conservation ethic as a landowner of five acres of rocky, sloping, forested land with a seasonal creek. My father helped me construct our first brush dams here to slow the runoff of rain on our newly and minimally cleared paths for electric lines and sewer lines to our septic drain field. I have worked for years to mulch and establish ground cover on the two cuts required for the minimal terracing for our home. In this small environment, I have seen firsthand the threats to soil and water if great care is not taken to disturb the land as little as possible and then with careful planning and long-term commitment. This careful planning and long-term commitment is what I expect from those responsible for the Jefferson National Forest.

Proposed Amendment 1 is a plan-level amendment, and it is the most extreme one, proposing that the mission of the U. S. Forest Service be cast aside so that the Jefferson National Forest can be freely available to so-called "utilities" (e.g., pipeline companies, and not just the currently proposed MVP) to increase their shareholders' profits. Surely the administration and planning of the George Washington and Jefferson National Forests must follow the mission of the national Forest Service. According to the website of the U.S. Forest Service, "The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations" (<http://www.fs.fed.us/about-agency/what-we-believe>). This website further explains: "The phrase [motto], 'Caring for the Land and Serving People,' captures the Forest Service mission." The first two items spelled out under this mission are these: "Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated lands" and "Listening to people and responding to their diverse needs in making decisions." Proposed Amendment 1 suggests giving up a "conservation ethic" and "promoting the health, productivity, diversity, and beauty of forests" for two detached 500-foot wide strips of the Jefferson National Forest, for a total of 3.4 miles, to make way now for a 42"-diameter pipeline for pressurized fracked gas that will likely not benefit any citizens of the two states it is proposed to cross, West Virginia and Virginia, and to leave the gate open for additional "utility" lines there in the future. How is that "listening to people"? Which people? The citizens in the counties traversed by the Jefferson National Forest? All the people of the United States, since national forests are a shared national treasure? Or the officials of Mountain Valley Pipeline and their advocates in the Federal Energy Regulatory Commission? Calling MVP a public utility is hyperbole; calling the Jefferson National Forest a "utility corridor" is a travesty. And what about the private lands that would be needed to connect these two portions of proposed "utility corridor"? How could individual landowners stand up to MVP and FERC if the U.S. Forest Service cannot? H.R.2295, the so-called "National Energy Security Corridors Act," would make a farce of the "conservation ethic" of the Forest Service, including the Jefferson National Forest.

INDIVIDUALS

IND352 – Elizabeth Struthers Malbon

Malbon re Proposed Forest Plan Amendments

12/9/16

3

IND352-2

Proposed Amendments 2, 3, and 4 are project-specific amendments and would involve changes in Forest Plan Standards by means of “temporary waivers.” Unfortunately, the effects of such “temporary waivers” would be long-term and/or permanent. Proposed Amendment 2 would dispense with the current reasonable plan to protect top soil and river bank conditions—thus encouraging erosion, sedimentation, and degraded water resources. The advantage? MVP could transport fracked gas across West Virginia and Virginia, and very possibly beyond the United States, at a fraction of the true cost to U.S. citizens and the global environment. Proposed Amendment 3 would allow the destruction of trees in old growth forest areas. What was the point of the Forest Service protecting these increasingly rare and irreplaceable old growth forests if they can be so easily given up for corporate profits? Old growth forests cannot be “mitigated” back into existence, and MVP does not even make clear a reasonable reforestation plan. Proposed Amendment 4 would allow the MVP to cross the Appalachian National Scenic Trail on Peters Mountain and degrade its “scenic integrity” from “High” to “Moderate,” and that “Moderate” level would not have to be achieved for 5 to 10 years “to allow for vegetation growth”; 10 years may be longer than the fracked gas from the field MVP is hoping to transport lasts. Again, short-term gain for a private corporation would trigger long-term loss for the public for whom Forest Service employees maintain the Jefferson National Forest in trust.

The Forest Service needs to exercise some “tough love” here; wise parents love their young children by *not* giving them everything they want; wise stewards of public forests need *not* give private corporations everything they want. The long and strong heritage of the Forest Service is at stake here. (The same could be said of the Bureau of Land Management, which will also have a role with regard to any grant of right-of-way for a “utility corridor” proposed by Amendment 1.)

In summary, these four proposed amendments are completely out of keeping with the Forest Service mission and the current Forest Plan for the Jefferson National Forest. They are, of course, in the interest of a private corporation, Mountain Valley Pipeline, LLC—and I take that “limited liability” as signally the full intention of the corporation to avoid all responsibility for the consequences, short- and long-term, of its actions (as can be seen in the history of fines and law suits against its parent companies for environmental violations). But the officials of the George Washington and Jefferson National Forests cannot afford to limit their liability; they are responsible to all the people of the region—and indeed of the nation—to care for these forests in the public trust. I implore such officials *not* to adopt but to resist strongly these four proposed amendments with all the dedication that brought you to and has sustained you in this important vocation.

Sincerely,



Elizabeth Struthers Malbon
1391 Breckenridge Drive
Blacksburg, Virginia 24060

IND352-2

See the response to comment FA10-1 regarding Amendments 2, 3, and 4.

INDIVIDUALS

IND353 – J. Dana McCarron

20161212-5002 FERC PDF (Unofficial) 12/10/2016 2:36:00 PM

J. Dana McCarron, Fulks Run, VA.
12/6/2016
Secretary Kimberly Bose
Federal Regulatory Energy Commission

Subject: Docket 16-10-000
Citizen Comment on the DEIS for the Proposed Mountain Valley Pipeline
(MVP)

Dear Secretary Bose:

Many of the respondents to the DEIS for the MVP have general and specific comments to make about all or a portion of the pipeline. My comment engages a somewhat broader and far more critical scope. Very few thinking, knowledgeable people deny the existence of global warming, although there are certainly some who still want to resist the idea that it is humankind induced. However, virtually no one is doing anything of a genuinely significant scale to honestly engage the magnitude of the challenge that is imminently facing us. So, the truth of the situation is that even though, for instance, the Governor of Virginia will readily acknowledge the facts of climate change due to global warming, thus, attempting to make it appear that he is aligned with the current state of erudition on the subject, he supports the pipelines, all their wasteful spending and all the consequential environmental damage associated with them. If he and his ilk truly understood what they are pretending to understand they would recognize the idiocy of the oil and gas companies arguments about the need for this infrastructure to ensure the "fuel" that will power our "growth" for the next 20 to 30 years and beyond. Not only would the billions of dollars be immensely better spent developing alternative means of hazardless power but, quite frankly we don't have 20 to 30 years to continue this absurd game of Russian roulette. They all pretend their environmental rhetoric is meaningful then set about repeating the same destructive practices that have created the crisis we are in. There are 3500 miles of pipelines being planned and under construction throughout the northeast. Thousands of riparian areas, wetlands and similarly ecologically sensitive areas will be adversely impacted by the construction and forever threatened by the presence of these pipelines. At what point do you finally see that there is a party going on at the corporate and government levels for growth, growth, growth and a full scale overt neglect of the magnitude of the destruction being wrought. They cannot stop it any more than a heroin addict can resist the next fix. It is all so patently absurd that it would be humorous if it wasn't so deadly for us all.

As we have recently witnessed, the EPA demonstrated their political vulnerability and lack of integrity by including last minute statements in their Fracking Study Report that intentionally mislead people to believe in the safety of Fracking, although their scientists found evidence to the contrary. This is a taste of the power of the monetary forces and their alignments with government against the welfare of the citizens. I suspect we will be seeing a great deal more of this with the new Administration taking office in January.

IND353-1

IND353-1

The EIS discusses climate change in section 4.13. See the response to comment IND2-3 regarding hydraulic fracturing.

INDIVIDUALS

IND353 – J. Dana McCarron

20161212-5002 FERC PDF (Unofficial) 12/10/2016 2:36:00 PM

IND353-1
cont'd

So, to all of you who are engaged in pretending that public comments will be considered because of the mandate to engage the public and who will effectively give a pass to this permit allowing the damage to unfold, understand that each of you, by default, becomes a climate change denier and a willing pawn in the destruction of the planet. Long ago I learned the difference and the gulf between education and intelligence and this is the most representative example imaginable.
You know not what you do -

J. Dana McCarron
6402 Northwoods Hollow
Fulks Run, Virginia 22830
540-867-9338
bearpaw612@gmail.com

INDIVIDUALS

IND354 – Ingrid Pankonin

20161212-5004 FERC PDF (Unofficial) 12/11/2016 11:42:19 AM

IND354-1 ingrid pankonin, berkeley, CA.
Please do not approve this pipeline! It would ruin one of our country's
greatest natural resources, an important tourist and environmental asset.
And it would set a terrible and dangerous precedent for future oil
industry projects to further destroy our wilderness. Please please
please do not let this happen!! Thank you.

IND354-1

Section 4.9 of the EIS provides a discussion of tourism. The MVP pipeline would transport natural gas; not oil.

INDIVIDUALS

IND355 – Greg Warren

20161212-5006 FERC PDF (Unofficial) 12/11/2016 8:22:26 PM

Greg Warren, Frisco, CO.
Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
888 First St. N.E. Room 1A
Washington, DC 20426
eFiled - December 11, 2016

Re: Proposed Mountain Valley Pipeline Comments: Docket No. CP16-10-000 -
81 FR 71041

Ms. Bose,

The National Trails System consists of 11 National Scenic Trails and 19 National Historic Trails designated by Congress "in order to provide for the ever-increasing outdoor recreation needs of an expanding population and in order to promote the preservation of, public access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Nation." National scenic trails are "extended trails so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass."

FERC has proposed Forest Plan amendments that would allow activities that would substantially interfere with the nature and purposes of the Appalachian National Scenic Trail (ANST). Proposed Forest Plan amendments represent a significant threat to all National Scenic and Historic Trails on lands managed by the USDA Forest Service because the current protections afforded the ANST in Forest Plans serve as a model for Forest Planning nationwide. Numerous energy transmission projects have crossed National Scenic and Historic Trails without requiring amendments to the respective Forest Plans, which has been achieved through thoughtful planning, impact analysis and partnership. Inadequate planning has resulted in a poor route proposal for the MVP project that does not adequately protect visual quality leading to substantial impacts and degradation of the nature and purposes of the ANST.

The DEIS would require amendments to the Jefferson National Forest Plan, the foundational document for Forest management. These amendments would not only be unprecedented, but would significantly erode the protection of the ANST, which the public has spent millions of dollars to protect.

Proposed Amendment 4 is of significant concern. This amendment would change the Scenic Integrity Objective (SIO) for the Rx 4A area from "High" to "Moderate," downgrading the standard for scenic integrity along the ANST. This amendment also allows 5-10 years following completion of the project for this SIO of "Moderate" to be achieved (two years is the typical standard) - this implies that the scenic integrity will be below "Moderate" for up to a decade. This would be substantial interference to the nature and purposes of the ANST.

IND355-1

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

IND355-1

INDIVIDUALS

IND355 – Greg Warren

20161212-5006 FERC PDF (Unofficial) 12/11/2016 8:22:26 PM

IND355-1
cont'd

Amending the plan in the manner proposed would negatively impact other Forest Plan prescription areas protecting Wilderness, Old Growth Forest, Inventoried Roadless areas, and fragile successional habitats. Furthermore, it requires the establishment of a new utility corridor directly adjacent to Federally Designated Wilderness and terminating immediately adjacent to the A.T. on both sides.

REQUESTED ACTIONS:

- All Forest Plan standards not met by any aspect of the proposed project must be identified in a supplemental DEIS, and the public must be afforded a minimum of 90 days to assess and comment. The 90 days must be provided after all relevant filings and information have been provided by the applicant as required by the National Forest Management Act, 36 CFR 219 part A §219.16(2), noting that "the Forest Service retains decision making authority and responsibility for all decisions throughout the {plan amendment} process 36 CFR 219 part A §219.4(a).
- No Amendment to the Forest Plan should be developed that lowers the Scenic Integrity Objectives of the Appalachian National Scenic Trail.

IND355-2

- Perform visual quality analyses following the Scenery Management System process, which would provide for scientific integrity of the analysis (40 CFR 1502.24).

IND355-3

- Provide for extensive onsite and offsite mitigation to reduce impacts created by this project if approved. Offsite mitigation could include commensurate financial support to maintain the travelway and protect the ANST corridor within the region.
- The National Park Service is the responsible administering agency for the ANST and therefore must concur with the required substantial interference determination for this project (16 U.S.C. 1246(c)).

Submitting supporting attachments through the FERC website is difficult, so I am instead sending to the "cc" recipients a National Scenic Trail planning handbook, which provides guidance for addressing the planning of National Trails on Federal lands. The guidance in this document should help lead to an analysis that is consistent with the National Trail System Act, National Forest Management Act, and National Environmental Policy Act.

Thank you for accepting and considering these comments.

Sincerely,

Greg Warren
NSTrail.org

Cc: Wendy Janssen, National Park Service
Appalachian National Scenic Trail Park Superintendent
wendy_janssen@nps.gov

Job Timm, George Washington and Jefferson National Forests

IND355-2

The EIS uses the Scenery Management System to evaluate the effects on visual resources on the Jefferson National Forest.

IND355-3

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

INDIVIDUALS

IND355 – Greg Warren

20161212-5006 FERC PDF (Unofficial) 12/11/2016 8:22:26 PM

Forest Supervisor
jtim@fs.fed.us

INDIVIDUALS

IND356 – Robert B. Lineberry

20161212-5010 FERC PDF (Unofficial) 12/10/2016 1:23:18 PM

Objection to Designated Utility Corridor, Jefferson National Forest, FERC Docket CP16-10-000

December 10, 2016

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

Neil Kornze, Director
Bureau of Land Management Washington Office
1849 C Street NW
Washington, DC 20240

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

Dear Ms. Bose, Members of the Commission, Director Kornze, and Supervisor Timm;

In regard to 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 a pipeline across the Jefferson National Forest (JNF): I wish to go on record as a concerned citizen in opposition to the granting of ROW changes to the Land Resource Management Plan (LRMP) of this national forest; in particular I oppose the designation of a designated utility corridor in the JNF.

Draft Environmental Impact Statement (DEIS) released by the Federal Energy Regulatory Commission (FERC) on September 16, 2016 does not adequately address implications of such amendments.

I wish to remind the Bureau of Land Management and the National Forest Service of their responsibilities to protect and preserve National Forest land for All Americans' use and enjoyment. Among the uses that I and other public citizens have come to expect and depend upon: preservation of our rapidly dwindling natural resources and ecosystems for future generations; recreational opportunities including but not limited to hiking, biking, horse-back riding, kayaking, canoeing, fishing, camping; pristine natural environments which foster spiritual reconnection with Nature; preservation of natural habitats of flora and fauna, including endangered species, old growth forests, grasslands, and wetlands; protection of the Waters of the United States which flow within and across National Forest boundaries.

IND
356-1

IND356-1

The FS and BLM have worked extensively with Mountain Valley to minimize the effects of the proposed project. See the response to comment FA8-1 regarding Amendment 1.

INDIVIDUALS

IND356 – Robert B. Lineberry

20161212-5010 FERC PDF (Unofficial) 12/10/2016 1:23:18 PM

Objection to Designated Utility Corridor, Jefferson National Forest, FERC Docket CP16-10-000

IND
356-1
cont'd

Key to these responsibilities: The Bureau of Land Management is charged with MANAGING these natural resources and features that they did not create or construct. Indeed, no human entity or agency has created these resources, and as such, cannot recreate them once they are damaged or destroyed. Hence, the involved governmental agencies have been entrusted with the responsibility of stewardship. Federal regulations have been enacted to guide this stewardship.

The proposed amendments blatantly disregard this responsibility by allowing desecration of natural resources that will not recover from the proposed actions allowed by the amendments. For decades into the future, the amendments will burden the National Forest Service with dealing with the subsequent problems of future erosion, pollution, invasion of species into areas left vulnerable by the denuding effects of pipeline construction, and eventual collapse of the pipelines once they are abandoned. The for-profit companies that construct these pipelines are making no provisions for covering these future costs.

Proposed Amendment 1 – Proposed: management prescription 5-C Designated Utility Corridors from the prescriptions: 4J, 6C, and 8A1. This amendment would make way not only for the MVP but for future pipelines. Although additional pipelines would be subject to separate approval processes, their construction more readily will be approved especially if legislation such as recently proposed House Resolution 2295 passes. Granting of this 500 foot swath through the land over which the Forest Service and Bureau of Land Management have jurisdiction makes way for violation of private lands on either end of the swath, for once multiple pipelines are constructed through the National Forest, where are they going to go? They will of course cross into private lands, thus violating the property rights and heritage rights of countless tax-paying US citizens. Property values will be diminished, family histories will be forever altered, human health and welfare will be endangered, and local governments will be overburdened with the unwelcome costs that pipelines inflict, including road maintenance, water replacement, diminished tax base and general damage control.

The DEIS fails to address these adverse effects.

IND
356-2

Proposed Project Only Amendment 2 – Proposed: permitted exceedance of soil and riparian corridor conditions. The integrity of number of creeks including Sinking Creek and Craig's Creek, will be jeopardized by damage to their riparian banks and sedimentation of their waters which drain into the Waters of the United States. Because of karst terrain within and adjacent to National Forest lands, damages to watershed will have widespread and incalculable consequences (well documented in *An Expert Report on Geologic Hazards in the Karst Regions of Virginia and West Virginia: Investigations and Analysis Concerning the Proposed Mountain Valley Gas Pipeline*; Ernst H. Kastning, Ph.D, P.G; July 3, 2016; previously submitted to FERC). Hence, the US Army Corp of Engineers should be especially concerned

IND356-2

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

INDIVIDUALS

IND356 – Robert B. Lineberry

20161212-5010 FERC PDF (Unofficial) 12/10/2016 1:23:18 PM

Objection to Designated Utility Corridor, Jefferson National Forest, FERC Docket CP16-10-000

IND 356-2 cont'd | about this potential threat to the responsibilities with which they have been charged: to protect the Waters of United States.

IND 356-3 | Proposed Amendment 3—Proposed: removal of old growth trees within the construction corridor. Again, the involved agencies are considering the destruction of something they did not create and cannot recreate. Old growth trees should be considered sacrosanct and the involved government agencies must make their preservation a resolute priority.

IND 356-4 | Proposed Amendment 4—Proposed: crossing of the Appalachian National Scenic Trail (ANST) at Peter's Mountain. The ANST is a national treasure and its protection is paramount. Jeopardizing the integrity of this treasure and its viewshed should not be a matter for consideration; however given that it is, this particular crossing through a greenfield deserves further scrutiny since a slightly less invasive alternative has been proposed: Hybrid Alternative Route 1A through an area already disturbed by utilities and intruding 1.4 less miles through National Forest.

Because the DEIS does not adequately address these concerns, nor take into consideration the future impacts of greenhouse gases, earthquakes, landslides, or cave-ins, but instead indicates "minimal environmental impacts", the fear shared by countless private citizens including myself is that the Final Environmental Impact Statement likewise will fail to take into account the concerns that hundreds (thousands?) of others and I have outlined. Hence, we call upon the Bureau of Land Management, the agency which would issue any right-of-way grants since two or more federal agencies are involved in the MVP route, to fulfill responsibilities to provide protections to our natural resources and the Waters of the United States by NOT granting approval to these amendments.

Respectfully submitted,

Robert Lineberry and Earle Irwin
1011 Madison Lane
Blacksburg, VA 24060

IND356-3 See the response to comment FA10-1 regarding Amendment 3.

IND356-4 See the response to comment FA10-1 regarding Amendment 4.

INDIVIDUALS

IND357 – Robert M. Jones (on behalf of Jason Taylor)

20161212-5013 FERC PDF (Unofficial) 12/10/2016 12:06:06 PM

Date: 10 December 2016

To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission

From: Jason Taylor, Filed on his behalf by Robert M. Jones, Registered
Intervenor

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

Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND357-1

On Sept 9 of this year, the Department of Conservation and Recreation sent a letter to FERC asking Mountain Valley Pipeline to avoid all of Slusser's Chapel Conservation Site. The DCR suggested a new route which would go around this extremely sensitive area by traveling along the ridge of Brush Mountain. This proposed "avoidance" route would not only avoid the very important and sensitive Slusser's Chapel Conservation Site, but would also avoid much of the karst-filled Mt. Tabor Sinkhole Plain including Slusser's Chapel Cave.

I am a landowner who lives on Mt. Tabor Road with my wife and two small children. My property is in the Slusser's Chapel Conservation Site and my home is located at the western edge of Slusser's Chapel Cave. I and everyone else in this area depend on private wells for our water supply. My water and that of many others comes from Slusser's Chapel Cave. Mountain Valley Pipeline plans to build an exceptionally large pipeline through this area. This concerns me greatly as the first thought that comes into my head is the safety of my family. If this huge pipeline crosses this important source of water, there is a clear possibility of erosion and contamination of the water supply. There is, in fact, a huge aquifer under all of this area. Pollution of the aquifer would be disaster. It is too dangerous to build such a large pipeline through this sort of conservation site, especially with as much karst topography as exists here.

For this reason, I agree with the plan Suggested by the DCR to avoid potential catastrophe by avoiding Slusser's Chapel Conservation Site. I do not want this nor any pipeline here at all!. However, if this pipeline is to be built, the DCR route is a far better alternative than the currently proposed route. The DCR route not only avoids the conservation site but is also on firmer ground and does not directly threaten peoples homes and water.

Sincerely,

Jason Taylor
2432 Mt Tabor Road
Blacksburg VA 24060

IND357-1

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

INDIVIDUALS

IND358 – Robert M. Jones (on behalf of Jennifer Rathmann)

20161212-5012 FERC PDF (Unofficial) 12/10/2016 12:08:58 PM

Date: 9 December 2016
To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Ms. Jennifer Rathmann, Filed on her behalf by Robert M. Jones,
Registered Intervenor
Re: Mountain Valley Pipeline, Docket CP16-10-000
Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND358-1

I am a partner in a chiropractic practice in Blacksburg VA, and a number of my clients live along the "Mount Tabor Variation" section of the proposed Mountain Valley Pipeline. I have become aware of the negative affects this pipeline could have on the environment, the water and the people of this area. I am writing to express my opposition for the following reasons:

IND358-1

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

1. The pipeline is being proposed to go through or near the Slusser's Chapel Conservation Site. This is a protected place where water for many people could easily be contaminated. People must not be left without clean water. It is also a place where protected species may also be harmed or destroyed.

IND358-2

2. I am also concerned about the possibility of a pipeline explosion occurring. It is not right to put people in harm's way by building the pipeline so close to people's homes. Families should not be forced to live close to a large pipeline which would injure or kill them if an explosion occurred.

IND358-2

See the response to comment IND2-1 regarding safety.

IND358-3

3. I am concerned about all the trees that would be cut down if the pipeline goes through this area. Many large trees such as oak, maple, walnut, hickory, birch and poplar will be lost. That would take a huge toll on this beautiful forested area.

IND358-3

Impacts on forested areas are discussed in sections 4.4 and 4.5 of the EIS.

IND358-4

Finally, I am opposed to the pipeline. But, if a pipeline is built in this area, I want to support another route that would be a great improvement over the present Mt Tabor Variation route.

IND358-4

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

I support the avoidance route suggested by the Department of Conservation and Recreation. This route would be a better choice because it would avoid the Slusser's Chapel Conservation Site and run along the top of Brush Mountain instead. This route would also be better because it would be further away from water sources and people's homes.

Sincerely,

Jennifer Rathmann
Blacksburg VA
1510 Nichols Way
Blacksburg VA 24060

INDIVIDUALS

IND359 – Tina Smusz (on behalf of Peter and Mary Jane Imhof)

20161212-5029 FERC PDF (Unofficial) 12/10/2016 9:29:31 AM

December 9, 2016

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

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

Dear Ms. Bose and Members of the Commission,

IND359-1

My wife and I live in Giles County VA and own a house in Montgomery County. Both of these properties are close to the proposed Mount Valley pipeline, so we are very concerned about how the construction will endanger our communities. Reports have identified threats to safety, water, environment and local tourism which, in this area, is based heavily upon recreation. We as residents and property holders strongly oppose the building of this pipeline based upon the dangers of construction, including fires and aquifer pollution, and the long term effects to our homes and lives.

Mountain Valley proposes that the pipeline be placed into karst topography (as in Swiss cheese) as well as over fault lines. These are physical characteristics inappropriate for a pipeline of this size. And such a size has never been built into a mountain terrain such as that of the New River Valley. Giles County was the epicenter of the largest recorded earthquake in Virginia and the pipeline crosses the fault line in the vicinity of this epicenter. This is a pipeline with a proposed pressure of 1440 PSI and a transmission rate of 23,000 + cubic feet per second. If it burst it would create catastrophic damage to the valley and its residents. We do not have the resources for an emergency of this magnitude.

IND359-2

Since the construction would require blasting through rock, erosion and the resulting sediment would cause diminishing water quality in the immediate future and over time. The area is filled with sinkholes, streams and springs, and caves. As many other residents do, we have wells which obtain water from local aquifers. Leakage of natural gas liquids containing heavy metals, and radon can contaminate this groundwater.

IND359-3

One of the New River Valley's major assets is the beauty nature has provided. Tourism generates a living to many people in the county and surrounding ones. And, the plan is for the pipeline to come in close proximity to homes in Newport Va. a unique historic village. The pipeline will create a major scar that will deface the area and degrade the recreation industry built here. Heavy loads delivered by tractor trailers will damage our roads; the proposed Bishop Rd access in Montgomery County would come within 100 feet of our house there. Jobs created by this pipeline will most likely be filled by out of area workers. So there will be no economic benefit to us at all. We will sacrifice a lot and receive nothing but a constant threat to our safety

IND359-1

The EIS addresses safety in section 4.12; karst and earthquakes in section 4.1; and tourism in section 4.9. See the response to comment LA1-4 regarding existing 42-inch pipelines in mountainous terrain. See the response to comment IND2-1 regarding safety.

IND359-2

See the response to comment CO14-1 regarding blasting. See the response to comment IND3-1 regarding drinking water. See the response to comment IND70-1 regarding erosion. See the response to comment IND92-1 regarding leaks.

IND359-3

Tourism is discussed in section 4.9 of the EIS. See the response to comment IND281-2 regarding taxes and jobs. See the response to comment IND288-3 regarding road damage. See the response to comment CO2-1 regarding benefits.

INDIVIDUALS

IND359 – Tina Smusz (on behalf of Peter and Mary Jane Imhof)

20161212-5029 FERC PDF (Unofficial) 12/10/2016 9:29:31 AM

IND359-3
cont'd

and environment while the pipeline is built and in use. We will not receive any of the gas locally. This project is not in the best interests of the public.

We strongly request that you pay attention to the negative safety, environmental and economic effects this pipeline will cause to citizens of this area.

Respectfully,

Peter and Mary Jane Imhof

Cc: US Forest Service, comments-southern-georgewashington-jefferson@fs.fed.us
US Bureau of Land Management, vcrafft@blm.gov, mliberat@blm.gov
Appalachian Trail Conference, lbelleville@appalachiantrail.org

INDIVIDUALS

IND360 – Robert M. Jones (on behalf of Hersha Evans)

20161212-5030 FERC PDF (Unofficial) 12/10/2016 12:03:04 PM

Date: 9 December 2016

To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission

From: Ms. Hersha Evans, Filed on her behalf by Robert M. Jones, Registered Intervenor

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

Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND360-1

I am writing to comment on the filing made by the Virginia Department of Conservation and Recreation in September 2016. The DCR expressed concern that Mountain Valley Pipeline's Proposed "Mount Tabor Variation" route would negatively impact the Slusser's Chapel Conservation Site in this area. If that were to happen, the water supply for many people living in the Mt. Tabor area could be harmed or destroyed. This would be devastating to the many residents of this area who all depend on their wells for the water needed in every day living.

In an effort to protect the Slusser's Chapel Conservation Site as well as most of the Mt. Tabor Sinkhole Plain, the DCR suggested a route that would avoid this sensitive area. This route would avoid many fragile areas by crossing along the ridge of Brush Mountain. This route would keep the pipeline away from many environmentally sensitive sites as well keeping it further away from people's homes and wells. This route would also avoid endangering the habitat of a number of biodiverse populations associated with the conservation site.

I do not want the MVP to be built through this area at all. However, if a choice is to be made, I support the avoidance route proposed by the Virginia Department of Conservation and Recreation. This avoidance route will be the safest sanest choice for the protection of our water and for the many environmentally sensitive areas along the Mt. Tabor Variation.

Sincerely,

Hersha Evans

55 Griggs Street

Christiansburg, VA 24073

IND360-1

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

INDIVIDUALS

IND361 – James Chandler

20161212-5031 FERC PDF (Unofficial) 12/11/2016 2:59:15 PM



Watershed Strategies, LLC
P.O. Box 21302
Roanoke, VA 24018

November 18, 2015

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

RE: Mountain Valley Pipeline Wetland Survey Omissions, Docket CP16-10-000

Dear Ms. Bose and Members of the Commission,

IND
361-1

Watershed Strategies, LLC is writing this letter to the Federal Energy Regulatory Commission (FERC) in an effort to bring to the forefront a situation of concern related to wetland surveying by contracted companies for the MVP project, docket number PF16-10-000. On July 13 my client, James and Kathy Chandler of Bent Mountain, received a certified letter from MVP stating that wetland surveying would occur on their property between the dates of July 23-25. The following day, July 14, Kathy Chandler witnessed a large crew of MVP contracted surveyors and personnel working on her property. Mrs. Chandler confronted the crew and was told that the workers were indeed performing wetland surveys on her parcels. This occurred a full nine (9) days prior to their stated survey dates.

Watershed Strategies, LLC was contracted by the Chandler's to perform a stream and wetland delineation on two parcels that they own. Watershed Strategies performed the contracted field work on August 11, 2015. Watershed Strategies identified eight (8) wetlands on the two Chandler parcels. The wetland surveyors for MVP identified and delineated two (2) wetlands on the same parcels during their July 14 site visit. While it is alarming that MVP surveyors would arrive a full nine days early to perform their wetland delineation, it is even more alarming that the MVP contracted wetland delineators identified and flagged only two wetlands on the parcels, while Watershed Strategies identified and flagged eight wetlands, a difference of 75%. This certainly raises a red flag as far as the ability of the MVP contracted wetland delineators to accurately perform their task.

Background

Watershed Strategies, a local stream and wetland consulting business, was contracted to perform a wetland and stream delineation, as well as a jurisdictional confirmation with the U.S. Army Corps of Engineers on a site on Bent Mountain, Virginia. The site is located at mile marker 243 of the proposed MVP pipeline corridor and includes tax parcel ID 111.00-01-62.01-0000 and 117.00-01-38.00-0000, both owned by the Chandler's.

Tax Parcel ID 111.00-01-62.01-0000 consists of roughly 72 acres of rolling terrain that included six (6) jurisdictional wetlands and two perennial streams. For the sake of clarity, the property was broken into the back portion where the pipeline corridor is proposed to pass through the property and the front portion of the property where a proposed pipeline access road is to be located. The back portion, along the pipeline corridor, contained five wetlands and one jurisdictional stream. MVP surveyors correctly identified and flagged one jurisdictional stream, however they failed to recognize and delineate any of the five wetlands that can be found adjacent to the stream. Some of the adjacent wetlands were small in size, while others were very large, and seemingly, impossible to miss. Given that the MVP flagging for streams

IND361-1

Comment regarding surveyors are noted. Additional information regarding the location of wetlands identified on the parcel would be required and would be collaborated with the COE. Wetland and stream delineations are conducted within a defined corridor for the proposed right-of-way and access roads. It is likely that the unidentified wetlands on the parcel fall outside of the survey corridor. Without specific information regarding the location of these wetlands in relation to the MVP environmental survey corridor, we are unable to make any determinations regarding the adequacy of the wetland surveys. During preliminary environmental surveys many potential access roads are evaluated for potential use during a project and negotiations with landowner are made in order to compensate for use of access roads.

INDIVIDUALS

IND361 – James Chandler

20161212-5031 FERC PDF (Unofficial) 12/11/2016 2:59:15 PM

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conf'd

(blue) was located right next to each of the wetlands in question, we feel that either the intent was to omit these wetlands from the survey, or the quality of delineation work by the surveyors is questionable.

The front portion of the property, located within the corridor of the proposed access road, contained one wetland and one jurisdictional stream. MVP wetland surveyors did not identify, nor flag the jurisdictional wetland or stream found along Green Hollow Road on this parcel. This wetland was relatively large in size, and seemingly, difficult to miss. The stream was quite obvious as well, as it passes under Green Hollow Road and onto the Chandler property. MVP delineated this stream just above the culvert on an adjacent parcel, but not below the culvert on the Chandler parcel even though the proposed access road would no doubt have an impact on this area based on the pipeline access road maps found on the Roanoke County GIS website.

Tax Parcel ID 117.00-01-38.00-0000 consists of approximately 25 acres of rolling to flat terrain that included two jurisdictional wetlands and two jurisdictional streams. This tax parcel is located within both the proposed pipeline corridor and the proposed access road corridor. MVP contracted wetland surveyors correctly identified and flagged both wetlands and streams on this parcel.

In summary, the MVP contracted wetland surveyors failed to identify and flag six wetlands and one jurisdictional stream existing on the two aforementioned tax parcels.

Landowners along Green Hollow Road were not aware of the proposed access road, prior to the July 14 survey. The route of the proposed access road was shared with Mrs. Chandler on July 14, only after an MVP representative and crew were confronted for trespassing on land that was clearly marked "no trespassing, no surveying". This same scenario of surveying on the wrong dates was a common theme on other parcels throughout Bent Mountain during late-July and early-August, 2015.

A jurisdictional confirmation with the U.S. Army Corps of Engineers (USACE) will be forthcoming on parcel ID 111.00-01-62.01-0000 and 117.00-01-38.00-0000. A report will be submitted to the USACE and copied to FERC once mapping can be completed during leaf-off conditions. This jurisdictional confirmation, once completed, will be used to cross reference wetland permit data submitted by the MVP, specific to parcel ID 111.00-01-62.01-0000 and 117.00-01-38.00-0000.

Credentials of Watershed Strategies

Watershed Strategies, LLC credentials include having a certified Professional Wetland Scientist (PWS) and a certified Professional Wetland Delineator (PWD) with the Commonwealth of Virginia on staff. The consultant has worked as a wetland scientist in this region since 2004 and is a 22 year Bent Mountain resident with an intimate knowledge of the local watershed.

Causes for Concern

There are several causes for concern related to the wetland and stream surveying taking place on Bent Mountain, with regard to the MVP project. The first concern centers on the fact that the subcontractors performing the surveys are not delineating and mapping obvious wetlands and streams found along the pipeline corridor near milepost 243. While it is impossible to know the exact reason for these omissions, it does generate questions and concerns regarding the intentions of the surveyors, as well as the qualifications of the surveyors. Watershed Strategies is currently working with other affected "stakeholders". Should a similar pattern of wetland omission occur on other sites, Watershed Strategies will be documenting and submitting a letter similar to this for the purpose of notifying the FERC and the U.S. Army Corps of Engineers of such omissions and requesting that each agency look further into the reasons why jurisdictional wetlands and streams are not being sufficiently and accurately identified and mapped on various sites.

INDIVIDUALS

IND361 – James Chandler

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IND 361-1 cont'd
A second cause for concern is the misleading information that is being presented to residents of Bent Mountain. MVP mailed a certified letter to our client on July 13, specifically detailing the dates in which the wetland and stream surveying would take place. The certified letter stated that wetland survey would take place between the dates of July 23-25, 2015. One day after receiving the certified letter, my client drove down their private road only to find a large group of surveyors performing the delineations on both sites on a date other than was specified in the letter. MVP surveyors were nine (9) days early! This same scenario has played out at numerous residences on Bent Mountain during late July and early August 2015. Given the frequency of this occurrence, it is difficult to believe that MVP was not purposefully misleading stakeholders.

A third cause for concern, particularly to those residents located on Green Hollow Road, is the proposed access road on Green Hollow Drive. Residents of Green Hollow Road were not made aware of this proposal. Only when my client caught surveyors in areas not associated with the pipeline corridor were they willing to offer this information. Green Hollow Road is a private road, maintained by private citizens. During road construction, this proposed access road will greatly affect the ability of residents to come and go without major disruption to their lives and schedules. More importantly, the activity along this access road, particularly during pipeline construction, could create a dangerous situation for citizens along Green Hollow Drive should there be an emergency. Why were stakeholders not made aware of this proposal?

Recommendations

IND 361-2
It is the opinion of Watershed Strategies, LLC that there appears to be a significant level of misinformation being given to stakeholders by MVP. Additionally, MVP appears to be withholding important information from stakeholders, such as the proposed access road on Green Hollow Road. Moreover, the quality of wetland survey near milepost 243 appears to be poor at best and cause for major concern at worst.

It is the belief of Watershed Strategies, LLC that MVP has proven unworthy of providing quality information to the stakeholders on Bent Mountain. Additionally, this is a 300 mile pipeline project that will impact thousands of streams, wetlands, and citizens. As a result, Watershed Strategies, LLC believes strongly that should this project be approved by the FERC, the FERC should require that the MVP project be subject to a U.S. Army Corps of Engineers (USACE) individual permit. As stated on the USACE website "These individual permits are issued for activities that have more than minimal adverse impacts to waters of the United States and evaluation of each permit application involves more thorough review of the potential environmental and socioeconomic effects of the proposed activity." The USACE website goes on to say "Permit Decisions are based on probable impacts associated with the proposed project, including cumulative impacts, on the public interest ([33 CFR 320.4](#))". Clearly, a 300 mile pipeline project, affecting thousands of streams, wetlands, and citizens should fall within the scope of an individual permit, based on the language found on the USACE website. A USACE Nationwide Permit 12 (Utility Line) is simply not sufficient for a project of this size and scope, particularly when you factor in the misinformation, lack of information, and subpar work already taking place on Bent Mountain.

The FERC has the responsibility to deny the permit for the MVP project (Docket #PF16-10-000) should MVP prove unworthy of accurately conducting important wetland and stream surveys, as well as honestly corresponding with important stakeholders. If MVP cannot perform those critical tasks, how can stakeholders, and the public at large, feel confident that they can construct and maintain a 300 mile natural gas pipeline? Should the FERC approve this project, it should not do so without ensuring adequate due diligence regarding the environmental review (NEPA), a USACE individual permit, and accurate information submitted on behalf of MVP. Should any of these conditions not be met, the project should be denied.

IND361-2

All of Mountain Valley's filings are available for public review on the FERC's eLibrary system. Wetland and stream delineations will be collaborated by the COE. MVP is seeking coverage under permit NWP12.

INDIVIDUALS

IND361 – James Chandler

20161212-5031 FERC PDF (Unofficial) 12/11/2016 2:59:15 PM

Respectfully,

David C. Tribble
Watershed Strategies, LLC

CC: James and Kathy Chandler, client, 10890 Green Hollow Dr, Bent Mountain, VA 24059
Isak Howell, Appalachian Mountain Advocates
Jennifer Frye, U.S. Army Corps of Engineers

INDIVIDUALS

IND362 – James Chandler

20161212-5034 FERC PDF (Unofficial) 12/11/2016 3:13:59 PM

James T. and Kathy E. Chandler

Physical address: 10890 Green Hollow Drive, Bent Mountain, VA 24059

Mailing address: PO Box 20638, Roanoke, VA 24018

Docket Number: CP16-10-000

November 18, 2015

- Issues to pipeline proposed route through our yard**
- IND362-1 .Proximity within feet of our home, being within the “kill zone” if leak/explosion occurs
- IND362-2 .Depreciation, lack of equity, limited resale if needed
- IND362-3 . Detrimental to quality of life for our children and family (use of yard, forest and pastures for recreation and daily living)
- IND362-4 .Proximity within feet of our well water for personal use, including the burden of lifelong testing
- IND362-5 .Detrimental to our landuse/tax plan by interrupting cattle grazing on our pastures
- IND362-6 .Devastation of mature forest equating to acres of timber loss directly in the pipeline path
- IND362-7 .Destruction of wildlife habitat and wetlands throughout corridor including known areas of scrub shrub(see attached letter from Watershed Strategies, Nov. 18, 2015)
- IND362-8 .Lifelong impact of not being able to build or add onto our house because of pipeline location, i.e. cannot build over or cross cuts through the middle of our parcel, not on the edge of the survey
- .Lifetime limits on being able to use our yard and property for our own recreation and future plans because of pipeline placement
- Issues with Green Hollow Dr. Being an Access Road (proposed as a permanent access)**
- IND362-9 .Long one lane road (approx 1mile) as the only entrance and exit for us and neighbors to and from workplace, school, and all other activities of daily living
- .Obvious threat of obliterating 911 services for us and neighbors. We have a child with asthma and parent with cardiac disease.
- .Destruction of known wetlands in multiple areas identified along access road Green Hollow Dr 24059(see attached letter)
- .Detrimental to our cattle grazing, as the access road would destroy the fencing of our pastures

- IND362-1 See the response to comment IND2-1 regarding safety. Mountain Valley’s response to this landowner’s concerns are listed on table 3.5.3-2.
- IND362-2 See the response to comment IND12-1 regarding property values.
- IND362-3 Landowners could continue to use land within the easement with the exception of construction of access roads or permanent structures within the permanent easement.
- IND362-4 See the response to comment IND3-1 regarding drinking water.
- IND362-5 See the response to comment IND332-1 regarding cattle.
- IND362-6 Impacts on forests are discussed in sections 4.4 and 4.5 of the EIS.
- IND362-7 Scrub-shrub wetlands typically re-grow within 1 to 3 years of disturbance. See the response to IND270-1 regarding wildlife.
- IND362-8 The proposed centerline would be more than 500 feet from the edge of the existing house. The MVP is not expected to impact the commenter’s desire to expand their home.
- IND362-9 Mountain Valley’s proposed modifications to access road MVP-RO-287 are provided in appendix E. As stated in section 4.8.2.2, Mountain Valley would maintain access to homes and driveways. This would extend to emergency response services. See the response to IND332-1 regarding pasture and cattle fences. Our Procedures state that “the only access roads, other than the construction right-of-way, that can be used in wetlands are those existing roads that can be used with no modifications or improvements, other than routine repair, and no impact on the wetland.” Based on alignment sheets filed on October 13, 2016, Mountain Valley would neck-down the access road in specific spots to avoid wetland impacts.

INDIVIDUALS

IND363 – James Chandler

20161212-5035 FERC PDF (Unofficial) 12/11/2016 3:49:35 PM

Clean Water for Our Medical Future

IND363-1 With the announcement of the expansion of Virginia Tech-Carilion's Research Complex, Roanoke has taken a huge leap forward in transforming itself from a "gritty railroad town" to an exciting medical city capital. The former was the description of Roanoke in national newspaper coverage concerning a tragic shooting 15 years ago. Sperling's Cities Rated Almanac lists cons of Roanoke as having an "industrial feel".

Medical research is appealing on many levels; it is a clean industry, attracts highly educated professionals to the area, and has the potential to be a powerful economic engine beyond the research itself. Those professionals invest in the larger community with home buying and supporting local businesses.

We have a looming, dark shadow approaching, however. A proposed 42 inch high pressure gas pipeline by Mountain Valley Pipeline to bring fracked gas from Pennsylvania to export threatens to cut through our Valley. The *installation* of the industry is not "clean", will not bring local jobs to the economy, and will forever scar our landscape, including our crown jewel, the Blue Ridge Parkway.

Little discussed is the effect the placement of the pipeline will have on water. The mountains are our drinking fountains. The streams and springs that flow clear from higher mountains are what make up the larger bodies of water from which we ultimately drink. The pipeline crosses through the watershed of Poor Mountain and Bent Mountain to Adney Gap. These waters flow into the Roanoke River. Blasting and construction will destroy these pristine streams, with sediment and contamination fouling the water downstream. This includes Spring Hill Reservoir, from which half of Roanoke County gets its water. Roanoke City may also taste tainted water; the Reservoir serves the City as well. How can we jeopardize our water and simultaneously proclaim our status as a medical mecca? This is a public health concern for the whole Valley.

Those who think that the pipeline does not affect them are wrong; their water will be affected, including emerging businesses whose future depends on high quality water. Those young professionals who may be attracted to a beautiful valley with clean water and a thriving medical community will not want to come to a Pipeline Town. The pipeline is the antithesis of an emerging health/research complex. Roanoke is on the cusp of a great and exciting future which will put us on the map of important medical cities. Let us not destroy that by becoming an appendage of the fracking fields!

IND363-1

As discussed in section 4.9.2 of the EIS, Mountain Valley's economic consultant estimated that during peak construction the project would support a total of about 4,400 jobs in Virginia, including direct and indirect jobs. During operation of the MVP, about 34 jobs, with an average annual salary of \$67,000 each, would be supported in Virginia. See the response to comment IND3-1 regarding drinking water. Water resources are discussed in section 4.3 of the EIS. See the response to comment CO14-1 regarding blasting.

INDIVIDUALS

IND364 – Tina Smusz (on behalf of Loretta Walker)

20161212-5038 FERC PDF (Unofficial) 12/11/2016 8:17:58 PM

December 9, 2016

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

IND364-1

I am deeply concerned about the proposed Mountain Valley pipeline. Part of my concern is its impact on the beauty of the area. A massive industrial right of way would permit the destruction of old growth national forests as it passes through national forest, and lowering of the scenic integrity objective where it crosses the Appalachian Scenic trail would put a blight on one of the most picturesque sections of the AT (USFS LRMP amendments 1 and 4). Continuation of its path would permanently degrade the small historic town of Newport. In addition to subsuming a wide swath through the forest, all the private homes along the route would be affected with lowering of property values – a phenomenon which is already occurring. A rupture in the pipeline which carries 23,144 cubic feet of gas pressurized at 1,440 pounds per square inch would be overwhelming to this community. Current emergency services are entirely inadequate.

IND364-1

The Jefferson National Forest and ANST are discussed in section 4.8 of the EIS. Historic resources are discussed in section 4.10. See the response to comment IND12-1 regarding property values. See the response to comment IND18-2 regarding emergency response.

IND364-2

The economic structure of the area would be seriously impacted since much of it is built on supplying the support for visiting vacationers and their local suppliers. Transportation routes, centers of population, and adjustment to commercial locations would require a whole new infrastructure.

IND364-2

See the response to comment CO2-1 regarding benefits. Transportation is discussed in section 4.9 of the EIS. Tourism is discussed in section 4.9 of the EIS.

IND364-3

Why do it? When the methane reaches the Chesapeake, it is destined for both foreign and out-of-state export. The local regions along MVP's path have adequate supplies, and with the completed development of renewable solar sources will be ready to supply other areas. Life for local residents would be very negatively impacted. The private business which operates the pipeline would realize the only profit!

IND364-3

See the response to comment IND2-3 regarding export. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

Please give your careful consideration to our concern for historic beauty and old growth forests which cannot be restored to their original state.

Loretta Walker

Blacksburg, VA 24060

Cc: Job Timm, Supervisor, Jefferson National Forest

INDIVIDUALS

IND365 – Tina Smusz

20161212-5039 FERC PDF (Unofficial) 12/11/2016 7:48:58 PM

December 11, 2016

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

Cc: Bureau of Land Management

Re: Mountain Valley Pipeline proposal, Docket No. CP 16-10 –Request for public meeting with BLM

Dear Ms. Bose and Members of the Commission,

I request that the Bureau of Land Management schedule a face-to-face public meeting in the New River Valley of Virginia to obtain citizens' uncensored, thoughtful input on the Mountain Valley Pipeline proposal which would traverse Giles and Montgomery counties.

The public has not been provided with adequate open, uncensored public sessions that truly allow voicing of their opinions and, more importantly, sharing their detailed information on topics crucial to the Mountain Valley Pipeline proposal for the New River Valley region of Virginia. The first scoping meeting in May 2015 was held in a location unfamiliar to many people in the area – the high school in Elliston, VA which has the smallest number of students served in Montgomery County (289 vs. 1,000+ at two other area schools) and is not centrally located in relation to main population areas. It is likely that this location discouraged citizen attendance. Paul Friedman from FERC chastised attendees in the audience for minor side comments during that event and threatened to prematurely end the public address session. His perceived hostility added to the stress of people already anxious about impacts on their homes, and quality of life. Additionally, the audience was told unequivocally that none of the gas transported through Mountain Valley Pipeline would be exported to other countries – a complete fallacy. We expect accurate information from FERC officials.

The second open comment session held in Roanoke Virginia on November 3, 2016 was the antithesis of "open," with individuals (plus a companion if desired) cloistered in a small room with a stenographer and the presence of either Paul Friedman or another FERC representative. Obviously this setting thwarts truly "public" comments, intimidates the presenter who lacks the reassuring presence of multiple other affected citizens, and prevents the sharing of valuable information in real time with other residents impacted by the pipeline. FERC's posting of these comments on the FERC website after the fact does not constitute a true public forum. Many of our older and rural citizens do not have the skills or computer access for reviewing these postings. This type of scoping process discriminates against people who are disproportionately affected by large transmission pipelines which are preferentially located through rural areas.

IND365-1

IND365-1

The FERC held open public sessions to hear comments about the projects; see section 1.4 of the EIS. See the response to comment IND2-3 regarding export.

INDIVIDUALS

IND365 – Tina Smusz

20161212-5039 FERC PDF (Unofficial) 12/11/2016 7:48:58 PM

IND365-1
cont'd

If the Bureau of Land Management offers an open meeting in our area, your staff will obtain valuable, uncensored input from thoughtful citizens along the intended pipeline route. Many residents of this area have spent their lives and careers studying, researching, and finding solutions for issues which pertain directly to this pipeline project such as public safety and health, protecting the environment and providing economic stability for our communities. We have been insulted and constrained by FERC's approach to obtaining input in so-called public venues. Multiple committed local groups and individuals are eager to engage courteously with your staff as we share valuable information. Please consider meeting in person with New River Valley citizens. Obviously, time is of the essence in setting up this opportunity.

Respectfully,

Tina L. Smusz, MD, MPH

Cc: US Forest Service, comments-southern-georgewashington-jefferson@fs.fed.us
US Bureau of Land Management, vcraft@blm.gov, mliberat@blm.gov
Appalachian Trail Conference, lbelleville@appalachiantrail.org

INDIVIDUALS

IND366 – Kathy E. Chandler

COMMENTS TO FERC/DEIS RE: MVP IMPACT ON OUR PROPERTY:
10890 Green Hollow Dr., Bent Mountain, VA 24059

Docket CP16-10-000

DECEMBER 12, 2016
KATHY E. CHANDLER

Route

IND366-1

- Cuts personal property in half; renders acreage landlocked, forever inaccessible and unusable
- The full ½ mile length will be deforested 125 feet in width of a variety of mature timber as verified by the US Forest Service
- Variety of wildlife will be displaced and habitat destroyed
- Major water sources will be crossed including Mill Creek which flows to Bottom Creek, Back Creek, Roanoke River, and Spring Hollow Reservoir Spring Hollow Reservoir is a water source for one half of Roanoke County
- Corridor becomes unusable land: unable to plant, drive or build in said area
- The corridor will render ½ of our real estate unusable

IND366-1

Mountain Valley’s response concerning pipeline routing on the subject property is listed on table 3.5.3-2 of the final EIS. Forest impacts are addressed in section 4.4; wildlife discussed in section 4.5; and water resources in section 4.3. The permanent easement can be used for pasture, or planted in crops. Once the temporary right-of-way is reforested, it can be harvested for timber in the future.

Intended Permanent Access Road

IND366-2

- The full length of Green Hollow (1 mile) will be affected
- Our parcel is in the last (1/4 mile) including an equipment depot at the end
- This will disrupt our ability and our neighbors’ ability ingress and egress for activities of daily living, work, school, and transportation in general
- Has the potential to interrupt 911 access and response in a timely fashion
- This will remove (1/4 mile) of cattle fencing and a cattle paddock
- Crosses multiple primary spring heads, streams, two culverts which leads to 30 acres of wetlands
- Interruption of these water sheds to 30 acres of wetlands which feed into Mill Creek pose the hazard of a French Drain effect which would kill the wetlands and subsequent tributary run off

IND366-2

See the response to comment IND362-9 regarding access road MVP-RO-287.

Property Value

IND366-3

- The access road poses permanent loss of curb value and property value impact to our home and acreage which we consider to be in a rural setting, non-traditional neighborhood and all parcels comprising our yard which we use for recreation.
- Lessens the serenity of a simple country road approach to our home in a quiet rural setting
- Property value cannot be mitigated, no amount of money can remove the physical scar of the corridor cutting through the middle of our land just a few hundred feet from our home and the well which is the only water source
- We have the risk of not being able to obtain home owners insurance

IND366-3

See the response to comment IND12-1 regarding property values. See the response to comment IND12-2 regarding homeowner’s insurance. See the response to comment CO14-1 regarding blasting. See the response to comment LA1-7 regarding herbicides. See the response to comment IND3-1 regarding drinking water. We are not aware of a recommendation for water testing 3 to 4 times a year due to the presence of a natural gas pipeline.

INDIVIDUALS

IND366 – Kathy E. Chandler

IND366-3
cont'd

- Risk of foundation fracture and other home damage due to the proximity of dynamite usage during the construction phase of the pipe placement
- Long term risk of chemicals in our water source because of herbicide use to keep the corridor clean during the lifespan if the pipeline
- Burden of permanent home water surveillance which has been recommended to be tested 3-4 times a year if pipeline is in place

IND366-4

Safety

- We are in the blast zone from any place on our property no matter where the pipeline is placed
- We face the risk of thinner pipe being used in a rural area which would not be as safe
- We have children who face the fear of blasting, construction, and the constant risk of potential explosion
- We face potential cost to leave our home during construction phase especially if we cannot get through our road used as an access road
- The permanent access road will threaten 911 response
- No way to rent, sell, or abandon our home and would need surveillance during the construction phase

IND366-5

Legal

- We have been taken advantage by a private corporation working in concert with Roanoke County to side step the due process of us having a court date set with MVP on Oct. 27, 2016
- We were taken by storm with up to 40 surveyors, land agents, security personal forcefully surveying on Oct. 10, 2016 which was a court holiday (Columbus Day)
- Roanoke County police informed us of a new policy specific to only us as land owners:that police would no longer ask surveyors to leave a land owners property when the land owner was present and asked for that assistance and police in fact, escorted the surveyors onto our property
- Because of this event MVP achieved all remaining survey needs and subsequently, on Oct. 11, 2016, MVP attorneys non suited the case which they had set on Oct. 27, 2016 thus eliminating our ability to tell our side of the story of other survey infractions including entry without notice on more than one occasion
- A lack of police protection which was withdrawn without being discussed with us as landowners directly or without telling our counsel directly
- At issue, and still not resolved or well described, the state survey statute is imperfect, some legal thinkers feel it needs to be heard in the courts, there are cases pending which have not had a true ruling, including a case pending in the Virginia State Supreme Court
- Roanoke County aided and abetted MVP in side stepping that responsibility to let us meet in court on October 27, 2016 and singled us out as landowners treating us differently from another landowner on Bent Mountain/ Poor Mountain who was also being surveyed that day

IND366-4

See the response to comment IND2-1 regarding safety. As discussed in section 4.12.1 of the EIS, the Applicants would design, construct, operate, and maintain the proposed facilities in accordance with the DOT's Minimum Federal Safety Standards in 49 CFR 192. See the response to comment IND18-2 regarding emergency response. As stated in section 4.8.2.2, Mountain Valley would maintain access to homes and driveways for both the homeowner and emergency response personnel.

IND366-5

The commenter's statements regarding surveys without permission are noted.

INDIVIDUALS

IND366 – Kathy E. Chandler

IND366-5
cont'd

- Effectively having police escort surveyors onto our land against our wishes and taking away our day in court

IND366-6

Water

- Our home and primary water source of our well will be affected by the proposed pipeline, passing within feet of our well and main water source
- A recent hydro geologist expert has assessed our property as being located along a fault line which would mean unstable environment and unsafe for pipeline placement
- The intended corridor crosses the boldest part of Mill Creek and will obliterate forested wetlands completely on the property behind us as well as on our land and the access road
- The access road includes forested wetlands, at least four springs and primary streams flowing into two crossing of the access road as it travels to Mill Creek
- Our access road and wetlands were surveyed unethically without any letter of notice in July 2015
- A FOIA request was never honored from the Army Corps of Engineers as we tried to get a report produced by TetraTech who surveyed that July
- TetraTech field supervisor in Pittsburg also refused to share their report and field notes from that day although they revealed that the events of that day were remarkable enough that they held a special in-service to instruct the staff about entry without notice
- A huge impact in water shed in Mill Creek which drains over 100 acres of our primary streams and wetlands as a watershed
- This watershed not only flows to Roanoke County but the Franklin County from our property

IND366-7

Unethical Entry of Property

- We have had repeated entry by survey crews under the advisory of Coates field service
- There have been three events with no notice letters at all and all resulting in the taking of private information about our property without our consent
- At least three known occasions where they have been found trying to enter property from neighboring parcels
- One forced entry; see above Oct. 10, 2016

Partial listing of Unethical Entries

- July 11 2015
- July 11, 2016
- July 14, 2016
- July 20, 2016
- Sept. 13, 2016
- Oct. 4, 2016
- Oct.5, 2016
- Oct. 6, 2015

IND366-6

See the response to comment IND3-1 regarding drinking water. Impacts and proposed mitigation for water resources and wetlands is discussed in section 4.3 of the EIS.

IND366-7

The statements regarding surveys without permission are noted.

INDIVIDUALS

IND366 – Kathy E. Chandler

20161212-5040 FERC PDF (Unofficial) 12/11/2016 4:30:01 PM

IND366-7
cont'd

- Oct. 8, 2016
- Oct. 10, 2016
- Oct. 24, 2016

Summary

IND366-8

- A two prong threat to our property; corridor and access road
- Greatly diminished property values
- Threat to our personal water and community water shed
- Safety risk for home and life and limb
- Unethical treatment in the survey process by MVP and its associates as well as local authorities

IND366-8

See the response to comment IND12-1 regarding property values. See the response to comment IND3-1 regarding drinking water. Impacts and proposed mitigation for water resources and wetlands is discussed in section 4.3 of the EIS. See the response to comment IND2-1 regarding safety.

INDIVIDUALS

IND367 – Donna S. Pitt

20161212-5042 FERC PDF (Unofficial) 12/11/2016 4:00:04 PM

December 11, 2016

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

RE: Docket16-10-000 Mountain Valley Pipeline, LLC

I am a landowner in Giles County Virginia and a registered intervener in this proposed project. Because I have no faith that what I presented to the FERC recorder on November 3, 2016, will in fact become part of the official record, I am submitting my comments in written form separately.

IND367-1

I have read your Draft Environmental Impact Statement and each and every one of MVP's submissions. I find what your staff has concluded in this DEIS and especially its conclusions, utterly incredulous, completely disingenuous and totally inadequate. You take MVP's incomplete and constantly changing data submissions as accurate and complete, and then make sweeping conclusions that any damage to the National Forest, the Appalachian Trail and thousands of acres of private lands will be "limited", "temporary", or "mitigable". How shockingly ignorant of you!

IND367-1

We disagree with the statements regarding the draft EIS. The draft EIS was written by a team of professional scientists, over a two-year period, using the best available data. The draft EIS was accurate. In addition, the draft EIS is an objective evaluation of the proposed projects and their potential impacts on specific environmental resources.

IND367-2

You have ignored thousands of public comments from professionals, from MVP's own subcontractors to the effect that the Alternate Route 200 is "unbuildable"¹. You have ignored the professional conclusion of the region's most prominent geological engineer, Dr. Ernst Kastning, listing him as a Reference and then ignoring his conclusion that the region [from Peters Mountain to the Mt. Tabor Plain] is "a no-build zone for a gas pipeline of this size".² You have allowed MVP to claim they can stabilize slip-prone soils, trench through sinking streams without destroying groundwater channels, fill in swales and sinkholes which affects groundwater recharge areas, all without the data to substantiate those claims.

IND367-2

See the response to comment LA5-1 regarding stakeholder comments. See also the response to comment IND62-1 regarding Dr. Kastning's report.

IND367-3

You have wrongly allowed MVP to claim there is a "need" for their gas since they have buyers for that gas, but you have ignored increasingly substantiated data that proves that the gas is not needed by the population it purports to serve, no matter who buys that gas. Why did no one read and cite the Synapse Energy Report data that concludes "For Virginia and the Carolinas, the anticipated natural gas supply capacity on existing and upgraded infrastructure is sufficient to meet maximum natural gas demand from 2017 through 2030."³ Thus you do not meet the NEPA requirement to establish the need.

IND367-3

See the response to comment FA11-12 regarding need.

IND367-4

You have ignored completely the cultural attachment of the citizens of the Appalachian region who are stewards of land handed down from their ancestors and which they desire to pass on to

IND367-4

Cultural attachment is discussed in section 4.10 of the EIS. Tourism is discussed in section 4.9 of the EIS.

¹ 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.

² Submittal # 20160713-5029, (CP16-10), Kastning, Ernst H., PD, PG., An Expert Report on Geologic Hazards in the Karst Regions of Virginia and West Virginia, July 3, 2016.

³ Synapse Energy Economics, Inc., Are the Atlantic Coast Pipeline and the Mountain Valley Pipeline Necessary? An examination of the need for additional pipeline capacity into Virginia and the Carolinas, September 12, 2016.

INDIVIDUALS

IND367 – Donna S. Pitt

20161212-5042 FERC PDF (Unofficial) 12/11/2016 4:00:04 PM

IND367-4
cont'd | their descendants. You have dismissed the fact that the residents of the region are more elderly and more disabled than surrounding counties. You have dismissed the huge economic cost to the counties that rely on ecotourism to an increasing degree to support their citizens. All these things will cause irreparable harm to the counties you seem determined to sacrifice for the profit of private corporations.

IND367-5 | Lastly, you are failing in your duty as a federal agency to share with the public the environmental impacts of, and alternatives to, proposed major federal actions that would significantly affect the region. You are allowing MVP to continue submitting data and alterations after the comment period for the DEIS is over, thus subverting the NEPA requirement to give time for public input. There are countless examples of the comment "Prior to Construction" (16 within the document, 19 in the Conclusion) which allows MVP to avoid public comment on its actions and assumptions. You are failing in the EPA's requirement that you quantify the total Green House Gas Emissions, upstream and downstream, for this project.

This Draft Environmental Impact Statement is incomplete, inaccurate, totally inadequate to meet the standard set by NEPA. It should be reissued after ALL data has been provided and the public given an opportunity to comment. Or you must decide to NOT Grant MVP a certificate at all.

Respectfully,

Donna S. Pitt
216 Zells Mill Rd.
Newport, VA 24128

IND367-5 See the response to comment CO5-1 regarding pending information in the draft EIS.

INDIVIDUALS

IND368 – James T. Chandler

20161212-5044 FERC PDF (Unofficial) 12/11/2016 3:54:51 PM

COMMENTS TO FERC/DEIS RE: MVP IMPACT ON OUR PROPERTY

DOCKET CP16-10-000

JAMES T. CHANDLER

DECEMBER 12, 2016

10890 GREEN HOLLOW DR BENT MOUNTAIN, VA 24018

IND368-1

The mountains are our water fountains, and they are imperiled. The proposed MVP pipeline will cut across Mill Creek on our property with a one hundred acre watershed and numerous springs and wetlands also on our property. Our well, our only water source, is rock throwing distance from the pipeline pathway. Damage to the water sources will spoil not only our water, but endanger the water supply for Roanoke County and even Roanoke City.

IND368-2

Our property is torn in half by the pipeline path, forever rendering half to being unbuildable and essentially unusable. Our personal enjoyment and the use of the land will be forever lost to us and our children. The permanent access road for the pipeline also happens to be the only road to our driveway, knocking down a quarter mile of our pasture fencing and permanently interfering with going to work, school, and even EMS access. Our property value will plummet, and we will likely never be able to sell if we needed to.

IND368-3

The surveyor tactics during this whole process have been deceptive and threatening, coming on dates not announced. We were out of town on vacation and asked that they not come during that time, but come they did, and our due process in court to resolve the conflict was cancelled by MVP.

This pipeline is bad for the environment, bad for Roanoke County, bad for water quality, will destroy property values, bad for the local economy, and is not needed. Please stop this before it is too late.

IND368-1

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

IND368-2

See also the response to comment IND362-3 regarding the commenter's property. See the response to comment IND362-9 regarding access road MVP-RO-287.

IND368-3

The statements regarding surveys without permission are noted.

INDIVIDUALS

IND369 – Taylor F. Johnson

20161212-5041 FERC PDF (Unofficial) 12/11/2016 4:22:18 PM

December 11, 2016

Dear Secretary Bose and Members of the Commission:

- IND369-1 The proposed Mountain Valley Pipeline (MVP) FERC DOCKET CP16-10-000, is not in the public interest. It poses very real threats to public health and safety in West Virginia and Virginia. Not only will it have permanent adverse impacts on the local environment, it will also drive several more decades of global climate pollution.
- IND369-2 Studies show that existing gas infrastructure is more than sufficient to meet regional energy needs for residents and industry. Therefore, the primary beneficiaries of the pipeline will be private companies. This is deeply concerning, given that a Certificate of Public Convenience and Necessity would allow the taking of private property for this project.
- IND369-3 The Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC) rightly concludes that constructing the pipeline will have significant adverse impacts to forests. However, the DEIS fails to fully account for the other threats posed by the MVP. Among them are:
- It lacks any real solution to safety concerns, the DEIS merely states that pipeline developers would comply with minimum construction and operation standards. It gives no reason for people living within the 1,400-foot blast radius to feel safe. The National Transportation Safety Board documents interstate pipeline accidents, and its database includes numerous recent natural gas pipeline ruptures, leaks, and explosions.
- Studies have shown a spike in accidents involving new pipelines in recent years. There is no way to justify the risk of an explosion or leak to the people who live within the quarter-mile, which includes my father and many other friends and family from the blast radius of the proposed pipeline. The following websites report many incidents of gas pipeline explosions and fires that have resulted in deaths and the destruction of property: <http://www.ntsb.gov/investigations/AccidentReports/Pages/pipeline.aspx> and <http://ieefa.org/wp-content/uploads/2016/05/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-April-2016.2.pdf> Figures from the U.S. Pipeline and Hazardous Materials Safety Administration show that onshore gas pipelines installed in the 2010s have incident rates more than five times greater than pipelines installed in the 1990s and 2000s.
- IND369-4 Existing studies reveal that the current pipelines are sufficient, including those located at the following web addresses (https://www.southernenvironment.org/uploads/words_docs/Synapse_Report_FINAL_FINAL.pdf and <http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-April-2016.pdf>) to carry the gas needed to meet customer demand in the Mid-Atlantic and Southeast. As many states shift their electric generation from coal and gas to wind, solar, and other renewable, it's likely that demand for gas will decrease in the long run. It appears that at this time, bad policies are creating incentives for companies to overbuild the pipeline.
- IND369-5 There are very real concerns from the people living in the region who rely on headwater streams and other water resources that stand to be significantly impacted by this project, yet the DEIS dismisses these concerns, saying only that developers would "evaluate any complaints" and "identify suitable settlements" in the event of contamination. The MVP's proposed route would cross three major aquifers and come within one tenth of a mile of two public water supplies, not to mention an untold number of private drinking wells (including that of my father and many other friends and relatives) not yet identified by the project partners. The project would also cross 377 perennial waterbodies across Pennsylvania, West Virginia, and Virginia. Are we willing to risk the failure of an underground pipeline that carries 2 billion cubic feet of gas per day when headwater streams, wells, and municipal drinking water supplies are so close?

- IND369-1 The Commission would decide whether or not the projects are in the public interest See the response to comment IND2-1 regarding safety. Climate change is discussed in section 4.13.
- IND369-2 The Commission would determine need. See also the response to comment IND277-13 regarding U.S. natural gas consumption. See the response to comment IND1-3 regarding eminent domain.
- IND369-3 See the response to comment IND2-1 regarding safety.
- IND369-4 Non-environmental FERC staff may review the Synapse report.
- IND369-5 See the response to comment IND3-1 regarding drinking water. Impacts and proposed mitigation for water resources and wetlands is discussed in section 4.3 of the EIS. See the response to comment IND179-2 regarding contamination. Climate change are GHG are discussed in sections 4.11 and 4.13. See the response to comment IND2-3 regarding hydraulic fracturing. Air and noise pollution are discussed in section 4.11 of the EIS. A new compression station in Virginia is not proposed.

INDIVIDUALS

IND369 – Taylor F. Johnson

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IND369-5
cont'd

The impacts to climate change are significant but the DEIS fails to adequately address the greenhouse gas lifecycle of a project that enables an additional 2 bcf/day of natural gas to be shipped and burned. This is not a sufficient analysis of the full climate impacts as required under NEPA.

The MVP would enable significantly more gas to be shipped, which means significantly more gas can be extracted using fracking techniques in the Marcellus shale region. Natural gas is predominantly methane. While methane does have a lower global warming impact than coal during electricity generation, it still accelerates climate change. Methane leaks directly into the atmosphere during fracking and distribution, and its global warming effect is 86 times greater than carbon dioxide's over a 20-year period and 36 times greater than carbon dioxide's over a 100-year period.

Traditional air pollution would be significant from this project as there are three large compressor stations have been proposed to move gas along the route in West Virginia, and there most likely will be a fourth sited in Virginia. FERC expects one of the West Virginia compressors to violate local air quality standards and require a permit from the West Virginia Department of Environmental Quality. The air and noise pollution from this project alone should alarm everyone. The DEIS states that one of the compressor stations will violate the Clean Air Act, but it leaves that issue to the West Virginia Department of Environmental Protection to resolve. There is also the significant issue of a once-proposed compressor station in Virginia that was removed from MVP's application of October 23, 2015. Even after the application's filing, residents in Montgomery County, VA reported that MVP surveyors and engineers continued in their efforts to site a compressor station in Virginia. This is on the record with the Montgomery County Board of Supervisors as of April, 2016. FERC must state definitively whether additional compression will be required, and it must consider the environmental impacts of an additional compressor station within the context of the proposed project.

IND369-6

According to the DEIS released by the FERC for the MVP, forests, farmland, public lands and the Appalachian National Scenic Trail would suffer severe impacts and harm. FERC concedes that there will be permanent adverse impacts to forests. The MVP would cross thousands of acres of prime forest land and habitat for species listed as threatened and endangered. It would cross national treasures like the Appalachian Trail and the Blue Ridge Parkway. The U.S. Forest Service has raised several of these forest impact issues, yet they have not been addressed by FERC or the project partners. The permanent impacts to farmland, Wilderness areas, Inventoried Roadless Areas, Old Growth Forest, fragile karst areas and fragment habitats of species listed threatened or endangered is unconscionable. Yet again, the DEIS waves off these concerns, only saying that FERC will consult with the U.S. Fish & Wildlife Service or will "mitigate" these concerns while offering no real plans on how this could be done.

National and local treasures are threatened by this project. The pipeline would cross the Weston and Gauley Bridge Turnpike, the Blue Ridge Parkway, and the Jefferson National Forest including the Appalachian National Scenic Trail on Peters Mountain near my childhood home. It would also cross the Brush Mountain Inventoried Roadless Area as well as a local treasure known as "THE NARROWS OF HANS CREEK" in Monroe county WV. The DEIS says FERC will consult with the U.S. Forest Service to minimize impacts to the National Forest, but nothing is said about other fragile places outside of the forest, like The Narrows of Hans Creek. However, the Forest Service has already commented that the sum of these crossings will result in significant impacts. The Appalachian National Scenic Trail has stated that the impacts to the AT are severe and would impact the trail like no other project ever. The EIS process should not move forward until all concerns raised by the United States Forest Service, the Appalachian National Scenic Trail, the BLM and citizens are addressed.

The DEIS points out that 14 out of 17 counties along the proposed route have poverty rates above their respective statewide averages. These are the places where the environmental impacts will occur and these inequities should be addressed adequately by the DEIS. The environmental justice issues also need to be addressed by the DEIS, yet instead of addressing how the environmental impacts will be mitigated, the DEIS states that short-term employment and local spending during construction will somehow offset community impacts. A short term bump in local

IND369-6

The EIS concluded that the project would have limited adverse impacts on most environmental resources, except for clearing of forest. Impacts on farmlands, and measures for reducing those impacts, are discussed in sections 2, 4.2, and 4.8 of the EIS. Forest is discussed in section 4.4; wildlife in section 4.5. The FS is a cooperating agency and assisted in preparation of the EIS. Section 4.8 of the EIS discusses Roadless Areas and the Jefferson National Forest. See the responses to FA11-4 and FA11-5 regarding the ANST. See the response to FA11-10 regarding the BRP. The crossing of the Weston and Gauley Bridge Turnpike is addressed in section 4.8 Threatened, endangered, and other special status species are discussed in section 4.7 of the EIS and in more detail in our BA. The EIS provides a discussion of karst in section 4.1. See the response to comment IND31-5 regarding environmental justice.

INDIVIDUALS

IND369 – Taylor F. Johnson

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IND369-6 spending does nothing to reduce the risks to public health and safety endured by these communities for countless
cont'd years after the construction is completed.

IND369-7 I would also like to comment on the Amendments to the USFS Land Management Resource Plan Amendments as
proposed by the NOAI contacted as part of the DEIS for the MVP. I agree completely with my father Maury
Johnson and will just attach his comments here.

*“Regarding the MVP DEIS Section 4.8.2.6 (proposed amendments 1 through 4 to the Jefferson National Forest
Plan): I am opposed to the granting of the ROW changes to the Land Resource Management Plan (LRMP), as
requested in the NOLA. For MVP to construct and operate a pipeline across federal lands managed by the U.S.
Forest Service (USFS) and the United States Army Corps of Engineers, a designation of a “utility corridor” in the
JNF would be required if the application is to be approved.*

*National Forest Service land is for ALL Americans. Preservation of our heritage, our rights, our water and our
natural resources provided by the Forest is a privilege of all citizens and not something that should be given away
to a corporation for financial profit.*

*I urge that you consider the amendments with due caution for how they will impact the future of the Jefferson
National Forest. Public input is essential, and should not be ignored by the Bureau of Land Management, the Army
Corp of Engineers, or the USFS.”*

I also wholeheartedly agree with Pam Ferrante's recent statement to FERC, the JNF and the BLM:

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

*The proposed Amendments would permit MVP to exceed restrictions on soil and riparian corridor conditions,
which is not acceptable. The environmental regulatory protections that are already in place for federally
protected forest land and watershed areas should not be ignored or over-ridden.*

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

*The pipeline and the gas transported will provide no additional benefits to the citizens in this area but it will have
a detrimental impact on the environment affecting all citizens for generations to come. There have many
questions as to the need for this pipeline. Pipelines already in existence need proper maintenance to improve
efficiency of transport and prevent ongoing environmental pollution. It appears the purpose of the MVP pipeline
is for the sole interest of a few private corporations to make a 12% profit at the expense of our National Forest.
This plan certainly does not serve the people nor does it meet the needs for future generations.*

*In accomplishing their mission and vision, the USFS states they use an “ecological approach” and the “best
scientific knowledge” along with “listening to people” in making decisions.
Consideration of public input is critical and should not be ignored by the USFS or the Bureau of Land
Management. The “people” have spoken. They have expressed their respect and concerns for the National Forest*

IND369-7

See the response to comment FA8-1 and FA10-1 regarding the
LMRP.

INDIVIDUALS

IND369 – Taylor F. Johnson

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IND369-7
cont'd

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

FERC must respect the National Forest, a treasure owned by the citizens, and allow it to be conveyed to generations in its most pristine and natural state. An error in judgment today could impact generations to come in the future."

I also agree with my father when he said: Recreation and tourism are critical to many communities, especially in the counties of Monroe, WV, and Giles and Craig counties in VA. A prime reason many people come here is for health, wellbeing and relaxation, the income that is generated by tourism, which is possibly the largest economic driver in Monroe County WV, would be severely impacted by a pipeline corridor across the county, Peters Mountain and the Jefferson National Forest. The proposed corridor would have a very severe negative impact on that industry in the county/region.

Appropriate land and natural resource management is vital to our country. The loss of the forested land and the corresponding ecosystem is alarming. Our National Forest land contains old growth trees, grasslands, road less and wilderness areas that support many species, critical habitats for threatened and endangered species, and many unique water bodies (rivers, creeks, lakes). Preservation, not destruction, is the keyword that the BLM, USFS and AMCOE should be putting into practice. We must reserve our entire remaining unspoiled and pristine environment for future generations; anything less would be unconscionable and an environmental crime.

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

Plan Amendment 1

I strongly oppose the proposed management prescription (Rx) 5-C Designated Utility Corridors from these Rx's: 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.

A 500-foot ROW is ridiculous. Everyone can comprehend the length of a football field. This ROW would be nearly twice the length of a football field! The ROW would be the initial step for future expansion, with the potential for more pipelines, electrical lines, water lines, etc., to be constructed. It should be clear that FERC is only reviewing a single applicant at this time and is not looking farther ahead for the possibility of these multiple uses within this utility corridor and the potential for more detrimental environmental impacts in the future. The USFS needs to protect the JNF from not only the immediate environmental impacts of this pipeline but possible future pipelines and other utilities..

The future impact of establishing a 500-foot ROW through both public and private land cannot be foreseen in establishing a precedent for further activity. The impact of the entire width of the designated corridor and whether that conflicts with the LRMF must be evaluated, as well as the impacts to private landowners within that same corridor.

This proposed amendment would not only create a "Utility Corridor" across he JNF, but would also create a "Pipeline/Utility Corridor Access Alley" in Monroe, Summers, and Greenbrier Counties, WV and Montgomery, Craig, Alleghany and Roanoke Counties, VA. The damage done by this "Access Alley" across these counties would be severe, but the greatest impacts would be to private landowners in counties on each end of this corridor, as all future projects would have to traverse these areas to enter and leave the corridor across the National Forest Lands.

Many landowners in these adjacent counties could become nothing more than custodians of the utilities; i.e., they can only "grow" pipelines in their land, make their land useless for anything else.

FERC restricts its review to the single applicant and not "future" possibilities of multiple uses of a utility corridor. Recent proposed legislation, House Resolution 2295, indicates that the future of locating pipelines and conducting environmental reviews will be streamlined. This will affect many landowners, Cultural Areas, and Historic Districts.

INDIVIDUALS

IND369 – Taylor F. Johnson

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IND369-7 cont'd	<p><i>The impact of the entire width of the designated corridor and whether that conflicts with the LRMP must be evaluated, as well as the impacts to private landowners within that same corridor.</i></p> <p><i>Another intervenor comment asked the following question which needs to be addressed "Who will remove or mitigate the metal pipeline(s) in 20, 30 or 40 years or more from now when the pipes start to corrode and breakdown?"</i></p>
IND369-8	<p>(Project Only) Amendment 2</p> <p><i>I oppose the proposal to permit exceptions to the soil and riparian corridor conditions. I believe that Peters Mountain Wilderness Area, the Appalachian National Scenic Trail (AT), Mystery Ridge, Brush Mountain Wilderness and Road-less Areas, the Old Growth Forest, Sinking Creek and Craig's Creek could suffer substantial damage with the construction. I find it objectionable to allow the construction of the MVP pipeline to exceed restrictions on soil and riparian corridor conditions. These exceptions in the fragile forest should not be allowed. MVP should comply with the current restrictions in place regarding soil and riparian corridor conditions and not be allowed to exceed them. I stress that the riparian buffer zones along streams in the JNF should remain intact to minimize adverse effects to the water bodies. Furthermore, I firmly believe that if soil conditions are exceeded, both ascending and descending Peters Mountain, Sinking Creek Mountain, and Brush Mountain, it will cause siltation of the water bodies below, damaging critical habitats and drinking water sources. The descent from Brush Mountain, Slussers Chapel Conservation Site in Montgomery County VA would likely be negatively affected by exceptions to the soil conditions. Slussers Chapel Cave has a B3 significance ranking for a rare millipede and isopods. Peters Mountain also has numerous endangered and rare species in its confines.</i></p>
IND369-9	<p>Amendment 3</p> <p><i>This amendment, like all the others, would allow the removal of old growth trees within the construction corridor. Ancient woodlands have attained unique ecological features because they have not been disturbed. They are a rare natural resource, and could never be replaced once destroyed. To destroy these marvelous trees would be reprehensible. This great National resource should not be sacrificed for an industry's private gain. The existing regulations are sufficient and should not be changed to remove more old growth trees. It would also have many of the same detrimental effects as have all the proposed amendments. <u>The LRMP should not be amended as Proposed in Amendment 3.</u></i></p>
IND369-10	<p>Amendment 4</p> <p><i>The LRMP should not be amended as requested in Proposed Amendment 4 to allow the MVP pipeline to cross the Appalachian National Scenic Trail on Peters Mountain. The Appalachian Trail is so vital to the identity of our area and its economy. Allowing the Scenic Integrity Objective to change from High to Moderate near the crossing of the most famous and prestigious national scenic trail in the U.S. is inconceivable. A recent statement released by the ANST said: "Our own analysis concurs with the statements of the United States Forest Service and suggests that the proposed Mountain Valley project represents a serious threat to the scenic value of the A.T. well beyond the scope of similar projects - as many as 19 prominent AT vistas may be severely impacted from this project, many of them viewing impacts as they occur on USFS land. As a result, the assessment of cumulative impacts to the AT is drastically insufficient. The scope of cumulative impact must be based on the nature of the impacted resource, not the proposed project. In ascribing an arbitrary geographic scope for this DEIS of 100 miles..."</i></p> <p><i>ANST went on to say "These amendments would not only be unprecedented, but would significantly erode the value of the Appalachian Trail which the public has spent millions to protect. Amending the plan in the ways proposed would negatively impact prescription areas protecting the Appalachian Trail, Wilderness, Old Growth Forest, Inventoried Roadless areas and fragile successional habitats. Further, it would require the establishment of a new 5c utility corridor directly adjacent to Federally Designated Wilderness, leading up to the AT's doorstep in a location that is currently wild and pristine."</i></p> <p><i>The Appalachian Trail, America's first National Scenic Trail, was initially envisioned in 1921 and first completed by citizens in 1937. It is maintained by volunteers nationwide, who have devoted thousands of hours and millions of</i></p>

IND369-8 See the response to comment IND56 and IND102.

IND369-9 See the response to comment IND56 and IND102.

IND369-10 See the response to comment IND56 and IND102.

INDIVIDUALS

IND369 – Taylor F. Johnson

IND369-10
cont'd

dollars to it upkeep and maintenance. It is America most beloved trail. We should respect the natural beauty of our land and protect it for future generations.

I fear the Jefferson National Forest and its fragile ecosystems will be so irreparably damaged by the construction of MVP that it will never be whole again. Decisions made about the forest will have adverse consequences to water resources both inside and outside of the forest as well as impact nearby privately owned land. The Forest Service's actions could enslave private landowners to pipelines forever. They certainly do not deserve to become hostages.

Since the Mountain Valley Pipeline project has not yet been approved, I find it hard to believe the proposed amendments which would vastly expand the amount of infrastructure – transporting as-yet-undefined materials – would even be considered by FERC. These amendments are irresponsible from a technical standpoint, and legally questionable, given the obvious need for a new environmental impact statement to address changes of this magnitude. It is also politically irresponsible: this move suggests the original intention behind the pipeline project was always larger than stated publicly and proposed in the initial filings. It suggests a troubling degree of dishonesty and disregard for the totality of stakeholder concerns voiced in previous comment periods and through a multitude of public forums. In spite of the insistence on the part of FERC and Mountain Valley Pipeline that any disruptions to local communities would only be temporary and limited to the construction phase, Proposed Amendment 1 effectively guarantees disruptions in perpetuity for our communities. “

I strongly oppose these amendments to the Forest Service Plan. Enacting these amendments will irrevocably harm the invaluable cultural resources we derive from the forests, streams, and other fragile areas of the National Forest. These amendments will also have lasting negative consequences on our more conventionally quantifiable property values, and disrupt many carefully planned retirements via loss of equity in homes near the route.

I strongly condemn the utter disregard for basic science and human health concerns evident in the four proposed amendments. Enacting these amendments will threaten not just the health of our soil and streams, but poses a lasting threat to our groundwater aquifers and human health. Once contaminated, our aquifers will never return to their original quality, depriving my generation as well as future generations of this resource. It also poses a threat to many endangered and rare species found in and near the JNF.

The four proposed amendments constitute an unconscionable and unjustifiable burden on us, the citizens and stakeholders, and absolutely must not be approved. I, therefore, implore the United States Forest Service, the Army Corp of Engineers and the Bureau of Land Management not to grant a right-of-way in response to the MVP application.

IND369-11

I would also like to take a moment to address an area dear to me, my family and many others known as “The Narrows of Hans Creek”. This unique area in Monroe County, WV would be obliterated by the Mountain Valley Pipelines crossing of Hans Creek in this area. This water gap has many diverse and unique species of plants and animal’s found in very few places in the area and/or state. It is also riddled by springs and unique features such as “The Blue Hole” which I have included a picture of in this submission. This area is a popular nature hike area, which is visited by many throughout the year. An extensive study of this area must be undertaken. The DEIs does not mention this area and therefore it should be withdrawn or at very least a supplemental DEIS should be issued to address this area.

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

IND369-11

The final EIS was updated to include a discussion of the Narrows of Hans Creek. We will not be producing a supplemental draft EIS. See the response to CO34-1 regarding the need for an independent hydrogeologic study.

INDIVIDUALS

IND369 – Taylor F. Johnson

20161212-5041 FERC PDF (Unofficial) 12/11/2016 4:22:18 PM

IND369-11
cont'd

Picture of the "BLUE HOLE" taken by my father, Maury Johnson in the Narrows of Hans Creek on 12-2-16 not far from the crossing of Hans Creek in the Narrows of Hans Creek area by the Mountain Valley Pipeline.



I strongly urge you to find that the Mountain Valley Pipeline is not in the public interest or in the interest of the George Washington and Jefferson National Forest and reject its application.

Taylor F. Johnson

236 Seventh Avenue
Huntington, WV 25701

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

Joby Timm Supervisor, GW and Jefferson National Forest
Jennifer Adams, Special Project Coordinator GW & Jefferson USFS
5162 Valleypointe Parkway
Roanoke, VA 24019

Tony Cook, USFS Southern District Regional Forest Supervisor Forest Service -- USDA
1720 Peachtree Road, NW Room 861 N
Atlanta, GA 30309

INDIVIDUALS

IND369 – Taylor F. Johnson

20161212-5041 FERC PDF (Unofficial) 12/11/2016 4:22:18 PM

U.S. Army Corps of Engineers
Headquarters
441 G Street NW
Washington, DC 20314-1000

U.S. Army Corps of Engineers
South Atlantic Division
600 Forsyth St. SW
Atlanta, GA 30303-8801

US Army Corps of Engineers
Huntington District
502 Eighth Street
Huntington, WV 25701

Monroe County Commission
PO Box 350
Union, WV 24983

US Senator Joe Manchin
WV Senate Elect Kenny Mann

WV Senator Ron Miller
WV Delegate Roy Cooper

INDIVIDUALS

IND370 – Robert M. Johnson (on behalf of Buck Cox and Janet DeGroff)

20161212-5045 FERC PDF (Unofficial) 12/12/2016 8:46:01 AM

Date: 12 December 2016
To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Buck Cox and Janet DeGroff, Filed on their behalf by Robert M. Jones,
Registered Intervenor
Re: Mountain Valley Pipeline, Docket CP16-10-000
Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND
370-1

We live on Mount Tabor Road directly across from the path of the MVP. Our property, Thundercroft, has 34 sinkholes and a cave that is 80 feet deep and 1200 feet long. The cave empties **below** Mill Creek which is on the boundary of our property. That fact is proof that the underground Mount Tabor geology is very complex and multi-leveled. Dye-trace studies are further proof that some of our sinkholes empty into Slusser's Chapel Cave which is at the center of the Mount Tabor Aquifer. The aquifer is the only source of water for the wells of all the Mount Tabor residents. Thus, the pipeline simply must not go so close to our sinkholes and caves. Also, across the road the pipeline goes over sinkholes that are most likely connected to our sinkholes underground with various passages.



Thundercroft Cave

There are further dye-trace results that are a demonstration of further connectivity of sinkholes to the east of our property to Slusser's Chapel Cave. Thus, the present pipeline route is an enormous danger to the water supply and water quality of this area.

There is a solution to this important problem. The Virginia Department of Conservation and Recreation suggested a route on the ridge of Brush Mountain that avoids most of the Slusser's Chapel Conservation Site. That route is far safer for the water in the Mount Tabor area than the proposed route.

Buck Cox and Janet DeGroff
3021 Mount Tabor Road
Blacksburg VA

IND370-1

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

INDIVIDUALS

IND371 – Robert M. Johnson (on behalf of Sandra Powell)

20161212-5046 FERC PDF (Unofficial) 12/12/2016 8:44:16 AM

Date: 12 December 2016

To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Sandra Powell, Filed on her behalf by Robert M. Jones, Registered
Intervenor

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

Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND371-1

I support the new pipeline route suggested by the Virginia Department of Conservation and Recreation. Their recommendation is that the Mountain Valley Pipeline should be rerouted to avoid the Slusser's Chapel Conservation Site. They recommend that the pipeline should be routed along the ridge of Brush Mountain.

I am a property owner on the Mt Tabor Variation, and I support this new route because if the pipeline is moved up to the ridge of Brush Mountain it would be further away from the conservation site and other places that the pipeline might harm. For instance, the pipeline would go through some very steep ravines on my property with some land so steep that it is difficult to walk on. I do not think that would be a good place to build a pipeline and my property would be harmed.

If a pipeline does go through this area, then it would best for it to be built on top of Brush Mountain. That way, it would be kept away from the Slusser's Chapel Conservation Site and from other unsuitable areas. I support the recommendation made by the DCR and I hope that this better and safer route will be chosen and approved.

Sandra Powell

IND371-1

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

INDIVIDUALS

IND372 – Robert M. Johnson (on behalf of Logan Brooke)

20161212-5047 FERC PDF (Unofficial) 12/12/2016 8:42:17 AM

Date: 12 December 2016

To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Logan Brooke, Filed on his behalf by Robert M. Jones, Registered
Intervenor

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

Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND372-1

My name is Logan Brooke. I am a hiker who enjoys the outdoors and appreciates the great natural beauty we have in SW Virginia. I writing this letter on behalf of the residents who live in the path of the proposed Mountain Valley Pipeline on Mt Tabor Road in Montgomery County, Virginia. This area of Mount Tabor is a beautiful place filled with steep mountains, trees and streams. It is a quiet rural area. White tailed deer, foxes, rabbits, raccoons and bears are just a few of the creatures who inhabit this area alongside the people who enjoy living here. This is not a place to be crossed by a large metal pipe full of explosive gas. It is not a place where bare gashes should cover the mountains. The Mountain Valley pipeline should not be built through here.

The Mt Tabor area where the pipeline will cross is an extraordinarily unsafe place to build a pipeline. This area lies in a well-known sinkhole plain. The "Mt Tabor Sinkhole Plain" is full of karst features like sinkholes and caves. There is also a large aquifer that lies under the mountains and valleys. The environmentally important Slussers Chapel Conservation Site is also in the path of the pipeline. This is not a place where large construction equipment and explosive charges should be used to bury a forty-two inch pipeline full of explosive gas. If the pipeline does come through this vulnerable area, the families who live here may lose their water. People need safe clean water. They also need to be away from "blast zones".

In order to address this serious issue, the Department of Conservation and Recreation suggested a different route for the pipeline which would avoid the Slussers Chapel Conservation Site. This route would take the pipeline along the ridge of Brush Mountain. This is a better route because It would be further away from the water sources and the residents of this area. As I have said, the Mountain Pipeline should not be built here. However, DCR alternative would do far less damage than the currently proposed as being a less damaging route. Therefore, I support the avoidance route as being an environmentally safer place to build the pipeline.

Dr. Logan Brooke
180 Woods Lane
Newport, VA 24128

IND372-1

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

INDIVIDUALS

IND373 – Robert M. Johnson (on behalf of Kelly Violette)

20161212-5048 FERC PDF (Unofficial) 12/12/2016 8:40:25 AM

Date: 12 December 2016

To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Ms. Kelly Violette, Filed on her behalf by Robert M. Jones, Registered
Intervenor

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

Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND373-1

I am a resident of Montgomery County, Virginia and my home is on Mt Tabor Road along the proposed route of the Mountain Valley Pipeline (formerly the Mt Tabor Variation). I am writing to say that I am strongly opposed to the Mountain Valley Pipeline going through this area. I am especially concerned that the proposed route will go through the Slussers Chapel Cave area! This is a very dangerous route for the pipeline to take. There is a high probability that construction of a pipeline through this area will affect and probably destroy peoples wells and their water. People far downstream from this area would also be affected by damage in the Slussers Chapel Cave Conservation Site.

My home is located very near Slussers Chapel Cave. In fact, my home is within part of the Slussers Chapel Sinkhole itself. This is, of course, a very sensitive and vulnerable part of the Mt tabor Sinkhole Plain. I am very concerned about the damage to my home and property that may be done if the pipeline is built here. Any digging or blasting near here would most certainly cause great harm not only to my property but to that of many others as well.

It is my hope that Mountain Valley Pipeline will understand the very real dangers and will not attempt to come through this poorly selected area. However, if a pipeline is to be built through this area, the Virginia Department of Conservation and Recreation has suggested a safer route that would avoid Slussers Chapel Conservation Site. This route would cross along the top of Brush Mountain. I support this route as being a much more safe and solid route and I believe that it would help protect the people and the wells of the MT Tabor area.

Sincerely

Kelly Violette
2580 Mt Tabor Road
Blacksburg, Va 24060

IND373-1

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

INDIVIDUALS

IND374 – Robert M. Johnson (on behalf of Kelly Violette)

ORIGINAL

1581 Jefferson Forest Ln
Preston Forest
Blacksburg, VA 24060

5 December 2016

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

RE: Mountain Valley Pipeline
Docket No. CP16-10-000
Comments on Environmental Impact Statement

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -9 P 4:43
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Madam Secretary,

IND374-1

I have read the DEIS for the Mountain Valley Project, and I am writing to voice my opposition to the construction as presently proposed. The sheer number of 'mitigation' plans cited in the DEIS are enough to make clear, on the face of it, that the pipeline is a bad idea, at least as currently proposed.

IND374-1

Comment noted.

My voice in this matter is relevant because of the fact that I live across the street from the National Forest Service boundary, clearly marked with several posted border markers, of the Jefferson National Forest. The proposals for the route of the pipeline have undergone numerous revisions, and all of the following points are pertinent for the proximity of my home to the current proposed routing:

IND374-2

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

1) The construction would place a scar on the, in some areas, few remaining acres of virgin eastern hardwood forest still in existence.

IND374-2

2) The value of my property would be substantially reduced, with no compensation from the pipeline company or the subsequent users of the pipeline.

IND374-3

Section 4.3.2.1 of the EIS discusses monitoring and testing of water wells within 150 feet of the proposed workspaces as well as testing of wells and springs within 500 feet of karst areas. Impacts to water wells located outside these distances is not expected.

IND374-3

3) The potential damage to my water well has not been addressed.

IND374-4

4) There will be considerable noise and air pollution associated with the construction and ongoing operation of the pipeline and compressor stations, again with no compensation for the obvious degradation to quality of life of residents, both human and otherwise, along the pipeline corridor.

IND374-4

Air and noise pollution are discussed in section 4.11 of the EIS.

IND374-5

5) I am not a geologist, but the information I have been able to glean from legitimate, balanced sources lead me to believe that the construction of a utility of this magnitude and complexity should not be carried out in a topography (mountainous) and geography (karst) such as exists along the proposed pipeline route(s).

IND374-5

Karst is discussed in section 4.1 of the EIS. See the response to comment LA1-4 regarding existing 42-inch pipelines in mountainous terrain.

I am not anti-progress. I am, however, legitimately concerned enough about this project, to make the effort to have my voice heard, and to state, unequivocally, that I am in vigorous opposition to the proposed pipeline construction and operation as currently proposed.

Regards,



David T. MacMillan, M.D., FACS

INDIVIDUALS

IND375 – Robert M. Johnson (on behalf of Kelly Violette)

1756 Smithfield Drive
Preston Forest
Blacksburg, VA 24060
25 November 2016

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

Re: OEP/DG2E/Gas 3
Mountain Valley Pipeline LLC
Docket No. CP16-10-000
Comments on Environmental Impact Statement

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
2016 DEC - 9 P 4 42
FEDERAL ENERGY
REGULATORY COMMISSION

To Whom It May Concern:

IND375-1

Mountain Valley LLC (Mountain Valley) proposes to construct and operate 301 miles of 42-inch-diameter high-pressure (2 billion cubic feet per day) natural gas pipeline and associated facilities from Wetzel County, WV, through Montgomery County to Pittsylvania County, VA. The proposal is submitted in association with Equitrans LP (Equitrans) which proposes to build and operate natural gas facilities in Pennsylvania and West Virginia that will interconnect with the Mountain Valley Pipeline (MVP).

IND375-1

See the response to comment IND28-3 regarding bankruptcy. See the response to comment FA11-12 regarding need. The Applicants stated that the expected useful lifespan of the projects would be about 50 years. While there is no termination date for a FERC natural gas Certificate, at the end of the 50-year period, the Applicants may need to repair, replace, or abandon facilities. Any of those actions would require permission from the Commission in response to new applications.

Mountain Valley is registered as a LIMITED LIABILITY corporation. Because of this designation, Mountain Valley should be required to establish a very large **Escrow Account** to protect citizens and communities from loss due to accidents. The corporation should not simply be able to declare bankruptcy and walk away.

The following comments refer to the Environmental Impact Statement (EIS) issued by the Federal Energy Regulatory Commission (FERC) on September 16, 2016. The EIS is incomplete and misleading at best. On the basis of this Statement, the Mountain Valley proposal should be denied in its entirety.

1.2.1 PROJECT NEED

Not proven.
Mountain Valley states that the **life of the pipeline is 20 years**. (What will happen to it after 20 years?)
Renewable energy sources are viable now and will be major sources for generations to come.

IND375-2

4.9 SOCIOECONOMICS

(1) The EIS states: *"Multiple studies indicate that the presence of a natural gas pipeline would not significantly reduce property values."* IN ITS BIASED ANALYSIS, IT POINTS FAVORABLY TO A STUDY FUNDED BY THE **INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA** WHILE IT IGNORES REPORTS FROM REALTORS IN THE AREA OF THE PIPELINE. PROPERTIES FOR SALE IN THE PRESTON FOREST NEIGHBORHOOD OF MONTGOMERY COUNTY, VA, HAVE REMAINED UNSOLD FOR MORE THAN 2 YEARS, DATING FROM THE INITIAL MVP PROPOSAL.

IND375-2

Many studies have shown that pipelines do not necessarily significantly affect property values. See also the response to comment IND12-1. See the response to comment IND345-4 regarding benefits to Montgomery County. See the response to comment IND2-3 regarding export. See the response to comment IND28-3 regarding bankruptcy.

(2) Residents of Montgomery County, VA, will have **NO ACCESS to gas** from this pipeline, while access to their land is restricted, property values decline, tax revenues decline, and they receive **NO CONTINUING COMPENSATION** from Mountain Valley which has use of their land. Montgomery County will receive no compensating revenue from MVP.

(3) Mountain Valley states that gas from the pipeline is not intended for **export**. The wording of the EIS is simply misleading, since MVP gas will contribute to exports as it merges with pipelines along the East Coast intended for export.

(4) There is no contingency plan in place if Mountain Valley declares **bankruptcy**. Mountain Valley must create an **escrow account** to cover costs to citizens and the community if bankruptcy is declared.

INDIVIDUALS

IND375 – Robert M. Johnson (on behalf of Kelly Violette)

20161212-0011 FERC PDF (Unofficial) 12/09/2016

IND375-3

4.1 GEOLOGY

(1) The EIS states: *"The MVP would cross 18.5 miles of slopes between 15 and 30 percent grade, and 72.6 miles of slopes greater than 30 percent."* It further states: *"About 67 percent of the MVP pipeline route... would cross areas susceptible to landslides."* Nevertheless, the EIS accepts assertions by Mountain Valley that its construction methods are safe. Given the fact that this organization **HAS NEVER UNDERTAKEN A PROJECT OF THIS MAGNITUDE**, how does one simply accept their "construction methods"?

(2) 118 miles of pipeline route are characterized by shallow bedrock, which could be subject to **blasting** if standard trenching techniques fail. Make no mistake, blasting will be used extensively in Montgomery and surrounding Counties. The "Draft Blasting Plan" of Mountain Valley is simply accepted by FERC, is unexplained, providing no assurance of safety to nearby landowners. The EIS states: *"Potential impacts on water wells, springs, wetlands, steep slopes, paleontological resources, nearby aboveground facilities, and adjacent pipelines and utility lines could result from blasting."* And yet it concludes: *"Therefore, we do not anticipate long-term or significant impacts on groundwater resources as a result of construction or operation of the projects."*

(3) **Karst topography** is recognized as unstable with sinkholes, sinking streams, and underground aquifers subject to pollution. Alternative routes to avoid the Slussers Chapel Conservation Site are no safer, involving, for example, construction along a ridge top, which is subject to damage from erosion. Ernst Kastning, a recognized authority on karst topography, labels the area in Giles and Montgomery Counties as a **"NO BUILD ZONE."**

IND375-4

4.11 PUBLIC HEALTH

1. In 2015, the American Medical Association (AMA) passed a resolution supporting legislation requiring a **Health Impact Assessment** on pipelines. There is no reference to such an assessment in the EIS statement. Any consideration of the MVP proposal must be delayed until an independent study is completed.

2. **Methane** is one of several components of natural gas. It accumulates in pipelines and compressor stations as sludge. A leak or rupture of the pipeline and release of pressure from compressor stations would result in release of this volatile greenhouse gas into the atmosphere. If a fire is ignited, it would be extremely intense and difficult or impossible to control. A decaying product of methane is **CO2** which remains in the atmosphere for thousands of years. And yet, the EIS erroneously concludes that these emissions should be considered **MINOR** sources.

3. **Radon** is also present in natural gas and accumulates in the pipeline. A leak or rupture releases this radioactive element (a leading cause of lung cancer) into the atmosphere or the ground.

4. The EIS states: *"Air quality impacts associated with construction of the proposed projects would include emissions from construction equipment and fugitive dust."* It further states: *"Such air quality impacts would generally be temporary and localized, and are not expected to cause or contribute to a violation of applicable air quality standards."* It attempts to minimize these emissions by accepting Mountain Valley's "Fugitive Dust Control Plan." This conclusion is meaningless unless there is **independent monitoring** of these emissions.

5. Compressor stations emit loud **noise**. Construction work involves loud noise from blasting, heavy equipment and trucks. The EIS states: *"We conclude that construction of the projects would not result in significant noise impacts on residents and the surrounding communities."* **THIS IS NONSENSE.**

IND375-3

See the response to comment IND148-4 regarding Mountain Valley's experience. The quotation from the draft EIS regarding potential impacts to water wells, springs, wetlands, etc. was taken from section 4.1.1. Section 4.1.2 of the EIS provides a summary of the draft Blasting Plan including mitigation measures. See the response to comment IND62-1 regarding Dr. Kastning's report.

IND375-4

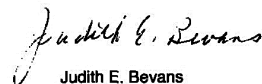
The potential health effects regarding methane are discussed in section 4.12 of the EIS. GHGs and fugitive emissions are discussed in section 4.13. Radon is discussed in section 4.11.1.4 of the EIS. As stated in section 4.11.1 of the EIS, potential impacts on air quality associated with construction and operation of the MVP and the EEP would be minimized by strict adherence to all applicable federal and state regulations, which are designed to be protective of air quality. Section 4.11.2 provides a discussion of noise estimate for construction and operation of the projects. As stated in section 4.11.2 of the EIS, to ensure that the actual noise levels resulting from operation of the compressor stations comply with our noise guidelines and do not result in significant noise impacts, we recommend to the Commission that Mountain Valley file a noise survey with the Commission.

INDIVIDUALS

IND375 – Robert M. Johnson (on behalf of Kelly Violette)

20161212-0011 FERC PDF (Unofficial) 12/09/2016

IND375-5	<p>4.11.1.2 CLIMATE CHANGE</p> <p>1. The EIS states: "As with any fossil fuel-fired project or activity, the MVP and EEP (Equitrans Expansion Project) would contribute GHG (greenhouse gas) emissions." A report from Oil Change International concludes that new gas pipelines will undermine US Climate Goals and are incompatible with 2016 Paris Accords on Climate Change.</p> <p>2. Methane (together with its by-product CO2) and radon are major contributors to damage to the atmosphere. The EIS states: "New compressor stations would be considered minor sources." Nevertheless, they are a source of global warming.</p>	IND375-5	Climate change, GHGs, and cumulative impacts are discussed in section 4.13 of the EIS.
IND375-6	<p>4.12 SAFETY</p> <p>1. By its own admission, Mountain Valley has no experience in an installation of this size and length. Since the EIS does not take this into account, FERC's desire to mitigate dangers and inexperience puts the public at risk.</p> <p>2. The EIS states: "Mountain Valley...would implement their own management plan for pipeline facilities." The Mountain Valley Management Plan must not be accepted at face value. Public safety must be insured through independent monitoring.</p> <p>3. Rupture of the pipeline in wooded areas of Giles and Montgomery Counties will result in explosion and forest fire. The presence of methane creates the documented potential for extreme heat and fire that cannot be controlled, placing human lives and personal property at risk. The MVP should not be constructed in these areas, including the Jefferson National Forest.</p> <p>4. The EIS simply divorces itself from any consideration of terrorism by saying that it is "unpredictable." By saying this, FERC simply absolves itself from any responsibility for public safety.</p>	IND375-6	See the response to comment IND2-1 regarding safety.
IND375-7	<p>UNANSWERED QUESTIONS</p> <p>1. Why is the proposed 500' "Utility Corridor" amendment to the US Forest Service Land and Resource Management Plan included in the EIS? If approved, is it a "bridge to nowhere" or will it be extended beyond the boundaries of the Jefferson National Forest to create an extensive "Utility Corridor" across Southwest Virginia?</p>	IND375-7	See the response to comment FA8-1 regarding the 500-foot-wide utility corridor within the Jefferson National Forest.
IND375-8	<p>2. Will there be a compressor station ultimately in Montgomery County?</p>	IND375-8	Mountain Valley is not currently proposing a compressor station in Montgomery County, Virginia. Installation of additional project facilities would require permission from the Commission in response to new applications. The Commission would conduct a separate environmental review under NEPA.
IND375-9	<p>3. Will MVP gas contribute to gas for export?</p>	IND375-9	See the response to comment IND2-3 regarding export.
IND375-10	<p>4. What will become of the pipeline once it is shut down permanently? A plan to remove it safely must be in place before any approval is considered.</p>	IND375-10	Section 2.7 of the EIS provides an overview of future plans and abandonment.
IND375-11	<p>5. The EIS refers to noise mitigation measures. These must be explained in detail.</p> <p>CONCLUSION</p> <p>In view of the inadequate and misleading EIS contents detailed above: the very challenging geology, Mountain Valley's inadequate construction experience, lack of a Public Health Assessment, lack of an Escrow Account, etc., THE MOUNTAIN VALLEY PIPELINE PROJECT SHOULD NOT BE APPROVED. Instead, FERC should concentrate on renewable energy projects.</p>	IND375-11	Noise mitigation measures are discussed in section 4.11.2 of the EIS.


Judith E. Bevans

INDIVIDUALS

IND376 – Patricia Curran Leonard

20161212-0012 FERC PDF (Unofficial) 12/09/2016

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

December 5, 2016

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -9 P 4:45
FEDERAL ENERGY
REGULATORY COMMISSION

FERC

Docket Number: PF15-3-000,
CP16-10-000 or CP16-13-000
customer@ferc.gov

Re: Opposition to the Mountain Valley Natural Gas Pipeline – The Clean Water Act and in-complete permitting

IND376-1

In the DEIS on page 1-15 it states: "Mountain Valley filed its permit applications with the Huntington and Norfolk Districts of the COE on February 21, 2016. Equitrans stated that it filed applications under Section 404 of the CWA and Section 10 of the RHA with the Pittsburgh and Huntington Districts of the COE on November 25, 2015. Due to alignment changes since that filing, Equitrans intends to file revised applications during the fall of 2016. Equitrans filed copies of its COE permit applications with the FERC on July 14, 2016."

The DEIS lacks sufficient data for FERC to render a decision. In attempting to understand the permitting process, additional information includes: "state water quality standards, which are federally required by the Clean Water Act and the Coastal Zone Management Act, cannot be federally preempted."

Not only in the districts named above in the DEIS, FERC needs to identify areas where all water quality would be impacted by the MVP proposal.

The Clean Water Act has a number of laws and protections especially in protected areas like: the Jefferson National Forest and the Blue Ridge Parkway. The applications that have been filed need to be exhaustively verified to ensure the laws and protections are being held to the CWA standards in place. All areas of water ways that will be impacted by the proposed MVP need permitting. FERC is responsible to ensure these waterways are protected and the complete filings are meeting the standards under law.

The DEIS has a number of in-complete areas that need completions before the next version is released. Please use all of the resources that exhaust and objectively review the applicants proposal for necessity.

Please do not approve this for profit EQT MVP pipeline proposal. This is not a public need or need.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND376-1

The Commission will make its decision regarding the projects after staff has produced a final EIS. The COE and the states will decide if the projects are in compliance with the CWA .

INDIVIDUALS

IND377 – Sandra P. Schlaudecker

20161212-5093 FERC PDF (Unofficial) 12/12/2016 12:10:21 PM

Date: December 11, 2016

To: Kimberly D. Bose, Secretary
Norman Bay, Chairman; Members of the Commission
Federal Energy Regulatory Commission
Neil Kornze, Bureau of Land Management
From: Sandra P. Schlaudecker, Registered Intervenor, Blacksburg, VA

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

Comment: The Bureau of Land Management should hold public comment meeting in Blacksburg, VA

IND377-1

According to a filing by the Bureau of Land Management, see following, they can ask for public meetings if there is enough public interest. I would like to see those meetings take place in Blacksburg, VA. The route goes through the middle of designated old growth forest in Montgomery County, near Blacksburg, as well as the Craig Creek watershed and the inventoried road-less area next to the wilderness area. No public hearing have been held so that the BLM can hear/learn from those affected what their concern are about the MVP.

"IU. BLM's Comments on Plans and Schedule for Public and Tribal Outreach and Coordination BLM employees attended FERC's recent public outreach meetings. BLM will review the comments provided during these meetings. BLM will continue to review comments submitted to FERC's docket. BLM continues to engage in government to government consultation regarding BLM's areas of concern. BLM will issue consultation letters in the coming months regarding MVP's right of way application. BLM reserves the authority and right to "[h]old public meetings, if sufficient public interest exists to warrant their time and expense" in light of FERC's public outreach meetings. If BLM chooses to do so, BLM would publish a notice in the Federal Register announcing in advance any public hearings and meetings regarding the Mineral Leasing Act right of way application. Sce 43 C".

IND377-1

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

INDIVIDUALS

IND378 – Sandra P. Schlaudecker

20161212-5097 FERC PDF (Unofficial) 12/12/2016 12:15:31 PM

To: Kimberly D. Bose, Secretary
Norman Bay, Chairman; Members of the Commission
Federal Energy Regulatory Commission
From: Sandra P. Schlaudecker, Registered Intervenor, Blacksburg, VA

Date: December 11, 2016

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

Comment: DEIS reveals 'Significant' Flaws and Necessity of Pipeline Not Shown

Dear Ms. Bose:

IND 378-1 | Much of what is written below was spoken to a stenographer in Roanoke VA on November 8, but I have not see any of those comments in the emails I normally receive regarding submissions to you, so am submitting them in print, though I left them with the stenographer that night.

I am also adding, as Tom Bouldin, in his submission dated Dec. 5, 2016, adds much more research to what I had, that I am in full support of his letter and research.

According to the National Environmental Policy Act (NEPA) FERC must define the “purpose and need” for a proposed project in the DEIS. According to a recently released study, September 2016, by the Massachusetts-based Synapse Energy Economics, the ACP and MVP would financially benefit the utility companies and investors, while burdening customers with higher bills to cover the cost of the unnecessary construction. An equal or greater amount of natural gas can be supplied by EXISTING and upgraded pipelines at a lower cost with far fewer impacts. They (MVP and ACP) cannot be said to serve the greater public good. Existing pipelines can supply more than enough fuel to power the region through 2030. By FERC failing to comply with NEPA’s mandates, horrible impacts to National Forest Land and private lands will take place. Eminent domain will have to be used to obtain land that owners do not want taken!

IND 378-2 | In the FERC/DEIS –DO272 September 2016 book, on page ES-14, under MAJOR CONCLUSIONS, it is stated “We determined that construction and operation of the project would result in limited adverse environmental impacts, with the exception of impact on forest. On page ES-7, under LAND USE and VISUAL RESOURCES, it says “The MVP pipeline route would mostly cross forest (81%)”. So if my math is correct, 81% of 301 miles equals 242 miles. How can such a project be considered? When the vast majority will do damage to the forest, and the DEIS states adverse environmental impacts will happen to the forest, this project should be halted.

IND 378-3 | NEPA also requires agencies to consider environmental impacts of a proposed project and make that information available to the public. As a registered intervenor, I receive all the FERC filings. It is almost impossible to locate a document due to the horrible way the FERC library is organized. Also, since there have been significant details added since the DEIS has been issued, the “final comments” date of Dec. 22, 2016 should be extended. It is not fair to have less than the normal 60 days to research the newest filings by MVP. It is my understanding, to date, the entire route has not been surveyed. Again, more time is needed! Filings have shown shortfalls in MVP’s data including effects of: blasting, sedimentation, private wells and septic systems, communities and landowners, steep slopes, and stream crossings, to name a few. It is the FERC’s job

IND378-1 See the response to comment FA11-12 regarding need. See the response to comment IND1-3 regarding eminent domain.

IND378-2 The EIS discloses significant impacts on forest. The EIS is not a decision document. The Commission will consider environmental impacts in part when it makes its decision whether or not to authorize the projects.

IND378-3 See the response to comment CO5-1 regarding pending information in the draft EIS. The standard comment period of 45 days was extended to 90 days for the MVP. See the response to comment LA3-1 regarding Mountain Valley’s October 2016 filings.

INDIVIDUALS

IND378 – Sandra P. Schlaudecker

20161212-5097 FERC PDF (Unofficial) 12/12/2016 12:15:31 PM

IND 378-3 cont'd to make sure all of these areas are adequately and correctly addressed and that this information is made available in a searchable and readable manner.

IND 378-4 Many things have been asked of MVP. Many have not been answered, or answered poorly, with information missing. It is my understanding the FERC has said, MVP can submit this information prior to construction, but how can a Scoping meeting such as this, have public input when the information is not available. Erosion is a HUGE concern. MVP and the FERC have assured the public that this will not be a problem—yet we have seen photos taken by a drone of the catastrophic erosion that has taken place just west of Pearisburg from the gas pipe placed for gas use at the Celanese plant. How can we trust what we are being told, when it seems we have been lied to in this case! And the terrain the MVP will have to traverse is even steeper and MUCH longer! And running a pipeline through karst topography when the lead scientist in this field, Dr. Earnst Kastning, has said this should not be done due to caves, underground streams, and sinkholes is absolutely wrong. Some of the leases I have seen allow for anything to be transported in the pipeline. It is my understanding hazardous liquids could be, but the FERC does not regulate these. Who does and does MVP have a legal obligation to inform leasees of this?

IND 378-5 I have read that if water wells are damaged on people's property, MVP will drill a new one. Because MVP is a Limited Liability Corporation (LLC), how much money will FERC require to handle all the damage done to people's property? And, what obligation will MVP have to remove the 42" pipe, once no more gas is transported? Or will the property owner be obligated to remedy any problems?

IND 378-6 Eminent domain is possible for the benefit of the State. With gas being exported to India or other countries, or even states other than Virginia and West Virginia, how can ED proceed, as the majority of the gas will not be used intrastate? At the scoping meeting in Montgomery County, VA in May of 2015, those in attendance were assured no gas would be exported. Why did the FERC representative lie to us, or was he lied to and was just parroting what he'd been told? This is a huge issue and if you can't trust what has said in public, how can you trust anything. There's nothing American about taking someone's land against their will for the profit of a company.

IND 378-7 I am not an expert in most areas that Mountain Valley Pipeline has looked at when it comes to damaging the environment and economy, so I look to others who are. The following is one of my many concerns: A new study by Charlottesville-based Key-Log Economics ("[*Economic Costs of the Mountain Valley Pipeline: Effects on Property Value, Ecosystem Services, and Economic Development in Virginia and West Virginia*](#)") estimates the total cost to an eight-county region in southern West Virginia and southwest Virginia to \$8.0 to \$8.9 billion, in present value terms. That includes between \$65.1 and \$135.5 million in the short term as construction strips forest and other productive land bear, and as private property values take a hit due to the dangers and inconvenience of living near the MVP route. It also includes \$119.1 to \$130.8 million each and every year after construction due to permanent changes in land cover, lost property tax revenues, and dampened economic growth in key sectors.

The Appalachian Trail Conservancy, another group of experts, has recently commented:

Jordan A. Bowman | Nov 18, 2016

IND378-4 See the response to comment IND70-1 regarding erosion. See the response to comment IND62-1 regarding Dr. Kastning's report. See the response to comment IND213-1 regarding materials to be transported.

IND378-5 See the response to comment IND3-1 regarding drinking water. Section 2.7 of the EIS provides an overview of future plans and abandonment.

IND378-6 See the response to the comment IND1-3 regarding eminent domain. See the response to comment IND2-3 regarding export.

IND378-7 See the response to the comment IND137-1 regarding the KeyLog report.

INDIVIDUALS

IND378 – Sandra P. Schlaudecker

20161212-5097 FERC PDF (Unofficial) 12/12/2016 12:15:31 PM

IND
378-8

The Appalachian Trail Conservancy (ATC) is strongly opposed to the proposed Mountain Valley Pipeline project, which would detract significantly from the scenic landscape of the Appalachian Trail (A.T.), produce irreversible damage to local ecosystems, and potentially lead to millions of dollars in lost revenue for communities that rely on outdoor recreation-based tourism.

They go on to say: However, after studying the woefully inaccurate [Draft Environmental Impact Statement \(DEIS\)](#) for the proposed Mountain Valley Pipeline and witnessing the inadequacies of the environmental compliance process initiated by the Federal Energy Regulatory Commission (FERC), we feel the proposed Mountain Valley Pipeline threatens the A.T. on an unprecedented scale.

With so many experts stating that the MVP project is going to damage so many areas, the FERC must deny any permits to proceed.

IND378-8

As shown in section 4.8 of the EIS, there would be no significant impacts on the ANST because the pipeline would be bored under it with a forested buffer to hide visual impacts; see also the response to comment CO17.

INDIVIDUALS

IND379 – Sandra P. Schlaudecker

20161212-5096 FERC PDF (Unofficial) 12/12/2016 12:13:34 PM

To: Kimberly D. Bose, Secretary
Norman Bay, Chairman; Members of the Commission
Federal Energy Regulatory Commission
Joby Timm, Supervisor, Jefferson National Forest
From: Sandra P. Schlaudecker, Registered Intervenor, Blacksburg, VA
Date: December 11, 2016
Re: Docket # CP16-10-000: Mountain Valley Pipeline

- I am opposed to the 4 amendments the Forest Service has proposed because:
- | | | | |
|----------|--|----------|---|
| IND379-1 | Amendment 1 would allow a 500 foot utility corridor through the forest, allowing multiple disruptions of steep slopes for each new pipeline or other utility and make a devastating visual scar through the forest, ruining the view shed for many including those enjoying the Appalachian Trail, causing severe erosion and sedimentation impacts on the mountain slopes, some nearing a 90 degree angle, and devastating private property. | IND379-1 | See the response to comment FA8-1 regarding Amendment 1. |
| IND379-2 | Amendment 2 would allow construction to exceed restrictions on soil conditions and riparian corridors violating Standard FW-5 which defines how much re-vegetation must be accomplished in 5 years and FW-9 which defines use of heavy equipment and the damage it causes. Also Standard 11-017 would be violated which discusses removal of trees in the riparian corridor. All of the above Standards need to be adhered to! | IND379-2 | See the response to comment FA10-1 regarding Amendment 2. |
| IND379-3 | Amendment 3 would allow for the removal of old growth forest in the Jefferson National Forest. I do not know how much old growth forest still exists in the JNF, but it is my understanding that Amendment 3 would allow for most of it to be destroyed. This should not be allowed for a private, for-profit company. There are reasons the Forest Service has guidelines. They need to protect our forests for future generations! Professionals with expertise in forest management devised these guidelines year ago. They should not be amended now, for MVP. | IND379-3 | See the response to comment FA10-1 regarding Amendment 3. |
| IND379-4 | Amendment 4 would allow MVP to cross the Appalachian National Scenic Trail (ANST) on Peter's Mountain which would exceed the Scenic Index Observation (SIO) to High. The Appalachian Trail Conservancy just filed a notice with the FERC stating that they are very concerned about all the errors and omissions the DEIS contains that they are totally against the MVP, which is not their normal stance. The DEIS needs to be rewritten! | IND379-4 | See the response to comment FA10-1 regarding Amendment 4. |
- In summary, I highly oppose the above amendments and pray they are not accepted.

INDIVIDUALS

IND380 – Patricia Curran Leonard

20161212-0023 FERC PDF (Unofficial) 12/09/2016

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

ORIGINAL

December 1, 2016

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -9 P 4:42
FEDERAL ENERGY
REGULATORY COMMISSION

FERC

Docket Number: PF15-3-000,
CP16-10-000 or CP16-13-000
customer@ferc.gov

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Interstate Highway 73

IND380-1

In the DEIS page 3-18 in Alternatives states: "Nevertheless, we asked Mountain Valley to explore a route alternative that followed highways. Mountain Valley came up with a conceptual alternative route following interstate highways where feasible due to their generally wider rights-of-way corridors and medians that would start at the Webster Interconnect in Wetzell County, West Virginia following U.S Highway 250 and head generally southeast, following U.S. Highway 19, Interstate 79, Interstate 77, U.S. Highway 58, and U.S. Highway 29 to Mountain Valley's proposed terminus at the Transco Station 165 in Pittsylvania County, Virginia (see figure 3.4.1-1)."

In a recent article this week in the Roanoke Times titled: **Franklin County still part of push for I-73, but delays action on sales tax increase proposal**

http://www.roanoke.com/news/local/franklin-county/franklin-county-still-part-of-push-for-i-73-but-delays-action-on-sales-tax-increase-proposal/article_b75c423f-b985-5e71-85d4-a5dc8f63e573.html

The issue is that the DEIS does not address the crossing of the proposed I-73 corridor. What is the impact of the interstate with the numerous crossings through Franklin County. What are the plans to address the safety and risks of the proposed MVP and the proposed I-73 Interstate in planning, construction, and maintenance? Is there an alternative route proposed due to the issues stated in the DEIS when pipeline constructions are close to interstates: "While there are no federal restrictions for placement of natural gas pipelines adjacent to, but outside of the right-of-way, the highway alternative route would likely present numerous and substantive construction challenges, including traversing roadway overpasses and underpasses, large interchanges, elevated sections of roadway including bridges, areas congested with development and homes, and narrow valleys where the most suitable terrain (i.e., flat) is already partially or fully encumbered by the roadway."

This would be a concern which I would like to see addressed in detail in the next version a EIS on the MVP project.

Pat Curran Leonard

4638 Dilons Mill Road

Callaway, VA 24065

540-929-5184

IND380-1

I-73 is a proposed new interstate from northern Michigan to South Carolina. According to the Roanoke Times, the idea of I-73 has been around for more than 20 years (2015). If the MVP is approved by the Commission, it is likely it would be constructed prior to the I-73 roadway. Therefore, the existence of the pipeline would be considered during planning of the I-73 route.

Roanoke Times. 2015. New I-73 signs go up, but not the highway. Available at: http://www.roanoke.com/news/local/new-i-73-signs-go-up-but-not-the-highway/article_af3b4be0-9f4f-576d-a4f0-e436f136ab26.html.

INDIVIDUALS
IND381 – Patricia Curran Leonard

20161212-0025 FERC PDF (Unofficial) 12/09/2016

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

December 3, 2016

ORIGINAL

FERC

Docket Number: PF15-3-000,
CP16-10-000 or CP16-13-000
customer@ferc.gov

FILED
SECRETARY OF THE
COMMISSION
2016 DEC - 9 P 4: 12
FEDERAL ENERGY
REGULATORY COMMISSION

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Pipelines near homes/historic places

IND381-1

In an article dated November 27th 2016 in the Roanoke Times titled: As pipeline looms, historic Newport braces for change

http://www.roanoke.com/business/as-pipeline-looms-historic-newport-braces-for-change/article_c5220468-6287-5c9d-9834-f31b4af74c89.html

“A survey crew working for Mountain Valley Pipeline recently hammered a stake into the Echolse’s yard about 65 feet from their home. The crew knotted orange surveyor’s tape near the top of the stake, signifying that it marks the centerline of the proposed 42-inch diameter buried pipeline that will transport natural gas at high pressure — if the controversial project moves forward.”

Everyone that works at FERC needs to read this article. Why does MVP need to place this highly explosive volatile gas so close to homes and humans? This makes no sense. If EQT is projecting to make billions of dollars on the sale of the natural gas through the MVP transportation line, finding a route that totally avoids humans and their homes.

IND381-2

The article also focused on the MVP proposed route into historic places: “The Greater Newport Rural Historic District Committee and its Ohio-based attorney, Matt Fellerhoff, contend that Mountain Valley and its contractors have not adequately inventoried the historic and cultural resources of the rural historic district or the Newport Historic District.”

IND381-3

FERC should insist that MVP find alternative routes away from homes and away from historic areas. The lost of these local resources and risk to the people and homes along the route can be devastating. Please do not allow MVP to take our local resources for EQT profits.

This is not a public need.

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

IND381-1

See the response to comment IND2-1 regarding safety. The FERC does not determine setback distances from residences. These are determined by PHMSA.

IND381-2

See the response to comment IND234-1 regarding the Greater Newport Historic District.

IND381-3

See the response to comment FA11-12 regarding need.

INDIVIDUALS

IND382 – Richard Ettelson

12-7-16

Richard Ettelson
2826 Trout Run Road
Waiteille, WV. 24984
(304) 772-3443

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

**The U.S. Forest Service Failure To Comply
With Regulations Concerning Public Involvement.**

Docket No. CP16-10
Mountain Valley Pipeline DEIS

ORIGINAL

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -9 P 4:41
FEDERAL ENERGY
REGULATORY COMMISSION

IND382-1

The U.S. Forest Service (FS), Bureau Of Land Management (BLM) and the Federal Energy Regulatory Agency (FERC) have come to a tacit understanding that effectively excludes the public from exercising their full administrative rights to participate in the Agencies consideration of the Draft Environmental impact Statement (DEIS) for the proposed Mountain Valley Pipeline (MVP) Project in its analysis of the 4 proposed FS Amendments to the Jefferson National Forest (JNF) Land And Resource Management Plan (LRMP) that must be approved in order for the MVP Project to be built across FS lands.

JNF Forest Supervisor Joby Timm is the Responsible Officer who will decide if these 4 proposed LRMP Amendments will be approved, or not. Under his supervision this case has been poorly handled by effectively restricting public participation and administrative regulations.

36CFR219 Subpart A concerns National Forest System Land Management Planning. 36CFR219.16 regulates the public notification process for amending the Forest Plan which is the regulation Supervisor Timm must follow. CFR219.16(c)(3) states; **“(3) When the notice is for the purpose of inviting comments on a proposed plan, plan amendment, or plan revision for which a draft EIS is prepared, the Environmental Protection Agency (EPA) FEDERAL REGISTER notice of availability of a draft EIS shall serve as the required FEDERAL REGISTER notice.”** EPA filed that notice in the Federal Register / Vol. 81, No. 199 / Friday, October 14, 2016.

This Federal Register filing by EPA was written for the FS and BLM; **“This NOA is specific to the BLM and the USFS and provides notice that these agencies have participated as cooperating agencies with FERC in the preparation of the MVP Project and Equitrans Project Draft EIS.”**

IND382-1

The Federal Register Notice for the Notice of Availability of the MVP draft EIS (including the Jefferson National Forest LRMP proposed amendments) was published by the lead agency, FERC, on September 27, 2016 with a stated comment period ending December 22, 2016. This Notice is the official notice starting the comment period. However, the FS must have a 90-day comment period for the proposed draft EIS Amendment 1 and the deadline of December 22, 2016 did not give the full 90 days for comments since the comment period started on September 27, 2016. Therefore, the FS and BLM also published a NOA for the MVP draft EIS (including the Jefferson National Forest LRMP proposed amendments) on October 14, 2016 that gave notice that comments must be received within 90 days following the publication of the FERC Notice of Availability, not December 22, 2016. This provided for a full 90-day comment period for comments related to the LRMP amendments.

INDIVIDUALS

IND382 – Richard Ettleson

IND382-1
cont'd

The public comment period on the LRMP Amendments is regulated by CFR219.16(a)(2) which states; **"2) To invite comments on a proposed plan, plan amendment, or plan revision, and associated environmental analysis. For a new plan, plan amendment, or a plan revision for which a draft environmental impact statement (EIS) is prepared, the comment period is at least 90 days."** Since the EPA Federal Register notice was dated October 14, 2016, the mandated comment period of 90 days would expire on January 12, 2017, but FERC set the time period for public comment on the DEIS to end on December 22, 2016 which effectively shortened the public opportunity to comment on the proposed LRMP Amendments to be considered in the DEIS by 20-days. That is not in compliance with Forest Service Regulations.

The FS was already aware of this discrepancy in dates for comment deadlines before a meeting was held at the Roanoke JNF Forest Supervisor's Office on October 3, 2016 which was attended by FS Staff Officers; Adams, Overcash, and Vaught. That meeting was also attended by 3 members of the public; Judy Azulay, Richard Ettleson, and Attorney Tammy Belinsky. In the discussion at that meeting the FS indicated that they would bring that discrepancy in public comment deadlines to FERC's attention. Apparently, FERC decided not to take any action concerning the FS requirement to allow 90-days for public comment from the EPA Federal Register filing of October 14, 2016. This effectively restricted the opportunity for public comment on the proposed LRMP Amendments.

Since the FS and BLM has directed that all public comments on the MVP project, along with those public comments that expressly relate to FS management of their lands including the 4 proposed LRMP Amendments, be sent in as DEIS comments the public had no other opportunity except to comply. BLM does not respond to public inquiries and comments, instead they simply forward anything they receive to FERC. The JNF under Forest Supervisor Timm has received hundreds of public inquiries and comments, and rarely issues any reply because that is not his management style. Apparently, it is also not his management style to comply with Federal Regulations. Deferring his responsibility to protect the land and serve the public interest to FERC's discretion is a shameful approach for advancing his career.

This matter needs to be reviewed, which is an additional reason why a Revised DEIS is necessary with an additional time-period for public comment at its completion so the FS, and BLM will be in conformance with the NOA in the Federal Register filing of October 14, 2016 that specifically designated a 90-day public opportunity to comment from that filing date.

Sincerely,

Richard Ettleson

INDIVIDUALS

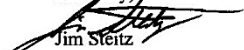
IND383 – Jim Steitz

20161212-0030 FERC PDF (Unofficial) 12/09/2016

IND383-1

Again, I implore you to reject this misguided, misbegotten, and plainly immoral 'Mountain Valley' pipeline. Our descendants in future Appalachia will look either upon a hideous metal scar gnawing through a denuded landscape, or a proudly low-carbon energy system hastened by our wise abstention from the hydrocarbons that threaten the survival of us all. Thank you for your attention to this urgent issue.

Sincerely,


Jim Steitz

IND383-1

The pipelines would be buried underground, and the right-of-way restored and revegetated.

INDIVIDUALS

IND384 – James R. Thomas

20161212-5107 FERC PDF (Unofficial) 12/12/2016 1:22:47 PM

James R. Thomas, Blacksburg, VA.

4796 Susannah Drive

Preston Forest

Blacksburg, VA 24060

12 December 2016

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

RE: Mountain Valley Pipeline
Docket No. CP16-10-000
Comments on Environmental Impact Statement

Dear Ms. Bose,

IND384-1

The proposed Mountain Valley pipeline would pass within about ¼ mile from my house, so that is the primary reason I write to you concerning this proposal. If built, it would significantly affect the value of my property and home without compensation. This house and the twelve acres it sits on is a significant portion of my estate that my wife and I have worked for and plan to pass on to our children.

IND384-1

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

IND384-2

There is also the possibility of true physical harm to me and my family from a pipeline rupture. I realize that this is not a high probability, but it certainly would be a high-consequence event.

IND384-2

See the response to comment IND2-1 regarding safety.

IND384-3

Much as been said about the potential positive economic impact that could accrue to this project. There probably will be some positive economic effects for a very few people, but to the detriment of many more.

IND384-3

The EIS concluded that for most environmental resources (except forest) there would not be significant adverse effects. See the response to comment CO2-1 and comment IND281-2 regarding benefits and taxes.

But aside from those personal reasons, I strenuously object to the damage the pipeline construction and maintenance would do to the environment over its 300-mile path. We have very little true wilderness left in the eastern U.S. and this pipeline would cross much of it. It would be one more violation of our heritage, and a very significant one. Once done, it can never be undone.

I strongly urge you and the committee to reject this pipeline application.

Very truly yours,

James R. Thomas

INDIVIDUALS

IND385 – Ashley L. Johnson

December 11, 2016

Subject: Docket CP16-10-000: Comments on the DEIS for the proposed Mountain Valley Pipeline

Dear Secretary Bose and Members of the Commission:

IND385-1 The proposed Mountain Valley Pipeline (MVP) is not in the public interest. It poses very real threats to public health and safety in West Virginia and Virginia. Not only will it have permanent adverse impacts on the local environment, it will also drive several more decades of global climate pollution.

IND385-2 Studies show that existing gas infrastructure is more than sufficient to meet regional energy needs for residents and industry. Therefore, the primary beneficiaries of the pipeline will be private companies. This is deeply concerning, given that a Certificate of Public Convenience and Necessity would allow the taking of private property for this project.

IND385-3 The Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC) rightly concludes that constructing the pipeline will have significant adverse impacts to forests. However, the DEIS fails to fully account for the other threats posed by the MVP. Among them are:

Safety:

The DEIS merely states that pipeline developers would comply with minimum construction and operation standards. It gives no reason for people living within the 1,400-foot blast radius to feel safe. The National Transportation Safety Board documents interstate pipeline accidents, and its database includes numerous recent natural gas pipeline ruptures, leaks, and explosions.

(<http://www.nts.gov/investigations/AccidentReports/Pages/pipeline.aspx>) Moreover, studies show a spike in accidents involving new pipelines in recent years. (<http://ieefa.org/wp-content/uploads/2016/05/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia- April-2016.2.pdf>)

There is no way to justify the risk of an explosion or leak to the people who live within the quarter-mile, which includes my father and many other friends and family from the blast radius of the proposed pipeline. The above website is riddled with reports of gas pipeline explosions and fires that have resulted in deaths and the destruction of property. Figures from the U.S. Pipeline and Hazardous Materials Safety Administration show that onshore gas pipelines installed in the 2010s have incident rates more than five times greater than pipelines installed in the 1990s and 2000s.

IND385-4 **Existing pipelines are sufficient:**

Studies, including those located at the following web addresses show that there is more than enough (https://www.southernenvironment.org/uploads/words_docs/Synapse_Report_FINAL_FINAL.pdf and <http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia- April-2016.pdf>) on existing pipelines to carry the gas needed to meet customer demand in the Mid-Atlantic and Southeast. As many states shift their electric generation from coal and gas to wind, solar, and other renewable, it's likely that demand for gas will decrease in the long run. But right now, bad policies are creating incentives for companies to overbuild the pipeline.

Water Quality:

IND385-1 See the response to comment IND2-1 regarding safety. Climate change is addressed in section 4.13 of the EIS.

IND385-2 See the response to comment FA11-12 regarding need and IND1-3 regarding eminent domain.

IND385-3 See the response to comment IND2-1 regarding safety.

IND385-4 See the response to comment FA11-12 regarding need.

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-5	<p>People living in the region rely on headwater streams and other water resources that stand to be significantly impacted by this project, yet the DEIS dismisses these concerns, saying only that developers would “evaluate any complaints” and “identify suitable settlements” in the event of contamination. The MVP’s proposed route would cross three major aquifers and come within one tenth of a mile of two public water supplies, not to mention an untold number of private drinking wells (including that of my father and many other friends and relatives) not yet identified by the project partners. The project would also cross 377 perennial waterbodies across Pennsylvania, West Virginia, and Virginia. Are we willing to risk the failure of an underground pipeline that carries 2 billion cubic feet of gas per day when headwater streams, wells, and municipal drinking water supplies are so close?</p>	IND385-5	The same protective Procedures would apply to all waterbodies regardless of size, including headwater streams as discussed in section 4.3 of the EIS. See the response to comment IND2-2 regarding drinking water. See the response to IND401-5 regarding missing water wells. See the response to comment IND92-1 regarding leaks.
IND385-6	<p>Climate Change:</p> <p>The DEIS fails to adequately address the greenhouse gas lifecycle of a project that enables an additional 2 bcf/day of natural gas to be shipped and burned. This is not a sufficient analysis of the full climate impacts as required under NEPA.</p> <p>The MVP would enable significantly more gas to be shipped, which means significantly more gas can be extracted using fracking techniques in the Marcellus shale region. Natural gas is predominantly methane. While methane does have a lower global warming impact than coal during electricity generation, it still accelerates climate change. Methane leaks directly into the atmosphere during fracking and distribution, and its global warming effect is 86 times greater than carbon dioxide’s over a 20-year period and 36 times greater than carbon dioxide’s over a 100-year period.</p> <p>Traditional Air Pollutants:</p> <p>Three large compressor stations have been proposed to move gas along the route in West Virginia, and there most likely will be a fourth sited in Virginia. FERC expects one of the West Virginia compressors to violate local air quality standards and require a permit from the West Virginia Department of Environmental Quality.</p>	IND385-6	Climate change is addressed in section 4.13 of the EIS. See the response to FA15-10 regarding life cycle emissions. The commenter’s statement is noted.
IND385-7	<p>Forests, Farmland, Public Lands & the Appalachian Trail:</p> <p>FERC concedes that there will be permanent adverse impacts to forests. The MVP would cross thousands of acres of prime forest land and habitat for species listed as threatened and endangered. It would cross national treasures like the Appalachian Trail and the Blue Ridge Parkway. The U.S. Forest Service has raised several of these forest impact issues, yet they have not been addressed by FERC or the project partners.</p> <p>The project will also permanently impact farmland, Wildemess areas, Inventoried Roadless Areas, Old Growth Forest, fragile karst areas and fragment habitats of species listed threatened or endangered. Yet again, the DEIS waves off these concerns, only saying that FERC will consult with the U.S. Fish & Wildlife Service or with ‘mitigate’ these concern while offering not real plans on how this could be done.</p>	IND385-7	See the response to IND155-2 regarding forests. Construction methods and proposed mitigation measures were evaluated and deemed to be protective of the resources.
IND385-8	<p>Air and Noise Pollution:</p> <p>The DEIS states that one of the compressor stations will violate the Clean Air Act, but it leaves that issue to the West Virginia Department of Environmental Protection to resolve. There is also the significant issue of a once-proposed compressor station in Virginia that was removed from MVP’s application of October 23, 2015. Even after the application’s filing, residents in Montgomery County, VA reported that MVP surveyors and engineers continued in their efforts to site a compressor station in Virginia. This is on the record with</p>	IND385-8	See the response to comment LA15-5 regarding changes to the MVP .

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-8 cont'd	the Montgomery County Board of Supervisors as of April, 2016. FERC must state definitively whether additional compression will be required, and it must consider the environmental impacts of an additional compressor station within the context of the proposed project.		See the response to comment IND95-1 regarding the Jefferson National Forest. Mountain Valley would bore under the ANST. Section 4.8 of the EIS provides a discussion of visual impacts including those to the ANST.
IND385-9	National Treasures: The pipeline would cross the Weston and Gauley Bridge Turnpike, the Blue Ridge Parkway, and the Jefferson National Forest including the Appalachian National Scenic Trail on my beloved Peters Mountain and the Brush Mountain Inventoried Roadless Area. The DEIS says FERC will consult with the U.S. Forest Service to minimize impacts. However, the Forest Service has already commented that the sum of these crossings will result in significant impacts. The ANST has stated that the impacts to the AT are severe and would impact the trail like no other project ever. The EIS process should not move forward until all concerns raised by the United States Forest Service, the Appalachian National Scenic Trail, the BLM and citizens are addressed.	IND385-9	See the response to comment IND95-1 regarding the Jefferson National Forest. Mountain Valley would bore under the ANST. Section 4.8 of the EIS provides a discussion of visual impacts including those to the ANST.
IND385-10	Local Economies and Environmental Justice: The DEIS points out that 14 out of 17 counties along the proposed route have poverty rates above their respective statewide averages. These are the places where the environmental impacts will occur. Yet instead of addressing how the environmental impacts will be mitigated, the DEIS states that short-term employment and local spending during construction will somehow offset community impacts. A short term bump in local spending does nothing to reduce the risks to public health and safety endured by these communities for countless years after the construction is completed.	IND385-10	Environmental justice is addressed in section 4.9 of the EIS.
IND385-11	I would also like to comment on the Amendments to the USFS Land Management Resource Plan Amendments as proposed by the NOAI contacted as part of the DEIS for the MVP' I agree completely with my father Maury Johnson and will just attach his comments here. "Regarding the MVP DEIS Section 4.8.2.6 (proposed amendments 1 through 4 to the Jefferson National Forest Plan): I am opposed to the granting of the ROW changes to the Land Resource Management Plan (LRMP), as requested in the NOIA. For MVP to construct and operate a pipeline across federal lands managed by the U.S. Forest Service (USFS) and the United States Army Corps of Engineers, a designation of a "utility corridor" in the JNF would be required if the application is to be approved. National Forest Service land is for ALL Americans . Preservation of our heritage, our rights, our water and our natural resources provided by the Forest is a privilege of all citizens and not something that should be given away to a corporation for financial profit. I urge that you consider the amendments with due caution for how they will impact the future of the Jefferson National Forest. Public input is essential, and should not be ignored by the Bureau of Land Management, the Army Corp of Engineers, or the USFS. I wholeheartedly agree with Pam Ferrante's recent statement to FERC, the JNF and the BLM: <i>"The proposed amendments are disturbing and all due caution should be considered for how they will impact the future of the Jefferson National Forest (JNF) and generations to come. The USFS motto is "Caring for the Land and Serving People" and the mission of the USFS is to "sustain the</i>	IND385-11	See the response to comment FA8-1 regarding Amendment 1.

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-11
cont'd

health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations". Allowing the pipeline to be constructed within the Jefferson National Forest (JNF) would violate the trust citizens have placed in our government to protect and steward a national treasure. This proposed pipeline crosses numerous delicate ecosystems, karst regions, and mountainsides and private properties. Decisions made by the USFS concerning the land they oversee will also impact communities in the area.

The proposed Amendments would permit MVP to exceed restrictions on soil and riparian corridor conditions, which is not acceptable. The environmental regulatory protections that are already in place for federally protected forest land and watershed areas should not be ignored or over-ridden.

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

The pipeline and the gas transported will provide no additional benefits to the citizens in this area but it will have a detrimental impact on the environment affecting all citizens for generations to come. There have many questions as to the need for this pipeline. Pipelines already in existence need proper maintenance to improve efficiency of transport and prevent ongoing environmental pollution. It appears the purpose of the MVP pipeline is for the sole interest of a few private corporations to make a 12% profit at the expense of our National Forest. This plan certainly does not serve the people nor does it meet the needs for future generations.

In accomplishing their mission and vision, the USFS states they use an "ecological approach" and the "best scientific knowledge" along with "listening to people" in making decisions. Consideration of public input is critical and should not be ignored by the USFS or the Bureau of Land Management. The "people" have spoken. They have expressed their respect and concerns for the National Forest and its fragile ecosystem. They realize not only the potential catastrophic changes that could occur in the immediate future but also in years to come if this pipeline is constructed in the National Forest.

FERC must respect the National Forest, a treasure owned by the citizens, and allow it to be conveyed to generations in its most pristine and natural state. An error in judgment today could impact generations to come in the future."

Recreation and tourism are critical to many communities, especially in the counties of Monroe, WV, and Giles and Craig counties in VA. A prime reason many people come here is for health, wellbeing and relaxation, the income that is generated by tourism, which is possibly the largest economic driver in Monroe County WV, would be severely impacted by a pipeline corridor across the county, Peters Mountain and the Jefferson National Forest. The proposed corridor would have a very severe **negative impact on that industry in the county/region.**

Appropriate land and natural resource management is vital to our country. The loss of the forested land and the corresponding ecosystem is alarming. Our National Forest land contains old growth trees, grasslands, road less / wilderness areas that support many species, critical habitats for threatened and endangered species, and many unique water bodies (rivers, creeks, lakes). Preservation, not destruction, is the keyword that the BLM, USFS and AMCOE should be putting into practice. We must reserve our entire remaining

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-12
cont'd

damage with the construction. I find it objectionable to allow the construction of the MVP pipeline to exceed restrictions on soil and riparian corridor conditions. These exceptions in the fragile forest should not be allowed. MVP should comply with the current restrictions in place regarding soil and riparian corridor conditions and not be allowed to exceed them. I stress that the riparian buffer zones along streams in the JNF should remain intact to minimize adverse effects to the water bodies. Furthermore, I firmly believe that if soil conditions are exceeded, both ascending and descending Peters Mountain, Sinking Creek Mountain, and Brush Mountain, it will cause siltation of the water bodies below, damaging critical habitats and drinking water sources. The descent from Brush Mountain, Shussers Chapel Conservation Site in Montgomery County VA would likely be negatively affected by exceptions to the soil conditions. Shussers Chapel Cave has a B3 significance ranking for a rare millipede and isopods. Peters Mountain also has numerous endangered and rare species in its confines.

IND385-12 See the response to comment FA10-1 regarding Amendment 2.

IND385-13

Amendment 3

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

IND385-13 See the response to comment FA10-1 regarding Amendment 2.

IND385-14

Amendment 4

The LRMP should not be amended as requested in Proposed Amendment 4 to allow the MVP pipeline to cross the Appalachian National Scenic Trail on Peters Mountain. The Appalachian Trail is so vital to the identity of our area and its economy. Allowing the Scenic Integrity Objective to change from High to Moderate near the crossing of the most famous and prestigious national scenic trail in the U.S. is inconceivable. A recent statement released by the ANST said: *IND385-11* *analysis concurs with the statements of the United States Forest Service and suggests* cont'd *Proposed Mountain Valley project represents a serious threat to the scenic value of the A.T. well beyond the scope of similar projects - as many as 19 prominent AT vistas may be severely impacted from this project, many of them viewing impacts as they occur on USFS land. As a result, the assessment of cumulative impacts to the AT is drastically insufficient. The scope of cumulative impact must be based on the nature of the impacted resource, not the proposed project. In describing an arbitrary geographic scope for this DTIS of 100 miles...*

ANST went on to say *"These amendments would not only be unprecedented, but would significantly erode the value of the Appalachian Trail which the public has spent millions to protect. Amending the plan in the ways proposed would negatively impact prescription areas protecting the Appalachian Trail, Wilderness, Old Growth Forest, Inventoried Roadless areas and fragile successional habitats. Further, it would require the establishment of a new 5c utility corridor directly adjacent to Federally Designated Wilderness, leading up to the AT's doorstep in a location that is currently wild and pristine."*

The Appalachian Trail, America's first National Scenic Trail, was initially envisioned in 1921 and first completed by citizens in 1937. It is maintained by volunteers nationwide, who have devoted thousands of hours and millions of dollars to its upkeep and maintenance. It is America's most beloved trail. We should respect the natural beauty of our land and protect it for future generations.

IND385-14 See the response to comment FA10-1 regarding Amendment 3. The remaining comments are noted.

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-14
cont'd

I fear the Jefferson National Forest and its fragile ecosystems will be so irreparably damaged by the construction of MVP that it will never be whole again. Decisions made about the forest will have adverse consequences to water resources both inside and outside of the forest as well as impact nearby privately owned land. The Forest Service's actions could enslave private landowners to pipelines forever. They certainly do not deserve to become hostages.

Since the Mountain Valley Pipeline project has not yet been approved, I find it hard to believe the proposed amendments which would vastly expand the amount of infrastructure – transporting as-yet-undefined materials – would even be considered by FERC. These amendments are irresponsible from a technical standpoint, and legally questionable, given the obvious need for a new environmental impact statement to address changes of this magnitude. It is also politically irresponsible: this move suggests the original intention behind the pipeline project was always larger than stated publicly and proposed in the initial filings. It suggests a troubling degree of dishonesty and disregard for the totality of stakeholder concerns voiced in previous comment periods and through a multitude of public forums. In spite of the insistence on the part of FERC and Mountain Valley Pipeline that any disruptions to local communities would only be temporary and limited to the construction phase, Proposed Amendment 1 effectively guarantees disruptions in perpetuity for our communities. “

I strongly oppose these amendments to the Forest Service Plan. Enacting these amendments will irrevocably harm the invaluable cultural resources we derive from the forests, streams, and other fragile areas of the National Forest. These amendments will also have lasting negative consequences on our more conventionally quantifiable property values, and disrupt many carefully planned retirements via loss of equity in homes near the route.

I strongly condemn the utter disregard for basic science and human health concerns evident in the four proposed amendments. Enacting these amendments will threaten not just the health of our soil and streams, but poses a lasting threat to our groundwater aquifers and human health. Once contaminated, our aquifers will *never* return to their original quality, depriving my generation as well as future generations of this resource. It also poses a threat to many endangered and rare species found in and near the JNF.

The four proposed amendments constitute an unconscionable and unjustifiable burden on us, the citizens and stakeholders, and absolutely must not be approved. I, therefore, implore the United States Forest Service, the Army Corp of Engineers and the Bureau of Land Management not to grant a right-of-way in response to the MVP application.

I want to include my closing statement made to the USFS in a February of 2014 letter:

“.....Finally, when growing up the first thing I would see when waking up at my Mom's house would be Peters Mountain. At my Dad's my favorite place on the farm was to travel to the highest peak on Ellison's Ridge and seeing Peters Mountain, unspoiled, traveling in both directions almost as far as you could see. All four schools I attended had a view of Peters Mountains. Sitting at a football game, or at any other activity at these school was made more special when you could just gaze at this truly magnificent wonder. While attending JMHS in Monroe County I was a part of the award winning band. Bands from all over WV and Va would attend our Music in the Mountains Band Festival and many would comment that this was the best setting they had ever played at, because of Peters Mountain.”

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-14
cont'd

I am currently serving in the US Navy and am stationed in San Diego Ca. I seldom get home, but when I do, I am comforted by the sight of Peters Mountain. When I fly into the Roanoke Airport, I know I am almost home when I can look out the plane window and see Peters Mountain from 20,000 ft. Please do not allow a private corporation to destroy the Waiteville Valley, the National Forest and especially my beautiful Peters Mountain."

For these reasons, I urge you to find that the Mountain Valley Pipeline is not in the public interest and reject its application.

Picture of Ellison's Ridge, Indian Creek Valley (just a few hundred feet from the MVP crossing of Indian Creek) and Peters Mountain near my home in Monroe County WV, Picture taken by my father Maury W Johnson-- Feb 2016.



IND385-15

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

Ashley L Johnson, 6424 Lake Mere Court, San Diego, CA 92119

IND385-15

Comment noted

INDIVIDUALS

IND385 – Ashley L. Johnson

IND385-15
cont'd

CC:

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

Joby Timm, Supervisor & Jennifer Adams Special Project Coordinator
George Washington and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, VA 24019

Tony Cook, USFS Southern District Regional Forest Supervisor
Forest Service ---USDA
1720 Peachtree Road, NW Room 861N
Atlanta, GA 30309

U.S. Army Corps of Engineers Headquarters 441 G Street NW Washington, DC 20314-1000	U.S. Army Corps of Engineers South Atlantic Division 600 Forsyth St. SW Atlanta, GA 30303-8801	US Army Corps of Engineers Huntington District 502 Eighth Street Huntington, WV 25701
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Monroe County Commission
PO Box 350
Union, WV 24983

US Senator Joe Manchin
WV State Senator elect Kenny Mann
WV Delegate Roy Cooper

WV State Senator Ron Miller

INDIVIDUALS

IND386 – Tim Dye

20161212-5234 FERC PDF (Unofficial) 12/12/2016 3:54:45 PM

IND386-1 Tim Dye, Rocky Mount, VA.
I just wanted to make sure it was documented that I do have some concerns about the October 2016 revised plan for the MVP Pipeline. There is a proposed service road between my property at 1338 Bonbrook Mill Rd, Rocky Mount, VA 24151 and Sandy Ridge Baptist Church and their cemetery. The pipeline is now planned to run across and down the other side of my property. There are wide open fields without houses on the northern side of the church - has anyone looked at going through these fields instead of going through a fully wooded lot in a hollow with a creek? It also appears that while under proposed construction, 100% off my road frontage is blocked. Would you please respond to this eComment that FERC has received it?

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

IND386-1

As stated in section 4.8.2, Mountain Valley would maintain access to homes and driveways. See the response to comment IND2-1 regarding safety.

INDIVIDUALS

IND387 – Patricia Curran Leonard

20161212-0038 FERC PDF (Unofficial) 12/09/2016

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

ORIGINAL

December 4, 2016

FERC

Docket Number: PF15-3-000,
CP16-10-000 or CP16-13-000
customer@ferc.gov

FILED
SECRETARY OF THE
COMMISSION
2016 DEC -9 P 4:44
FEDERAL ENERGY
REGULATORY COMMISSION

Re: Opposition to the Mountain Valley Natural Gas Pipeline – FERC Responsibility to: "rigorously explore and objectively evaluate all reasonable alternatives"

IND387-1

As part of the responsibilities of FERC to applicants and the living world they are responsible to protect, the Draft Environmental Impact Statement does not rigorously explore nor objectively evaluate all reasonable alternatives.

In the DEIS on page ES-13 it states: The no-action alternative was considered for the projects. While the no-action alternative would eliminate the environmental impacts identified in the EIS, the stated objectives of the Applicants' proposals would not be met. Further, the natural gas shippers would seek alternative transportation infrastructure that would impact similar resources as the projects. Our analysis of system alternatives included an evaluation of whether existing or proposed natural gas pipeline systems could meet the projects' objectives. We could not identify any existing interstate natural gas transmission systems that fully extend from the Applicants' proposed starting points (in southwestern Pennsylvania and northern West Virginia) to the termini of their pipelines (in the case of MVP this would be at Transcontinental Gas Pipe Line Company LLC's Station 165 in southeast Virginia). Because existing systems have their capacities already subscribed, there would not be enough space available on those systems for the additional volumes proposed by Equitrans (0.4Bcf/d) and Mountain Valley (2Bcf/d)."

The no-action alternative does more than eliminate the environmental impacts, have you listened to the concerns of the people who will be impacted by this proposal? The risk to us along the route would be gone. The stress, sleepless nights and worry would be gone. The risk of water damage years down the road would be gone, loss of the trees and vegetation would be gone, issues of pipeline construction would be gone, worries to the natural habitats of the honey bee, wolf, bats and delicate slope wildflowers would be gone.

FERC – take the time to understand what needs are really at the termini of the MVP pipeline. Where is this gas being subscribed? Is it for U.S. consumption or export? Does the infrastructure support the volume that this new pipeline will produce? Please do not approve this for profit application that taking no action would be the best alternative.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND387-1

See the response to comment IND2-3 regarding export. See the response to comment FA11-12 regarding need. Customers for the projects are listed in section 1.2 of the EIS.

INDIVIDUALS

IND388 – Elizabeth Thomas

20161213-5004(31820665)

Elizabeth Thomas, Blacksburg,, VA.

4796 Susannah Drive
Preston Forest
Blacksburg, VA 24060
December 10, 2016

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

RE: Mountain Valley Pipeline
Docket No. CP16-10-000
Comments on Environmental Impact Statement

Dear Ms.Bose,

IND388-1

I ask that the Federal Energy Regulatory Commission DENY PERMISSION for construction of the Mountain Valley Pipeline. Our Forest Service should also deny access for constructing or accessing said pipeline in the Jefferson National Forest or in other natural areas set aside to protect the ever shrinking native and natural areas of Our Great Nation. Commissioned surveys are inaccurate.

The main beneficiaries of MV pipeline would be its wealthy owners and a few construction contractors from outside the immediate area. Fracking to extract the potentially valuable natural gas resource endangers everyone’s health and well-being in innumerable ways. Precious clean water is polluted and wasted while destabilizing underground and above-ground environments. Clear-cut areas become wastelands for erosion to allow the profiteers to destroy and export away our natural wealth offshore.

IND388-2

If construction is allowed along the surveyed and marked route, which comes steeply up Brush Mountain through large areas of karst, it immediately affects our lovely, quiet, wooded neighborhood. All our water comes from drilled wells whose supply is very likely to be disrupted by the blasting. We sit on a triple watershed divide with flow feeding the New River and Gulf of Mexico; the James River and Chesapeake Bay; and is the origin point for the Roanoke River which flows to Albemarle Sound. Chemical pollutants and eroded silt would affect all waters. In addition, the earthquake of 2011 produced a visible crack we observed where the pipeline survey crosses Brush Mountain road and a larger earthquake in 1897 affected this same area.

For these and so many, many more important reasons, DO NOT GRANT the permit for the Mountain Valley Pipeline construction. Sincerely,

Elizabeth F. Thomas

IND388-1

See the response to comment CO2-1 regarding benefit. See the response to IND2-3 regarding hydraulic fracturing and export. After pipeline installation underground, the right-of-way would be restored and revegetated. Water resources are discussed in section 4.3 of the EIS.

IND388-2

See the response to comment CO14-1 regarding blasting. Karst terrain and earthquakes are addressed in section 4.1 of the EIS. See the response to comment CO14-3 regarding spills. See the response to comment IND70-1 regarding erosion.

INDIVIDUALS

IND389 – Christine Kane

20161213-5006 FERC PDF (Unofficial) 12/13/2016 5:52:47 AM

- christine kane, melbourne, FL.
- IND389-1 The proposed Mountain Valley Pipeline should be denied. This pipeline, if constructed, will cross geologically unstable land, increasing the risk of landslides, gas leaks and erosion. A pipeline cutting across the Appalachian Trail is unthinkable. The Appalachian Trail is a world famous hiking destination and brings visitors from around the world to enjoy its beauty. If this pipeline is permitted, it could easily set a precedent for building other pipelines in other forests around the country. It is about time that we encourage the implementation of
- IND389-2 alternative energy sources instead of continuing down the slippery slope of disaster for the planet.
- IND389-3 I am requesting that the Federal Energy Regulatory Commission conduct an environmental impact statement that addresses energy infrastructure needs. The construction of pipelines needs to stop.

IND389-1 See the response to comment IND92-1 regarding leaks. Karst terrain is addressed in section 4.1 of the EIS while landslides are discussed in section 4.1 of the EIS. See the response to comment IND70-1 regarding erosion.

IND389-2 Visual impacts on the ANST are discussed in section 4.8 of the EIS.

IND389-3 Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

INDIVIDUALS

IND390 – John Festa

20161213-5007 FERC PDF (Unofficial) 12/13/2016 7:37:36 AM

IND390-1

John Festa, Manakin Sabot, VA.

I am in favor of building the pipeline, but let us do it in the least disruptive way. I am especially concerned about the impact to the AT. Can the pipeline be moved to existing infrastructure crossings?

I urge FERC to protect the Appalachian Trail and its surrounding landscape and communities. Please evaluate the comprehensive need for pipeline development to transport natural gas from the same Marcellus shale plays in a single Programmatic Environmental Impact Statement so that this infrastructure can be appropriately sited and the cumulative impacts to our National Parks, National Forests, and private lands can be understood before moving forward.

Thanks for looking out for the American people.
John Festa

IND390-1

Comment noted. Impacts on the ANST are addressed in section 4.8 of the EIS. Programmatic EISs are discussed in section 1.3. See the response to comment FA11-12 regarding need. Cumulative impacts are discussed in section 4.13 of the EIS.

INDIVIDUALS
IND391 – Lauren C. Malhortra

20161213-5008 FERC PDF (Unofficial) 12/13/2016 8:02:37 AM

Submission Description: (doc-less) Motion to Intervene of Lauren C Malhotra under CP16-10-000.

Submission Date: 12/13/2016 8:02:37 AM

Filed Date: 12/13/2016 8:30:00 AM

Dockets

CP16-10-000 Application for Certificate of Public Convenience and Necessity and Related Authorizations.

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	
-----	-----
Individual	laurcm6@vt.edu

Basis for Intervening:

As a young person and someone who calls southwest Virginia their home, I am deeply concerned about impacts to our regions' environment and economics, driving people from their homes and their land, and losing so much of what makes Virginia unique, beautiful, and bountiful. I fear that the pipeline will disrupt and destroy the community bonds that will be so necessary in creating the resilient state that we need to be in order to weather the climate destruction that is already bearing down on us as citizens of the region. I reject the notion that we have to choose to lock ourselves into a climate-chaos causing infrastructure project for the sake of relying on a "bridge fuel" when what is desperately needed is movement towards a just, sustainable, and community led future. I love my home, and the people who live here, and will not see it or them hurt for the sake of corporate gain that will not benefit the local communities it claims to.

IND391-1

IND391-1

See the response to comment CO2-1 regarding benefits. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy. Non-environmental Commission staff will make a determination on whether to grant a party's out-of-time intervention request.

INDIVIDUALS

IND392 – Stephen D. Trail

20161212-5280 FERC PDF (Unofficial) 12/12/2016 4:59:49 PM

December 12, 2016

Dear Secretary Bose,

IND392-1

My name is Stephen D. Trail, a lifelong resident of Summers County, West Virginia. I am a former Professor having instructed at Concord University, Athens W.V. for five years, along with Mountain State University, Beckley W.V. for 23-years, in geography/environmental sciences/history/paleontology/archaeology. I have credentials for instructing all the aforesaid courses, if needed I can provide. I have an adjunct professorship from George Mason University, Va, in Public Health, a granted full-professorship from WVU Extension Service, WVU Morgantown W.V. in "Wetland Waste Water Disposal i.e. "Wetland Waste Water Disposal Systems," ". My Bachelor of Arts Degree is from Marshall University in geography and history primarily. My Masters Degree is from Radford University, Radford Va. in History and Geography, along with post Masters Degree work in Higher Education. I am a former Sanitarian that worked in Summers County for 31-years full-time and Monroe County for 17-years part-time. Having partially grown up on Keeney's Mountain I am very familiar with the artesian aquifer that runs through the Mountain (actually a ridge). The aquifer is very strong and powerful, it is so powerful that there are residents of the Mountain that can not cap their well pipes, so they just let them run, the water is potable. And, of course most wells on the Mountain are capped meeting construction standards per West Virginia State Health Department requirements, of course this does include old wells installed prior to water well construction standards, along with springs. For the 31-years that I sampled people's wells on Keeney's Mountain, my conclusion is that they presently have potable water and in most places an abundance of clean, clear water.

Also, when I taught Conservation of Natural Resources or Physical Geography I became very familiar with the dynamics/concepts of hydrology in this matter: a perched artesian aquifer in this case per Keeney's Mountain, I fear and have great concerns for the consequences of blasting/installing pipeline that could potentially burst said perched artesian aquifer, for as you know this type of aquifer is extremely fragile and vulnerable.

Sincerely,

Prof. Stephen D. Trail, R.S.
22 Park Street Circle
Hinton, W.V. 25951

IND392-1

Groundwater is discussed in section 4.3 of the EIS.

INDIVIDUALS

IND393 – Ryan Wedsock

20161213-5013 FERC PDF (Unofficial) 12/12/2016 6:17:36 PM

To the Fine Folks At FERC,

IND393-1

I am writing to you today as a resident of Blacksburg, Virginia and a Graduate student at Virginia Tech to record my voice in protest against the advancement of the Mountain Valley Pipeline. I reject the pipeline on environmental, economic, and moral grounds. We can no longer ignore the damage that climate change poses to unleash on our planet. To pursue fossil fuel technologies like natural gas at this time is actively suicidal. No Environment Impact Survey can offer solutions for this problem; it is inherent to the use of fossil fuels themselves. While I appreciate the efforts of those workers who created the EIS, and their attempts to incorporate policies which limit the environmental damage of the pipeline into it, I do not find it sufficient. Part of the acreage which is sacrificed for this project is old growth forests which have the highest environment benefits to the surrounding community. The proposed amendments also allow the pipeline to cross the venerated Appalachian Trail, and as a hiker this seems to defeat the dual purpose of the trail: providing an escape from civilization and a lesson in the value of nature. Certainly, fines can be levied on Mountain Valley LLC for violations of the provisions in the EIS, but I find this unsatisfactory for two reasons. One, no amount of fine can retroactively reverse the damage to billion-years-old Karst topography or rebuild a pristine old growth forest. Second, levying such fines will be the purview of the incoming administration – an administration which is actively hostile to both climatology and the environment. I frankly do not trust them to properly oversee this matter.

IND393-1

Climate change is discussed in section 4.13 of the EIS. See the response to comment IND40-1 regarding renewable energy. Karst is addressed in section 4.1 of the EIS. Impacts on the ANST are analyzed in section 4.8, including a discussion of visual impacts.

IND393-2

I also object on economic grounds. A recent report by Key-Log Economists LLC has revealed the true extent of the damage such a proposal threatens. Montgomery County would see reduced tourism, reduced real estate spending, lower taxes, and greater insecurity. Given the mild economic conditions which prevail in the country today, I understand worker's desire to find jobs wherever possible. However, almost none of those jobs would be in Montgomery County, while those who do find jobs would only be able to do so for a short time. Arguing for this pipeline because it will create jobs is a poor exercise of cost-benefit reasoning, primarily because while it gives a small, short-term cost to a few people, it has long-lasting environmental and economic costs for many more people. It seems to me, frankly, that it is Mountain Valley, not the people of Southwest Virginia, who have the most to gain here.

IND393-2

Socioeconomics is discussed in section 4.9 of the EIS. See the response to comment IND137-1 regarding the KeyLog report. See the response to comment IND345-4 regarding benefits to Montgomery County. See also the response to comment IND281-2 regarding benefits to Virginia.

Which is why I reject this pipeline, finally, for moral reasons. A society can not long last that allows the wealthy to act with impunity with the hope that all of us will benefit. In my view, the only acceptable society is one in which people are allowed to get wealthy, to pursue wealth-building pursuits like this pipeline, only insofar as it benefits everyone. Clearly, however, this pipeline does not. It also directly harms vulnerable individuals around the world who will have to suffer from the consequences of climate change. From both the perspective of utilitarianism and human rights, this is unacceptable. Allowing the construction of this pipeline would simply add another block to the wall of suffering of people around the globe, in addition to violating their right to life and self-determination.

Thank you for the work that you do, and for considering this letter, among many others.

Ryan Wedsock
Blacksburg, VA

INDIVIDUALS

IND394 – Robert M. Jones (on behalf of Bruce and Nora Fugate)

20161213-5021 FERC PDF (Unofficial) 12/12/2016 9:27:29 PM

Date: 12 December 2016
To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Bruce & Nora Fugate, Filed on their behalf by Robert M. Jones,
Registered Intervenor
Re: Mountain Valley Pipeline, Docket CP16-10-000
Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND394-1

We are writing to express our concern for the current route that has been proposed by Mountain Valley Pipeline in the Mt Tabor area. This route, which passes through the Mt Tabor Sinkhole Plain is a very dangerous location for a pipeline. In fact, the Virginia Department of Conservation and Recreation wrote a letter to FERC stating that the current route proposed by Mountain Valley Pipeline (formerly the Mt Tabor Variation) has the potential to seriously impact the Slussers Chapel Conservation Site. This site is also very important to the water supply of the people who live on the current path of the MVP in the Mt Tabor area. In the SCCS, all water paths lead to Slussers Chapel Cave. If the cave becomes clogged with sediment or is polluted as a result of pipeline construction the water supply for hundreds of people could be destroyed.

Because of this serious and unthinkable possibility, the DCR recommended an alternative route that the MVP should take in order avoid the Slussers Chapel Conservation Site. This route would cross on the top of Brush Mountain. This route would avoid the sensitive Conservation site and would also have the benefit of avoiding the homes and properties of people living along the current route. People's wells and water would be further away from the pipeline and any possible damage to the water supply.

Our home is located on Dry Run Road in Montgomery County, VA. We have lived in this location for 70 years. The pipeline will come through our property and it will adversely affect our property as well as our business raising cattle and hay. The newly proposed route will not help our situation. However, we want to say that we are not in favor of any pipeline in this dangerous area, but we do support the "Avoidance" route suggested by the Virginia Department of Recreation and Conservation because it offers greater safety for our neighbors who live along the current route.

Sincerely,

Bruce and Nora Fugate
1796 Dry Run Road
Blacksburg VA 24060

IND394-1

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

INDIVIDUALS

IND395 – Robert M. Jones (on behalf of Les and Patty Fuller)

20161213-5022 FERC PDF (Unofficial) 12/12/2016 9:30:25 PM

Date: 12 December 2016
To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Les & Patty Fuller, Filed on their behalf by Robert M. Jones,
Registered Intervenor
Re: Mountain Valley Pipeline, Docket CP16-10-000
Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND395-1

We are residents of Montgomery County Virginia and have lived in the Mt Tabor area for 24 years. Our home is near the proposed Mountain Valley Pipeline Route and we are writing to express our concerns about serious problems that are likely to occur if this pipeline is built through this area. We are greatly concerned that MVP has not taken into account the many environmental dangers that the pipeline presents to the people of this area. We are particularly concerned about the safety of our water. We have great concerns about the damage to the water supply that may be done if the pipeline is allowed to cross through the Slussers Chapel Conservation Site. We live in the Slussers Chapel Conservation Site close to the east end of Slussers Chapel Cave. If construction of the pipeline disturbs the aquifer, we and many others will be without the clean water that is essential to our family and many other families in this area. The risk to everyone in this area is too great to permit the pipeline to cross in this unique and sensitive habitat.

The pipeline will affect not only people, but also the livestock that live on this land. We raise alpacas on our land. They provide an important source of income for our family. This land is perfect for raising alpacas as they have been thriving due to the lack of clay, decent soil on this mountain parcel providing good grazing, the pure mineral rich water, and quiet surroundings. As sustainable as they are the alpaca herd is truly a product of their environment. The barns and pastures for our herd are located near the highest point on our property, which also happens to be the most exposure to loud noises. Any noise pollution and constant roadway activity will reduce productivity in loss of offspring due to abortions, loss of fertility, and overall general health. The water quality from our well is incredible giving the alpacas a mineral rich supply which they in turn use to grow their outstanding fiber. However, stressed alpacas do not reproduce successfully, do not carry offspring to term, and do not produce wool strong enough to be turned into product. We serve the Town of Blacksburg each Saturday with our handmade woolens and other farm made products for sale at the Farmer's Market. Our sales return tax revenue to the state and county. The farm outsources work to the local area providing income for tasks that need to be accomplished each day. Over the past

18 years our farm has been used by the Virginia Maryland College of Veterinary Medicine as a teaching lab for the large animal veterinary students. We have hosted artisan groups, senior citizens, day care children, and many citizens of the area in enjoying a moment of wonder seeing the alpacas and viewing the Jefferson National Forest and Brush Mountain in all its beauty. It is clear that the construction and operation of the pipeline could have very detrimental affects on both the animals and the people of this area. If the water supply fails, we all will suffer.

IND395-1

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

INDIVIDUALS

IND395 – Robert M. Jones (on behalf of Les and Patty Fuller)

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IND395-1
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Therefore, We ask that the FERC reject the currently proposed route and select a route proposed by The Virginia Department of Conservation and Recreation. This route would run along the ridge on Brush Mountain and would avoid a number of environmentally sensitive karst areas. We support this avoidance route because it is distanced from many homes as well as people and their livestock. We also support this avoidance route because it would impact less karst terrain and avoid damage to our vital water sources. Please give strong consideration to this route.

Thank you,

Les and Patty Fuller
2621 Mt Tabor Road
Blacksburg VA 24060

INDIVIDUALS

IND396 – Robert M. Jones (on behalf of Donald and Joanna Sunshine)

20161213-5023 FERC PDF (Unofficial) 12/12/2016 9:32:06 PM

Date: 12 December 2016
To: Ms. Kimberly Bose, Secretary, Federal Energy Regulatory Commission
From: Donald & Joanna Sunshine, Filed on their behalf by Robert M. Jones,
Registered Intervenor
Re: Mountain Valley Pipeline, Docket CP16-10-000
Subject: Put the Mountain Valley Pipeline on the Ridge of Brush Mountain

IND396-1

We have lived on Mt Tabor Road for many years and we are writing to make you aware that we are very concerned about the environmental damage to this area that may be caused by the proposed Mountain Valley Pipeline. We live within the Mt Tabor Sinkhole Plain. This area is a unique landscape that is unsuited to host a giant pipeline. A worse place to build a pipeline could hardly be imagined. The Mt Tabor Sinkhole Plain is karst. All karst. It is not the fertile plains of Iowa with deep fields of topsoil. It is, instead a karst bedrock that contains many layers of connected underground passages that supply water to many homes in the Mt Tabor area - including our home.

The problem is that if there is damage or spillage during or after construction of the pipeline, it will not just lay on the ground. It will not easily be "cleaned up" or mitigated. It enters the underground water system through any of the many sinkholes or a cave or into any of the above or underground streams that inhabit this area. That, of course, would be catastrophic. That will not affect the water of just one family. That will affect the water of many families whose wells will be contaminated. That is the difference karst makes. All of the Mt Tabor Sinkhole Plain is karst. It is Swiss cheese and a very dangerous place to build a pipeline.

It is clear that the pipeline should not cross through the Mt Tabor Sinkhole Plain. It certainly should not cross the Slusser's Chapel Conservation Site as is proposed.

In an attempt to avoid catastrophe, the Virginia Department of Conservation and Recreation has proposed an alternative route. Instead of the current route, the DCR suggests a more safe and solid route that would traverse the top of Brush Mountain. While it is our hope that no pipeline will ever come near this area, we do support the route proposed

IND396-1

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

INDIVIDUALS

IND396 – Robert M. Jones (on behalf of Donald and Joanna Sunshine)

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IND396-1 | by the DCR . We do not welcome any pipeline in this vulnerable area, but
cont'd | choose to support this safer “avoidance” route.

Respectfully,
Donald and Joanna Sunshine
770 Sunshine Farm
Blacksburg, VA 24060

INDIVIDUALS

IND397 – Elizabeth Struthers Malbon

20161213-5024 FERC PDF (Unofficial) 12/12/2016 10:15:20 PM

To: Federal Energy Regulatory Commission

From: Elizabeth Struthers Malbon
1391 Breckenridge Drive
Blacksburg, Virginia 24060

Re: Mountain Valley Pipeline, CP16-10-000
DEIS: Whose “convenience and necessity”?

Date: December 12, 2016

IND397-1

As a resident of the Preston Forest Subdivision in Blacksburg, Montgomery County, Virginia, I am writing to express my disbelief and dismay at the corporate audacity of Mountain Valley Pipeline, LLC in submitting an “Application for Certificate of Public Convenience and Necessity,” and thus a Draft Environmental Impact Statement (FERC/DEIS-D0272), for the Mountain Valley Pipeline (Docket Number CP16-10-000). In other letters, I have (and will) address many of the weakness of the DEIS itself; however, here I wish to comment on the inappropriateness of a so-called “Certificate of Public Convenience and Necessity” in the first place. The relevant question is, of course, Whose “convenience” and whose “necessity” would the Mountain Valley Pipeline serve?

A “Certificate of Public Convenience and Necessity” would be needed by a utility company in order to deliver utility services to a locale. But what is a utility company? Here is a legal dictionary definition:

n. any organization which provides services to the general public, although it may be privately owned. Public utilities include electric, gas, telephone, water, and television cable systems, as well as streetcar and bus lines.

<http://legal-dictionary.thefreedictionary.com/Utility+companies>

By this definition, Mountain Valley Pipeline, LLC does not actually qualify as a “utility company.” In fact, in early contacts, MVP did not make such a claim. A representative of EQT or NextEra stated in a public meeting of the Montgomery County Board of Supervisors in Fall 2014: the pipeline is “like a toll road”; MVP will not own or control the gas the pipeline transports—so MVP cannot answer any questions about how or where that gas will be used. (It is now known that 95% of the gas to be transported would be owned by affiliates of MVP (<http://www.lexology.com/library/detail.aspx?g=4fcd032f-7434-49da-848a-56aed11eb6ea>). Thus, MVP made it plain that it never had a plan to use the fracked gas to heat homes or run factories in the areas the pipeline cuts across—as a utility company would do. Rather, MVP’s goal and reason for being was to sell the gas to the highest bidder, with indications pointing to foreign export markets. At a Spring 2015 meeting of the Montgomery County Board of Supervisors, an MVP representative finally admitted, when one of the supervisors refused to accept his various ways of avoiding an answer, that there have been no queries from municipalities, utilities, or businesses in Montgomery County expressing interest in purchasing any of the gas from the proposed MVP pipeline. Even the MVP representatives could sense that their answer was not sitting well locally. Later MVP did enter into an agreement (made public in October 2015) with

IND397-1

See the response to comment FA11-12 regarding need. See the response to comment IND1-3 regarding eminent domain. See the response to comment IND2-3 regarding export. See the response to comment CO2-1 regarding benefits.

INDIVIDUALS

IND397 – Elizabeth Struthers Malbon

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E. S. Malbon to FERC

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Roanoke Gas, in Roanoke County, through RGC Midstream, a subsidiary of Roanoke-based RGC Resources, as is Roanoke Gas (http://www.roanoke.com/business/pipeline-company-announces-partnership-with-roanoke-gas/article_98814628-0683-50b6-9a56-206998afecdb.html). The order of these events has made it clear that MVP's interest was never in serving as a utility company or serving local utility companies or meeting any "public convenience and necessity," but only in doing whatever seems necessary to accomplish their goal of building a high-pressure pipeline for transporting fracked gas across West Virginia and Virginia at the lowest possible cost (environmental and health and safety costs being passed on to local residents and localities) to a port where it could be shipped to the highest bidder, domestic or foreign. Just what "public convenience and necessity" would that serve?

Judge Robert Irons ruled on August 5, 2015 in a trial in Union (Monroe County), West Virginia, that Mountain Valley Pipeline had failed to establish, as required by West Virginia law, that the pipeline project offered sufficient public use for West Virginians to justify entering private property without an owner's permission for surveying (http://www.roanoke.com/news/local/mountain-valley-pipeline-opponents-win-a-round-in-west-virginia/article_63e81d57-cf5c-5370-a3af-66cb2f7b3fad.html). This ruling was upheld by the Supreme Court of Appeals of West Virginia on November 15, 2016 (<http://www.lexology.com/library/detail.aspx?g=4fcd032f-7434-49da-848a-56aed11ebee>). Although a Virginia judge has not yet so ruled, it would not be impossible for one to do so on the basis of the evidence. The 2012 amendment to Section 11 of Article 1 (Bill of Rights) of the Constitution of the Commonwealth of Virginia does protect property rights from private corporations such as MVP. This amendment, a ballot measure approved by 74.45% of the voters, updated a 2007 law that stated that private property could be taken only when the public interest dominated the private gain. The 2012 amendment prohibits eminent domain being used for private enterprise, job creation, tax revenue generation, or economic development, thereby restricting it to only being invoked to take private land for public use. There is nothing about the proposed 300-mile Mountain Valley Pipeline that falls in the category of public use, although land that is now available for public use in the Jefferson National Forest would be taken OUT of public use were this pipeline to be constructed. This is not the work of a public utility. This is the work of a private corporation that exists to make money for its officers and shareholders. Private enterprise, of course, is not against the law. What is against the law—as well as all principles of fairness—is pretending to be a public utility in order to get free or cheap access to private landholdings. MVP wants to buy low and sell high by shifting a significant part of the costs (and the pain) to others, while all the gain would go to MVP officers and shareholders. Just whose "convenience and necessity" would be served by that?

And is the Federal Energy Regulatory Commission in any position to make a clear judgment about whose "convenience and necessity" would be served by the Mountain Valley Pipeline? FERC gives as its mission statement: "Assist consumers in obtaining reliable, efficient and sustainable energy services at a reasonable cost through appropriate regulatory and market means" (<https://www.ferc.gov/about/strat-docs/strat-plan.asp>). In the case of the Mountain Valley Pipeline, just which consumers does FERC seek to assist in this way? Certainly none in Montgomery County. Any in Virginia? (Maybe a few served by Roanoke Gas, brought into the deal late for that token purpose?) Any in West Virginia? (Not

INDIVIDUALS

IND397 – Elizabeth Struthers Malbon

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E. S. Malbon to FERC

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IND397-1
cont'd according to Judge Irons and the Supreme Court of Appeals of West Virginia.) It would seem to be the very "consumers" FERC is mandated to "assist" who would bear the brunt of the environmental degradation, property devaluation, and health risks but not have access to the gas (for which there has been NO request) or any other economic benefit (for which there has been NO evidence). This situation will be something FERC will need to explain carefully in its decision regarding the "public convenience and necessity" of the proposed Mountain Valley Pipeline. Many of those would-be-assisted consumers will be watching and reading with care.

IND397-2 But the FERC mission statement leads to further questions. Is fracked gas that has to be transported long distances over fragile karst topography and through national forest land and in areas already crisscrossed with existing and proposed pipelines "efficient"? Is fracked gas a "sustainable" energy source in our era of global climate change and growing water scarcity? And does a pipeline such as the proposed Mountain Valley Pipeline represent a "reasonable cost" for a source of fracked gas estimated to last 30 years at the most? Who is asking these questions that are implied quite directly in FERC's mission statement? When we attended the FERC scoping meeting about the proposed Mountain Valley Pipeline in Elliston, Virginia in 2015, we got the definite impression that FERC was pursuing a mission to assist corporations in their desire to build pipelines at the lowest cost and greatest convenience to themselves. This impression has been reinforced by every communication we have received from FERC since then. There is a powerful Latin phrase, *Quis custodiet ipsos custodiet?* The words can be translated into English as "Who watches the watchers?" FERC regulates corporations who both contribute to its staff and hire its staff. FERC is funded by fees levied on the industries it regulates, industries whose lobbyists make generous contributions to those who make the laws that the regulators enforce. Indeed, who watches the watchers?

IND397-3 It is interesting that FERC does not mention safety in its mission statement itself: "Assist consumers in obtaining reliable, efficient and sustainable energy services at a reasonable cost through appropriate regulatory and market means." However, it does list safety as one of three goals involved in pursuing that mission: "2. Promote Safe, Reliable, Secure, and Efficient Infrastructure" (<https://www.ferc.gov/about/strat-docs/strat-plan.asp>). Safety would surely be a matter not only of "public convenience" but also of "necessity." We know that there are gas pipeline explosions every year (http://www.naturalgaswatch.org/?page_id=4044). I was appalled when I first learned that firefighters do not fight fires resulting from pipeline explosions because such fires are too intense. Emergency responders simply try to evacuate people wherever possible. In my neighborhood, that might require helicopters, which are not locally available. The original route of the MVP proposed to cross our driveway where it meets the road. When we learned more about pipeline explosions, we told our children, now moved away, that in the event of an explosion at that crossing point, they would not have to worry about arranging our cremations or the sale of our home or the packing up of its furnishings and family mementos and photographs. All would be taken care of, so to speak, in the explosion and resulting fire. Many families with children at home understandably could not conscientiously expose their children to such risks and would be forced to move. Early on in the surveying process, a subcontractor of MVP carelessly caused a brush fire on private property in Franklin County ([IND397-2 See the response to comment IND2-3 regarding hydraulic fracturing. See the response to comment FA11-12 regarding need.](http://www.roanoke.com/business/pipeline-company-</p></div><div data-bbox=)

IND397-3 Section 4.12 of the EIS provides a discussion of safety and summarizes interstate natural gas pipeline incidents. See the response to comment IND2-1 regarding safety.

INDIVIDUALS

IND397 – Elizabeth Struthers Malbon

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cont'd | [apologizes-after-smoking-subcontractor-starts-brush-fire-in/article_d690855d-d82f-5c0b-856f-175c563f31a0.html](https://www.ferc.gov/finance/energy/energy-environment/energy-environment/apologizes-after-smoking-subcontractor-starts-brush-fire-in/article_d690855d-d82f-5c0b-856f-175c563f31a0.html)), so it is difficult to think of MVP as a company that puts safety first, last, and always. And it is not clear that FERC can focus on its own stated mission and goals in distinction from the desires of MVP. While ignoring safety may serve the short-term interest or convenience of a private corporation such as MVP, safety is always a matter of public necessity.

IND397-4 | What about fracking itself, the “opportunity” of which makes MVP interested in getting its own “toll road” built so it can cash in on the profits before it’s too late? Is fracking a matter of “public convenience and necessity”? Not to the West Virginia families who can no longer drink their tap water. Not to the families in several states who have experienced dramatic increases in earthquakes due to the pressure of waste water produced in the fracking process being pumped back into the ground. Were a pipeline for fracked gas constructed in our neighborhood, our county, our state, we would feel that we were accessories after the fact for contributing to the environmental devastation—as yet not experienced in its fullness—that fracking entails as it contaminates fresh water with toxic chemicals and forces that water underground. There are alternatives to fossil fuels; there are no alternatives to fresh water. Fracking is a shortsighted option that benefits the few, part of a larger global problem and not part of the solution. Fracked gas delays the real changes we need to make in our energy sources; pipelines for fracked gas compound the problem. Pipelines that transport fracked gas for private corporate gain cannot be a matter of “public convenience and necessity.”

IND397-5 | While MVP officials and reports, including the DEIS, have admitted explicitly very little about the dangers of constructing this pipeline in this place, maybe MVP, LLC does show some sense of the dangers of constructing such a pipeline along the currently proposed route by setting themselves up as a *limited liability* company. It is not hard to imagine that when something goes wrong (all pipelines leak; some pipelines explode), it will be some subcontractor’s fault, and eventually, after some costly and drawn-out court battles, both landowners and municipalities will pay. It is easy to imagine that, when the officials of MVP (or EQT or NextEra)—or FERC for that matter—retire (as my husband and I have recently done), they will not have to worry about the safety or equity of their homes (as we and so many others will if the MVP is constructed). And there are many, many landowners across West Virginia and Virginia who will be put in far greater jeopardy than we will be. Such a prospect is not in the public interest.

We all know the saying, “one person’s trash is another person’s treasure.” In this case, the Mountain Valley Pipeline proposes to trash a public treasure (homes, livelihoods, water supplies, national forest, rivers, view sheds, plant and animal wildlife, the Appalachian Trail, and more) to enrich the private treasure of its officials and shareholders who live elsewhere. Virginia, and to an even greater extent West Virginia, has served too long as a “sacrifice zone” for large corporations who extract whatever they can. Now MVP wishes to sacrifice huge areas of West Virginia and Virginia to transport what has been extracted elsewhere. At a public meeting of the Montgomery County Board of Supervisors in Fall 2014, held at the Blacksburg High School to accommodate the crowds eager to hear officials from EQT and NextEra answer questions about the proposed pipeline, one company official tried to present the “economic opportunity” that this fracked gas could

IND397-4 | See the response to comment IND2-3 regarding hydraulic fracturing.

IND397-5 | The EIS concluded that for most environmental resources (except forest), impacts would be temporary or short-term, and not significant. The pipeline would not destroy the beauty of the area; after installation, the right-of-way would be restored and revegetated. See the response to comment IND28-3 regarding financial responsibility. See the response to IND2-1 regarding safety. See the response to IND12-1 regarding property values. See the response to CO2-1 regarding benefits. Statements are noted.

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IND397 – Elizabeth Struthers Malbon

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bring to Montgomery County. A member of the Board of Supervisors responded something like this: Well, if I lived elsewhere and would get rich from the pipeline, I might think of it as providing economic opportunity too, but I don't and I don't. Same here.

In our home on Brush Mountain, we live in and on a treasure in which we have invested money, time, and memories; of course we don't want to see it trashed. However, it's not just that we don't want the Mountain Valley Pipeline in our backyard, we don't want it in anybody's backyard. We would not wish such a pipeline from such a company, with all its environmental and safety issues, in the backyard of an enemy! And we are insulted beyond measure that someone could argue that taking and degrading both private property and public property (national forest) for a pipeline to be built, owned, and operated by a private corporation that would transport gas fracked elsewhere at great environmental, social, and economic cost across two states at great environmental, social, and economic cost to another elsewhere so that it could be sold to yet another elsewhere for a higher price and thus achieve a larger profit for the private company that transported it is in the interest of "public convenience and necessity." We are not stupid. We are the public.

I call upon the Federal Energy Regulatory Commission to carry out its stated mission with integrity, equity, and farsightedness and to "assist consumers" by refusing to grant a Certificate of Public Convenience and Necessity for the proposed Mountain Valley Pipeline.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

20161213-5025 FERC PDF (Unofficial) 12/13/2016 7:46:52 AM

December 13, 2016

Dear Secretary Bose and Members of the Commission:

IND398-1

I would also like to comment on the Amendments to the USFS Land Management Resource Plan Amendments as proposed by the NOAI in the MVP DEIS. (section 4.8.2.6 -proposed amendments 1 through 4 to the Jefferson National Forest Plan): I am opposed to the granting of the changes to the Land Resource Management Plan for the JNF.

Regarding the LRMP, as requested in the NOIA for the MVP (FERC Docket CP16-10-000) to construct and operate a pipeline across federal lands managed by the U.S. Forest Service (USFS) and the United States Army Corps of Engineers, a designation of a "utility corridor" in the JNF would be required if the application is to be approved.

National Forest Service land is for ALL Americans. Preservation of our heritage, our rights, our water and our natural resources provided by the Forest is a privilege of all citizens and not something that should be given away to a corporation for financial profit. I urge that you reject these amendments due to how they will impact the future of the Jefferson National Forest.

The USFS motto is *"Caring for the Land and Serving People" and the mission of the USFS is to "sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations"*. Allowing the pipeline to be constructed within the Jefferson National Forest (JNF) would violate this trust. This proposed pipeline crosses numerous delicate areas, karst regions, and mountainsides and private properties. Decisions made by the USFS concerning the land they oversee will also impact communities in the area.

The proposed Amendments would permit MVP to exceed restrictions on areas in the forest, which should not be allowed. The environmental regulatory protections that are already in place for federally protected forest land and watershed areas should not be ignored or waived.

The destruction such as the cutting of old growth trees within the construction corridor is criminal. They are symbols of our heritage and should be treasured, not cut down. They are a unique part of the forest, that the USFS is meant to preserve, not to be destroyed forever. Allowing MVP to avoid the environmental controls mandated by NEPA strictly for a for-profit company and in total disregard of the environment and the effects on citizens is inexcusable.

In accomplishing their mission and vision, the USFS states they use an *"ecological approach" and the "best scientific knowledge"* along with *"listening to people"* in making decisions. Consideration of public input is important and should not be ignored by the USFS or the Bureau of Land Management. The citizens have spoken. They have expressed their respect and concerns for the National Forest. They realize not only the horrible destruction that will occur in the immediately but also years of a ruined forest that will come if this pipeline is constructed in the National Forest. ***Decision made today will impact generations to come in the future.***

Recreation and tourism are critical to many communities, especially in the Monroe Co. WV and counties in WV and VA. Tourism maybe the largest economic driver in region and would be severely impacted by a pipeline corridor across the area, including Peters Mountain and the Jefferson National Forest. The proposed corridor would have a very severe negative impact on that industry in the county and region.

IND398-1

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

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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IND398-1
cont'd

Appropriate land and natural resource management is vital to our country. The loss of the forested land and the corresponding ecosystem is alarming. Preservation, not destruction, is the keyword that the BLM, USFS and AMCOE should be putting into practice. We must reserve our entire remaining unspoiled and pristine environment for future generations; anything less would be unconscionable and an environmental crime.

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

Plan Amendment 1

I strongly oppose the proposed 5-C Designated Utility Corridors. The land allocation would be 500 feet, except as it crosses the Appalachian National Scenic Trail (ANST) and Peter's Mountain Wilderness.

A 500-foot ROW is ridiculous. The ROW would be the initial step for future expansion, with the potential for more pipelines, electrical lines, water lines, etc., to be constructed. The USFS needs to protect the JNF from not only the immediate environmental impacts of this pipeline but possible future pipelines and other utilities..

The future impact of establishing a 500-foot ROW through both public and private land cannot be foreseen in establishing a precedent for further activity. The impact of the entire width of the designated corridor and whether that conflicts with the LRMP must be evaluated, as well as the impacts to private landowners within that same corridor.

This proposed amendment would not only create a "Utility Corridor" across the JNF, but would also create a "Pipeline/Utility Corridor Access Alley" in Monroe, Summers, and Greenbrier Counties, WV and Montgomery, Craig, Alleghany and Roanoke Counties, VA. The damage done by this across these counties would be severe, but the greatest impacts would be to private landowners in counties on each end of this corridor, as all future projects would have to traverse these areas to enter and leave the corridor across the National Forest Lands.

Many landowners in these adjacent counties could become nothing more than custodians of the utility corridor, making their land useless for anything else. The LRMP must be evaluated, as well as the impacts to private landowners within that same corridor.

IND398-2

Amendment 2, would impact the Peters mountain Wilderness Area, the Appalachian Trail, Mystery Ridge, the Brush Mountain Wilderness and Roadless areas, old growth forest and many other fragile areas in such a way as to destroy these areas forever, I therefore oppose this amendment as well

IND398-2

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

IND398-3

Amendment 3, like all the others, would allow the removal of old growth trees within the construction corridor. Ancient woodlands have attained unique ecological features because they have not been disturbed. They are a rare natural resource, and could never be replaced once destroyed. To destroy these marvelous trees would be reprehensible. It would also have many of the same detrimental effects as have all the proposed amendments. The LRMP should not be amended as Proposed in Amendment 3.

IND398-3

See the response to comment FA10-1 regarding Amendments 3 and 4.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

20161213-5025 FERC PDF (Unofficial) 12/13/2016 7:46:52 AM

IND398-3
cont'd

The Appalachian Trail, America's first National Scenic Trail, was initially envisioned in 1921 and first completed by citizens in 1937. It is maintained by volunteers nationwide, who have devoted thousands of hours and millions of dollars to its upkeep and maintenance. It is America's most beloved trail. We should respect the natural beauty of our land and protect it for future generations; therefore the LRMP should not be amended as requested in Proposed **Amendment 4** to allow the MVP pipeline to cross the Appalachian National Scenic Trail on Peters Mountain. The Appalachian Trail is so vital to the identity of our area and its economy. Allowing the Scenic Integrity Objective to change from High to Moderate near the crossing of the most famous and prestigious national scenic trail in the U.S. is inconceivable. A recent statement released by the ANST said: *"Our own analysis concurs with the statements of the United States Forest Service and suggests that the proposed Mountain Valley project represents a serious threat to the scenic value of the A.T. well beyond the scope of similar projects - as many as 19 prominent AT vistas may be severely impacted from this project, many of them viewing impacts as they occur on USFS land. As a result, the assessment of cumulative impacts to the AT is drastically insufficient. The scope of cumulative impact must be based on the nature of the impacted resource, not the proposed project. In ascribing an arbitrary geographic scope for this DEIS of 100 miles..."* they went on to say *"These amendments would not only be unprecedented, but would significantly erode the value of the Appalachian Trail which the public has spent millions to protect. Amending the plan in the ways proposed would negatively impact prescription areas protecting the Appalachian Trail, Wilderness, Old Growth Forest, Inventoried Roadless areas and fragile successional habitats. Further, it would require the establishment of a new 5c utility corridor directly adjacent to Federally Designated Wilderness, leading up to the AT's doorstep in a location that is currently wild and pristine."*

I fear the Jefferson National Forest and its fragile environment will be so destroyed by construction of MVP that it could never be repaired. The decisions made by the USFS about the forest will have adverse consequences to water resources both inside and outside of the forest as well as impact nearby privately owned land. The Forest Service's actions could saddle private landowners with pipelines forever. They certainly do not deserve that fate.

IND398-4

Since the Mountain Valley Pipeline project has not yet been approved, I find it hard to believe the proposed amendments which would vastly expand the amount of infrastructure – transporting as-yet-undefined materials – would even be considered by FERC. These amendments are irresponsible from a technical standpoint, and legally questionable, given the obvious need for a new environmental impact statement to address changes of this magnitude. It is also politically irresponsible. This move suggests the original intention behind the pipeline project was always larger than stated publicly and proposed in the initial filings. It suggests a troubling degree of lies and disregard for the totality of stakeholder concerns voiced in previous comment periods and through a multitude of public forums. In spite of the insistence on the part of FERC and Mountain Valley Pipeline that any disruptions to local communities would only be temporary and limited to the construction phase, Proposed Amendment 1 effectively guarantees disruptions in perpetuity for our communities."

As stated previously, I strongly oppose these amendments to the Forest Service Plan. Enacting these amendments will irrevocably harm the invaluable cultural resources we derive from the

IND398-4

Comment noted.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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IND398-4
cont'd | forests, streams, and other fragile areas of the National Forest. These amendments will also have lasting negative consequences on our more conventionally quantifiable property values, and disrupt many carefully planned retirements via loss of equity in homes near the route.

I strongly condemn the utter disregard for basic science and human health concerns evident in the four proposed amendments. Enacting these amendments will threaten not just the health of our soil and streams, but poses a lasting threat to our groundwater aquifers and human health. Once contaminated, our aquifers will never return to their original quality, depriving my generation as well as future generations of this resource. It also poses a threat to many endangered and rare species found in and near the JNF.

IND398-5 | The four proposed amendments constitute an unconscionable and unjustifiable burden on us, the citizens and stakeholders, and absolutely must not be approved. I, therefore, implore the United States Forest Service, the Army Corp of Engineers and the Bureau of Land Management not to grant a right-of-way in response to the MVP application. Do not allow any corridor to cross the Jefferson National Forest, Peters Mountain and the Appalachian National Historic Trail.

Furthermore, the proposed Mountain Valley Pipeline (MVP) is not in the public interest. It poses very real threats to public health and safety in West Virginia and Virginia. Not only will it have permanent adverse impacts on the local environment, it will also drive several more decades of global climate pollution.

IND398-6 | Studies show that existing gas infrastructure is more than sufficient to meet regional energy needs for residents and industry. Therefore, the primary beneficiaries of the pipeline will be private companies. This is deeply concerning, given that a Certificate of Public Convenience and Necessity would allow the taking of private property for this project.

IND398-7 | The Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC) rightly concludes that constructing the pipeline will have significant adverse impacts to forests. However, the DEIS fails to fully account for the other threats posed by the MVP. Among them are:

It lacks any real solution to safety concerns, the DEIS merely states that pipeline developers would comply with minimum construction and operation standards. It gives no reason for people living within the 1,400-foot blast radius to feel safe. The National Transportation Safety Board documents interstate pipeline accidents, and its database includes numerous recent natural gas pipeline ruptures, leaks, and explosions. There is no way to justify the risk of an explosion or leak to the people who live within the quarter-mile, which includes many friends and family from the blast radius of the proposed pipeline. Figures from the U.S. Pipeline and Hazardous Materials Safety Administration show that onshore gas pipelines installed in the 2010s have incident rates more than five times greater than pipelines installed in the 1990s and 2000s.

IND398-8 | Existing studies reveal that the current pipelines are sufficient; to carry the gas needed to meet customer demand in the Mid-Atlantic and Southeast. As many states shift their electric generation from coal and gas to wind, solar, and other renewable, it's likely that demand for gas will decrease

IND398-5 | Comment noted.

IND398-6 | Section 3.3 of the EIS provides a discussion of using existing systems as an alternative to the MVP. See the response to comment IND1-3 regarding eminent domain.

IND398-7 | See the response to comment IND2-1 regarding safety.

IND398-8 | Section 3.3 of the EIS provides a discussion of using existing systems as an alternative to the MVP.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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IND398-8 | in the long run. But right now, bad policies are creating incentives for companies to overbuild the
cont'd | pipeline.

IND398-9 | There are very real concerns from the people living in the region who rely on headwater streams
and other water resources that stand to be significantly impacted by this project, yet the DEIS
dismisses these concerns, saying only that developers would “evaluate any complaints” and
“identify suitable settlements” in the event of contamination. The MVP’s proposed route would
cross three major aquifers and come within one tenth of a mile of two public water supplies, not to
mention an untold number of private drinking wells not yet identified by the project partners. The
project would also cross hundreds of perennial waterbodies across Pennsylvania, West Virginia, and
Virginia. Are we willing to risk the failure of an underground pipeline that carries 2 billion
cubic feet of gas per day when headwater streams, wells, springs and municipal drinking water
supplies are so close?

IND398-10 | The impacts to our climate are significant but the DEIS fails to adequately address the greenhouse
gas lifecycle of a project that enables an additional 2 bcf/day of natural gas to be shipped and
burned. This is not a sufficient analysis of the full climate impacts as required under NEPA.

The MVP would enable significantly more gas to be shipped, which means significantly more gas
can be extracted using fracking techniques in the Marcellus shale region. Natural gas is
predominantly methane. While methane does have a lower global warming impact than coal during
electricity generation, it still accelerates climate change. Methane leaks directly into the atmosphere
during fracking and distribution, and its global warming effect is 86 times greater than carbon
dioxide’s over a 20-year period and 36 times greater than carbon dioxide’s over a 100-year period.

Traditional air pollution would be significant from this project as there are three large compressor
stations have been proposed to move gas along the route in West Virginia, and there most likely will
be a fourth sited in Virginia. FERC expects one of the West Virginia compressors to violate local air
quality standards and require a permit from the West Virginia Department of Environmental
Quality.

IND398-11 | According to the DEIS released by the FERC for the MVP, forests, farmland, public lands and the
Appalachian National Scenic Trail would suffer severe impacts and harm. FERC concedes that there
will be permanent adverse impacts to forests. The MVP would cross thousands of acres of prime
forest land and habitat for species listed as threatened and endangered. It would cross national
treasures like the Appalachian Trail and the Blue Ridge Parkway. The U.S. Forest Service has raised
several of these forest impact issues, yet they have not been addressed by FERC or the project
partners.

The project will also permanently impact farmland, Wilderness areas, Inventoried Roadless Areas,
Old Growth Forest, fragile karst areas and fragment habitats of species listed threatened or
endangered. Yet again, the DEIS waves off these concerns, only saying that FERC will consult with
the U.S. Fish & Wildlife Service or with ‘mitigate’ these concern while offering not real plans on how
this could be done.

IND398-9 | See the response to comment IND3-1 regarding drinking water.
We found the Applicants proposed mitigation would be
protective of drinking water.

IND398-10 | See the response to comment FA15-10 regarding the lifecycle of
gas.

IND398-11 | We conclude that with mitigation, the project is not likely to have
significant impacts on most environmental resources. The right-
of-way would be restored and revegetated following construction
(see section 2.4.2 of the EIS). Specific mitigation is discussed
throughout section 4 of the EIS.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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IND398-12	<p>Traditional air pollution would be significant from this project as there are three large compressor stations have been proposed to move gas along the route in West Virginia, and there most likely will be a fourth sited in Virginia. FERC expects one of the West Virginia compressors to violate local air quality standards and require a permit from the West Virginia Department of Environmental Quality. The air and noise pollution from this project alone should alarm everyone. The DEIS states that one of the compressor stations will violate the Clean Air Act, but it leaves that issue to the West Virginia Department of Environmental Protection to resolve. There is also the significant issue of a once-proposed compressor station in Virginia that was removed from MVP's application of October 23, 2015. Even after the application's filing, residents in Montgomery County, VA reported that MVP surveyors and engineers continued in their efforts to site a compressor station in Virginia. This is on the record with the Montgomery County Board of Supervisors as of April, 2016. FERC must state definitively whether additional compression will be required, and it must consider the environmental impacts of an additional compressor station within the context of the proposed project.</p>	IND398-12	See the response to comment IND785-6 regarding air and noise impacts and additional compressor stations.
IND398-13	<p>National and local treasures are threatened by this project. The pipeline would cross the Weston and Gauley Bridge Turnpike, the Blue Ridge Parkway, and the Jefferson National Forest including the Appalachian National Scenic Trail on Peters Mountain near my childhood home. It would also cross the Brush Mountain Inventoried Roadless Area as well as a local treasure known as Peters Mountain and the “Narrows” of Hans Creek in Monroe county WV. The DEIS says FERC will consult with the U.S. Forest Service to minimize impacts to the National Forest, but nothing is said about other fragile places outside of the forest, like the Narrows of Hans Creek or the forest near the JNF on Peters Mountain but not included in the JNF. However, the Forest Service has already commented that the sum of these crossings will result in significant impacts. The Appalachian National Scenic Trail has stated that the impacts to the AT are severe and would impact the trail like no other project ever. The EIS process should not move forward until all concerns raised by the United States Forest Service, the Appalachian National Scenic Trail, the BLM and citizens are addressed.</p>	IND398-13	The FS and BLM are cooperating agencies and assisted in preparation of this EIS.
IND398-14	<p>Inequities existing in local economies and environmental justice issues need to be addressed adequately by the DEIS but are not. The DEIS points out that 14 out of 17 counties along the proposed route have poverty rates above their respective statewide averages. These are the places where the environmental impacts will occur. Yet instead of addressing how the environmental impacts will be mitigated, the DEIS states that short-term employment and local spending during construction will somehow offset community impacts. A short term bump in local spending does nothing to reduce the risks to public health and safety endured by these communities for countless years after the construction is completed.</p>	IND398-14	The environmental justice analysis provided in section 4.9 of the EIS is consistent with EO 12898.
IND398-15	<p><u>At this time, I would like to include my comments that I issued when I filed as an intervenor:</u></p> <p><i>“I have lived on or near Peters Mountain and Monroe County almost my entire life. My family’s ancestral property is on Peters Mountain and in the Zenith Valley. To us this is sacred and holy ground. We have a cultural attachment to this place and were part of a US Forest Service Cultural Attachment study in the 1990s in light of another assault on our mountain and valley by another powerful and greedy corporation.</i>”</p>	IND398-15	The commentor’s statements are noted.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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IND398-15
cont'd

My father proudly served in the US Army during World War II to protect our freedoms and our way of life, so that we could continue to be free and enjoy the land and mountain that we so dearly love.

GOD made this place special and we have been fortunate to be its caretakers and defenders, defending it from destruction and exploration by uncaring, greedy people and corporations. We get along with Mother Nature: she takes care of us, we take care of her. I know many people do not understand this relationship, but me and my family live it and have lived it for decades.

Incidentally, this unique relationship led me to be asked by former Congressman Nick Joe Rahall II, to testify before the United States Congress a few years ago, to address cultural attachment and environmental issues about Peters Mountain, Monroe County and our beautiful area.

The very idea of placing a large scar and potentially devastating pipeline across Peters Mountain or Monroe County has caused me much stress and has caused me to have high blood pressure. I am heartbroken and sick.

**Picture of Peters Mountain taken near my family homeplace, taken by my friend
Paula Oliver Mann**



I grew up in the 50's and 60's where you had to get underneath your desk at school and hope to God "they" didn't drop an atomic bomb on you. I now live in the blast zone of the bomb pipeline aka the Mountain Valley Pipeline (Alternate 110), which if approved would run through the middle of my farm and rape eighty-five acres of the most precious, sacred, holy ground in Monroe County with ancient oak trees, Indian burial grounds and a frog pond in the middle of it. If approved and built, very

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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IND398-15
cont'd

day my thoughts will be "Oh, my God, is that thing going to blow up? It's going to vaporize everything within a mile." Even if the route goes through the original MVP path, it will still destroy the water and safety and peace of mind of Monroe County.

Being raised here, I have spent nearly sixty years, along with my family, defending this county/area. We have fought and lived in this county and have helped with its foundation and protection. Now some outside force/uncaring corporation wants to destroy everything me, my family and many other have worked for years to build and protect.

These are just a few of the reasons I oppose this pipeline with every square inch if my soul.

I note that it is early in the FERC process, and my delay in intervention will not cause any prejudice to or burden the existing parties, particularly since the notice on earlier intervention was available through the FERC e-docket within the window for intervention. My interest would not adequately be represented by any other parties. In order to ensure that permitting my intervention will not result in disruption of the proceeding, I accept the record as it currently exists."

I strongly urge you to find that the Mountain Valley Pipeline is not in the public interest and reject its application.

IND398-16

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

Sincerely,

Patricia Ann "Cookie" Cole
Rt. 1 Box 46
Union WV 24983

Neil Kornze, Director Joby Timm, Supervisor & Jennifer P. Adams, Special Project Coordinator
BLM Washington Office George Washington and Jefferson National Forests
1849 C Street, NW, Rm. 5565 5162 Valleypointe Parkway
Washington, DC 20240 Roanoke, VA 24019

Tony Cook, USFS Southern District Regional Forest Supervisor
Forest Service-USDA 1720 Peachtree Road, NW Room 861 N Atlanta, GA 30309

IND398-16 See the response to CO34-1 regarding hydrogeological studies.

INDIVIDUALS

IND398 – Patricia Ann “Cookie” Cole

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U.S. Army Corps of Engineers Headquarters 441 G Street NW Washington, DC 20314-1000	U.S. Army Corps of Engineers South Atlantic Division 600 Forsyth St. SW Atlanta, GA 30303-8801	US Army Corps of Engineers Huntington District 502 Eighth Street Huntington, WV 25701
Monroe County Commission PO Box 350 Union, WV 24983	WV State Senate Elect Kenny Mann US Senator Joe Manchin US Congressman Evan Jenkins	WV State Senator Ron Miller WV Delegate Roy Cooper

INDIVIDUALS

IND399 - Carol Yopp

20161212-0072 FERC PDF (Unofficial) 12/12/2016

Dec. 6, 2016

ORIGINAL

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

FILED
SECRETARY OF THE
COMMISSION

2016 DEC 12 P 2:24

FEDERAL ENERGY
REGULATORY COMMISSION

RE: Mountain Valley Pipeline (Docket No. CP16-10-000) and
Equitrans Expansion Project (Docket No. CP16-13-000)

Dear Sir,

I feel that FERC should be fully aware of the environmental hazards & the risky expansion of the Imminent Domain law allowing for the taking of private land for personal purposes of industrial and private companies for profit.

There are multiple risks involved with the environmental factors also. All of these should be seriously considered.

The good of the general population is foremost of the thinking of the pipeline.

It is with hope and expectation that this will be done.

Sincerely,

Carol Yopp
Kodan House
1466 Blue Bird Road
Rocky Mount, Va. 24151

IND399-1

See the response to comment IND1-3 regarding eminent domain.
See the response to comment IND2-1 regarding safety.

IND399-1

INDIVIDUALS

IND400 – Lisa Hyatt

20161213-5029 FERC PDF (Unofficial) 12/13/2016 9:48:28 AM

IND400-1	Lisa Hyatt, Somerset, VA. The DEIS fails to meet the regulatory standard to justify crossing the Jefferson National Forest. The applicant is required to show that there is NO reasonable alternative to crossing Forest Service lands or the request must be denied. The applicant and FERC have merely given the opinion that the route crossing the Forest is preferable - this does not satisfy the law.	IND400-1	Alternatives are discussed in section 3 of the EIS.
IND400-2	The Draft EIS is legally and technically inadequate. It omits important information, misrepresents facts and findings, and fails to support conclusions with credible scientific and technical analyses. A revised DEIS must be prepared and the public must have the opportunity to review and comment on a version that is complete and accurate.	IND400-2	See the response to comment LA5-1 regarding preparation of the draft EIS.
IND400-3	The DEIS makes no attempt to assess the impacts of this proposed pipeline on the Appalachian Trail in context with other pipelines and projects that would damage the AT's character and value. This failure violates FERC's duty to perform an adequate cumulative impacts analysis under NEPA.	IND400-3	The ANST is discussed in section 4.8 of the EIS. Cumulative impacts to the ANST are discussed in section 4.13 of the EIS.

INDIVIDUALS

IND401 – Robert Shippee

20161213-5073 FERC PDF (Unofficial) 12/13/2016 11:16:10 AM

Robert Shippee, Richmond, VA.

IND401-1 -I strongly oppose the application for a Special Use Permit to cross the Jefferson National Forest and the requests for amendments to the Forest Plan. I believe the Bureau of Land Management (BLM) and the Forest Service must reject these proposals and I urge you to do so.

IND401-2 -The Draft EIS is legally and technically inadequate. It omits important information, misrepresents facts and findings, and fails to support conclusions with credible scientific and technical analyses. A revised DEIS must be prepared and the public must have the opportunity to review and comment on a version that is complete and accurate.

IND401-3 -The DEIS fails to meet the regulatory standard to justify crossing the Jefferson National Forest. The applicant is required to show that there is NO reasonable alternative to crossing Forest Service lands or the request must be denied. The applicant and FERC have merely given the opinion that the route crossing the Forest is preferable - this does not satisfy the law.

IND401-4 -The MVP, as currently proposed, would harm the wilderness experience in the Peters Mountain and Brush Mountain East areas. Though, the pipeline would skirt the boundaries of both Wilderness areas, the disruption during construction would damage the value of these areas and the scars left behind could also mar certain views from both areas.

IND401-5 -Wild Virginia and area residents have documented the existence of springs and wells around the MVP route in the Peters Mountain area that were not discovered or disclosed in the DEIS. These omissions are, by themselves, serious breaches of FERC's duty to identify and assess the environmental impacts of the project. In addition, they call into question the applicant and FERC's overall effort to find and protect water sources that could be affected by the pipeline.

IND401-6 -The MVP is proposed to cross about 1 mile of the Brush Mountain Inventoried Roadless Area, thus damaging the value of this area. The existence of remaining roadless areas on the Forest is valuable, because they are all too rare. Roads damage forests by degrading water quality, changing hydrologic cycles, promoting invasion of harmful non-native species, and eliminating forest habitat. The pipeline, both during construction and throughout the many decades its impacts would be felt, will create many of the damages and risks that roads create.

IND401-7 -The DEIS must be revised to include analysis of impacts and the ability of the applicant to avoid or mitigate resource damages in what the Forest Service has designated High Hazard areas. The combined risks of high landslide potentials, highly erodible soils, very steep slopes, sensitive species and habitats, and other factors calls into question whether the MVP can be built at all in a way that protects public resources.

IND401-8 -The DEIS analysis of possible cumulative impacts on water bodies, particularly on headwater streams is superficial and incomplete.

IND401-1 Comment noted.

IND401-2 The draft EIS is not inadequate, and meets the legal requirements of NEPA. Our conclusions in the EIS are supported by facts. See the response to comment LA5-1 regarding preparation of the draft EIS.

IND401-3 See the response to comment IND400-3 regarding alternative crossings of the Jefferson National Forest.

IND401-4 The Brush Mountain and Peters Mountain Wildernesses would not be crossed by the proposed MVP pipeline route. An analysis of visual impacts is presented in section 4.8.2 of the EIS.

IND401-5 Table 4.3.1-2 is not an exhaustive list of springs and swallets in each of the counties that would be crossed by the MVP pipeline route. If the MVP is approved by the FERC, Mountain Valley would conduct surveys in areas previously denied, and well and spring data would be placed into the public record for this proceeding.

IND401-6 The Roadless Area Conservation Rule and impacts to roadless areas under this regulation are discussed in section 4.8 of the EIS.

IND401-7 Section 4.1 addresses the risks of high landslide potentials, highly erodible soils, and very steep slopes, The applicable mitigation measures designed to minimize the potential for soil movement and to ensure adequate restoration and revegetation are identified in the Erosion and Sediment Control Plan (POD, Appendix C), Landslide Mitigation Plan (POD, Appendix F), the Site Specific Design of Stabilization Measures in High Hazard Portions of the Route (POD, Appendix G), the Restoration Plan (POD, Appendix H), and the Winter Construction Plan (POD, Appendix L). Mountain Valley would also follow our Plan.

IND401-8 Cumulative impacts are addressed in section 4.13 of the EIS.

INDIVIDUALS

IND401 – Robert Shippee

20161213-5073 FERC PDF (Unofficial) 12/13/2016 11:16:10 AM

IND401-9 | -The DEIS makes no attempt to assess the impacts of this proposed pipeline on the Appalachian Trail in context with other pipelines and projects that would damage the AT's character and value. This failure violates FERC's duty to perform an adequate cumulative impacts analysis under NEPA.

IND401-9

The ANST is discussed in section 4.8 of the EIS.

INDIVIDUALS

IND402 – Tina Smusz (on behalf of Curtis A. Laub)

20161213-5077 FERC PDF (Unofficial) 12/13/2016 11:19:57 AM

December 10, 2016

Curtis A. Laub
4375 Mount Tabor Road
Blacksburg, VA 24060

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

Dear Secretary Bose,

IND402-1

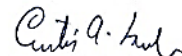
I am a citizen of Montgomery County, Virginia, through which EQT/NextEra proposes to construct a portion of the Mountain Valley Pipeline (MVP) running from Wetzel County, West Virginia to Pittsylvania County, Virginia. I live a short distance from the proposed right of way. This letter is to voice my opposition to the construction of this gas line.

Scientific evidence indicates that shale gas transmission poses serious risks to human health. The MVP has potential for the release of air pollutants and radioactive materials, as well as the risk of a catastrophic explosion and subsequent fire in the forest and mountains of Southwest Virginia.

The expected lifetime of this pipeline is not suited to the unstable karst terrain of this area—ANY subsidence along the route of the pipeline will put the pipeline at risk of rupture and subsequent groundwater and surface water contamination. The entire Mount Tabor Road and Dry Run area (not just the Mt. Tabor Sinkhole Plain) is peppered with sinkholes; unexpected subsidence can happen without warning anywhere, regardless of the best prepared Karst Mitigation Plan.

I strongly urge you to implement alternatives to the MVP proposal that are evaluated in FERC/DEIS-D0272, including the no-action alternative and promotion of energy conservation.

Respectfully,


Curtis A. Laub

IND402-1

Evidence shows that natural gas transmission through underground welded steel pipelines does not pose a risk to public health or safety; see section 4.12 of the EIS. Air quality is addressed in section 4.11 of the EIS. Karst and sinkholes are addressed in section 4.1 of the EIS. Groundwater resources are discussed in section 4.3 of the EIS. The No Action Alternative and renewable energy are discussed in section 3 of the EIS.

INDIVIDUALS

IND403 –Rachel Rose

20161213-5078 FERC PDF (Unofficial) 12/13/2016 11:27:08 AM

Rachael Rose, Harrisonburg, VA.
Good day,

IND403-1

I am writing as a concerned citizen of the Commonwealth of Virginia. I understand that I am a part of the problem regarding fuel consumption. We all are. It is time to find another way. This is a complicated issue, but our children's future is at stake.

I strongly oppose the application for a Special Use Permit to cross the Jefferson National Forest and the requests for amendments to the Forest Plan. I believe the Bureau of Land Management (BLM) and the Forest Service must reject these proposals and I urge you to do so.

The DEIS must be revised to include analysis of impacts and the ability of the applicant to avoid or mitigate resource damages in what the Forest Service has designated High Hazard areas. The combined risks of high landslide potentials, highly erodible soils, very steep slopes, sensitive species and habitats, and other factors calls into question whether the MVP can be built at all in a way that protects public resources.

The DEIS analysis of possible cumulative impacts on water bodies, particularly on headwater streams is superficial and incomplete.

Thank you kindly,

Rachael Rose

IND403-1

See the response to comment IND401-7.

INDIVIDUALS

IND404 – Carl E. Zipper

20161213-5106 FERC PDF (Unofficial) 12/13/2016 12:07:33 PM

12 December 2016

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

Re: Mountain Valley Pipeline proposal, Docket No. CP 16-10
Draft Environmental Impact Statement (DEIS)
Visual resource impact evaluation is flawed

Dear Ms. Bose and Members of the Commission,

I am writing to comment on the Draft Environmental Impact Statement (DEIS) for the Mountain Valley pipeline application.¹ I am concerned that FERC and the DEIS have failed to consider adequately the proposed pipeline's adverse effects on visual resources.

I have written to the Commission about visual resource effects previously;² this letter should be considered as a continuation of that submittal.

Summary of Previous Comments:

The method used by the DEIS to evaluate visual impacts is inadequate to the task. Therefore, the DEIS conclusion that adverse effects to visual resources "would be adequately minimized" is unsupported.

In the prior submittal, I state that DEIS analyses are inadequate for several reasons.³ The DEIS utilizes visual simulations within photographs taken from "key observation points" (KOPs) for the purpose of evaluating visual impacts of the Mountain Valley Pipeline (if constructed). However, such photographs are inadequate to the task of evaluating visual impacts for several reasons; these include (but are not limited to):

- Potential bias (either intentional or unintentional) of KOP selection.
- The inadequacy of fixed-point photos as indicators of visual impacts in landscapes with broad views: Fixed-point photos require selection of a photo resolution, and of an angle of view; while visual experiences incorporate multiple points of view and angles of view.
- Reliance on fixed points for visual effects evaluation ignores experiences of parties traversing linear features – such as motorists and vehicle passengers on roadways, and hikers and bikers on recreational trails.
- Failure to use landscape visualization tools that are widely available, and are more capable of representing visual impacts in complex landscapes than limited numbers of fixed-point simulations.

¹ Mountain Valley Project Equitrans Expansion Project Draft Environmental Impact Statement. FERC/DEIS-D0272 (Hereafter stated as DEIS).

² Submittal 20161121-5049 to FERC Docket CP16-10.

³ Submittal 20161121-5049 to FERC Docket CP16-10.

IND404-1

IND404-1

The referenced prior letter regarding visual impacts is responded to in IND243. The visual impact analysis in section 4.8 of the final EIS has been revised to incorporate supplemental data filed by Mountain Valley in response to our EIRs and FS comments. The draft EIS would not be withdrawn, but the final EIS addresses comments on the draft.

INDIVIDUALS

IND404 – Carl E. Zipper

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If constructed, Mountain Valley Pipeline would cause adverse effects:

I have conducted an assessment of potential visual impacts at multiple locations along the proposed pipeline corridor. The construction of a pipeline with a deforested corridor, as proposed by Mountain Valley Pipeline LLC and the DEIS, would result in adverse effects to visual resources. The DEIS should be revised to reflect that fact.

I base the above statement on an analysis of visual impacts by the proposed Mountain Valley Pipeline. I conducted these analyses using the viewshed tool of Google Earth Pro. I describe the analyses below.

Visual Assessment Goal: Determine if certain segments of the proposed Mountain Valley Pipeline's deforested corridor are likely to be visible from broad areas.

Method:

Visibility points (VPs) were selected from pipeline-related disturbances based on visibility expectations. They include points expected to be visible from major roadways and from scenic byways; points on mountain ridges that are expected to be visible from broad landscape areas; and points expected to be visible from recreational resources such as the Appalachian National Scenic Trail.

The Google Earth viewshed tool was used to identify landscape areas with potential to view each VP. This operation was performed by placing a Google Earth placemark at each VP, and using the Google Earth viewshed tool to identify landscape areas that are visible from the placemark location without blockage by landscape features such as mountains or hills, *i.e.* the VP's viewshed. It is reasonable to expect that parties located within the viewshed and looking toward the VP location should be able to see the VP location unless such views are blocked by buildings or vegetation. Hence, I term the landscape areas with potential to view each VP as "reverse viewsheds".

The analysis is conducted using the default value of 2m for the VP's height above the land surface. Thus, the analysis underestimates areas with potential to view the pipeline disturbance at the VP because all VPs are in areas of mature forest, which is typically 60 to 100 feet in height within the project area.⁴ A deforested corridor sliced into mature forest of that height should be visible from a greater area than would a point 2m above the ground. The analysis also underestimates visibility because viewpoints of the deforested corridor within the reverse viewshed would be above the ground. A standing person, for example, would have a viewpoint several feet above the ground surface; but the viewshed tool simulates visibility of the ground surface; hence, the reverse viewsheds have been defined as if the viewpoint were located at the ground surface.

The reverse-viewshed simulations are unable to consider potential blockages of view by vegetation. If a deforested corridor extends from the VP toward the viewer,⁵ the VP should be visible to the viewer, and the deforested corridor located in between the viewer and the VP should be visible as well. If a deforested corridor extends in a direction that is perpendicular to a straight line from the viewer to the VP, the VP may not be visible to the viewer. In light of this distinction, I have placed representations of the proposed deforested corridor in the vicinity of

⁴ US Forest Service states that typical height for white oak (*Quercus alba*) is 80 to 100 feet (https://www.na.fs.fed.us/pubs/silvics_manual/volume_2/quercus/alba.htm); and that typical heights for mature northern red oak (*Quercus rubrum*) are 65 to 98 feet (https://www.na.fs.fed.us/pubs/silvics_manual/volume_2/quercus/alba.htm).

⁵ As in Figure 3 of submittal 20161121-5049 to FERC Docket CP16-10.

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IND404 – Carl E. Zipper

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each VP on the reverse viewshed images as a means of considering of the proposed corridor's orientation relative to potential viewing areas.

The Google Earth viewshed tool extends only to a distance of 10 kilometers (km) (6.214 miles) from the viewing point. Therefore, reverse-viewshed simulations are limited to distances of ≤ 10 km (≤ 6.214 miles), although visible distances over landscapes within the project area can exceed that range.

Results and Discussion:

Results of the reverse-viewshed simulations are displayed as Figures 1-13 in the pages that follow my signature. Reverse viewsheds are defined as circular areas of 10 km (6.214 mile) radius centered on a given point, generally a point within the proposed deforested corridor represented by milepost, that is represented by a yellow thumbtack figure – the Google Earth placemark from which the reverse viewshed was simulated. The areas designated as green color are the reverse viewsheds, and are areas where a viewer would have potential to see the deforested corridor at the yellow-thumbtack location. The reverse-viewshed images have been truncated to exclude areas with minimal visibility of yellow-thumbtack location.

All images are displayed from a vertical view and with conventional orientation, with north at the top of the image. The Google Earth scale bar is visible on the lower left corner of most images but difficult to see; therefore, a duplicate scale bar has also been added manually. All milepost (MP) designations refer to the October 2016 proposed pipeline route⁶ and are approximate as designated by the ~ symbol.

Appalachian Plateaus: Within the Appalachian Plateau physiographic province (MPs 0 through ~188), visual resource impacts are evident. Two scenic highways and a recreational trail would be impacted by the project, if constructed as proposed (Figures 1 – 3). I am not as familiar with this pipeline segment as I am with segments further south; hence, my analysis within this region was not as thorough; and it is likely that widely visible points in addition to those identified here would occur on this portion of the route if the pipeline were constructed as proposed.

The visual impacts I was able to assess appear to be more limited in distance within the Appalachian Plateaus than those proposed for further south. This is a direct result of the terrain's character. In this area, much development is located along narrow valleys where visibility is blocked by adjacent mountain slopes; while most of the proposed pipeline corridor occurs on mountain ridges where it is not easily seen from valleys below. Key visibility points appear to be where the proposed corridor crosses valleys that contain roadways, recreational resources, and development.

Valley and Ridge, and Blue Ridge: Between MP ~190 and MP ~240, significant and severe visual resource impacts are evident. Major impacts occur due to the proposed pipeline's crossings of Peters Mountain at the WV-VA border (Figures 6 and 7); Sinking Creek Mountain at the Craig-Montgomery County border (Figures 9 and 10); and Fort Lewis and Poor Mountains near the Montgomery-Roanoke County border (Figure 13). Each of these crossings occurs at a location that appears as visible from broad areas because of the prominence of these landscape features. The visibility of the Sinking Creek, Fort Lewis, and Poor Mountain crossings would be enhanced due to the deforested corridors crossing mountain ridges. Although the Peters Mountain crossing is planned as a boring beneath the Appalachian Trail, the deforested corridors planned for the mountain's northwest and southeast flanks both appear as highly visible from broad areas (Figures 6 and 7). Brush Mountain in Montgomery County is also a

⁶ As described the Mountain Valley Pipeline submittal 20161014-5022 to Docket CP16-10.

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prominent landscape feature; the potential visual impact of its crossing also appears as extensive (Figure 11), although more difficult to assess due to the crossing corridor's orientation relative to some potential viewing areas with dense populations.

It appears that proposed deforested-corridor segments would be clearly visible from multiple communities including Peterstown WV (Figure 4), Pearisburg VA and Giles County High School (Figures 7 and 8), the Sinking Creek Valley along Route 42 northeast of Newport VA (Figure 9), the Mount Tabor Road area near Blacksburg VA (Figure 11), and the Elliston-Lafayette area in Montgomery County VA (Figure 13). It also appears that the proposed deforested corridor may be visible from densely populated areas of Blacksburg VA (Figures 10 and 11) and from segments of dense residential and commercial areas along Route 11 in western Roanoke County VA (Figure 13), although visibilities from these areas are unclear because of corridor orientation.

Several locations proposed for deforestation within the Jefferson National Forest (JNF) appear to be highly visible from inhabited areas, including the southeastern slope of Peters Mountain (Figure 7); the ridge of Sinking Creek Mountain, where the deforested corridor would enter the JNF (Figure 9 below and Figure 10); and the ridge of Brush Mountain (Figure 11). The segment extending from the ridge of Sinking Creek Mountain (Figure 10) to the ridge of Brush Mountain (Figure 11) appears as highly visible from broad areas within the JNF itself, including the Forest Service road that is located on the ridge of Brush Mountain, during the leaf-off season.

The Appalachian Trail Conference (ATC) has stated concern with visual impacts by the deforested corridor as viewed from the Appalachian National Scenic Trail (ANST).⁷ The analyses described here support the ATC's concerns, as multiple segments of the proposed deforested corridor appear as visible from the ANST on Peters Mountain (Figures 4 – 8), and from the ANST segment northwest of the proposed pipeline crossing and south of Peters Mountain (Figures 7 & 8).

In addition, views from other valued assets would be impacted if the pipeline is constructed as proposed. The north-slope ascent of Sinking Creek Mountain would severely impair visual resources that can be viewed from Route 42 / Bluegrass Trail⁸, a state-designated Scenic Byway in Giles and Craig Counties (Figure 9). Views from the Route 785 / Catawba Road in Montgomery County, also a state-designated Scenic Byway, would also be impacted if the pipeline is constructed as proposed (Figure 12).

The analysis described above was selective and based on my personal knowledge of the area, but there are parts of the project are that I do not know well. It is quite possible that additional visual resource effects would occur in the MP ~190-240 segment if the pipeline were constructed as proposed.

Southeast of Poor Mountain: Because I am not as familiar with these areas, I have not evaluated potential visual effects in these areas. However, the MP ~240-265 segment also occurs in terrain where broad landscapes can be viewed from multiple vantage points, as the deforested corridor is proposed to cross Bent Mountain and descend Blue Ridge mountain slopes through Franklin County to the Piedmont. It is possible that visual resource effects in this segment would extend well beyond those described by the DEIS.

⁷ Submittal 20161208-5043 to CP16-10.

⁸ See Figure 2 of submittal 20161121-5049 to FERC Docket CP16-10.

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IND404 – Carl E. Zipper

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Summary:

The DEIS analysis of visual resource effects is flawed. If the pipeline is constructed, multiple severe and significant visual resource impacts would occur -- but are not recognized by the DEIS. Certain points along the proposed corridor would have widespread and long range visual impacts, but the DEIS gives no hint of that. Those points are not difficult to find -- some occur on upper slopes and ridge crossings of high mountains -- yet the DEIS authors failed to find them. The DEIS analysis of visual resource effects is flawed; the DEIS conclusion of "limited" visual resource effects is not supported and is not correct.

The DEIS should be withdrawn. If a revised DEIS were to be issued, a thorough and competent visual resource analysis and assessment should be substituted for the inadequate and flawed analysis of the current DEIS.

Visual resources are important to the cultural identities and economic plans of potentially affected areas.⁹ The analyses described here demonstrate that visual resource effects would be severe in the MP ~190 to ~240 segment, if the pipeline were to be constructed as proposed. Potential impacts to visual resources should be considered by FERC and by the DEIS as "adverse effects".

The most logical remedy would be to abandon the proposed Mountain Valley Pipeline project. It is clear that the initial routing process was flawed for reasons in addition to those that concern visual effects.¹⁰ This analysis demonstrates that potential visual resource effects within the MP ~190-240 segment are adverse and severe. Despite FERC policies and National Environmental Policy Act requirements, no effort has been made by the applicant to avoid severe adverse visual effects; and the applicant's proposals to mitigate such effects are minimal and inadequate.¹¹

I am a registered intervenor in the Docket CP16-10 proceedings, and I am sending these comments to the full service list via e-mail as per FERC policies.

With regards,



Carl E. Zipper
Blacksburg Virginia 24060

Cc: US Forest Service, comments-southern-georgewashington-jefferson@fs.fed.us
US Bureau of Land Management, vcraft@blm.gov, miberat@blm.gov
Appalachian Trail Conference, lbelleville@appalachiantrail.org,
adowns@appalachiantrail.org
Barbara Rudnick, USEPA, Rudnick.Barbara@epa.gov
Edward Boling, Council of Environmental Quality, Edward_A.Boling@ceq.eop.gov

⁹ See submittal 20161121-5049 to FERC Docket CP16-10, p. 7 and 8, "Visual Resource Impacts are Not Insignificant."

¹⁰ See submittal 20151125-5156 to FERC Docket CP16-10.

¹¹ See submittal 20161121-5049 to FERC Docket CP16-10, p. 6 & 7, "Plans Claimed as Mitigating Adverse Visual Impacts Are Problematic".

INDIVIDUALS

IND405 – Mode A. Johnson

20161213-5120 FERC PDF (Unofficial) 12/13/2016 12:32:02 PM

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

From: Mode A. Johnson, M.S., Registered Intervenor and Affected Landowner

Date: December 13, 2016

Re: Docket No. CP16-10-000 Mountain Valley Pipeline

Opposition to the Mount Tabor Variation Route Portion of the 2016 Proposed Route

Introduction

IND405-1

The Mount Tabor Variation route should not have been incorporated into the October 2016 Proposed Route¹ for reasons demonstrated in this report. MVP was asked by FERC in the spring of 2016 to develop “at least one best possible alternative route... designed specifically to avoid high-density karst”² and, subsequently, the Mount Tabor Variation route was developed. However, the Draft Environmental Impact Statement (DEIS) released on September 16, 2016 states that both the 2015 Proposed Route and the 2016 Proposed Route with the Mount Tabor Variation, “have certain environmental advantages and disadvantages” but concludes “the potential for the Mount Tabor Variation to eliminate or greatly minimize effects to the Mount Tabor Sinkhole Plain warrants further study and consideration.”³

The comprehensive analysis presented in this report shows no “environmental advantages” to the Mount Tabor Variation route or any potential for this route “to either eliminate or greatly minimize effects to the Mount Tabor Sinkhole Plain” compared to the original 2015 Proposed Route. In fact, **there are more environmental disadvantages with the Mount Tabor Variation route and a greater potential to affect the karst ecosystem.**

The Virginia Department of Conservation and Recreation (VDCR) has recommended a Slussers Chapel Avoidance Concept route to avoid this fragile conservation site completely. This route would greatly minimize the negative environmental effects on the surrounding karst terrain when compared to the Mount Tabor Variation route.

More disturbing is that the DEIS report stated:

“Prior to the end of the draft EIS comment period, Mountain Valley should file with the Secretary the results of on-site surveys for the Mount Tabor Route Alternative to assess constructability and identify karst features that should be avoided if the alternative is adopted into the proposed pipeline route.”³

¹ FERC submittal 20161014-5022, (massive data release after initial DEIS)

² FERC submittal 20160331-4008

³ FERC submittal 20160916-4001(316926200), page 3-52, DEIS Report

IND405-1

See the response to comment CO6-1 regarding the Mount Tabor Variation. See the response to comment IND196-2 regarding the filings made just before or after the close of the comment period.

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IND405 – Mode A. Johnson

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The words “prior to the end of the draft EIS comment period” is extremely disturbing. Through the environmental review process:

“NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.”⁴ (under lining is author’s emphasis)

It will be impossible for citizens, public officials and the scientific community to adequately evaluate the information presented at the very end if the draft EIS comment period. This is a blanket confirmation from FERC that they will accept the results from MVP without proper assessment.

Incomplete Surveys along the Mount Tabor Variation

IND405-2

The Mount Tabor Variation route has been selected as the “preferred” route without complete surveys and the opportunity for the public to comment. Many parcels along the Mount Tabor Variation route were not surveyed prior to the release of either the initial DEIS or subsequent data releases.^{1,5,6,7} In fact, there are parcels along this route (VA-MO parcels 3371, 5519 and 5520) that had not been completely surveyed as late as November 13, 2016.

DEIS stated in supplemental data released in October:

“With approximately 85% of the Mount Tabor Variation surveyed for karst features using electrical resistivity and the remaining 15% evaluated through field reviews and desktop analysis, Mountain Valley does not expect any significant risk associated with karst...”¹

A map of the electrical resistivity (E.R.) surveys performed by MVP along the Mount Tabor Variation route is shown in Figure 1.⁸ Through “desk top analysis” the author of this report computes only 68% of the total Mount Tabor Variation route had been surveyed (thick green line) while 32% of the total variation route had not been surveyed (thick orange and thin red lines). This is significantly less than MVP’s claim. In addition, specific areas along the pipeline had been identified for “additional review” (thick yellow lines) which would increase the length of the pipeline route that is requiring surveying to assess karst features. No reason was given for these additional surveys. The author was informed that additional E.R. surveys were

IND405-2

We recommend in section 3 of the EIS, that Mountain Valley adopt Variation 250, which would reduce impacts on karst terrain.

⁴ 40 CFR 1500 Part 1500 - Purpose, Policy, and Mandate(b)

⁵ FERC submittal 20160916-4001, DEIS Report

⁶ FERC submittal 20161020-5176, (massive data release after initial DEIS)

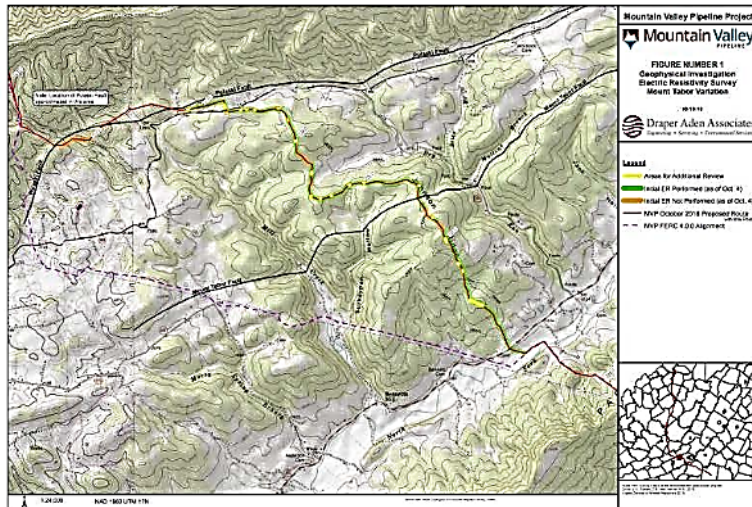
⁷ FERC submittal 20161027-5212, (massive data release after initial DEIS)

⁸ FERC submittal 20161014-5022(31716356), (massive data release after initial DEIS)

IND405-2
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required on his parcels that could have been accomplished on November 17, 2016, the date agreed for additional surveys with Coates Field Service (MVP), but E.R. testing was not done.

Figure 1. Electrical resistivity survey along the Mount Tabor Variation Route⁹



The author also disagrees with the statement “Mountain Valley does not expect any significant risk associated with karst...”. The Mount Tabor Variation pipeline will not only traverse the Slussers Chapel and Old Mill Conservation Sites but construction of the pipeline will run along the eastern boundary edge of both conservation sites. **Construction of the Mount Tabor Variation route will be completely on karst bedrock.**

⁹ FERC submittal 20161014-5022(31716356), (massive data release after Initial DEIS)

DEIS Comparison of 2015 and 2016 Proposed Routes

IND 405-3

DEIS presented a table comparing environmental features along the 2016 Proposed Route (the Mount Tabor Variation) and the corresponding section of the 2015 Proposed Route.¹⁰ Data from this table have been summarized in Table 1.

Table 1. Comparison of the divergent portions of the 2016 Proposed Route (Mount Tabor Variation [MTV]) and the 2015 Proposed Route. Data has been summarized from DEIS Table 3.5.7-1¹⁰ (see Attachments at the end of this report).

Feature	2016 Proposed Route (MTV)	2015 Proposed Route	Comments
Total length	5.8 miles	5.6 miles	MTV is longer
Adjacent to existing Right of Way (ROW)	0 mile	2.5 miles	MTV is not adjacent to any existing ROW
Land disturbed w/ construct ROW	88.4 acres	85.2 acres	MTV is 4% more
Populated areas within 0.5 mi. town limits	0	1	Town of Blacksburg in this area is sparsely populated.
NRHP designated/ eligible historic districts crossed	0 mile	0 mile	No difference
Landowner parcels crossed	22	29	Many landowners own multiple parcels. Therefore this feature is meaningless
Residences within 50 ft of construction workspace	0	0	No difference
Forested land crossed	5.1 miles	2.9 miles	MTV has 76% more
Forested land affected during construction	77.3 acres	44.1 acres	MTV is 75% more
Forested land affected during operation	30.9 acres	17.6 acres	MTV is 75% more
Interior forest crossed	72.3 acres	24.2 acres	MTV is 200% more
Wetlands crossed [1]	0 feet	44 feet	MTV alignment map indicates 79 linear feet wetlands at MP 222.8
Forested wetlands crossed	0 feet	0 feet	No difference
Perennial water bodies crossed [2]	4	0	MTV crosses perennial streams 5 times
Shallow bedrock crossed	2.5 miles	2.2 miles	MTV is 14% more
Steep slope crossed (>20%)	2.4 miles	1.7 miles	MTV is 41% more
Side slope crossed	2.0 miles	1.8 miles	MTV is 11% more
Landslide potential crossed [3]	5.8 miles	5.6 miles	These miles are equal to the length of each route
Karst crossed [4]	0.7 mi.	1.2 mi.	Incorrect

[1], [2], [3], [4] – see discussion below

¹⁰ FERC submittal 20161014-5022(31736357), page 6 of 19, (massive data release after initial DEIS)

IND405-3

The draft EIS did not analyze the entire October 2016 Proposed Route. However, the final EIS does. The commenter used the term “Original 2015 Proposed Route;” which we assume refers to the proposed route filed by Mountain Valley with its application to the FERC on October 23, 2015; that we analyzed in the draft EIS. We assume the commenter intended to reference table 3.5.1-7 from the draft EIS, not table 3.5.7-1; however, many of the parameters from table 3.5.1-7 are different than those presented in table 3.5.7-1.

As stated in section 3 of the EIS, to ensure a consistent environmental comparison and to normalize the comparison factors, we generally used desktop sources of information (e.g., publicly available data, aerial imagery) and assumed the same right-of-way widths and general workspace requirements. We evaluated data collected in the field if surveys were completed for both the proposed route and its corresponding alternative.

INDIVIDUALS

IND405 – Mode A. Johnson

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IND405-3
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Of the 19 “features” compared by MVP in this table, 9 features were essentially unchanged between the original 2015 Proposed Route and the 2016 Proposed Route (MTV). However, by incorporating the Mount Tabor Variation into the route there will be:

- 76% more forested land crossed;
- 200% more interior forest affected during both construction and operation of the pipeline;
- 75% more forested land destroyed;
- 41% and 11% greater construction on steep slope and side slope, respectively;
- no construction along an existing Right-of-Way with the Mount Tabor Variation route compared to 2.5 miles on the 2015 Proposed Route.

The author would also like to point out that “Threatened and Endangered Species” were not evaluated as a feature in this table. VDCR had warned that “land disturbance could affect a state designated significant cave and/or one or more documented occurrences of cave obligate rare, threatened, or endangered species”.¹¹

It is obvious that FERC has not scrutinized the data presented to them by MVP. This review is inadequate and inaccuracies found will be discussed below (bracketed numbers refer to the superscripts in Table 1):

[1] **“Wetlands crossed”**- According to the DEIS table no wetlands will be crossed on the Mount Tabor Variation Route. **This is obviously wrong.** The alignment map for MVP parcel VA-MO #5516 indicates 79 linear feet wetlands crossed at MP 222.8.¹² When the author walked this area, survey tape printed with “wetland” was identified along this stream. It is obvious MVP is not meticulous at looking at their survey data provided them.

IND405-4

[2] **“Perennial water bodies crossed”**- The Mount Tabor Variation route will cross 4 streams according to this table but in actuality the **pipeline construction will traverse streams 5 times.** The main stream feeding directly to Slussers Chapel Cave will be crossed two times by the pipeline.^{13,14} These stream crossings are documented in the DEIS alignment maps¹² and depicted in Figure 2.

IND405-4

See the response to comment IND405-3 regarding discrepancies between survey data and section 3 tables.

¹¹ FERC submittal 20160317-5126, VDCR

¹² FERC submittal 20161014-5022(31736313), (massive data release after initial DEIS)

¹³ FERC submittal 20160425-5183, Majors

¹⁴ FERC submittal 20160929-5012, Ligon

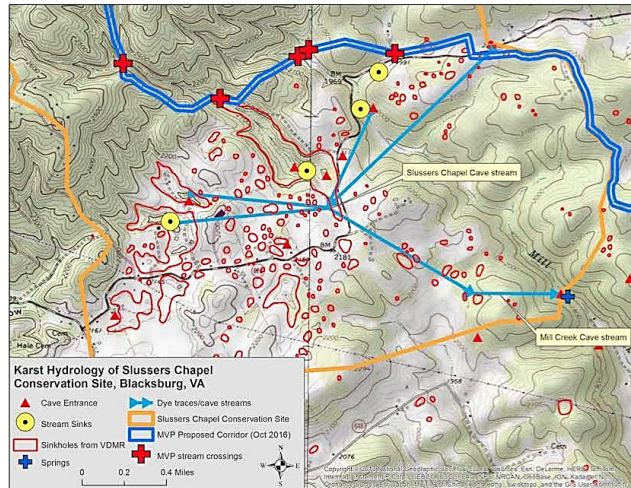
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IND405 – Mode A. Johnson

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IND405-4
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Figure 2. Hydrological details of Slussers Chapel Conservation Site. The red crosses show the locations of stream crossings by the pipeline.¹⁵ Blue lines with arrows refer to findings from dye trace studies.



IND405-5

[3] “**Landslide potential crossed**”- MVP has calculated that landslide potential is 5.8 and 5.6 miles for the Mount Tabor Variation route and 2015 Proposed Routes, respectively. This would indicate there is a **landslide potential for the total length of both routes**. This is not acceptable terrain to construct a 42-inch diameter pipeline.

IND405-5

Landslides are addressed in section 4.1 of the EIS.

IND405-6

[4] “**Karst crossed**”- MVP calculated 0.7 mile of karst will be crossed by the Mount Tabor Variation resulting in “...*approximately 0.5 mile less karst area as mapped by the U.S. Geological Survey...*”¹⁶ compared to the 2015 Proposed Route. MVP did not provide a reference of the U.S. Geological Survey maps utilized nor did they document the mile post where the pipeline crosses karst features. Consequently, **the citizens and scientific community are unable to adequately evaluate the information presented.**

IND405-6

Karst is addressed in section 4.1 of the EIS. See the response to comment IND405-3 regarding desktop sources. Data sources for karst areas crossed by the Mount Tabor Variation were reviewed and updated in the final as appropriate. See the response to comment IND62-1 regarding Dr. Kastning’s report.

¹⁵ Dye-trace studies presently being conducted under a grant from the Cave Conservancy of the Virginias to the New River Land Trust with technical assistance from the Virginia Department of Conservation and Recreation.

¹⁶ FERC submittal 20161014-5022(31736357), page 4, (massive data release after initial DEIS)

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IND405 – Mode A. Johnson

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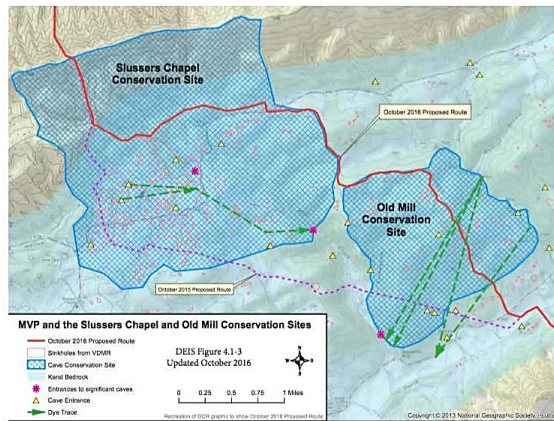
IND405-6
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Evidence presented in previous reports indicates the length of karst crossed by the Mount Tabor Variation route is grossly underestimated in DEIS Table 3.5.7-1. The total length of construction of the Mount Tabor Variation route, 5.8 miles, will involve soluble rock. MVP was asked by FERC "...to avoid high-density karst"¹⁷ **The 2016 Proposed Route incorporating the Mount Tabor Variation route has not accomplished this request.**

The Kastning report mapped karst bedrock along the base of Brush Mountain extending to the east along Mount Tabor Road.¹⁷ **The Mount Tabor Variation route would be constructed on karst bedrock.** This report also states that a greater length of the proposed Mount Tabor Variation route traverses cave conservation areas compared to the original proposed corridor.

The DEIS published a map showing the entire Mount Tabor Variation route well within karst bedrock (Figure 3). Thus **5.8 miles of the pipeline would be constructed on karst bedrock** and not the 0.7 miles indicated in Table 1 (Table 3.5.7-1).

Figure 3. The 2016 Proposed Route including the Mount Tabor Variation (red line) as it traverses Slussers Chapel Conservation Site and Old Mill Conservation Site on karst bedrock (light turquoise shaded area).¹⁸



¹⁷ FERC submittal 20160713-5029, Ernst H. Kastning, An Expert Report on Geologic Hazards in the Karst Regions of Virginia and West Virginia, Figure 1

¹⁸ FERC submittal 20161020-5175, Figure 4.1-3, (massive data release after initial DEIS)

INDIVIDUALS

IND405 – Mode A. Johnson

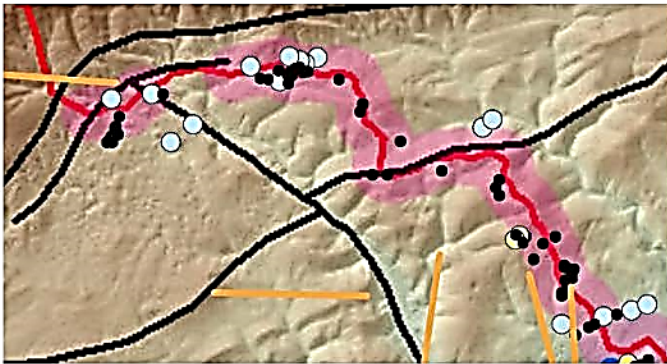
20161213-5120 FERC PDF (Unofficial) 12/13/2016 12:32:02 PM

IND405-6
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Early dye-trace studies¹⁹ have demonstrated the westerly flow of groundwater through the karst system (Figures 2 and 3). Ongoing dye-trace studies¹⁵ have now identified groundwater flow from the eastern edge of Slussers Chapel Conservation Site validating the interconnectivity of the subterranean water conduits within this conservation site (Figure 2). The proposed Mount Tabor Variation route will traverse this underground water flow path. The DEIS needs to acknowledge these “*environmental...disadvantages*” as they stated. **The Mount Tabor Variation route will not “eliminate or minimize effects to the Mount Tabor Sinkhole Plain”.**³

DEIS published a figure depicting karst along the proposed pipeline route (Figure Number 1 in the Attachment at the end of this report).⁸ Figure 4 is a section showing the Mount Tabor Variation route and the karst area along the pipeline (shaded in pink). According to this figure the entire Mount Tabor Variation route is along karst bedrock except for approximately 0.5 mile segment. Once again, **5.8 miles of the Mount Tabor Variation pipeline will be constructed on a karst bedrock** and not 0.7 mile as indicated in Table 1 (Table 3.5.7-1).

Figure 4. Section of the Mount Tabor Variation (red line) showing karst areas (pink) and fault lines (black). (DEIS Figure Number 1 is found in the Attachments at the end of this report)



Evidence presented above indicates that construction of a pipeline along the route would be on karst bedrock. MVP was asked by FERC “...to avoid high-density karst”.² **Contradicting data is presented in the DEIS.** The 2016 Proposed Route incorporating the Mount Tabor Variation route has not accomplished this request and should not be considered as the preferred route.

¹⁹ Fagan, J. and Orndorff, W., Karst Hydrology Investigations in the Cambrian Elbrook and Conocoheague Formations of Pulaski and Montgomery Counties, Virginia, Proceedings from Second Appalachian Karst Symposium 2008. VDCR, Division of Natural Karst Heritage Program, 2008, page 8

Comparison of 2015 and 2016 Proposed Routes by VDCR

IND405-6
cont'd VDCR compared the potential impact of the 2015 and 2016 Proposed Routes on karst-associated biodiversity (Table 2).

Table 2. VDCR Comparison of the potential impact of the Proposed (2015 Proposed Route) and the Proposed with Mount Tabor Variation (2016 Proposed Route).²⁰

Route (alternative)	Sinkholes (dist – mi.)		Cave entrances (dist – mi.)		Natural Heritage Resource Cave Conservation Sites*			Miles in cave consite	Karst consite impact index**
	<1	<.25	<1	<.25	1 mile	.25 mi.	intersect		
Proposed	505	131	87	18	10	7	3	4.93	1.82 FL
Proposed with Mount Tabor Variation	511	139	88	12	9	7	3	5.51	2.01 FL

* includes any cave with documented element occurrences

** sum of ratios of length in conservation sites to biodiversity ranking (B rank) of each site

FL – federally listed species associated with a cave conservation site

This table indicates there will be a greater number of sinkholes within .25 and 1 mile of the Mount Tabor Variation route compared to the 2015 Proposed Route. As Kastning reported, “...the presence of sinkholes of any size in a soluble rock terrain is an indicator of a subsurface hydrologic karst environment.”¹⁷ **By selecting the Mount Tabor Variation route, MVP has not moved the pipeline off karst terrain as FERC requested.**

Although there will be a lesser number of cave entrances within .25 and 1 mile of the Mount Tabor Variation route, it should be noted that this route now precariously positions the pipeline closer to Slussers Chapel Cave. The alignment of the Mount Tabor Valley pipeline is now 3,000 feet uphill/upstream from the cave entrance which is located in a sinkhole valley.²¹ **The integrity of both this fragile, significant cave and the Slussers Chapel conservation site will be threatened.**

The karst consite impact index is a standard of measurement for comparing the potential impact on karst-associated biodiversity. The VDCR analysis in spring 2016 showed that the 2015 Proposed Route, prior to incorporation of the Mount Tabor Variation, had the second highest potential impact to karst biodiversity (1.82 FL) and “a very high potential to impact karst resources when compared with several of the other alternatives...”¹¹ proposed at that time. **The 2016 Proposed Route that incorporates the Mount Tabor Variation route has an even higher karst consite impact index (2.01 FL).** The DEIS recommended MVP to assess the feasibility of the Mount Tabor Variation route to “potentially limit impacts on caves and other karst

²⁰ FERC submittal 20160520-5051, VDCR

²¹ FERC submittal 20161128-5050, Ferrante

IND405-6
cont'd

features”.²² **The Mount Tabor Variation route does not limit the impacts on caves and karst features. If the original 2015 Proposed Route was undesirable due to the impacts on caves and karst features, then the 2016 Proposed Route incorporating the Mount Tabor Variation route is even more undesirable.**

Defining the Mount Tabor Sinkhole Plain

The Mount Tabor sinkhole plain, an area consisting of karst bedrock and subterranean water conduits, cannot be defined by distinct boundaries. MVP clearly underestimated the size and extent of the karst features along Mount Tabor Road. MVP was asked by FERC to “*provide a map delineating the boundaries of the Mount Tabor Sinkhole Plain...*”.² MVP drew both a polygon²³ and a circle²⁴ delineating what they considered to be the boundary for the Mount Tabor sinkhole plain with no geological rationale explanation given. In fact, DEIS has released both of these very different depictions of the sinkhole plain in different figures, both labeled as Figure 3.5.1-8. Consequently, the reader does not know which figure is referred to when Figure 3.5.1-8 is discussed.

Dr. Kastning stated the Mount Tabor sinkhole plain “*...is the broad lowland area of exposed carbonate rock that constitutes the Mt. Tabor Karst Sinkhole Plain. It is located northeast of Blacksburg in a residential area along Mt. Tabor Road*”. He further adds, “*There is every reason to believe that the entire Mt. Tabor Karst Sinkhole Plain is a single, extensive, and well-integrated karst aquifer*”.¹⁷ Dye trace tests performed in October/November 2016 have indicated a positive link between the groundwater flow from the eastern boundary of the Slussers Chapel Conservation Site along Mount Tabor Road near MP 223.4 to Mill Creek, Slussers Chapel Cave and Thundercroft Cave (Figure 2).¹⁵ MVP has even described the Mount Tabor sinkhole plain and the associated cave area as “*...between Brush Mountain and Paris Mountain lies a rolling karst valley that forms the headwaters of the North Fork and the Roanoke River... The area around Mt. Tabor Road is highly karstified with an abundance of sinkholes forming a small sinkhole plain*”.²⁵ **The Mount Tabor Variation route does not avoid the sinkhole plain as described.**

In summary, the Mount Tabor sinkhole plain is not a distinct area with clearly defined boundaries but a fragile ecosystem consisting of karst and subterranean waterways. This vast area extends from Brush Mountain in the north to Paris Mountain in the south and extends well past the eastern boundary of the Slussers Chapel Conservation Site. **The Mount Tabor Variation route will not avoid the Mount Tabor sinkhole plain but will continue to traverse karst terrain.**

²² FERC submittal 20160916-4001, page 4-255, (massive data release after initial DEIS)

²³ FERC submittal 20160916-4001, page 3-53, Figure 3.5.1-8 (massive data release after initial DEIS)

²⁴ FERC submittal 20161014-5022, page 5 of 19, Figure 3.5.1-8, (massive data release after initial DEIS)

²⁵ FERC submittal 20151023-5035, Draft Resource Report 6 – Geological Resources, page 38 of 65

Conclusion

IND405-6
cont'd

MVP has not fulfilled FERC's request to find an alternate route that will avoid high-density karst. In the selection of the Mount Tabor Variation route MVP only redirected the pipeline construction through the same fragile karst ecosystem. If the 2015 Proposed Route is not acceptable due to the detrimental effects on the karst terrain, the Mount Tabor Variation route is no improvement. In fact, **there is evidence that this alternate route will have a more significant negative impact on the fragile karst ecosystem.**

Attachments:

Table 3.5.1-7 from DEIS report released on October 14, 2016

Original table from VDCR submittal to FERC on May 20, 2016

DEIS Figure Number 1

Cc: U.S. Forest Service
Bureau of Land Management
Rep. Morgan Griffith
Senator Tim Kaine
Senator John Warner
Montgomery County Board of Supervisors
Virginia Department of Conservation and Recreation
Cave Conservancy of the Virginias
New River Land Trust
Gov. Terry McAuliffe

INDIVIDUALS

IND406 – Dia Broussard

20161214-5011(31823787)

DIA BROUSSARD, LINDSIDE, WV.
Dianne L. Broussard
6613 Back Valley Road
Lindsay, WV 24951
304-832-6386
mr.travers@frontier.com

December 12, 2016

Thomas L. Tidwell, Chief
U.S. Forest Service
United States Department of Agriculture
1400 Independence Ave., SW
Washington, D.C. 20250-1111

Mr. Joby Timm
Forest Supervisor
George Washington Forest
5162 Valleypointe Parkway
Roanoke, VA 24019

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

Re: DENY Mountain Valley Pipeline Crossing U.S. Forest Service Lands, Docket CP 16-10-000

Dear Chief.Tidwell , Mr. Timm, & Ms. Adams:

“Leave No Trace” were the words delivered by my teacher to my grade school class during our first field trip to a National Park back in the mid 1960’s. We were taught to leave the forest the way we found it, no exceptions. That trip was a most memorable one for me as I discovered there was a whole other world out there in the forest. It was quiet and peaceful except for the shouts of joy and glee by we students as we discovered things we had never known existed: falls and streams, towering rock formations, massive trees too large to hug, huge orange and yellow Poplar blossoms that had fallen to the ground, bluebirds!! I was in love, true bliss.

That introduction to the forest world began a love affair that would perpetuate my entire life. Over the years the parks and forest became my escape during challenges and troubled times; I found a source of healing walking among the giant trees and alongside the birds and wildlife that called the forest home. I also discovered I could combine my love of dogs with my love of the forests; my dog Bandit and I trained with a K9 Search & Rescue team in multiple states to help find hikers lost or injured in wilderness areas. Those would be the best years of my life as my dog and I spent many hundreds of hours in the beauty and wildness of various woodlands and terrains.

IND406-1

The FS is working with Mountain Valley to incorporate mitigation measures, such as reducing the permanent operational right-of-way that is converted to herbaceous cover from 50 feet wide to 10 feet wide for its length on the Jefferson National Forest. Reducing the herbaceous right-of-way width and allowing more of a vegetative transition within the operational corridor (i.e., grasses over the pipeline then shrubs between the grasses and treeline) would help mitigate the effects of the change to the scenic character of the area.

IND406-1

INDIVIDUALS

IND406 – Dia Broussard

IND406-1
cont'd

I grew to respect the forest and its waters as a habitat and lifeline for an abundance of species, as well as its vulnerability, knowing that even the tiniest of changes can have an enormous impact on its health and inhabitants. Often we can not control natural pests that harm our forests and we have limited control over weather related damages or fires during extensive drought. However, as man and stewards of our forests we can control our own footprint and impact on its health and ecological integrity.

“Leave No Trace” applies today as much as it did a half century ago when I took my first steps into a National Forest. The USDA Forest still posts this policy on their website and it should not be waived for any of man's current energy obsessions or any other reason. “Leave No Trace” applies as much or more to grand scale operations by man which leave grand scale impact and permanent scaring, as it does to individuals who only wish to enjoy and heal in the park's environment.

Please respect and protect our National Forest lands: deny MVP and all pipeline projects permission to cross our National Forests.. There will always be outside pressures to permit intrusions, exceptions and the like; but, if you don't stand up for nature, wildlife, the environment who will ? It is NOT natural gas that sustains us but the environment that sustains us: the air, the water, the plants and the bees that pollinate the plants. When pipelines are permitted through park lands, like any other trend, it will spread to other national and state park lands throughout our country. That precedence will then exploit our park lands to other commercial and utility uses. The very limited and temporary benefit a pipeline crossing will provide to some, will drastically and permanently impact our historically protected forest and all its inhabitants, as well as the public that relies on a place to visit that is yet unscathed by man. Leave No Trace. Let me know if I can provide any additional information to help your agency protect our forests.

Thank you for your time and consideration,

Dianne L. Broussard

cc: The President, The White House
Kimberly Bose, FERC
Gina McCarthy, EPA
Randy Huffman, WVDEP

INDIVIDUALS

IND407 – Thomas and Judith Pospichal

20161214-5012(31823792)

Thomas and Judith Pospichal, Blacksburg, VA.
Re: Docket Number CP16-10-000

Dear FERC:

IND407-1 | We are writing to request that the FERC refuse to allow the proposed Mountain Valley Pipeline through West Virginia and Virginia.

We are residents of Blacksburg, VA on Jefferson Forest Lane (VA 818) along the ridge of Brush Mountain in Montgomery County. We have owned our home there since 2004 and we have resided in Virginia enjoying its mountains, fresh waters, Chesapeake Bay and ocean beaches since 1978.

Our opposition to the proposed pipeline is twofold, environmental and economic.

Our environmental concerns are very personal as well as for our community. Our only source of freshwater is our well nearly 200 feet below the ridge of our mountain. Ours and our many neighbors' wells so close to the proposed horizontal pipeline drilling and possible fractures of the highly karst geology are seriously threatened. Those threats will be during not only the pipeline drilling and excavation, but also for the long term due to pipeline accidents that could degrade our water and our mountainside adjacent to the Jefferson National Forest.

IND407-2 | Our economic opposition is based on whether two massive pipelines (Mountain Valley and Atlantic Coast) across the mountains of West Virginia and Virginia are really necessary. Are two new pipelines across our region really needed for some folks to make massive profits selling gas to both domestic and foreign markets?

Please consider our fragile environment, the massive costs to allow others to make huge profits, and the integrity our communities.
Thanks for your concern.

Tom and Judy Pospichal

IND407-1 | Water resources are addressed in section 4.3 of the EIS. Horizontal directional drills (HDDs) are not proposed to be used on the MVP.

IND407-2 | The Commission will provide its opinion on need in its Project Order. See the response to comment IND2-3 regarding export.

INDIVIDUALS

IND408 – Dwayne Milam

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

Dear Secretary Bose:

IND408-1 I am writing to protest the treatment of route selection in the DEIS for the Mountain Valley Pipeline through Summers County, West Virginia. The DEIS does not analyze EQT's "preferred" route for the MVP but simply chooses to support that route without examining the significant impacts to forests, major water resources, the rural communities that depend on these resources, and the major impacts to biodiversity in Summers County, West Virginia.

IND408-1 Alternative routes are discussed in section 3 of the EIS.

It appears that EQT's plan may have been to devise a route that takes advantage not only of prominent ridges along the Appalachians but of the proximity of local small airfields—such as those between Rainelle, WV and Pence Springs, WV— rather than developing a route that would avoid significant environmental damage. And while fly-overs and desktop reviews now are being used by EQT, they are poor substitutes for actual "boots on the ground" surveying. Of course, the Pence Springs airfield could prove to be very beneficial to EQT during construction and for post-construction monitoring, especially since the Applicant is also proposing to construct workspaces/contractor yards nearby and to cross the Greenbrier River at Pence Springs. Please note a local concern: the proximity of the

IND408-2 Greenbrier Academy for Girls (<http://greenbrieracademy.com/>) to the proposed construction yards and the Greenbrier River crossing. Other comments to the Docket have noted the extreme opposition to MVP's proposed crossing of the Greenbrier (including a petition with more than 1650 signatures). It has also been documented that the National Rivers Inventory lists the Greenbrier River as "a free-flowing river with outstandingly remarkable natural and cultural values of national significance." Whatever motivated the proposed route, it is a terrible choice in terms of potential environmental devastation for the forests and watersheds of Summers County.

IND408-2 Mountain Valley now proposes a dry crossing of the Greenbrier River, as evaluated in section 4.3 of the final EIS. See also the response to comment IND119-8.

IND408-3 **MVP Routed through Steepest Terrain in Summers County, West Virginia**
Table 4.1.1-1, p. 4-4 of the DEIS lists Summers County as having the highest elevation to be crossed by the MVP in West Virginia, 2nd along the entire route only to Roanoke County, Virginia (3,733 feet for Summers and 3,741 for Roanoke—a difference of 8'). In dealing with representatives of the MVP, I have found it rather strange that field agents have made great efforts to purchase rights-of-way from property owners prior to a determination of what exactly would be the best route for this proposed pipeline, and prior to a determination from FERC whether or not the MVP will even be approved. It seems that by purchasing these easements, EQT has committed their company financially to a route that may not be the best, safest or the least damaging to the environment. The MVP route (with minor modifications) was chosen before anyone even set foot on the ground...prior to ANY surveying...prior to ANY comments...the route was

IND408-3 Steep slopes and landslides are addressed in section 4.1 of the EIS. See the response to comment LA1-4 regarding existing 42-inch-diameter pipelines in mountainous terrain.

INDIVIDUALS

IND408 – Dwayne Milam

IND408-3
cont'd

decided. FERC should ask themselves HOW is this possible? How can such a massive undertaking be planned and routed before anyone has even examined or studied the issues? How can every concern raised in thousands of comments by the public be "mitigated"? How can FERC disregard reports from recognized scientists and professionals criticizing this project, yet agree with reports provided by EQT that do not provide evidence to support their claims? How can EQT say it is too dangerous to co-locate this pipeline with other established pipeline rights-of-way, yet they want the right to have second or multiple pipelines included in landowner easement contracts? As a suggestion to FERC, you should take heed of the concerns raised by the people along the MVP route...we are the experts of our land and have lived here for generations. We know the MVP is a bad idea and if approved, we will be the ones living with the consequences...there are some things that cannot be "mitigated".

Just look at what is being proposed: EQT has developed a plan for the route to enter the county along the rugged flank of Keeney's Knob (http://www.wvexp.com/index.php/Keeney_Mountain). At an altitude of 3,921 feet at its peak, it is the 10th highest mountain in the state (<http://www.peakbagger.com/list.aspx?lid=13502>) and the "knob is the highest geographic landmark in southern West Virginia south of the Allegheny Mountains in northwestern Greenbrier County." http://www.wvexp.com/index.php/Keeney_Knob_Fire_Tower

As proposed, the MVP would cross up and down slopes steeper than 50% for a total of 3.8 miles in the county (that's about 20% of the route in Summers County)—and all but .4 of those miles would be on Keeney Mountain. MVP acknowledges that any slope over 30% requires additional workspaces and special building techniques—but 20% of their chosen route in Summers County makes this necessary. Since the MVP is planned to cross ridges as much as possible, one must question the wisdom of clearing a 125-foot -wide path of all vegetation, and burying the proposed 42" pipeline about 8 feet in rocky soil where bedrock is shown to range from 0 to 7 inches deep in about 2.3 miles of the route, and between 22 and 31 inches for another 5 miles (<http://indiancreekwatershedassociation.org/about-the-icwa-interactive-environmental-map>). In the DEIS, however, the Appendix shows only 4 miles of the route crossing land where the bedrock is less than 7 feet deep. This appears to be a serious error.

Since Keeney's Knob is the highest point in southern West Virginia south of the Alleghenies (and is an outlier of the Alleghenies), the logical question is:

Why would EQT choose:

- **to cross the most rugged, highest terrain in an area with the greatest potential for soil erosion and slope failure?**

INDIVIDUALS

IND408 – Dwayne Milam

IND408-3
cont'd

- to traverse an area of narrow, twisting one-lane mountain roads that are dangerous in the summer (and very hazardous in the winter)?
- plan almost 100 crossings of streams (some multiple times) before those impacted streams enter the Greenbrier River at Talcott and the New River at Sandstone, WV?

This is a watershed that provides communities between Pence Springs and Hinton, the county seat, with a public water supply (the Big Bend Public Service District in Talcott), and provides hundreds more family homes, farms, and businesses with water from private wells and springs.

A simple program such as Google Earth shows several low-lying (and not heavily populated) areas that border Keeney's mountain range: logically a route with fewer changes in elevation would be safer for the public, and pipeline installation would be less damaging to fields as opposed to the destruction of large tracts of biodiverse forests. FERC should ask EQT how and why they made the decision to choose this route for a 42", high pressure pipeline over such rugged terrain? It cannot be less potentially damaging to the environment to build a pipeline across a mountain...though the spokesman at EQT's open house in Hinton did say that they "like to ride the ridges." **In Summers County, "riding the ridges" with the MVP means destroying core forests of high biodiversity significance and impacting the source water streams for the Greenbrier River and the New River.**

IND408-4

Water Resources and Flooding

With steep elevations, numerous small streams and thousands of acres of forests, Keeney's Mountain range provides a valuable source of water for Summers and Greenbrier Counties and is an irreplaceable resource in terms of biodiversity for the entire region. It is well known that this area of West Virginia is prone to frequent flooding and intense localized flooding as occurred on June 21, 2016 (<http://www.wearewvproud.com/story/32277155/high-water-throws-summers-county-into-chaos>), not to mention the November 5, 1985 hundred year flood, or another hundred year flood that occurred on January 20, 1996 (<http://www.wvencyclopedia.org/articles/33>) or the almost yearly localized flooding.¹

¹ **"The Greenbrier is the longest untamed (unblocked) river left in the Eastern United States. It is heavily used for recreational pursuits.** Its upper reaches flow through the Monongahela National Forest, and it is paralleled for 77 miles (124 km) by the [Greenbrier River Trail](#), a rail trail which runs between the communities of Cass and North Caldwell. It has always been a valuable water route, with the majority of the important cities in the watershed being established riverports. The river gives the receiving waters of the New River an estimated 30% of its water volume. **Over three-fourths of the watershed is an extensive karstic (cavern system), which supports fine trout fishing, cave exploration and recreation.** Many important festivals and public events are held along the river throughout the watershed." The Greenbrier "River is vulnerable to Nonpoint source pollution and sediment from timbering and flooding. It has been on the WV List of Impaired Streams since 2006 for the contamination of fecal coliform bacteria. The West Virginia Department of Environmental Protection and various concerned citizen groups are working to prevent further stresses upon the river.

IND408-4

Groundwater, landslides, and pipeline safety were discussed in section 4.3, section 4.1, and section 4.12 of the EIS, respectively. A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS.

INDIVIDUALS

IND408 – Dwayne Milam

IND408-4
cont'd

Why would any corporation propose to build a 42" diameter pipeline across a free-flowing river such as the Greenbrier that is known to experience regular, severe flooding?

All of the residents in the Keeney's Knob vicinity rely on wells (many less than 100 feet deep) and springs for water, yet the representatives of the MVP have thus far not determined how many wells and springs actually lie in the vicinity of the pipeline. According to Attachment B of the Updated DEIS submitted on 10/21/16, DEIS Table 4.1.1-14 indicates that 15.14 miles of shallow bedrock will be crossed in Summers County out of a total of approximately 17.1 miles. Blasting will be required to some unknown degree for construction of the MVP, yet as previously stated by EQT, if any damages occur, the subcontractor will be responsible...not EQT. Additionally, there is no mention of the timeframe in which any attempts will be made to repair/compensate property owners for damages (or even the procedure to do this)...only a vague promise of providing water if wells are damaged. There is no mention of drilling replacement wells, or in the likely event that a "new" well may be of poor or inadequate quality, if EQT will drill additional wells until a suitable replacement is found. FERC should be aware that finding a good quality well in mountainous terrain is often very difficult. A very large number of comments FERC has received focus on water quality issues, yet, to my knowledge, no comprehensive surveys of wells, springs or testing have been done in Summers County over the two years since this project was proposed. One must question how serious FERC and EQT are regarding this fundamental necessity for human life and agricultural activities. It seems logical that a *Draft Environmental Impact Statement* would include this critical information, yet it remains conspicuously absent.

IND408-5

Biodiversity

Since the Keeney's Knob range has thousands of undeveloped acres, it is home to a variety of wildlife and lies in the path of various bird migratory routes. According to the West Virginia Division of Natural Resources:

"Part of the Atlantic Flyway is located in West Virginia, and year round, various species of birds may be found in the Summers County area. Approximately 88 of the estimated 171 species of birds in West Virginia are considered "Neotropical". These include a variety of warblers, thrushes, swallows, tanagers, flycatchers, sandpipers and grosbeaks. These birds travel to West Virginia in the Spring from tropical areas to nest and raise their young. In the Fall they travel back to warmer climates. Unfortunately, some of these vital bird species have experienced significant decline in recent years...mostly due to the activities of man. Perhaps the greatest threat to these neotropical species is forest fragmentation. West Virginia has/had large sections of forests that provide the necessary habitat for these birds to safely raise their young. Unfortunately, forest fragmentation reduces these areas of mature forest and necessitates these birds to nest on the edge of the once forested edges. Some neotropical species build their nests on the ground, or are smaller bird species, and therefore, are less able to defend their nests from various edge lurking predators such as raccoons, opossums, house cats, crows, blue jays and snakes."
<http://www.wvdnr.gov/publications/PDFFiles/neotropbirds.pdf>

IND408-5

Section 4 of the EIS provides an assessment of water resources and other natural resources such as vegetation, geology, soils, wildlife, and threatened and endangered species. As stated in section 4.4 of the EIS, both Mountain Valley and Equitrans developed Migratory Bird Habitat Conservation Plans to minimize impacts on bird species. In addition, Equitrans has agreed to conduct tree clearing outside of the migratory bird nesting season (i.e., from August 2 to April 14). Mountain Valley would conduct tree clearing in select areas during the migratory bird nesting season (limited to the timeframe of April 15 to April 30). Mountain Valley had indicated it would extend clearing into the first two weeks of the nesting period due to logistical constraints. However, Mountain Valley has agreed to conduct nest searches in these select areas prior to tree-clearing, would protect active nests until the hatchlings have fledged, and would coordinate with the FWS regarding additional mitigation.

INDIVIDUALS

IND408 – Dwayne Milam

IND408-5 cont'd | Yet EQT's plan is for the MVP to virtually cut through the center of perhaps the largest forested area in Summers County, referred to as WV Core 30 Forest Area in Attachment C Updated DEIS Figures, 10/21/16. There is no mention of how the proposed MVP will affect the turkey or ruffed grouse population, the six species of owl or the variety of other species, including many different types of woodpeckers (some protected), ducks and geese (which use various rivers, ponds and streams during migration, or permanently reside in the area), various birds from the heron family, or members of the hawk family (eagles, hawks and kites) and other protected species such as the turkey vulture. There is virtually no mention in the DEIS of the wide variety of birds located in the Keeney's Knob area or how construction and the loss of thousands of acres of habitat will affect their population, or any impacts to the nearby Three Rivers Avian Center (<http://www.tracwv.org/>) which is located in Brooks, WV, also within the Keeney range.

IND408-6 | Another problem area is the plan by EQT—after burning the slash of thousands of acres of forests—to allow the 125-foot cleared area to revert to a shrub/scrub environment, and to keep a 50-foot wide corridor clear for the actual pipeline. According to the West Virginia Division of Natural Resources:

"Invasive plants often get started in areas disturbed by such human activities as road and trail building, timbering, mining, and other tasks that remove native vegetation, disturb the soil, or dramatically change the amount of sunlight or moisture that strikes the land. From such situations, a relatively small number of invasive species have moved into natural areas. These species have reproduced rapidly, forming stands that exclude nearly all other plant species. In the worst cases, they radically altered the ecosystem processes, altered natural areas, and displaced native species. Concerned citizens have long been sounding alarms about the effects of pollution and misuse of land on our native plant and animal communities. Recently, increasing concern has been expressed that non-native plant species are invading and changing natural areas. These aggressive 'weeds' are non-native invasive plants, sometimes referred to as exotic pest plants." <http://www.wvdnr.gov/wildlife/invasivewv.shtml>

This plan by EQT is completely inadequate in the real world and is damaging to both the natural environment and for agricultural activities. If such an approach is allowed to occur, farmers and homeowners will most likely be required to use various herbicides to combat these invasive plants...further damaging the environment. FERC must require EQT to develop a plan to address and re-cultivate plants **and trees** that naturally occur along the entirety of the proposed MVP route.

IND408-7 | **Negative Impacts to Tourism**
In spite of numerous comments to Docket CP16-10 about potential negative impacts of the MVP to tourism in Summers County, the DEIS continues to support EQT's claim that there will be only a single minor negative impact to tourism: tourists may not be able to secure rooms when construction is at peak. As a life-long resident, I join many others in my community who cannot accept this claim by the Applicant. We know this area, and we

IND408-6 | See the response to comment FA15-5 regarding forest impacts. See the response to comment IND343-1 regarding invasive species.

IND408-7 | Tourism is discussed in section 4.9 of the EIS and recreation is discussed in section 4.8 of the EIS. The Blue Stone National Scenic River is 12 miles away from the pipeline; New River Gorge National Scenic River 5 miles; Pipestem State Park 14 miles. Historic Districts are discussed in section 4.10 of the EIS. The Pence Spring Historic District is 0.5-mile away from the pipeline; Alderson Historic District 5.5 miles.

INDIVIDUALS

IND408 – Dwayne Milam

IND408-7
cont'd

know what is involved (for both tourists and residents) in travelling rural roads to gain access to surrounding communities, to our rivers, parks, the special events that sustain tourism, and to shopping and hospital facilities. There is going to be a negative impact to tourism in Summers County and no amount of public relations' claims can change that.

Keeney's Mountain range encompasses much of Summers County from historic Pence Springs (which includes the Pence Springs Hotel Historic District, The Greenbrier Academy for Girls and a unique operational springhouse); Talcott (the origin of the John Henry Legend) and the Graham House which is "one of the oldest and most historic homes in West Virginia" <https://visitwv.com/our-area/summers/>; the nationally listed Hinton Historic District (home of Railroad Days and the Festival of Rivers); Sandstone (Sandstone Falls and part of the New River Gorge National River); as well as Green Sulphur Springs and portions of Greenbrier County, which include Alderson (the largest 4th of July Celebration in West Virginia), historic Blue Sulphur Springs and Dawson. Three major rivers, including the Greenbrier River (National Rivers Inventory) and the New River Gorge National River (the oldest river in North America <https://www.nps.gov/neri/learn/nature/the-new-river-fact-or-fiction.htm>) border Keeney's Knob—while the Bluestone National Scenic River and Pipestem State Park (<https://www.nps.gov/blue/index.htm>) are also located in Summers County.

Travel to this area is facilitated by I-64 (a major East to West traffic route) , which is roughly Northwest of Keeney's Knob (near Dawson, Lick Creek, Green Sulphur Springs and the town of Sandstone); State Route 12 is generally to the East of Keeney's Knob and passes through Asbury, Alderson, Pence Springs, Lowell and Talcott. State Route 3 is to the West of Keeney's Knob and passes through Hinton, Brooks and Sandstone. These are the major roads that border the Keeney's range and facilitate travel for the many residents and tourists that come to this area to participate in various festivals. These include the Fourth of July celebration in Alderson, the large weekly Pence Springs Flea Market (<http://www.pencespringsfleamarket.com/history.htm>) and popular Catfish Hole (<https://www.facebook.com/Catfish-Hole-213962035373000/>) fishing area, the State Fair of West Virginia (<http://statefairwv.com/>), the Greenbrier Classic golf tournament (<http://www.greenbrierclassic.com/>), the New Orleans Saints training camp (http://www.neworleanssaints.com/team/tc_greenbrier.html), the Taste of our Towns (<https://www.facebook.com/TasteOfOurTowns/>), Lewisburg Chocolate Festival (<https://www.facebook.com/LewisburgChocolateFestival/>), John Henry Days (<http://johnhenryhistoricalpark.com/john-henry-days.html>), Hinton's Railroad Days (<http://www.hintonwva.com/railroaddays.html>) and Festival of Rivers (<http://www.hintonwva.com/festivalofrivers.html>). Other popular tourist destinations include Bluestone State Park (<http://www.bluestonesp.com/>), Pipestem State Park (<http://www.pipestemresort.com/>), Sandstone Falls (<https://www.nps.gov/neri/planyourvisit/the-sandstone-falls.htm>), Sandstone Visitors Center (<https://www.nps.gov/neri/planyourvisit/the-sandstone-falls.htm>), Bluestone State

INDIVIDUALS

IND408 – Dwayne Milam

IND408-7
cont'd

Park (<http://www.bluestonesp.com/>). Of course these various events do not include the numerous opportunities to fish, hunt, camp, hike, kayak, whitewater, birdwatch, shop, dine or simply go on a road trip and enjoy the scenery. Tourism is a MAJOR industry in Summers (<https://www.summerscountywv.gov/>) and Greenbrier Counties (<http://greenbrierwv.com/about-cvb/importance-of-tourism>) and has contributed 702 million dollars to the New River/Greenbrier Valley in 2012. (http://www.wvcommerce.org/App_Media/assets/doc/travelandrec/industry/marketing/2012_Economic_Impact.pdf)

IND408-8

Visual Impacts

As has been discussed earlier, Keeney's mountain range covers a large part of Summers County and portions of Greenbrier County. The Keeney range lies above major traffic routes—though with the exception of I-64 bordering the northern-most part of Summers County, these are two-lane State routes. Keeney Knob is a striking landmark visible from adjoining counties. There are numerous tourist activities in the area, some of which have been documented in this submittal. Considering these factors, why have only a few modeling studies been conducted regarding the visual impact of the MVP? Why have angles that depict the crossing of the Greenbrier River by the MVP been photographed and modeled in such a way that they are deceptively complimentary to this project? The same is true of the simulations of the compressor station near Dawson, WV. The compressor station in Dawson does not blend in with the agricultural landscape of the area. Some compressor stations are designed to look like barns, why is this compressor station designed in such a way as to maximize visual impact? Why is it set upon a hill easily visible from I-64? Why have modeling studies not been conducted from different locations showing the visual impact of a 125-foot wide construction corridor across the highest peak in Southern West Virginia south of the Alleghenies? These questions should have already been answered prior to the release of the DEIS.

To summarize, Keeney's Knob is the highest point in southern West Virginia south of the Alleghenies— and traversing the Keeney mountain range is what EQT is proposing for the MVP. **The important question is: why would the DEIS support EQT's decision to select as its preferred route one that would destroy a vast swath of core forests of significant biodiversity; would traverse the most rugged, highest terrain in an area with the greatest potential for soil erosion (20% of the route with slopes steeper than 50%); and would impact critical watersheds that re-charge residential wells and springs for a large segment of the county, as well as impact the source water streams of these sub-watersheds, and ultimately the Greenbrier and New Rivers?** The DEIS provides no meaningful analysis of these significant issues for consideration by the public and cooperating agencies. **And is it not problematic that similar lapses are likely to occur for every county traversed by the MVP?** The DEIS should be revised and a new Comment timeline issued to accommodate the submission of significant data thus far omitted.

7

IND408-8

Visual impacts are addressed in section 4.8 of the EIS.

INDIVIDUALS

IND408 – Dwayne Milam

Sincerely,
Dwayne Milam, Summers County, West Virginia
Intervenor

INDIVIDUALS

IND409 – Tina Smusz (on behalf of Mark A. Hileman)

December 13, 2016

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

RE: Docket #CP16-10-000 (Mountain Valley Pipeline) – Comments on the Draft Environmental Impact Statement for the Proposed Mountain Valley Pipeline

Dear Ms. Bose,

IND409-1 | I am writing to express valid concerns with the September 2016 Draft Environmental Impact Statement (DEIS) concerning the proposed Mountain Valley Pipeline. The DEIS is extremely deficient in providing constructive analysis in many of the areas addressed. This letter addresses two major deficiencies. First, the DEIS inadequately addresses the issue of crossing karst terrain. While it provides some basic actions during construction to prevent surface water runoff and hazardous material spills, it lacks critical attention to long term consequences of both building and maintaining the integrity of this pipeline through the proposed routing in Virginia. Secondly, the DEIS brutally minimizes the substantial visual, environmental, and economic impacts of the proposed pipeline on the Appalachian National Scenic Trail and its surrounding communities.

Please note that I am not one of the many hundreds of individuals concerned about the proposed route of this 42" natural gas pipeline coming across my land. It does not. But the current proposed route of this pipeline does present significant, unacceptable harm to me and thousands of residents in our area of Virginia. The construction of the pipeline could easily contaminate private rural wells and municipal drinking water sources, especially with the proposed routes in Virginia planned to go through major areas of unstable, porous karst terrain in Montgomery, Giles, Craig, and Roanoke counties. Blasting in this type of terrain can impact the groundwater flow supplying wells of households many miles away from the blast zone. Our family previously witnessed the impact to a major spring on our property that was damaged by minor blasting from a home site almost a half mile away from our property. The spring ran muddy for many weeks after the blasting, and the water flow has been permanently and significantly reduced from this action.

In addition to potential damage to existing wells from construction (including contamination from spilled diesel fuel entering the karst channels), any leak from the functioning pipeline could have serious negative consequences to groundwater. The pipeline will travel through a designated seismic zone and over terrain that is considered extremely unstable. These karst aquifers could be easily contaminated by heavy metals and benzene traveling with the natural gas. The threat to household water continues into perpetuity after pipeline decommissioning due to deposits of radioactive sludge and heavy metals along the bottom of the pipes. Decommissioned pipes are more fragile and prone to fracturing from external forces. They, too, could poison the drinking water

IND409-1

The draft EIS was not deficient. Karst is addressed in section 4.1 of the EIS. Visual impacts on the ANST are discussed in section 4.8. See the response to IND62-1 regarding Dr. Kastning's report. Groundwater and drinking water impacts are discussed in section 4.3 of the EIS.

INDIVIDUALS

IND409 – Tina Smusz (on behalf of Mark A. Hileman)

IND409-1
cont'd

of thousands of individuals many miles away from the contamination site. So far no entity assumes the responsibility for safely decommissioning the pipeline when its utility has ended (considered estimates put that at 10-20 years based on declining supplies of cheaply extracted gas coupled with dwindling profit margins for investors). Tracer dye studies conducted in the early 1990's by graduate students at Virginia Tech showed that dye placed in a deep well in Giles County found its way into the Roanoke City water supply within 24 hrs -- a distance of at least 30 miles.

A July 3, 2016 report titled *An Expert Report on the Karst Regions of Virginia and West Virginia* by Ernst H. Kastning, Ph. D, P.G. concluded that the karst in this region constitutes a serious incompatibility with the proposed pipeline. Dr. Kastning, an expert in the field of geology, hydrogeology, and karst terrain stated the "effect of these threats on the emplacement and maintenance of the line, as well as the potential hazards of the line on the natural environment, renders this region as a 'no-build' zone for the project." Simply put, the karst region in this area of Virginia is not compatible with safely building nor maintaining this pipeline.

The DEIS states that MVP would conduct two pre-construction water quality evaluations on water wells within 150 feet of the project (500 feet in karst terrain) to use to compare to post-construction water quality/yield samples should a owner lodge a complaint after construction. To me this represents a complete misunderstanding of groundwater flow issues in karst terrain. What remedy will there be for private citizens who live 600', 1000' or even miles away who experience disturbances in drinking water flow or quality? Private well owners outside the inappropriately diminutive zone area will have to fight to prove that the damages to their wells were a direct consequence of building the pipeline, all the while living without potable water. Any pre-construction water analysis and post-construction water assessments should be open to all well owners served by the aquifer being breached (as defined by outside, impartial hydrologic experts) regardless of the overland distance between their wells and the pipeline construction route. This is necessitated by the crossing of major ground water aquifers by the proposed route. Limiting evaluation and remediation of ground water well quality and flow issues to a 500' radius shows a profound lack of understanding of underlying karst formations and the possible consequences of placing this pipeline in designated seismic zone areas.

IND409-2

My second major concern with the DEIS is the extremely deficient and inaccurate analysis of impacts to the Appalachian National Scenic Trail (ANST). The current proposed pipeline route creates serious and unacceptable damage to the ANST and its surrounding landscapes and communities. The location of the proposed crossing is a scenic and unbroken forested landscape that is adjacent to the federally designated Peters Mountain Wilderness area. I have hiked along this section of the ANST many times and know the significant damage to the view shed that this pipeline scar will cause. The proposed route will significantly degrade the views visible from many sections of the trail (the ATC has assessed up to 100 miles of trail) including important viewing areas from Angels Rest, Kelly Knob, McAfee Knob, and Rice Fields - to name a few.

The United States Forest Service made repeated comments on Resource Reports and FERC documents that MVP needed to perform visual impact assessments regarding

IND409-2

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

INDIVIDUALS

IND409 – Tina Smusz (on behalf of Mark A. Hileman)

IND409-2
cont'd

the ANST for all route alternatives. An August 8, 2016 correspondence from the ATC to FERC noted the proposed MVP pipeline route would be visible to users from multiple locations along the ANST. The ATC recommended that visual simulations be conducted to evaluate the impacts. In conducting a basic visual analysis in October of 2015, the United States Forest Service found that the proposed ANST crossing would result in a significant visual impact for hikers on the trail. This visual impact assessment is missing from the DEIS and apparently was never completed by MVP. The negative visual impacts of the proposed pipeline route to the scenic view shed from the ANST would be extensive and unacceptable. An alternative crossing of the ANST at SR 635 (Big Stony Creek Road) discussed in the DEIS does very little to reduce the view shed disfigurement, and creates its own set of problems. This alternative connects with the original route which experiences significant view shed impairment from multiple Key Observation Points (KOP) along the ANST.

As a member of the Appalachian Trail Conservancy (ATC), I am well aware that the ATC has a history of working cooperatively with various industries to ensure that the energy needs of the public are met while simultaneously preserving the beauty of the Appalachian Mountains and the unique hiking experience provided by the Appalachian National Scenic Trail. I know that the ATC and the Roanoke Appalachian Trail Club provided input to the MVP on adjustments to the proposed project route which would avoid significant negative impact to the trail, including following existing infrastructure corridors already cut into the landscape. A May 4, 2016 correspondence from the ATC to FERC objected to the planned crossing for the ANST. The ATC preferred that the crossing location be moved to a location where the ANST is already being crossed; that it be moved further away from the Peters Mountain Wilderness area; and that it be moved further away from Angels Rest to reduce the significant impacts to trail users. But MVP has treated this input as unimportant and has proceeded with a route that was unacceptable from the start in regards to the impact on the ANST. The ATC states that the proposed MVP pipeline route threatens the ANST on an "unprecedented scale." I have been a member of the Appalachian Trail Conservancy for many years and this is the first time I have witnessed the organization strongly opposing a pipeline construction project!

The DEIS also failed to address the economic impact to local businesses. The current project route will potentially lead to millions of dollars in lost revenue for communities in Virginia that rely on outdoor recreation-based tourists and Appalachian Trail hikers, who seek sections of the Trail unmarred by the impacts of energy infrastructure and other signs of construction. The value of the recreational experience for tourists who come to enjoy the beauty in this area will be spoiled, and will reduce the number of tourists and potential income for local communities who depend on them.

In conclusion, the current DEIS needs to be withdrawn and MVP needs to address the significant deficiencies in this document. A more appropriate and accurate DEIS should be published to address the long term consequences of building and maintaining this pipeline through the significant karst areas and unstable terrain being crossed by the proposed route in Virginia. And the substantial visual, environmental, and economic impacts of the proposed pipeline on the Appalachian National Scenic Trail and its surrounding communities needs to be accurately assessed, including conducting the required visual impact analysis. MVP has ignored the legitimate concerns and input of

INDIVIDUALS

IND409 – Tina Smusz (on behalf of Mark A. Hileman)

IND409-2
cont'd

expert geologists, respected agencies such as the Appalachian Trail Conservancy (ATC), the United States Forest Service, and knowledgeable local residents and business owners. This is clearly reflected in FERC's submission of the extremely deficient September 2016 Draft Environmental Impact Statement. Upon completion of a new, more responsible DEIS addressing all deficient areas, the public must be granted the legally required 90 day comment period to review and respond to the document.

Sincerely,

Mark A. Hileman

Catawba, Virginia

cc: Jennifer P. Adams, George Washington and Jefferson National Forest Service
Bureau of Land Management
Core of Engineers

INDIVIDUALS

IND410 – Pamela L. Ferrante

To: Secretary Kimberly D. Bose, Chairman Norman C. Bay, FERC Commissioners,
Paul Friedman and Nicholas Tackett

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

Re: CP16-10-000 Mountain Valley Pipeline Project - Bureau of Land Management (BLM)
Permitting Timetable and Public Meetings

IND410-1

I agree with the Bureau of Land Management (BLM) regarding the permitting timetable schedule and need for public outreach meetings related to the Mountain Valley Pipeline (MVP) project CP16-10-000.¹

I was pleased to see BLM employees attending FERC's "public outreach meetings" and I am also pleased to know BLM will review the comments provided at these meetings. However I would not use the term "public outreach" to describe the meeting I attended in Roanoke. We did not have the opportunity to voice our opinions or to share our information with other concerned citizens at this meeting. In fact, one attendee at the Roanoke meeting has described this session and another previous public session as "hostile"² due to the attitude of a FERC representative. BLM should hold public meetings to hear valuable, uncensored and thoughtful concerns of the citizens along the proposed pipeline route. I know there is sufficient public interest to have these meetings.

The BLM and other federal agencies need adequate time to review a massive project such as the construction of the MVP pipeline. The permitting timetable should be adjusted to allow BLM and these agencies the needed time for proper review of all necessary activities.

Outreach public hearings should be held to receive valuable input from the citizens affected. An adequate timetable for permitting reviews by the BLM and other federal agencies is necessary for a project of this magnitude and the impact on the environment.

Cc: Vicki Craft, Project Manager, BLM
Jennifer Adams, JNF

¹ FERC submittal 20161207-0057

² FERC submittal 20161212-5039

IND410-1

Comment noted.

INDIVIDUALS

IND411 – Guy W. Buford

20161215-5068(31826032)

Guy W Buford, Rocky Mount, VA.
OUR ONLY EARTH (#4)

Let us give thanks.

IND411-1

Imagine! It can be hard to at this time in the United States. Basic love for the land, or any humble sense of gratitude and responsibility for the continent, have dropped out of the bottom of our political values list.

Personal, short-term self-interest, by contrast, has been elevated to a national virtue – even the very purpose of a human life in this universe.

With this unsatisfying role – paranoid carbuncles sucking the life out of the planet, rather than free and far-seeking caretakers – its no wonder that grumpy insatiability eats at us, keeping our joy at bay and our squabbling chronic.

In such a context, expressions of reverence for creation may seem foreign. They can feel as barbaric and untranslatable as native ways did to the first European visitors, accustomed to their London streets and a joyous God confined to stone cathedrals.

But such incomprehension doesn't deaden or negate these living values. They are still calling in fact, from the stones and mountains and stars of these December twilights to be heard by the living – while we still have ears to hear and a land to love.

DO NOT APPROVE THE MOUNTAIN VALLEY PIPELINE

Excerpts from Field Notes by Liza Field 11/19/16

IND411-1

This does not appear to be a comment about the draft EIS issued by the FERC in September 2016 for the MVP.

INDIVIDUALS

IND412 – David Seriff

12/14/2016

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

IND412-1

I am one of the thousands of Virginia citizens unequivocally opposed to the Mountain Valley Pipeline. Solid scientific and economic arguments prove that there is no legitimate justification to gouge this horrendous scar across our land. However I would like to share an even more important reason not to build it: This project is fundamentally immoral. It undermines the very foundation of our humanity. Allow me to explain.

FERC and MVP are organizations made up of individuals. Each has a place to live, family ties, and is a member of various communities: work, home, social, religious, etc. But most importantly each is a member of the human community. Whether we choose to recognize it or not in our technologically dominated society, each human has an intimate relationship with the earth— and therefore a responsibility to it. Some people choose to ignore this reality: water comes from a faucet, light from a switch, food from the grocery store etc. but others feel a strong visceral sense of connection to the land, water, and air that sustains us all. Many of us stake our fundamental values upon the land which we call home, the food that we buy (locally whenever possible - or homegrown) and our water sources that sustain our very existence.

I must pose this question: Do FERC, MVP or other pipeline supporters recognize their own personal moral compass in this regard? This is as important to consider (if not more so) than any other argument about the pipeline!

Please reflect on this for a moment: Do you know a special tree? Or do you tend to and care for a yard? Do you love a particular park, creek or stream? Are any of these living things so familiar to you that you feel a deep personal connection to them? Would you be saddened to see the tree cut down, or the yard covered in concrete, the park bulldozed or the creek poisoned? Please stop reading for a second or two. Take a deep breath. Consider for a moment: As a human being, what is your own personal sense of connection to this good earth?

Anthropologists have proven again and again the importance of a relationship to the earth for humans. Even people landlocked by concrete in a city benefit psychologically from a bit of greenery, a single tree, a tiny park or waterway. This connection runs primal and deep in the human soul. Can you feel this about where you live, travel and work? Do you appreciate some sense of place? (Beyond your local Wal Mart, Kroger or McDonalds of course.) Do you appreciate and relate to the land, trees, streams and hills in your area? Can you recognize a fundamental spiritual connection to the earth? Can you honestly deny this reality if you search your soul? If we deny this truth are we not just soulless parasites sucking on the fruits of the land without regard to its health — or ultimately our own well being?

There are many undeniable reasons this pipeline should not be built. They are well documented in other submissions to FERC that I have read. Here are just a few key points:

- Energy supply - there is already an oversupply of oil, coal and gas in the US (hence low prices) and an abundance of existing pipelines to distribute gas. No American citizens or businesses are going cold or suffering for a lack of energy resources in the US. This pipeline is totally unnecessary for any critical contribution to the US energy supply.

IND412-1

The Commission would decide if there is a legitimate justification for the projects.

INDIVIDUALS

IND412 – David Seriff

IND412-2	<ul style="list-style-type: none">• Methane - while gas burns cleaner than coal, methane leaks that occur in the fracking process and transportation of gas makes it equally bad —if not worse— for our environment. We are in a climate crisis and this project would cause even more harm.
IND412-3	<ul style="list-style-type: none">• Eminent Domain - it is unconstitutional to use this power for private gain and this project clearly does not benefit locals. It destroys private property and public property. It enriches MVP at the expense of private
IND412-4	<ul style="list-style-type: none">• Engineering Nightmare - building a 42" high pressure gas pipeline across the steep and rugged Appalachian mountains and severe karst terrain has never been attempted and cannot be accomplished safely.
IND412-5	<ul style="list-style-type: none">• Corporate Social Responsibility - leading corporations across the country recognize the need to improve energy efficiency and switch to renewables for the health and well being of our planet. The best and the brightest companies are investing heavily in alternative energy to maximize their profits as well as support the long-term needs of our country and the environment. The demand for fossil fuels will quickly decline in the coming years and there is no reason to add pipeline infrastructure and deny the inevitable.
IND412-6	<p>The Mountain Valley Pipeline is part of a short term “gold rush” for quick financial returns. It is plain to see that the gas will either be shipped overseas for higher profits or offset other gas supplies so <i>they</i> can be shipped elsewhere. This in no way benefits the Virginias. This project is not a highway, or railroad, or long term infrastructure project that the public will use for hundreds of years. No, with less than 20 years projected lifespan of Marcellus shale gas, how can anyone morally rationalize the destruction of 100-year-old trees, historical family farms and our beautiful priceless landscapes? It is unconscionable to override the rights of hundreds of landowners for the short-term benefit of a few.</p>
IND412-7	<p>The Blue Ridge Mountains are a place of rugged beauty that has an intrinsic value beyond how it can be used by humans. The US government has recognized the importance of certain precious tracts of land since 1872 when they created the first national park. The Appalachian Trail and Blue Ridge Parkway are icons of this process. In 2004 the government protected the Brush Mountain Wilderness and Inventoried Roadless Area in order to preserve this special place for the health and enjoyment of people and wildlife alike. These places are for people to get away from civilization to refresh and feed their souls in the natural world. These areas were intentionally protected to avoid exactly the type of destruction MVP intends!</p> <p><i>“Everybody needs beauty as well as bread, places to play in and pray in, where nature may heal and give strength to body and soul alike.” - John Muir</i></p> <p>FERC and MVP leaders: Are you brave enough to come out of your ivory towers to see this land firsthand and face the people whose lives you are willing to undermine with this project? I invite you to stay at my home on the top of beautiful Brush Mountain in Montgomery County Virginia at the edge of the Jefferson National Forest. Wake up in the early hours and walk the pipeline path with me in the cool misty mountain dawn. Come see the majestic oaks and sturdy old maple trees you'll flatten. Watch the abundant wildlife whose homes you will destroy. Drink the pristine mountain water from my well before your dynamiting of our rocky ridges pollutes and destroys our fragile aquifer. Let's hike the blast zone together. See firsthand where, when the pipeline eventually shifts on the steep mountain incline or sinks into the karst landscape then fractures and explodes, it not only annihilates everything in the blast zone but starts a wildfire that burns down dozens of homes across the mountainside. I can introduce you to numerous</p>

IND412-2 See also the response to comment IND2-3 regarding hydraulic fracturing.

IND412-3 See the response to comment IND1-3 regarding eminent domain.

IND412-4 See the response to comment LA1-4 regarding existing 42-inch natural gas pipelines in mountainous terrain.

IND412-5 See the response to comment IND40-1 regarding renewable energy.

IND412-6 See the response to comment IND2-3 regarding export. See the response to comment CO2-1 regarding benefits.

IND412-7 FERC staff visited the project area and held public meetings; read section 1.4 of the EIS. Visual impacts and the Brush Mountain Inventoried Roadless Area are discussed in section 4.8.

INDIVIDUALS

IND412 – David Seriff

IND412-7
cont'd

neighbors who are emotionally sick about your ill-conceived pipeline plans, and who fear for the future of their families.

*"I would feel more optimistic about a bright future for man if he spent less time proving that he can outwit Nature and more time tasting her sweetness and respecting her seniority."
- E.B. White*

Tell us the truth FERC and MVP: Are you so out of touch with the potential damage your project will cause that only your minions will come out and do your dirty work? Are you so blinded by greed that you can see only the potential economic gain for the already wealthy energy companies and not the destruction you will cast upon common folk? Are you guided by any personal moral compass on this issue — or this "just business?"

Which brings me to ask: Are you truly conscious enough to recognize power you have to help heal our Mother Earth — or to cause further harm? Ultimately you decide, but please remember that there is a high price to pay by your progeny and ultimately by the entire world for selfish shortsighted decisions. Take a breath and feel into this reality. Wake up to your humanity. This issue is bigger than you or your job. Please recognize your moral responsibility to our world!

"The nation behaves well if it treats the natural resources as assets which it must turn over to the next generation increased, and not impaired, in value." - Theodore Roosevelt

The MVP would be a giant step backwards in the race to provide sustainable energy for America. Due to rapid technological innovation in efficiency and renewable energy, within as little as 10 years the Mountain Valley Pipeline project will be seen as a financial debacle. It will go down in history as a huge injustice perpetrated on citizens and our planet. If you allow this unnecessary monstrosity to be built you are undermining essential moral and ethical standards of human life by perpetuating ongoing harm both from the immediate property destruction as well as the ongoing damage from burning fossil fuels.

Come sit with me on the mountaintop. Get quiet. Truly feel this place which is so vibrant with life. Then open your mind and heart to truly understand the irreconcilable damage the MVP would cause. Do not put yourself in a position where you look back with sorrow and remorse about your choices in this matter. Please, I beg you, for the good your conscience and our planet: Stop the insane destruction of the Mountain Valley Pipeline before it begins.

"In wildness is the preservation of the world." - Henry David Thoreau

David Seriff
5068 Preston Forest Dr.
Blacksburg, VA 24060
540-552-7310

INDIVIDUALS

IND413 – Stephen and Anne Bernard

Sept 9, 2016

This portion of this comment
has already been responded
to (see IND8)

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

ORIGINAL

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SECRETARY OF THE

2016 DEC 13 A 11:34

REC'D

To: Ms Bose, Mr Bay and Members of the Commission

From: Stephen and Anne Bernard, Landowners and Intervenors

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

We want to alert FERC to a recent finding on our property of a significant and sensitive archaeological site. MVP, through Coates Field Services, entered our property with their contractor, Tetra Tech, on August 29th and conducted a continuous 10 day Phase 2 archaeological survey ending September 7th. This site had previously been identified as important by a survey in 1986 as recorded with the VA Dept of Historic Resources, #44FR0191. This site is exactly in the path of the proposed pipeline through our property, and we feel this information will have a significant negative impact on this route. We strongly believe that before any EIS statement is released, the information gathered on this important site should be analyzed and taken into careful account, and the pipeline should be at least rerouted away from this property. In addition, there is another documented site directly west of this one that has not been surveyed (#44FR0190) by Coates for MVP.

The head of the surveying team related that this site significantly shows the overlap and transition between the Archaic (Hunter gatherers) to the Woodland (Agricultural society beginnings) periods of our history.

MVP is rushing through the analyzing process, denying the public the opportunity to make a judgement on this project. Again, we do not believe that the EIS Statement should be released minus this information, which will not be thoroughly analyzed before this statement is made. FERC needs to have this information now, before this statement can be accurately made available.

Our property is identifiable as:

TAX MAP 0370001902, and 037001901, Franklin County, VA . Tract

INDIVIDUALS

IND413 – Stephen and Anne Bernard

This portion of this comment
has already been responded
to (see IND8)

N. VA- FR-046.01, BVA-FR-13.

Enclosed is an aerial view of the property with aforementioned
archaeologically significant sites, and the proposed MVP construction site
of the same property.

Sincerely,

Stephen and Anne Bernard

INDIVIDUALS

IND413 – Stephen and Anne Bernard

Pipeline letter draft
2016

August 24th,

IND413-1

We have lived in our home for 35 years and have enjoyed the beauty of our view and land, and built a life here as artists. My husband Steve worked in the construction trade and built our studio over a period of 7 years, and finished it 19 years ago. We are both on social security with no retirement pensions as we chose to be fine artists, so we have lived frugally in order to follow our artistic ambitions.

Anne has been teaching a series of weekly art classes here for 32 years. This is our main source of any predictable income of any kind for us both, as Steve's COPD rendered him unable to work a job 10 years ago. Art sales are unpredictable at best in today's economy.

Anne's classes include 12-15 students that come year round. We also have clients that come to view art for sale, both in the studio, and in our home. Art groups such as the *Bald Knob Artists* have met here for lectures on various painting techniques, etc. This is not only our home but our business address.

Both Anne and Steve have been members of the Market Gallery, an artist run Co-op gallery in Roanoke Va. for 7 years. Anne was Artist in Residence at the Virginia Museum of Fine Art in Richmond in 1984 and 1985, teaching at museum affiliates across the state. Steve is a well respected member of the artistic community and has received the coveted Virginia Museum of Fine Arts Fellowship in the drawing Category in 2014.

Directly across the road from our driveway our church is located, The Boones Mill Christian Church. In addition to weekly services, various groups meet there including The Red Cross Bloodmobile, The Frontier Girls, and the Boones Mill Garden Club.

IND413-1

The commentor's parcel is addressed in section 3.5 of the EIS.

INDIVIDUALS

IND413 – Stephen and Anne Bernard

IND413-1
cont'd

We believe that this information meets the criteria for designation as a "High Consequence Area" and that it will require Special mitigation to ensure public safety.

This pipeline endangers not only our health and safety but our living as artists as well. We can not be expected to work in the unsafe conditions that this pipeline will ensure.

Respectfully, Anne and Steve Bernard

Bernard Fine Arts Studio

www.annewaybernard.com

www.marketgalleryroanoke.com

INDIVIDUALS

IND414 – Mode A. Johnson

December 15, 2016

To: Secretary Kimberly D. Bose, Chairman Norman C. Bay, FERC Commissioners, Paul Friedman and Nicholas Tackett

From: Mode Johnson, Registered Intervenor and Affected Landowner

Re: CP16-10-000 Mountain Valley Pipeline Project

Subj: Bureau of Land Management Re: Permitting Timetable and Public Meetings

IND414-1

I am in agreement with the Bureau of Land Management (BLM) comments in their letter to FERC on November 16, 2016 regarding the permitting timetable schedule and need for public outreach meetings related to the Mountain Valley Pipeline (MVP) project CP16-10-000.

Adequate time to review this large project by the BLM and other federal agencies will improve the timeliness, predictability, and transparency of the Federal permitting and environmental review process. Major infrastructure projects such as the MVP pipeline project require substantial time and effort by many BLM sections and other federal agencies to review. The permitting timetable should be adjusted to allow BLM and other agencies the needed time for proper review of all necessary activities.

The BLM should exercise its authority to hold the needed public outreach meetings due to the effect this \$3.5 billion project will have on numerous counties in Virginia and West Virginia, slicing through the heart of Appalachia. Many of the residents affected do not have computers, are not computer literate or do not have easy access to the Internet. The cultural diversity of the residents affected is a major reason public outreach meetings in various localities should occur and are necessary. The MVP project will effect many residents by going near towns, villages, and homes in many of these areas. Construction of this 42-inch, high pressure, natural gas pipeline will cut a swath 125-feet wide to bury the pipe 10-feet below grade as it goes through farms and forests, over mountains and across the Appalachian National Scenic Trail and the Blue Ride Parkway, not to mention the crossing of rivers and streams.

An adequate timetable for permitting reviews is necessary for a project of this magnitude and the resulting impact on people and the environment. Outreach public hearings are essential to inform and receive input from the citizens affected.

Cc: Vicki Craft, Project Manager, BLM
Jennifer Adams, JNF
Anita Bradburn, ACOE

IND414-1

Comment noted.

INDIVIDUALS

IND415 – David Arthur

20161214-5114(31824809)

David, Rocky Mount, VA.

IND415-1

I am a landowner stuck in the path of the destructive meteor named the Mountain Valley Pipeline. Just a humble family man raising his kids and loving his wife. The thought that a private company can come invade our community and basically take our land for their gain and the benefit of their stockholders is puzzling to me. Not to mention that this pipeline is not coming through our region to provide our communities with natural gas but its sole purpose is to sell and ship this gas overseas. My wife and I are both proud veterans and I will forever feel as though the government has turned their back on the middle class people for a private company to get rich. It's embarrassing that this project has gotten to this point and it should come to an immediate halt. Shouldn't I be able to count on this committee to protect the people and the environment and do the right thing? I certainly hope so.

David Arthur

IND415-1

See the response to comment IND1-3 regarding eminent domain. See the response to comment IND2-3 regarding export. Roanoke Gas is a partner in the project, and will provide natural gas to communities in Virginia.

INDIVIDUALS
IND416 – Molly Carole Diane Crutchfield

Scanned

11/2/2016

Comments to FERC

Federal Energy Regulatory Commission

Regarding Proposed Project:

Mountain Valley Pipeline (MVP)

Docket Number CP16-10-000

FILED
SECRETARY OF THE

2016 DEC 13 A 11:30

REGULATORY

2016/11/02

Carole.Crutchfield@ghs.com
540-493-1089
Franklin County

Molly Carole Diane Crutchfield
194 Riverdance Place
Rocky Mount, VA 24151

IND416-1

I am greatly concerned about the dangers of contamination and disruption to the groundwater, rivers, streams and wetlands posed by the proposed MVP project. There is well documented evidence that the construction and maintenance of that pipeline carries with it dangerous toxic chemicals that will permeate the ground around the pipeline, including:

- Anticorrosive coatings applied onto the pipe in situ
- Back-filling with coal ash containing multiple dangerous toxic chemicals
- Leakage of the pipeline contents; liquefied natural gas produced by fracking
- Maintenance of the pipeline right-of-way, including applications of herbicides and defoliants

IND416-1

Usually, pipe is coated at the factory, not in-situ. The trench would not be backfilled with coal ash. The pipeline would transport natural gas in vapor state; not LNG. Underground welded steel pipelines rarely leak. Mountain Valley does not propose to use herbicides, unless requested by landowners.

IND416-2

The construction will also produce serious erosion, which may never be reversed. The runoff from the right-of-way will dump large amounts of sediment into the rivers, streams and wetlands in the vicinity of the pipeline.

IND416-2

See the response to comment IND70-1 regarding erosion.

IND416-3

Bear in mind that this is a private for profit enterprise that is not designed to benefit any community through which it passes. Every citizen whose property is directly or indirectly impacted by this pipeline will face dangers to the lives of their families, as well as to their property. Attempts to clean up the eroded areas and remove the toxic chemicals will create an extreme financial burden on all of the taxpayers. The only benefactors from this project will be the investors at the expense of thousands of citizens.

IND416-3

See the response to comment CO2-1 regarding benefits.

Carole Crutchfield

INDIVIDUALS

IND417 – Jack W. Finney

20161220-5000 FERC PDF (Unofficial) 12/19/2016 5:07:15 PM

Jack W. Finney, Blacksburg, VA.
December 19, 2016

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

RE: Mountain Valley Pipeline
Docket No. CP16-10-000
Comments on Environmental Impact Statement

Dear Ms. Bose:

IND417-1 I write to state my strong opposition to the Mountain Valley Pipeline proposal in Montgomery County, Virginia.

IND417-2 My family would be subjected to undue risk, as we are within the blast and evacuation zones) without any compensation. The pipeline would

IND417-3 substantially reduce the value of my property. And our area would be

IND417-4 subjected to considerable construction traffic, noise and air pollution, plus potential damage to well water.

IND417-5 Experts have testified that it is dangerous to bury a large 42-inch-diameter pipeline in an area with karst and steep unstable slopes.

For these and many other reasons, I oppose the Mountain Valley Pipeline route that goes through Montgomery County, Virginia.

Sincerely,

Jack W. Finney

IND417-1 See the response to comment IND2-1 regarding safety.

IND417-2 See the response to comment IND12-1 regarding property values.

IND417-3 See the response to comment FA15-10 regarding emissions. Traffic is discussed in section 4.9 of the EIS; noise and air quality issues in section 4.11 of the EIS

IND417-4 Wells are discussed in section 4.3.1 of the EIS. See the response to comment IND401-5 regarding pending water wells. See the response to comment IND226-17 regarding water wells and blasting.

IND417-5 Karst is addressed in section 4.1 of the EIS. See also the response to comment LA1-4 regarding existing 42-inch pipelines in karst terrain.

INDIVIDUALS

IND418 – Guy M. Buford

CP16-10 23

ORIGINAL

Re: Draft Environmental Impact Statement for the Mountain Valley Pipeline (Docket No. CP16-10-000) and Equitrans Expansion Project (Docket No. CP16-13-000)

A Landowner's Perspective

The Mountain Valley Pipeline (MVP)
and
The Federal Energy Regulatory Commission (FERC)

FILED
SECRETARY OF THE
COMMISSION

2016 DEC 13 A 11:26

FEDERAL ENERGY
REGULATORY COMMISSION

IND418-1

MVP – A joint venture of energy companies, principally EQT, a Delaware Corporation located in Pittsburgh.

FERC – A rogue federal agency, fully funded by fees collected from members of the Natural Gas Industry; and responsible for oversight of interstate natural gas pipelines through scheduling, planning, review and approval/disapproval of the final project; approval of the construction of the final plan carries with it the right of eminent domain for the acquisition of pipeline easements from private landowners.

FERC and MVP have an interesting relationship. It appears to be much like the fox guarding the hen house. Follow along with me as I wade through this relationship and development process. MVP first notified landowners in northern Franklin County by mail in Sept./Oct. 2014 of a proposed pipeline requiring passage through their lands; and MVP's intent to make a pre-filing application to FERC in October, 2014. Thus began the inundation of landowners with requests for permission to survey their land, sketchy and incomplete mapping, volumes of confusing and disorganized data pertaining to the project. FERC and MVP communicated back and forth with environmental questions and answers as the volumes of disorganized information accumulated. This continued for a year of sketchy map and data revisions; during which landowners began to vaguely grasp the scope of the project and its impact. How were we to find out specifically what was going on?

MVP filed their formal application with FERC in October, 2015 with the route still fluctuating and data in a continued disorganized and incomplete condition. During the next year landowners were continually harassed by surveyors; FERC and MVP continued their dance of Q & A with little significant progress. Yet, FERC saw fit to issue the Draft Environmental Impact Statement (DEIS) on September 16, 2016 with closure of the review period on December 22; with much incomplete data and MVP still shifting the route. This DEIS, particularly in its summaries and conclusions, appears to be unsupported by facts and lacking in the truth. Subsequently MVP issued many revisions to alignment and environmental data in mid to late October. So here we are today with an irrelevant and premature DEIS that does not agree with the current plan and cannot receive a reasonable review within the time allotted. We the people are expected to make our final comments on this DEIS of a project that is still incomplete and changing? This is not reasonable.

During these 2 years of project development, we the people and various other entities, some highly knowledgeable and well credentialed, have submitted numerous relevant and some very detailed comments about the project and the mountainous terrain through which it is proposed to pass. Yet there is little evidence of any of this in the DEIS, or that they were even considered. It seems that we the people are not a part of the process. Perhaps time will tell otherwise.

Guy W. Buford
11/03/2016

IND418-1

FERC was created by the U.S. Congress, and carries out its mission in accordance with the Natural Gas Act. The draft EIS analyzed the route filed by Mountain Valley in its October 2015 application. The final EIS address minor route modifications made in October 2016. See the response to comment LA5-1 regarding stakeholder comments.

INDIVIDUALS

IND419 – Eleanor Anne Marsh

FILED
SECRETARY OF THE
COMMISSION
2016 DEC 13 A 11:25
FEDERAL ENERGY
REGULATORY COMMISSION

Eleanor Ann Marsh
74 Cheyenne Lane
Rocky Mount/Virginia 24151,

The Honorable Norman C. Bay and Commissioners
Federal Energy Regulatory Commission
888 1 Street NE
Washington, DC 20426

re: Docket CP 16-10-000 Mountain Valley Pipeline

ORIGINAL

Dear Chairman Bay and Commissioners:

IND419-1

My husband, Don and I, along with all homeowners in the Woods Edge Subdivision, are located in the "Evacuation area" of the above referenced pipeline and the following are the reasons for objecting to the construction of said pipeline:

IND419-1

See the response to comment IND2-1 regarding safety. The Commission would decide on the benefits of the projects in their Project Order; also see section 4.9 of the EIS.

1- People in the "BLAST AREA" would be displaced. Many are families that have lived on the land for generations. They are farmers, ranchers, young families raising their children in a clean and healthy environment, retired and elderly that will lose their homes, businesses, and peaceful clean surroundings. There is NO BENEFIT to these citizens other than the destruction that will result from this ugly path through Virginia.

IND419-2

2- Wildlife will be put in harms way This is in a rural area teeming with wildlife: deer, turkeys, ground hogs, raccoons, foxes, birds. (I alone have over 22 species of birds that I have identified on my property. In fact, my property is a Certified Wildlife Habitat by The National Wildlife Federation (Certificate #203,050). I am sure they would not sanction this pipeline. Also, the Federal Government relocated a Red Wolf to our area.

IND419-2

See the response to comment IND270-1 regarding wildlife.

IND419-3

3- Everyone in the "EVACUATION AREA" will never have a good night's sleep again. How can you? Wondering when this pipeline may explode? Are my kids playing near it? How can we ever sell our home? Who will ever insure us? There has already been a construction loan turned done due to this

IND419-3

See the response to comment IND2-1 regarding safety. See the response to comment IND12-2 regarding insurance and mortgages. See the response to comment IND3-1 regarding drinking water.

INDIVIDUALS

IND419 – Eleanor Anne Marsh

IND419-3
cont'd

proposed pipeline. How can we get a mortgage on our home if a need arises?
How many wells will collapse when they blast to bury the pipes (they call this
"ROCKY MOUNT" for a good reason...THIS AREA IS ROCKY....). Where will we
get our water? What happens to the streams, marshlands, nesting trees for
birds, food for otherwild life? THIS IS A DISASTER IN THE MAKING..

We and our neighbors love Rocky Mount/Franklin County. Please listen to us,
and turn down this pipeline.

Thank you for your kind consideration.



Eleanor Ann Marsh
Donald Paul Marsh
(540)484-4967

INDIVIDUALS

IND420 – Louisa Gay

December 15, 2016

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

Dear Ms. Bose and Members of the Commission,

Statement:

IND420-1

The Draft Environmental Impact Statement (DEIS) presented alternatives beyond the applicant's preferred alternative, including the "No-action Alternative," the "Highway Collocation Alternative," the "Collocation with the ACP," and "Alternative 1." There were many minor route modifications and variations, some that FERC recommended for incorporation in addition to those that were incorporated by the applicant. Beyond these minor modifications, all other major route alternatives previously considered were dismissed. Only the applicant's preferred alternative was considered. It is clear that there are additional alternatives that could be considered, which may reduce adverse environmental impacts.

The potential to provide a significant environmental advantage over the preferred route should be made within the context of the NEPA tenants. FERC's policy for certification of natural gas pipelines¹ emphasizes that projects should be designed to "avoid unnecessary environmental and community impacts."² In addition, "commission certificate policy should also provide an incentive for applicants to structure their projects to avoid, or minimize, the potential adverse impacts that could result from construction of the project."³ Because the applicant has not made a reasonable effort to compare adverse impacts of Hybrid Alternative 1A to the Proposed Route, FERC cannot certify that they discharged their duty to comply with NEPA.⁴

FERC did not require that MVP devote adequate time and resources to each alternative so that reviewers and agencies could evaluate their comparative merits.⁵ The least environmentally damaging practicable alternative is Hybrid Alternative 1A not the Alternative 1 Route, which was included in the DEIS. Regrettably, the Hybrid 1A was **not discussed in the DEIS**, and it did meet the 'Purpose and Need' aspects of the proposed project. This alternative would have *avoided or substantially lessened* many adverse environmental impacts. Without additional analysis of Hybrid Alternative 1A, it

¹ Statement of Policy, Certification of New Interstate Natural Gas Pipeline Facilities, Docket No. PL99-3-000, issued September 15, 1999.

² Ibid., p. 13

³ Ibid.

⁴ 40 CFR, Section 1502.14 Alternatives including the proposed action

⁵ Submittal 20151130-5432, p. 138-140

IND420-1

Section 3 of the final EIS has been revised to provide a discussion of the Hybrid 1A Alternative route.