

# INDIVIDUALS

## IND420 – Louisa Gay

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cont'd

is not clear that the preferred alternative is the only one that would meet the stated 'Purpose and Need.'

### **Background:**

In EIR #2, the criteria used by MVP to compare alternatives was cursory. Threatened and endangered species (TES) and National Register of Historic Places (NRHP) were not listed as 'features.' Out of the 27 'features' compared by MVP for the Proposed Route versus the Hybrid Alternative 1A, 12 were essentially unchanged, 1 was unanswered, and 9 were **more favorable** for the Hybrid Alternative 1A.

If a moderately comprehensive study had been conducted, it would have permitted complex resources and project impacts to be evaluated. Criteria deemed to be of similar or equivalent impact should not be discarded by either the applicant or FERC. Even if MVP had determined at a cursory level based upon "aerial flyover review" that alternatives would have similar impacts, it is unlikely that this perfunctory examination would consider the function or value of the resource that would be affected. A flyover is not an adequate means to consider the value of a resource such as an Historic District.

Alternatives that were dismissed from further study should have had a **detailed rationale for their dismissal**. Otherwise, this omission could be viewed as intentional, creating a bias for the reader, presenting the preferred route in a more favorable light.

The criterion for analysis should be whether or not there is a significant advantage or equivalent impact over the preferred route. If there is, then FERC should not permit the applicant to dismiss the alternative prior to a detailed analysis.

If the applicant's rationale for dismissal from further consideration of an alternative route was that it is "not technically feasible or practical," they should be required to indicate, in detail, the empirical data that was used to eliminate that alternate. Empirical data will assure FERC, Federal and State agencies, and Intervenors that the proposed route is in fact the most appropriate.

### **Impacts Avoided by Hybrid Alternative Route 1A:**

1. The Hybrid Alternative 1A *avoids* **crossing any Historic Districts**, whereas Alternative 1 crosses 5.0 miles of them and the Proposed Route crosses 14.<sup>6,7</sup> Specifically, the Hybrid 1A would avoid crossing the following six (6) Historic Districts:

- Greater Newport Rural Historic District 035-0412,
- North Fork Rural Historic District 060-5474,
- Coles-Terry Rural Historic District 080-5689,

<sup>6</sup> Submittal 20161208-5015

<sup>7</sup> Submittal 20161020-5175(31746171); p. 121 of 153

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- Bent Mountain Rural Historic District,
- Blue Ridge Parkway Historic District,
- Cahas Mountain Rural Historic District 033-0393

2. The Hybrid Alternative 1A *avoids* the Threatened & Endangered Species (TES) the Roanoke logperch. It is listed in the DEIS as “**Likely to Adversely Affected**.”<sup>8</sup> The Hybrid 1A would not cross the three waterbodies “known to contain the federally endangered Roanoke logperch.”<sup>9</sup> Interestingly, the Alternative Route’s 110, 110J and 110R were all eliminated as possible alternatives based upon a TES. Environmental Solutions & Innovations (ESI) stated “previous alignments (such as Alternatives 110, 110J, 100R) were eliminated because of the presence of sensitive resources. These alignments proposed to intersect with streams that support populations of federally endangered James spinymussel.”<sup>10</sup>

### Impacts Lessened by Hybrid Alternative Route 1A:

#### 1. Right-Of-Way (ROW) Collocation

The Hybrid Alternative 1A is collocated with an electrical transmission line for 68.4 miles versus 22 miles for the Proposed Route. The **difference of 46.4 collocated miles is significant** and *advantageous because FERC requires collocation to the extent possible.*

#### 2. USFS, Appalachian National Scenic Trail, and the Blue Ridge Parkway Crossings

The Hybrid Alternative 1A would cross only 1.6 miles of USFS land, while the Proposed Route crosses 3.4 miles. The *Hybrid Alternative 1A would avert some of the USFS, the Appalachian Trail Conservancy, and the Roanoke Appalachian Trail Club (RATC) concerns for those areas.*<sup>11</sup> Specifically, less impact to the crossing of Peter’s Mountain, Sinking Creek, and Brush Mountain Inventoried Roadless Area.

The Hybrid Alternative 1A would cross the “Blue Ridge Parkway (BRP), the Jefferson National Forest (JNF), and the Appalachian National Scenic Trail (ANST) adjacent to existing 138 kV overhead electrical transmission lines.”<sup>12</sup>

The impacts to these resources are not equivalent. The Proposed Route greenfield cut would harm the forest habitat by fragmentation, which is in stark contrast to collocation

<sup>8</sup> Submittal 20160916-4001(31692620); p. 421 of 781

<sup>9</sup> *Ibid.*, p. 423 of 781

<sup>10</sup> Submittal 20160421-5195; Attachment DR2 USFWS-1. P. 3

<sup>11</sup> Submittal 20160311-5103; p. 2, 26, 28

<sup>12</sup> Submittal 20160421-5195; p. 185



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in an area that is already disturbed. Collocation is advantageous because it does not interrupt the interior forest habitat.

### 3. Karst Features

The Hybrid Alternative 1A crosses 37.3 miles of karst terrain, whereas the Proposed Route crosses 53.3 miles.<sup>13</sup> This difference of 16 miles is significant because Draper & Aden documented pipeline instability concerns throughout the 51 miles of surveyed karst terrain.<sup>14,15</sup> A karst survey of The Hybrid Alternative 1A route has not been conducted. Nevertheless, examples of Karst features avoided by the Hybrid Alternative 1A are:

- Conservation sites: Clover Hollow, Canoe Cave, Slusser's Chapel, Blake Preserve, and Old Mill.
- Thirty-one caves and their allogenic recharge zones, including: Greenville Glenray, Bobcat, Rich Creek, Lhoist, Crook's Crevice, Mahaffey Trash, Williams Contact Shaft, High Voltage, Conklin Sink, Echols, Pig Hole, Tawney's, Smokehole, Hog Hole No. 2, Overlooked, Canoe, Jones, Unnamed, Fred Bull's, Dog Collar, Slusser's Chapel, Thundercroft (on the Mount Tabor Variation), Ryan's Coal, Zipper's Pit, Mill Creek, Old Mill, Bob Henderson's, Hancock's Blowhole No. 1 and No. 2, Thompson's, and Johnson's.
- The unique and vibrant convergent, subterranean drainage networks<sup>16</sup> of the Mount Tabor Sinkhole Plain and the Indian Creek Watershed in Monroe County, WV.<sup>17,18</sup>

### 4. Wetlands

The Hybrid Alternative 1A would cross 2,090 feet of wetlands, whereas the Proposed Route would cross 3,299 feet. Roanoke County Administrator, Thomas Gates, expressed a significant concern for the wetlands located on Bent Mountain that the Proposed Route would cross.<sup>19</sup> Because MVP indicated there would be no re-establishment of plant species to saturated wetlands, he questioned who would be

<sup>13</sup> Submittal 20160916-4001(31692618); p. 961 of 995

<sup>14</sup> Submittal 20160226-5404; Karst Hazards Assessment (Desktop Review and Field Reconnaissance);

Table 2, Karst Features, p. 1-10

<sup>15</sup> Submittal 20160916-4001(31692618); p. 961 of 995

<sup>16</sup> Submittal 20160317-5126; p. 8

<sup>17</sup> Submittal 20160419-5119

<sup>18</sup> Submittal 20160125-5017; p. 1-19

<sup>19</sup> Submittal 20160411-5323; p1

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responsible for the redevelopment and rehabilitation<sup>20</sup> of the impacted wetland. Hybrid Alternative 1A would not cross Bent Mountain wetlands.

## 5. Bedrock

The Hybrid Alternative 1A crosses only 114.9 miles of shallow bedrock, whereas the proposed route crosses 216 miles.<sup>21</sup> The difference of **100 miles is significant** because it would require **less blasting**. Even with a strict blasting plan, landslide potential can increase and damage to well-water supply, nearby springs, and karst features is possible.

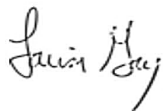
## Summation

A common complaint from the public about the entire process has been that the applicant's information is inadequate. This was also recently noted by the Bureau of Land management (BLM). They indicated that the applicant has "not provided sufficient information regarding the proposed crossings for BLM to provide a detailed discussion of potential avoidance, minimization, or mitigation strategies"<sup>22</sup> for the U.S. Forest Service lands. They state:

the applicant continues to reserve the idea of cutting an open trench over the Appalachian National Scenic Trial if conventional boring is unsuccessful and has provided inadequate information to BLM on the contingency. Without further information about this and a number of other issues, BLM cannot provide detailed comments on potential avoidance, minimization and mitigation strategies.<sup>23</sup>

An overarching, meaningful discussion of the cumulative impacts of such a major construction project should be paramount in the DEIS. Sadly, alternatives and cumulative Impacts were only cursorily discussed with little if any emphasis placed on **long-term** and **reasonably foreseeable impacts**. The DEIS should be rejected for its inadequacies.

Respectful Submitted,



Louisa Gay

<sup>20</sup> Submittal 20160411-5323; p2

<sup>21</sup> Submittal 20160916-4001; Table 4.1.1-14

<sup>22</sup> Submittal 20161207-0057(31815076)

<sup>23</sup> Ibid.

# INDIVIDUALS

IND421 – Wil Overman

20161214-5122(31824946)

Will Overman, Charlottesville, VA.

IND421-1 Both of these projects are not worth the impacts to both the environment and communities that will be affected.

IND421-1 The Commission would decide if the benefits of the projects outweigh environmental impacts.

# INDIVIDUALS

## IND422 – Elizabeth Tobey

COMMENTS OF ELISABETH TOBEY AND RONALD TOBEY ON THEIR BEHALF, AND ON BEHALF OF PRESERVE GREENBRIER COUNTY MOUNTAIN VALLEY PIPELINE  
 CP-16-10-000  
 DECEMBER 13, 2016

IND422-1

Intervenors and affected parties, named above, hereby incorporate by reference as though fully set forth herein all comments, pleadings, and documents filed by them individual, or collectively, previously in this matter of the Mountain Valley Pipeline project, whether under this number or another.

The Draft Environmental Impact Statement (hereinafter DEIS) is not sufficient as required by law because it relies upon material mistakes of fact and misrepresentations by the applicant to draw the conclusions reached in the draft EIS. It fails to consider or mention material issues. It fails to consider reasonably foreseeable future projects, such as fracking and connecting pipelines. There is no analysis of the future impact on water sources of fracking that the pipeline will bring to our area, or of the geological dangers of fracking. *Lands Council v. Powell, 395 F3 1019, 1027, (9th Circuit 2005); Grand Canyon Trust v. FAA 290 F3d. 339, 346 (DC Circuit 2002.)* EQT has admitted its plans to frack in their recent filings, indicating it would like to put in over 500 fracking wells along the pipeline.

IND422-2

Because the DEIS relies upon material misrepresentations of fact by the applicant and material omissions, and leaves many material issues to be resolved by the applicant in the future, the DEIS does not meet the goal of full public disclosure of the environmental ramifications of environmental impacts. *Trend v. Watkins 731 F. Supp. 530, 532 (D. C. 1990).*

Because these material issues and facts are outside the bare record, it deprives the affected parties of any meaningful remedy at law or in equity and results in the deprivation of the applicants' property rights and deprives them of both the equal protection and the due process of the law. For example, the number of homes in our area that are going to be within 1500 feet of the pipeline are underestimated. The agency FERC is a pawn of the energy companies, and is tasked with facilitating pipelines. It is a violation of a basic tenet of our government, that the governmental agency overseeing the industry should be independent of the agency. A cursory inspection of the people employed by FERC, as well as the commissioners, shows a revolving door between the agency and the companies it regulates. It is incestuous, and FERC cannot be trusted to oversee the projects with due regard to the citizen's concerns. The administrative law judge to whom an appeal will lie is employed by FERC. This is not an independent judicial review.

The DEIS does not adequately address the environmental impacts on the human environments. It is required to consider the effect on the quality of life that causes a significant impact. It must be considered in the local context and must include consideration of uncertain and/or unique risks. *Hanly v. Kleindienst 471 F.2d 823 (2d Cir. 1972) 40 CFR section 1508.14, and 1508.27a*

IND422-3

The pipeline, and particularly the Stallworth Compression Station will permanently and significantly alter an environment that is exclusively agricultural and will degrade the tracts of woodlands unscarred by any right of ways or industrial features. It unfairly targets and burdens the elderly, poor and disabled population that lives in the area, which is the vast majority of the population. (We are elderly and have long term health issues made worse by any air pollution.) There is no discussion of ameliorating technology such as air pollution controls, scrubbers, etc.

IND422-1

See the response to comment LA5-1 regarding the preparation of the draft EIS. As described in section 4.13, the Cumulative Impacts analysis was conducted in accordance with CEQ guidance, which defines cumulative impacts as: "impacts on the environment which result from incremental impacts of the [proposed] action when added to other past, present, and reasonably foreseeable future actions..." Section 4.13.1 of the draft EIS discusses potential cumulative impacts of oil and gas exploration and production activities and non-FERC-jurisdictional natural gas gathering systems in the area of geographic scope, when added to the proposed projects.

IND422-2

See the response to comment FA11-2 regarding pending data for the draft EIS. Potential impacts on the human environment are discussed in multiple sections of the EIS, including sections 4.8 (Land Use) and 4.9 (Socioeconomics).

IND422-3

Section 4.8 of the EIS discusses land use impacts for aboveground facilities, including the Stallworth Compressor Station. Forest fragmentation is discussed in sections 4.4 and 4.5 of the EIS. Environmental justice is addressed in section 4.9 of the EIS. Air quality impacts and mitigation measures are discussed in section 4.11 of the EIS.

# INDIVIDUALS

IND422 – Elizabeth Tobey

IND422-4 The effect of the spraying of herbicides in an area that uses the runoff from the pipeline route for water is not discussed in the context of its impact on water quality. In addition, the runoff will end up in vulnerable wetlands that abut the site of the compressor station.

IND422-5 The DEIS fails to consider the effect of the pollution from the compressor station on the local environment. It sits in valley that has an inversion layer. It is a source of pollution that roughly doubles the amount of pollutants in this area, yet strangely the report concludes it is not a significant impact! It reaches that startling conclusion because the resulting pollution is within federal standards. However, even if within standards, it can still have a significant impact on the environment.  
The main pollutant is methane, which is one of the worst greenhouse gases. The issue of acid rain is not addressed.  
The unreliability of power sources in the Dawson area in the winter will require frequent use of the backup generators. No analysis of the pollution from them is included. For example, last year we were without power for 5 days at a time, and for one or two days several more times. In prior years it has been up to 10 days. Nor is internet reliable in this area.

IND422-6 The stations need to be surrounded by noise walls and landscaped with native plants to hide the wall to keep the rural area landscape as intact as possible. The project is dropping a heavy industry plant into a bucolic area. It will have a dramatic and long lasting impact on the nature of the area and its scenery. The blowdowns will be at least once a month, hardly infrequent. A helicopter will be doing frequent flyovers (at least once a month) of the route to check for leaks. We will no longer be able to go up in our woods away from all man-made noise, which is one of the main reasons we bought this property.

IND422-7 The DEIS fails to consider the local impact on any issue unless there are standard for it. For example, light pollution is not considered. Again, the test for the EIS is whether or not it considers significant impacts on the environment, regardless of whether there are legal standards or not for that particular impact. There is no discussion of the impact of idling construction equipment or the increase in traffic on a two-lane narrow road with no shoulders.

IND422-8 The analysis of the impact of clearing a right of way through highly erodible soil is laughable. The notion that planting a shallow rooted grass cover crop will hold the soil as well as old growth tree root systems is so patently untrue that it amounts to knowingly false assertions that are not scientifically sound. The conclusion that the impact of the right of way will be short lived is simply unsupported by any acceptable scientific analysis.

There is no consideration given to a different route that avoids soils classified as highly erodible.  
There is no plan to provide adequate water to our agricultural ponds and livestock.  
The plan to leave large piles of timber stacked on the edge of the right of way will create a dam for the flow of water because the pipeline route parallels the ridgetops. Because the pipeline cannot be crossed by heavy trucks without special matting, it will fall to the landowners to pay the costs for the removal of the trees.

IND422-9 The "safety plan" that is to be developed fails to address the fact that evacuation of livestock and people is almost impossible on the narrow roads especially in winter. My home is sitting on a 20-mile long stretch of highly flammable gas. It is inaccessible to firefighting equipment even if there were the resources to fight such a fire in West Virginia. Essentially the plan will be to let the fire burn itself out,

IND422-4 See the responses to comments LA1-7 and LA1-8 regarding herbicides.

IND422-5 GHGs are discussed in sections 4.11 and 4.13 of the EIS. The statement regarding acid rain is noted. As discussed in section 2.1.2 of the EIS, telecommunications for the MVP would consist of radio and/or cellular with VSAT service as a backup. Section 2 in the final EIS has been revised to provide additional information regarding backup power systems.

IND422-6 Visual impacts associated with aboveground facilities are discussed in section 4.8 of the EIS. Noise impacts and mitigation are discussed in section 4.9 of the EIS. Flyovers of the project area would be periodic. We have revised the final EIS to address impacts from flyovers.

IND422-7 Section 4.5 of the EIS discusses light pollution. As stated in the draft EIS, MVP would implement mitigation measures to minimize construction emissions. Construction equipment emissions were calculated assuming all units were operating – giving worst case emissions projections. In addition, as stated in section 4.11, the Applicants committed to limit the idling of engines when construction equipment is not in use in an effort to reduce emissions. Traffic is discussed in section 4.9 of the EIS.

IND422-8 See the response to comment LA5-1 regarding the preparation of the draft EIS. See the response to comment IND 70-1 regarding erosion. Construction methods and proposed mitigation measures were evaluated and deemed to be protective of the resource. See the response to comment regarding third-party monitoring to ensure compliance with proposed mitigation measures. Section 3 of the EIS provides the Alternative Analysis. As discussed in section 4.8 of the EIS, the Applicants would ensure that livestock have access to water sources during construction; or an alternative source of water would be provided. As stated in section 2.4 of the EIS, cut timber would typically be disposed in accordance with landowner wishes; unless the Applicants purchase the timber as part of their compensation agreements. The Applicants would remove temporary matting once construction is complete in that area.

IND422-9 See the response to IND2-1 regarding safety. See the response to comment IND18-2 regarding emergency response. See the response to comment IND28-3 regarding financial responsibility.

# INDIVIDUALS

## IND422 – Elizabeth Tobey

IND422-9 cont'd | ruining our land and home. Insurance is not available to cover our losses in the event of a toxic leak or fire. The pipeline will flee into bankruptcy and we will be destitute.

IND422-10 | The area in which the compressor station is being built (Stallworth) is full of Indian artifacts. A survey was done across the road from the site of the station and a treasure trove was found. Yet NO survey digging was conducted on the compressor station property itself!

IND422-11 | The plan to discharge water used in construction is flawed and so vague as to make it impossible to know the impact. Water is to come from "local sources". What are these specifically? Wetlands? Our ponds? Our well? Discharging the spent dirty water into "vegetated areas" in highly erodible soils and expecting the shale soil to hold it is ill conceived and not scientifically sound so as to minimize erosion.

The crossing under the roads for the pipeline need to be constructed deep enough that heavy logging trucks and agricultural equipment can pass over it safely.

IND422-12 | The need for the project in terms of domestic gas use is not adequately addressed. It is disingenuous to claim that the gas is not intended for export. The MVP is a legal entity made up of gas producers. Each of the partners can and will export the gas if it does not find an equally profitable local market.

IND422-13 | Lastly the issue of restoration of boundary markers is wholly inadequate in the DEIS. The properties in Greenbrier County are not described by survey in the deeds, but by metes and bounds. For example, how are they going to restore the old white oak that stands as a marker in my deed? (Yes, it still stands). They should be required to provide us with a survey and permanent survey markers.

The wells on our property are not mapped in the DEIS. There needs to be a complete hydrological survey along the pipeline so that the interconnected water systems can be studied as a whole. There are no plans to protect aquifers or well water. The open cut crossings are the most damaging sort of crossing.

CONCLUSION:

This project should not be approved. The project will drop an industrial complex into a wholly rural area. The project should be routed through other already industrialized areas to minimize its impact. It will completely destroy the reasons we moved here. We have made an investment of over \$750,000, and employed many local people in our venture. It will endanger our health and destroy our mental well being. It unfairly burdens the local residents BECAUSE they are poor and elderly and ill. Thus MVP knows it will be able to browbeat the citizens into submission for private gain.

IND422-10 | Cultural resources surveys for the Stallworth Compressor Station location are discussed in section 4.10 of the EIS. It is stated that about 82 acres were inventoried at the Stallworth Compressor Station location.

IND422-11 | Table 4.3.2-8 (previously table 4.3.2-10) lists the sources that would be used to obtain hydrostatic test water. This table was updated for the final EIS. As stated in in section 4.3 of the EIS, the hydrostatic test water would be discharged through an energy dissipation device, typically in the same watershed as the source from which it was obtained. To minimize scour, erosion, and sediment transport, hydrostatic test water would be discharged over vegetated land surfaces through filter bags or hay lined dewatering structures. Additionally, the discharge rate would be regulated using valves and energy dissipation devices. Table 2.4-3 of the EIS discusses pipe installation depths at road crossings.

IND422-12 | See the responses to comments FA11-18 and IND2-3 regarding project need and export, respectively.

IND422-13 | The landowner is encouraged to negotiate installation of boundary markers as part of Mountain Valley's easement agreement directly with Mountain Valley. As stated in section 4.3 of the draft EIS, we recognize that the Applicants have not identified all private domestic water supply wells within 150 feet of the construction work areas. In a January 26, 2017 EIR, we asked Mountain Valley to provide the location of water wells, springs, and swallets within 150 feet of construction workspaces (500 feet in karst), based on surveys and publically available data sources, Section 4.3 discusses impacts on water supply wells, updated as appropriate in the final EIS.

# INDIVIDUALS

IND423 – Elizabeth C. Fine

December 14, 2016

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

Mr. Joby Timm, Forest Supervisor  
George Washington and Jefferson National Forests  
5162 Valleypointe Parkway,  
Roanoke, VA24019

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

Dear Ms. Bose and Mr. Timm:

IND423-1

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

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

IND423-2

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

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

IND423-1

See the response to comment CO5-1 regarding preparation of the draft EIS. See the response to comment FA8-1 regarding the 500-foot-wide utility corridor within the Jefferson National Forest. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

IND423-2

See the response to comment IND92-1 regarding leaks. GHGs and fugitive emissions are discussed in section 4.13 of the EIS. See the response to comment IND2-3 regarding hydraulic fracturing.

# INDIVIDUALS

## IND423 – Elizabeth C. Fine

IND423-2  
cont'd fracking of the Marcellus Shale. A 2014 study published in the *Proceedings of the National Academy of Sciences* by researchers at Cornell who examined the records of over 41,000 wells in Pennsylvania concluded that: "About 40 percent of the oil and gas wells in parts of the Marcellus shale region will probably be leaking methane into the groundwater or into the atmosphere . . ." (<http://www.news.cornell.edu/stories/2014/06/four-10-wells-forecast-fail-northeastern-pa>). Such leaks come from cracks in cement casings that are caused by human error in cement mixing as well as natural occurrences.

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

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

IND423-3 Amendment 2 would permit the MVP to ignore Forest Service standards regarding riparian corridors and soil conditions, adversely affecting the water quality for many. Amendment 3 would permit the removal of old-growth trees, destroying a resource that can never be replaced. Such old-growth trees remove more carbon dioxide from the atmosphere than younger trees (<http://www.natureworldnews.com/articles/5658/20140116/older-trees-grow-faster-take-up-more-carbon.htm>). The fourth amendment would enable MVP to violate the protected Appalachian National Scenic Trail on Peters Mountain and to lower the Scenic Integrity Objective for the area and the Appalachian Trail from "High" to "Moderate," with restoration permitted to take 5 to 10 years after construction. The grave damage that these four amendments pose undermines the very reasons for being of the Jefferson National Forest and the Appalachian National Scenic Trail.

IND423-4 The DEIS does not establish convincing need for the pipeline. Other studies have shown that existing pipelines can adequately meet current and future needs in this region for shipping natural gas and that gas pipelines are being over-built ([https://www.southernenvironment.org/uploads/words\\_docs/Synapse\\_Report\\_FINAL\\_FINAL.pdf](https://www.southernenvironment.org/uploads/words_docs/Synapse_Report_FINAL_FINAL.pdf); <http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-April-2016.pdf>),

IND423-5 I urge FERC and the U.S. Forest Service to pay heed to Dr. Earnst Kastning, whose study of the effects of building the MVP through the karst terrain of this region concludes, "Karst and associated hazards constitute a serious incompatibility with the proposed pipeline. The effect of these threats on the emplacement and maintenance of the pipeline, as well as the potential

IND423-3 See the response to comment FA8-1 regarding Amendment 2. See the response to comments FA10-1 regarding Amendments 3 and 4.

IND423-4 See the response to comment FA11-12 regarding need.

IND423-5 See the response to comment IND62-1 regarding Dr. Kastning's report.



# INDIVIDUALS

## IND423 – Elizabeth C. Fine

*Fine, Letter to FERC and U.S. Forest Service*

3

IND423-5 hazards of the line on the natural environment, renders this region as a 'no-build' zone for the  
cont'd project" (Kastning Response to DEIS).

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

Sincerely,



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

cc Thomas L. Tidwell, Chief  
U.S. Forest Service  
United States Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250-1111

# INDIVIDUALS

IND424 – Patricia Curran Leonard

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

December 7, 2016

FERC

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 DEC 13 P 4: 14  
FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Cumulative Effects

IND424-1

In the DEIS on page 4-507 it states: "Cumulative effects on federally listed wildlife and aquatic species would be most likely to occur where projects would result in permanent or long-term loss of habitat types important to wildlife. These include oil and gas development, transportation projects, residential development projects, and non-jurisdictional project-related facilities listed on appendix U. Construction activities such as right-of-way and other workspace clearing and grading would result in loss of vegetation cover and soil disturbance, alteration of wildlife habitat, displacement of wildlife species from the construction zone and adjacent areas, mortality of less mobile species, and other potential indirect effects as a result of noise created by construction and human activity in the area. Overall impacts would be greatest where projects are constructed in the same timeframe and area as the proposed projects or that have long-term or permanent impacts on the same or similar habitat types."

MVP will have permanent loss of habitat and wildlife. Why is this something that we as humans are willing to accept that this is acceptable. This is not acceptable to me for what benefit? I do not have any natural gas appliances nor does my electric power plant use natural gas to supply energy. Any loss of life is not acceptable. Humans should not allow greed to swallow any ounce of decency we project outward to the universe. FERC should go out and get to know the areas where permanent or long-term loss of habitat would occur if the MVP project gets approved.

The committee members who will decide on the application need to touch the trees that will be fallen, the waterways that will be trenched up and contaminated, and the wildlife who live with nature and then will be killed and destroyed because they were in the way of EQT's greed.

Please do not approve this for profit business proposal that has no benefit to me or the wildlife that will be permanently destroyed.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND424-1

Many power plants burn coal to generate electricity, which is much more polluting than burning natural gas. Yes, MVP would cause a loss of habitat. See the response to IND270-1 regarding wildlife. The Commissioners will weight environmental impacts against market benefits using the EIS and the public record in this proceeding. See the response to comment FA11-12 regarding need.

# INDIVIDUALS

IND425 – Patricia Curran Leonard

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

December 11, 2016

FILED  
SECRETARY OF THE  
COMMISSION

FERC

2016 DEC 13 P 4:14

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

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Noise Levels

IND425-1

In the DEIS on page 4-163 it states: “Specifically, construction noise could lead to nest abandonment, egg failure, reduced juvenile growth and survival, or malnutrition or starvation of the young. However, studies note that separating the effects of acute increases in noise levels from the optical stimulus that often accompany such noises (e.g., the loud noise of a low-flying aircraft and the observation of the approaching aircraft) can be difficult (Kempf and Hueppo, 1997). Thus, during construction, the effects of noise on wildlife would be greatest immediately adjacent to the construction right-of-way. While pipelines have no operational noise associated with them, compressor stations would generate noise on a continuous basis once in operation.”

Noise is a real issue that could lead to additional impacts if aircraft is used to monitor the pipeline route. As stated above the loud noise of low-flying aircraft and observing the approach of the aircraft can be difficult on wildlife.

FERC needs to address whether MVP will use aircraft in monitoring the pipeline and what effects that monitoring would have on wildlife. What will the schedule be and how will the monitoring by air impact wildlife and property owners. This impact can be the noise but also privacy issues.

Please address these on-going effects of maintaining the pipeline with noise, aircraft, and privacy issues.

Please do not approve this for profit no public use project.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5164

IND425-1

Section 4.12 was revised to discuss the frequency of overflight inspections. Aerial inspections would take place at least twice per year using Federal Aviation Administration licensed aerial services with pipeline survey experience. Surveys would be conducted during daylight hours at low altitude and reduced speed. All fixed wing and helicopter aircraft used would meet noise certification standards based on their type. Impacts to wildlife are not expected.

**INDIVIDUALS**  
**IND426 – Patricia Curran Leonard**

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

December 6, 2016

FERC

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

ORIGINAL

FILED  
SECRETARY OF THE  
COMMISSION  
2016 DEC 13 P 4:13  
FEDERAL ENERGY  
REGULATORY COMMISSION

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Viewsheds along the MVP ROUTE

IND426-1

In the Draft EIS on page 4-266 it states: "These anticipated changes to the scenic integrity of scenery on the national forest would not meet High or Moderate SIOs if they are visible from roads, trails, and other viewing platforms on and off the national forest, including residential communities, parks, golf courses, etc."

Wikipedia defines: A viewshed is the geographical area that is visible from a location. It includes all surrounding points that are in line-of-sight with that location and excludes points that are beyond the horizon or obstructed by terrain and other features (e.g., buildings, trees).

While it is important to address the impact on the national forest areas, the issue of the MVP cutting a 301 mile path through the Appalachian Mountain range will devastate not only the scenic integrity of the forest but every mountain and landscape the MVP will traverse.

The views and landscapes of this area will be forever changed. Change not because of necessity but greed from a private equity firm wanting to transport natural gas that will potentially leave this country and be purchased to the highest bidder.

FERC should not only look at the changes to scenic integrity of only the National Forest areas but all along the pipeline that will be forever altered for the greed of a private equity firm.

FERC should look at the landscape of the entire route. If you do you will see that MVP will create an un-needed, unnecessary damage to all scenery along the entire 301 miles of pipeline route.

Please do not allow this tragedy to unfold. Do not approve this for profit proposal only to benefit a private equity firm.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND426-1

Visual resources are addressed in section 4.8 of the EIS. See the response to comment FA11-12 regarding need.

**INDIVIDUALS**  
**IND427 – Patricia Curran Leonard**

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

December 12, 2016

FERC

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 DEC 13 P 4: 13  
FEDERAL ENERGY  
REGULATORY COMMISSION  
ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Mud along roads during construction

IND427-1

Anytime there is a construction project or anywhere here in Franklin County VA when the earth gets disturbed, there is mud that gets driven out to the roads. Construction mud can cause issues with accidents, dirt flung all over cars, and hazards when mixed with rain with sliding on the surface of the highway.

I did not see anything in the Draft Environmental Impact Statement that addresses the issue of construction debris and mud on the roads through the construction areas.

Where would the issue of mud and construction debris be addressed in the DEIS?

Please address these and other issues when the next version/release of the EIS.

Please do not approve the MVP application. This pipeline is for profit and not a public good.

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

IND427-1

As stated in section 4.9.2.5 of the EIS, “public roads used by construction vehicles to get to and from workspaces could experience increase sediment tracking/build-up and surface damage. Mountain Valley would mitigate the trackout of sediment from the access roads or workspaces onto paved roads using rock construction entrances. If sediment or other loose material is tracked onto paved roads, Mountain Valley contractors would sweep or vacuum to remove from the road.”

# INDIVIDUALS

IND428 – Patricia Curran Leonard

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

December 8, 2016

FERC

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 DEC 13 P 4:13  
FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Getting the purpose right

IND428-1

In the Draft EIS on page 1-8 of the Introduction it states: “In its formal application with the FERC, Mountain Valley explained that the Mid-Atlantic and Southeastern United States has been mostly supplied with natural gas from the Gulf Coast. Recently, Gulf Coast supplies have been declining, while Mid-Atlantic and Southeastern market demands have been growing. In the Southeast, many electric generating utilities are switching from a fuel source of coal to natural gas (EIA, 2015). In addition, the population of the East Coast is expected to rise in the future. At the same time, natural gas production from shale formations in the Appalachian Basin has been increasing; from 2 Bcf/d in 2010 to 15 Bcf/d in 2014. According to Mountain Valley, the MVP would alleviate some of the constraints on this natural gas production by adding infrastructure to transport lower-priced natural gas from the Appalachian Basin to industrial users and power generators in the Mid-Atlantic and Southeastern United States, as well as to local distribution companies (LDC).”

In my formal response, I would like to explain that if FERC would conduct their own research on needs, supplies, and current assessments of the industry, a different definition of the current situation appears. While some of the electric generating utilities are switching fuel sources from coal, with the new administration in early 2017, it is expected that coal productions will continue. Populations along the coast have not been rising as much as expected. It would be expected that FERC vet out many of the claims that MVP has proposed in their application. Also demands in other forms of renewable energy have been increasing at a much faster rate. Natural gas is taken from the ground using hydraulic fracturing which has major environmental impacts such as systemic activity and abundant use of wastewater that poses a risk for major contamination.

FERC needs to adjust and research the MVP application for fact-checking and energy needs of current environments along with the alternatives in place or coming online in 2017.

Please do not approve this for profit proposal that will not provide a public use.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065 540-929-5184

IND428-1

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

# INDIVIDUALS

IND429 – Patricia Curran Leonard

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

December 10, 2016

FERC

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 DEC 13 P 4:13  
FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Burning Fossil Fuels

IND429-1

On page 3-2 of Alternatives in the DEIS it states: "The generation of electricity from renewable energy sources is a reasonable alternative for a review of power generating facilities, and states or federal entities that are contemplating new fossil-fuel based power plants may indeed decide to consider alternate forms of energy for a comparison of overall impacts and benefits. However, authorizations related to how the markets will meet demands for electricity are not part of the application before the Commission and their consideration is outside the scope of this EIS."

What should not be ignored in this analysis is the issue of continuing – in fact – transporting such high volumes of natural gas for use is adding to the fossil fuel consumption in which in turn will be harming the planet even more. Fossil fuels have direct impact on the warming of the climate. Moving all of the hydraulic fractured natural gas in large volumes will add more fossil fuels into the environment – has FERC analyzed what that will do to the planet?

The potential of high volumes of natural gas to be burning in the future because of the size and volume of this transportation line should be evaluated and researched before a decision for approval of MVP is concluded.

Please evaluate all impacts of natural gas and this transportation line will have on the planet by burning more fossil fuels.

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

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND429-1

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

# INDIVIDUALS

IND430 – Patricia Curran Leonard

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

December 9, 2016

FERC

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

FILED  
SECRETARY OF THE  
COMMISSION  
2016 DEC 13 P 4:13  
FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

Re: Opposition to the Mountain Valley Natural Gas Pipeline – Build the Power Plants at the well site

IND430-1

On page 1-7 of the DEIS in the introduction it states: "The Council on Environmental Quality's (CEQ) regulations for implementing NEPA at 40 CFR 1502.1 recommends that an EIS should briefly address the underlying purpose and need for a project. In general, as described by the Applicants, the purpose of both the MVP and the EEP is to transport natural gas produced in the Appalachian Basin to markets in the Northeast, Mid-Atlantic, and Southeastern United States."

If that is the purpose of the MVP, why is it that the infrastructure for powered industry by natural gas is not in place. The DEIS says that natural gas is needed at Roanoke Gas. But how much gas does Roanoke Gas use? If FERC really take a look at the current need to power locations along the route, you will find that most business, schools, factories, and homes do not have natural gas as the energy source. Has FERC taken a look at how much natural gas Roanoke Gas uses today? What is the percentage of gas supplied by MVP will be "needed" by Roanoke Gas?

Why does the gas need to be transported? EQT should build power plants at the source wells in Pennsylvania. The natural gas power plants output of energy can flow into the distribution electric grid throughout those markets. This and other alternatives should be explored by FERC and make other recommendations that could spare the devastation proposed to the property owners, water, wildlife and habitats that will bear the burden of this project.

Please do not approve the MVP application because there is not a public need, this is for profits only for EQT.

Pat Curran Leonard

4638 Dillons Mill Road

Callaway, VA 24065

540-929-5184

IND430-1

If the MVP is approved, Roanoke Gas would provide natural gas to local customers in southwestern Virginia. The FERC does not regulate siting or construction of power plants. The purpose of MVP is to transport natural gas from points of production to points of use; including power plants in the southeastern United States. See the response to comment FA11-12 regarding need.



# INDIVIDUALS

IND431 - Bob Peckman

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  
 FEDERAL ENERGY REGULATORY COMMISSION  
 2016 DEC 13 P 4:14  
 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](http://www.ferc.gov) under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account, which can be created on-line.

COMMENTS: (Please print; use and attach an additional sheet if necessary)

IND  
 431-1

The DEIS assumes that a quake will not break the pipeline. Safety preparedness in industry requires that we plan for what will happen W/HEU the pipeline breaks. Assuming it will not break is stating that there is no plan for things that are likely to happen. That is not acceptable!

IND431-1

Seismic activity is addressed in section 4.1 of the EIS. There are existing pipelines in California which has much greater seismic activity than Virginia.

Commentor's Name and Mailing Address (Please Print)

Bob Peckman  
 8131 Webster Dr.  
 Roanoke, VA 24019

# INDIVIDUALS

IND432 – Robert Head

IND  
432-1

## SOS—Save Our Springs

RE: Mountain Valley Pipeline—Docket No. CP16-10-000

Comment:

Pence Springs was first found because  
the buffalo regularly drank there.

it rises from the ground on the Greenbrier

bottoms close to the spur of Keener Mtn, over which  
the old buffalo trail may yet be followed to Green Sulphur  
springs on Lick Creek. Ginger Ale is made from Pence water.  
The water is also bottled & sold. It was awarded the highest  
awards & Silver Metal at the St Louis Exposition in 1904.

Name: Robert Head

email:

Address: 104 S. Jefferson, Lewisburg WV 24901

IND432-1

Water resources are discussed in section 4.3 of the EIS. We concluded that impacts would be temporary and not significant on streams like the Greenbrier River near Pence Springs, West Virginia. Mountain Valley now proposes to use a dry crossing of the Greenbrier River.

# INDIVIDUALS

IND433 – Darlene Fife

IND  
433-1



## SOS—Save Our Springs

RE: Mountain Valley Pipeline—Docket No. CP16-10-000

Comment:

1) The crossing at the Greenbrier River  
at Pence Springs would be enormously  
harmful to the river & its life.  
2) There are wetlands at the top of Snake Run &  
Grassy Meadows that will be destroyed & should  
not be. 3) The pipeline is a disaster for the land &  
people of W.V.

Name: DARLENE FIFE

email: —

Address: 846 Jefferson ST. S.  
Lewisburg WV 24901

IND433-1

Water resources and wetlands are addressed in section 4.3 of the EIS. We concluded that impacts would be temporary and not significant on streams like the Greenbrier River near Pence Springs, West Virginia. Mountain Valley now proposes to use a dry crossing of the Greenbrier River.

# INDIVIDUALS

## IND434 – Sydney Rubin

20161215-5002(31825674)

Sydney Rubin, Charlottesville, VA.

IND434-1

I am about to graduate from UVA with an environmental science degree and am very concerned about the water quality and ecosystem impact the Mountain Valley Pipeline will have. I understand the delicate balance the ecosystems of the forest are in and how this pipeline would destroy it. The pipeline, both during construction and throughout the many decades its impacts would be felt, will result in degraded water quality, changed hydrologic cycle, promotion of invasive species, and eliminated forest habitat. Humans rely on a healthy ecosystem for our own health and well being. I strongly oppose this pipeline and urge you to deny it.

IND434-1

Section 4.3 of the EIS discussed water resources. See also the response to comment IND343-1 regarding invasive species.

# INDIVIDUALS

IND435 – Cosmo A. Catalano, Jr.

Federal Energy Regulatory Commission  
Kimberly D. Bose, Secretary  
888 First St. N.E. Room 1A  
Washington, DC 20426  
eFiled – December 14, 2016

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

Ms. Bose,

IND435-1

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 and impair the resources and values of the Appalachian National Scenic Trail (ANST). These 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 FERC 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, and the “maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities” of the ANST as mandated by Congress in the National Trails System Act. There is a long-established process within the Forest Service for reviewing utility crossings of the ANST that has been successfully applied for many decades—balancing the needs of national and regional infrastructure projects with the goals of the National Trails System. FERC must allow that established review process to take place.

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 and impair the resources and values of the ANST.

IND435-1

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

# INDIVIDUALS

IND435 – Cosmo A. Catalano, Jr.

IND435-1  
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 both sides of the ANST.

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

Thank you for accepting and considering these comments.

Sincerely,

Cosmo Catalano, Jr  
Appalachian Trail Volunteer  
Stewardship Council Member of the Appalachian Trail Conservancy  
catalano.cosmo@gmail.com

Cc: Job Timm, George Washington and Jefferson National Forests  
Forest Supervisor  
[jtimm@fs.fed.us](mailto:jtimm@fs.fed.us)

Wendy Janssen, National Park Service  
Appalachian National Scenic Trail Park Superintendent  
[wendy\\_janssen@nps.gov](mailto:wendy_janssen@nps.gov)

Karen Overcash  
George Washington and Jefferson National Forest  
Forest Environmental Coordinator  
[kovercash@fs.fed.us](mailto:kovercash@fs.fed.us)

# INDIVIDUALS

## IND436 – Kara Jeffries

20161215-5014(31825818)

Submission Description: (doc-less) Motion to Intervene of Kara Jeffries under CP16-10-000.

Submission Date: 12/14/2016 5:44:07 PM

Filed Date: 12/15/2016 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	tourjek@vt.edu	
------------	----------------	--

Basis for Intervening:

Hello,

IND436-1

My name is Kara Jeffries. I belong to a community situated along the path of the proposed Mountain Valley Pipeline. I am writing to express my opposition. This pipeline poses risks, both human and environmental, that far outweigh any benefit. Damage to streams and waterways will have permanent effect on the surrounding ecosystems. Delicate habitats will be destroyed. Forests will be fragmented. The quality of drinking water for residents who rely on wells will be in jeopardy. This pipeline will disrupt soils in an area dominated by karst topography, meaning the impacts will extend far beyond the borders of the actual pipeline and its construction right of way. Setting monetary profit of investors aside, it will not be in anyones best interest. The Mountain Valley Pipeline should be denied approval.

Thank you,

Kara Jeffries  
 882 Coal Bank Hollow Rd.  
 Blacksburg, VA 24060

IND436-1

Non-environmental Commission staff will make a determination on whether to grant a party’s out-of-time intervention request. The EIS addresses water resources in section 4.3, soils in section 4.2, forests in section 4.4, and karst in section 4.1.

# INDIVIDUALS

IND437 – Georgia Haverty

15 December 2016

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

Dear Ms. Bose and Members of the Commission,

IND437-1

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

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

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

Sincerely,

Georgia Haverty  
Doe Creek Farm, Inc.  
Pembroke, VA

cc: Neil Kornze, Director, BLM; Joby Timm, Supervisor, Jefferson National Forest

IND437-1

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



# INDIVIDUALS

## IND438 – Elizabeth Struthers Malbon (on behalf of Don Barber)

December 13, 2016

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

Re: Applications for Authorization to Construct A Natural Gas Pipeline,  
Liquefied Natural Gas (LNG) or Other Facility (CP Dockets)  
FERC Docket Number for the Mountain Valley Pipeline Project, LP  
Docket No. CP16-10-000

Commission:

IND438-1 | I wish to add my opposition to construction of the Mountain Valley Pipeline (MV) identified above. My reasons are numerous, some general and philosophical and others specific and factual.

Broad Concerns:

- From a general perspective, this pipeline is a potential disaster to the numerous residents and communities along its proposed route. The size of the pipeline, the volumes to be transported, the pressures involved, and the gases to be transported are all quite unique, extremely dangerous, little tested, and inappropriate for the proposed route and surrounding environment.

IND438-2 | • The probability of gas leaks and their consequences is high. In the terrain of southwestern Virginia, gas leaks can readily lead to contamination of well water, accumulation in earthen cavities with explosive possibilities, and noxious air contamination. It is inappropriate to subject residents and communities to these dangers for the profit of private corporations.

IND438-3 | • The pipeline will be of no significant economic benefit to the citizens of the Commonwealth of Virginia or West Virginia. The MVP will serve as a conduit to ship gas to peripheral terminals including likely export out of the United States. There are no, or minimal, specific plans to tap into the pipeline for local use, and to do so would require rather costly investment with little access to the gas being transported.

IND438-4 | • Job creation has been exaggerated and often misunderstood. It has been said that 3,200 jobs would be created. But this is grossly misleading. These jobs would only be in construction of the entire pipeline and would involve rather skilled labor brought in for the task. They would only be in existence for the construction phase. Once built, there is no further need

IND438-1 | See the response to comment IND2-1 regarding safety. See the response to comment LA1-4 regarding existing 42-inch natural gas pipelines in mountainous terrain.

IND438-2 | Actually, underground welded steel FERC-regulated transmission pipelines rarely leak; see section 4.12 of the EIS. See the response to comment IND92-1 regarding leaks.

IND438-3 | See the response to comment CO2-1 regarding benefits. See also the response to comment IND281-2 regarding benefits to Virginia. See the response to comment IND2-3 regarding export. As discussed in section 1.2 of the EIS, the MVP would be tapped to supply natural gas to Roanoke Gas, a local distribution company serving southwestern Virginia.

IND438-4 | As stated in section 4.9 of the EIS, local workers would comprise about 25 percent of the workforce during construction. See also the response to comment IND281-2 regarding permanent jobs.

# INDIVIDUALS

## IND438 – Elizabeth Struthers Malbon (on behalf of Don Barber)

IND438-4 cont'd	for those job numbers. In comparison, only a few jobs would be needed for routine maintenance of the entire pipeline. Hardly significant job creation in light of environmental and human risks.		
IND438-5	<ul style="list-style-type: none"><li>The proposed route for the pipeline traverses (and takes) a great deal of private property by eminent domain. This sounds simple and tidy. But the taking of private land that people have spent their lives acquiring, living on, or developing for the financial benefit of a large and distant corporation is a nasty concept. People are committed to their land and to its value and have put years into their way of life. Taking that land without justifiable cause that would benefit the greater population is inappropriate. To take that land for the financial gain of a corporation to be able to export their product is counter to the concept of eminent domain.</li></ul>	IND438-5	See the response to comment IND1-3 regarding eminent domain.
IND438-6	<ul style="list-style-type: none"><li>Remaining property values will be greatly reduced. Even those properties not directly taken will be devalued. Who wants to live in the shadow of such large pipeline with its potential for leaks, explosions, and well contamination alongside its grotesque surface destruction. All without benefit. Having lived on my property for over 30 years, I am now faced with property devaluation rather than appreciation. And in turn, although there may be some minor tax benefit to the state, localities and counties will lose significant revenue due to devalued property. An all too common downhill flow of funding.</li></ul>	IND438-6	See the response to comment IND12-1 regarding property values.
IND438-7	<ul style="list-style-type: none"><li>The pipeline will have significant negative effects on the environment of this region. Areas that will be negatively affected are known for their scenic beauty, tourism, and lifestyle. The Appalachian Trail, the Blue Ridge Mountains, the Blue Ridge Parkway, the national forests, and the valleys of the New and Roanoke Rivers will all be degraded.</li></ul>	IND438-7	We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest).
IND438-8	<ul style="list-style-type: none"><li>US fossil fuel energy needs are currently being adequately met. Greater production of fossil fuels for export do not benefit the American people. In fact, exporting fuel sources will in turn lead to higher energy costs for US citizens.</li></ul>	IND438-8	See the response to comment IND2-3 regarding export.
IND438-9	<ul style="list-style-type: none"><li>This pipeline would transport gas obtained by hydraulic fracturing and would further encourage this process called fracking. As we inject more and more secretive toxins into the ground, they will eventually find their way back to poison our environment including ground water and our wells. Some effects are here, and others will be here in the very near future, whether it be general ill health or specific diseases.</li></ul>	IND438-9	See the response to comment IND2-3 regarding hydraulic fracturing.
IND438-10	<ul style="list-style-type: none"><li>The Mountain Valley Pipeline and the Atlantic Coast Pipeline are both in the proposal stages, would transport comparable materials, and generally cover comparable routes. It is our understanding that at least one, and possibly more pipelines are being considered to do the same. Would it</li></ul>	IND438-10	The ACP Project is examined as an alternative in section 3.

# INDIVIDUALS

## IND438 – Elizabeth Struthers Malbon (on behalf of Don Barber)

IND438-10  
cont'd

not be more rational to minimize the destruction and combine these various proposals? Although rational may not be your forte, it should be considered.

IND438-11

Recent and Specific Developments:

- FERC is required (NEPA – National Environmental Policy Act) to define the purposes and the need for a pipeline project DEIS (Draft Environmental Impact Statement). According to a recent study, the MVP and the ACP projects would significantly burden customers with higher energy bills to cover the costs of the unnecessary construction. Apparently existing and upgraded pipelines can supply an equal or greater amount of natural gas at lower costs with far fewer negative impacts. This fact stands on its own but also adds credence to the concept that further destruction of the environment, destruction of people's property, and potentially harmful effects on our health are for the sole profit of a distant corporation.

IND438-12

- The FERC DEIS is inaccurate and incomplete. To conclude that the project would result in limited adverse environmental impacts with the exception of impact on the national forest is a ludicrous, contradictory statement. Since even you admit that the pipeline route mostly crosses forest (81%), it is thus obvious that the adverse environmental impact would be significant.

IND438-13

- The time allocated for analysis, posting, and response is inadequate. Shortfalls have been shown in MVP data on effects of blasting, sedimentation, private wells and septic systems, communities, steep terrain, and stream crossings. It is FERC's responsibility to adequately and appropriately address these issues. Private citizens have neither the resources nor the knowledge to address all of these issues. And it should be your responsibility to represent the needs and concerns of affected citizens rather than only those of pipeline corporations. And to do so honestly and transparently.

IND438-14

- FERC and MVP have demonstrated a failure to provide adequate and accurate information. Examples include effects of erosion and the influence of karst topography.

Many people involved with these concerns fear that erosion issues would be much more significant than admitted to by MVP. An example near home of this is the erosion that has taken place near Pearisburg, VA, from a gas pipeline constructed for a local plant. Topography involved in the MVP will be much steeper, much longer, and much more difficult to address.

pg 3

IND438-11

See the response to comment FA11-12 regarding need.

IND438-12

The draft EIS was not inaccurate. See the response to comment CO5-1 regarding preparation of the draft EIS. See the response to comment IND155-2 regarding forest impacts.

IND438-13

The period to comment on the draft EIS was 90 days. See the response to comment IND378-3 regarding the comment period. All timely comments on the draft EIS were considered by the FERC staff and addressed in the final EIS.

IND438-14

See the response to comment IND70-1 regarding erosion. Karst is addressed in section 4.1 of the EIS. Water resources are addressed in section 4.3 of the EIS.

# INDIVIDUALS

## IND438 – Elizabeth Struthers Malbon (on behalf of Don Barber)

IND438-14 cont'd	Scientists continue to warn about the karst topography of the region. We have been warned that this type of construction is completely inappropriate in this type of topography due to caves, underground streams, and sinkholes. Why do not the scientists receive more credibility? You seem to ignore them at our peril.
IND438-15	<ul style="list-style-type: none"><li>We are lacking an honest and forthright statement as to what can and will be transported in this pipeline and it's final destination and distribution. What hazardous materials will be included and transported? And why is MVP so unwilling to confirm and quantify the exportation of the items to be transported? Since exportation philosophically negates eminent domain, I can see their rationale. But you should not allow this to happen !</li></ul>
IND438-16	<ul style="list-style-type: none"><li>The overall contribution of this energy source and this pipeline to the overall greenhouse effect and global warming is ignored.</li></ul>
IND438-17	<ul style="list-style-type: none"><li>The response to destruction of people's wells and septic systems has not been specifically addressed. It is noted that if someone's well becomes contaminated, a new well would be drilled. I can just imagine the legal nightmare of an individual trying to prove, in court, against a large wealthy corporation, that their well was contaminated by MVP. That would be funny if not so serious. Even if legally successful, just drilling a new well would not suffice if the water table became contaminated. I find this to be a ridiculous response. Will MVP be required to establish a financial "set aside" to pay for damage to people's resources?</li></ul>
IND438-18	<ul style="list-style-type: none"><li>Resolution of damages incurred during construction has not been adequately addressed. Other issues poorly considered include structural damage to buildings and roads and negative effects on the environment due to both heavy machinery and blasting.</li></ul>
IND438-19	<ul style="list-style-type: none"><li>You have failed to consider various issues pertinent to the national forests. There are groves of old growth forest within the Jefferson and George Washington National Forests with recommendations for new and additional wilderness areas. The proposed route would significantly negatively affect these areas, specifically the old growth sections which are already established and irreplaceable.</li></ul>
IND438-20	<ul style="list-style-type: none"><li>The Appalachian Trail Conservancy interpreted your DEIS of the MVP as a threat to major ecosystems and the landscape of Virginia and West Virginia and is strongly opposed to the proposed MVP project. Major concerns include permanent damage to iconic views along the Appalachian Trail (which are misrepresented in your DEIS), health and safety concerns for nearby communities and the surrounding environment, harmful changes to the Jefferson National Forest Management Plan, and</li></ul>

IND438-15	As stated in section in section 1 of the EIS, the applicants are seeking authorization to construct and operate interstate natural gas transmission facilities. The pipelines would only transport natural gas in a vapor state. See the response to comment IND1-3 regarding eminent domain. See the response to comment IND2-3 regarding export.
IND438-16	Global warming and climate change are discussed in sections 4.11 and 4.13 of the EIS.
IND438-17	Water wells and septic systems would not be destroyed. As discussed in section 4.3 of the EIS, water wells would be subject to pre-construction testing to determine baseline values. Post-construction sampling would conducted for water supply owners that lodge complaints after construction. See the response to comment IND28-3 regarding financial responsibility.
IND438-18	As stated in section 4.8.2 of the EIS, "an easement agreement between a company and a landowner typically specifies compensation for losses resulting from construction, including losses of non-renewable and other resources, damages to property during construction, and restrictions on uses that would not be permitted on the permanent right-of-way. Compensation would be determined through negotiations between the company and the landowner."
IND438-19	See the response to comment FA10-1 regarding Amendment 3.
IND438-20	Visual impacts, including the ANST, are discussed in section 4.8 of the EIS.

# INDIVIDUALS

## IND438 – Elizabeth Struthers Malbon (on behalf of Don Barber)

IND438-20  
cont'd

potentially significant negative impact on the economy of nearby communities.

Please consider the concerns of those who live on the land and who will be negatively affected by your decisions.

Respectfully,

Don Barber

4593 Preston Forest Drive  
Blacksburg, VA 24060  
540-552-9108  
[dbarber@vt.edu](mailto:dbarber@vt.edu)

# INDIVIDUALS

## IND439 – Elizabeth Struthers Malbon

To: Federal Energy Regulatory Commission

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

Re: Mountain Valley Pipeline, CP16-10-000  
DEIS: Proposed—and not proposed—Compressor Stations

Date: December 14, 2016

IND439-1

As a resident of the Preston Forest Subdivision in Blacksburg, Montgomery County, Virginia, I am writing to express my serious concern about the compressor stations proposed—and not proposed—in the Draft Environmental Impact Statement (FERC/DEIS-D0272) for the Mountain Valley Pipeline (Docket Number CP16-10-000). In the Pre-Application for the MVP (Docket Number PF15-3), four compressor stations were proposed, including one in Montgomery County, possibly in the Catawba Valley. Many objections to the Montgomery County compressor station and its siting were raised by local citizens. Then, quite mysteriously, this compressor station failed to appear in the DEIS, which proposes only three compressor stations (DEIS, p. 2-11). A shared suspicion in Montgomery County is that the need for a compressor station here is still present for this 300-mile-long pipeline, but MVP has decided not to reveal those plans until later—perhaps hoping to procure a Certificate of Public Convenience and Necessity first. (MVP watchers have made note of some property in Montgomery County recently bought by MVP that seems not to be for pipeline construction itself.) It is not hard to imagine that MVP officials might say (if the MVP were given a go-ahead for the next stage), Oh, now that we are building (or confirming details to build) the pipeline system, we have realized that we DO need a compressor station in Montgomery County after all. Such action would likely qualify as segmentation, breaking an integrated project up into segments for purposes of easier approval, a procedure that is not permitted by the National Environmental Policy Act. Were this to happen, concerned citizens would certainly explore legal options to challenge the irregularity.

### **Segmentation and Cumulative Environmental Impacts**

Segmentation may also be a problem in the failure of FERC to respond positively to numerous requests from citizens, as well as elected officials, to consider the environmental impact of the proposed MVP together with other pipelines proposed for the same area. In a FERC filing on October 30, 2015, several groups urged FERC to conduct a unified “programmatic” Environmental Impact Statement (EIS) for the proposed Mountain Valley Pipeline, Atlantic Coast Pipeline, Atlantic Connector Pipeline, and WB Express Project.

A decision the U.S. Court of Appeals for the District of Columbia issued in *Delaware Riverkeeper Network, et al. v. Federal Energy Regulatory Commission* may be relevant to this situation of the more limited DEIS submitted for the MVP alone. An Energy and Environmental Alert posted to the K&L Gates website on June 20, 2014, describes the case

IND439-1

See the response to comment IND375-8 regarding the fact that there is no compressor station proposed for Montgomery County, Virginia. The reasons the FERC did not prepare a programmatic NEPA document is explained in section 1.3. See the response to comment IND241-1 regarding the Appalachian Connector project. The ACP was considered as an alternative in section 3 of the EIS.

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## IND439 – Elizabeth Struthers Malbon

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IND439-1  
cont'd

and the decision (<http://www.klgates.com/dc-circuit-to-ferc-environmental-review-of-related-pipeline-expansion-projects06-20-2014/>; all quotations in this and the following paragraph are from this website). The background of the ruling is a regulation of the National Environmental Policy Act (NEPA). "In developing an EA [Environmental Assessment] or EIS [Environmental Impact Statement], NEPA prohibits an agency from unduly 'segmenting,' or splitting apart, a single project into multiple projects and [sic] which could thereby reduce the scope of potential impacts considered in the environmental review (arguably minimizing the potential environmental impacts of the proposed action)." Since the environmental impact of even one compressor station is huge, it is not unreasonable to assume that the environmental impact of three compressor stations for the MVP project proposed in the DEIS would be less than the environmental impact of the four such compressor stations proposed in the Pre-Application Filing. One cannot help but wonder whether segmentation may be behind the change from four to three proposed compressor stations for the MVP. In the *Riverkeeper Network* court case, it was FERC (not the builder of the pipeline in question) that was found to be in the wrong in allowing the segmentation. As is well known, FERC works cooperatively with corporations in their applications, which FERC then approves.

The commentators on the *Riverkeeper* case in the online posting cited above (Barry M. Hartman, Sandra E. Safro, Maureen O'Dea Brill, and Michael L. O'Neil) continue: "The court concluded that FERC violated NEPA by (1) improperly segmenting the Northeast Project environmental review from the three other 300 Line upgrade projects and by (2) failing to meaningfully analyze the cumulative impacts of all four projects in its review. The decision establishes important law on the issue of improper segmentation, both for pipeline projects and other infrastructure expansions generally." The situation with the MVP, the ACP, and two other projects seems comparable to this case. Even beyond the issue of segmentation, the commentators on the D.C. court decision note that the court reasoned "that NEPA regulations require an agency to consider the cumulative environmental impacts of a proposal 'when added to other past, present, and reasonably foreseeable future actions' in developing an EA or EIS." Clearly the proposed ACP is reasonably foreseeable. Finally, the commentators ask, "so what?" Their answer is important for the situation of the MVP and the ACL, proposed to arrive at the same destination: "Agencies [like FERC] rarely lose NEPA cases, and when they do, they often alter their behavior to avoid future losses, and sometimes go farther than what is necessary to avoid a future successful challenge. As a result, projects in the NEPA pipeline (pun intended) after a loss like this can expect to face broader reviews and agency reluctance to expedite its review." Thus, it is all the more surprising that FERC has, so far, resisted public pressure to direct that a programmatic EIS be prepared for the several pipelines proposed for Virginia. This public pressure will not end. The posting cited here and in the previous paragraph is written primarily as advice to would-be investors in pipeline projects, advice MVP seems not yet to have taken. But it is also a cautionary tale to FERC of what can happen in a U.S. Court of Appeals when either segmentation or failure to consider the environmental impacts of connected, cumulative, and similar federal actions. Those with serious questions about the DEIS for the MVP, submitted in the absence of such broader consideration—and possibly with an attempt at segmentation in relation to the originally proposed compressor station in Montgomery County that has disappeared from the DEIS—will be keeping a close eye on the situation.

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## IND439 – Elizabeth Struthers Malbon

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IND439-2

### Environmental Impacts of Compressor Stations

But even if the proposed 300-mile MVP could be constructed with just three compressor stations, none of which were to be in Montgomery County, the environmental impact would be devastating. Although gas pipelines themselves have serious environmental and health risks (we know that all pipelines leak, and we know that pipelines carrying fracked gas also leak remnants of the toxic chemicals introduced in the fracking process), the compressor stations required to regulate the pressure in such pipelines compound their negative environmental and health impacts considerably. Although all pipelines leak, we don't know in advance how bad the leaks will be or where they will occur. Although some pipelines explode, releasing their flammable and toxic contents and causing enormous damage to natural and human environments and health, not all pipelines explode. But all compressor stations put pollutants into the air (including volatile organic compounds and nitrous oxides that result from combustion of the fracked gas used to run the compressors), and all compressor stations blowdown their contents regularly (for fracked gas, that would be gas plus remnants of fracking chemicals), and all compressor stations contribute to noise pollution and light pollution twenty-four hours a day, seven days a week. It would be inaccurate to speak of environmental and health "risks" of this situation; the results are guaranteed.

In terms of **air pollution**, compressor stations release, among other things, methane and formaldehyde. Like carbon dioxide, methane is a greenhouse gas, but methane is considered about 20 times as potent a greenhouse gas as carbon dioxide. This fact needs to be taken into consideration with evaluating just how "clean" using fracked gas is or is not. Thus the amount of methane that is released into the atmosphere has to be considered as cost in the evaluation of both economics and the environment. But engine exhaust is not the only source of emissions in a compressor station; there are also methane leaks in the compression equipment, some of which can be captured easily and some of which cannot, and scheduled blowdowns. The so-called "natural" gas fracked in the Marcellus shale region and proposed to fill the Mountain Valley Pipeline is generally referred to as "wet" gas and contains a smaller percentage of methane and also many other contaminating hydrocarbons or Natural Gas Liquids. It is not clear whether MVP will remove these contaminants prior to the entry of the fracked gas into the Mountain Valley Pipeline, but compressor stations are often used along routes to continue to clean the gas before it reaches its final destination. Even if such contaminants are removed before the gas enters the proposed MVP, as the fracked gas passes through the pipeline, water and other hydrocarbons may condense out of the gas, and these impurities will need to be removed by the compressor stations so that they can be disposed of or sold. This is thus yet another source of pollution. It is estimated that 49.6 billion cubic feet of methane gas is lost each year due to unplanned and unwanted emissions and 7 billion cubic feet of methane is lost from compressor venting or blowdowns. Thus one cannot fairly compare the emissions from combusted coal and combusted natural or fracked gas when comparing the environmental impact of these two fossil fuels. When the full picture is examined, including methane and pollutants released both intentionally and through leakage and environmental destruction involved in pipeline and compressor station construction and

IND439-2

Environmental impacts would not be significant (except for the clearing of forest). Underground welded steel FERC-regulated natural gas transmission pipelines rarely leak; read section 4.12 of the EIS. See the response to comment IND92-1 regarding leaks. See the response to comment IND2-1 regarding safety. Air emissions are addressed in section 4.11.1. GHGs are discussed in sections 4.11 and 4.13 of the EIS. See the response to comment IND375-4 regarding air quality and noise impacts.



# INDIVIDUALS

## IND439 – Elizabeth Struthers Malbon

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IND439-2  
cont'd | maintenance (to say nothing of the environmental damage caused by fracking in the first place), fracked gas is only a “bridge fuel” for a bridge to nowhere!

IND439-3 | **Noise pollution** is another known factor with compressor stations—not a possibility but a guarantee. Although FERC requires that compressor stations not exceed an average day-night sound level of 55 decibels, this is an average, and highs may exceed that number. But the decibel level only measures loudness. Sounds can also be disturbing due to their frequency (especially constancy), the topography of the area, or even the weather and wind speed on a particular day. In rural areas, we are accustomed to hearing the sounds of nature—bird songs, water in creeks, wind in the trees. Many have chosen to live in such areas to appreciate such sounds; many others have lived and worked on family farms in such areas with such daily delights for generations. Apparently, compressor stations are permitted to be noisier at night, up to 100 decibels, when city dwellers might be asleep with their windows closed. But the usual nighttime noise level in many rural areas is around 35 decibels. We have learned from a citizen who has researched noise levels in such compressor stations that companies often try to buy more land so that they can run the compressors at a higher decibel (since measurements are taken not at the compressor station but at the nearest inhabited structure/s). Buying a larger tract of land, then, would not be for the benefit of local citizens, who expect some peace and quiet in the countryside whether they are near an inhabited structure or not, but (not surprisingly) for the benefit of the company building the compressor station, who could thus spend less money on noise abatement. The louder the noise, the farther away it can be heard. We are also aware of the health—including mental health—effects of exposure to continuous noise, even if the noise is not especially loud. In fact, exposure to continuous noise has been used as a form of torture. The residents of Montgomery County—and all of Virginia and West Virginia—would not be fooled by this ruse.

The information source for the above two paragraphs is  
[http://preservethenv.com/articles/natural\\_gas\\_compressor\\_stations.pdf](http://preservethenv.com/articles/natural_gas_compressor_stations.pdf).

An area originally proposed by MVP for a compressor station in Montgomery County (the Swann Compressor Station) is the Catawba Valley, federally recognized as the North Fork Valley Rural Historic District. This valley is not zoned for major industry, which is what a compressor station would represent. Apparently, the huge noise of a blowdown is frightening in its surprise as well as in its volume. The fact that MVP might be able to cut a deal with one landowner willing to make a profit by selling his land does not mean that the entire community should be made to suffer from twenty-four hours a day, seven days a week noise and light pollution. Being able to see the stars at night and hear the birds in the daytime is a birthright in the Catawba Valley—and much of Montgomery County (including my neighborhood, Preston Forest); this birthright should not be sold—or stolen.

### Conclusion

While it may be true that a compressor station is a necessary evil if a pressurized pipeline to transport fracked gas is to be built, the guaranteed environmental and health damage of a compressor station—or three, or four—just highlights that the building of such a pipeline is an evil that cannot be sustained. The potential environmental and health risks of a

IND439-3 | As stated in section 4.11.2 of the EIS, an  $L_{dn}$  of 55 dBA is the threshold for both daytime and nighttime. Due to the 10 dBA nighttime penalty added prior to calculation of the  $L_{dn}$ , for a facility to meet the  $L_{dn}$  55 dBA limit, the facility must be designed such that a constant noise level on a 24-hour basis does not exceed 48.6 dBA  $L_{eq}$  at any NSA. Noise measurements are taken at the compressor station property line.

# INDIVIDUALS

## IND439 – Elizabeth Struthers Malbon

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IND439-3  
cont'd

pipeline are compressed into known and predictable damages by a compressor station. Thus a compressor station compresses not only gas but also the environmental and health costs associated with the entire system of fracking gas and transporting it. For which public is such a venture supposed to be good? Certainly not the residents of West Virginia and Virginia who would have to breathe the polluted air and be disturbed by the unwelcome noise and light of the three—or maybe even four?—compressor stations required to move pressurized fracked gas up and down our mountains and valleys. There would be no public good in that. The only “good” would be for the officers and shareholders of Mountain Valley Pipeline, LLC. Private gain is not to be confused with public good. It is ironic that the only way MVP seems to have shown any acknowledgement of the topography in which they propose to bury this pipeline for fracked gas is in the name “Mountain Valley.” Yet what they propose to do in the way of destruction of our mountains and valleys with a 42”-diameter 300-mile-long pipeline and multiple compressor stations is insulting.

One cannot “mitigate” away the environmental impacts of converting rural and forested areas into industrial zones (that even fail to provide local jobs), as compressor stations would do. The mitigation measures listed in the DEIS are inadequate throughout. I call upon the Federal Energy Regulatory Commission to deny a Certificate of Public Convenience and Necessity for the Mountain Valley Pipeline on the basis of its failure to contribute to the public good and, in fact, to degrade much of the existing public good in the areas it proposes to cross.

# INDIVIDUALS

## IND440 – Larissa Browning

This is a form letter. 64 copies of this letter have been submitted.

20161215-5048(31825903)

Larissa Bowman, Fairview, NC.

- IND440-1 My comments pertain to unaddressed issues that may adversely impact the watershed and natural environments within and 'downstream' of this project. They are as follows:  
Section 4.3.2 Stream Crossings: The DEIS states that MVP plans to cross the Elk, Gauley and Greenbrier Rivers using the open-cut wet crossing method. This method uses no water diversion and is the most invasive and impactful crossing method available. FERC must require MVP to minimize impacts during river crossings including reducing the construction area to a minimum.
  - IND440-2  Section 4.3.3 Wetland Crossings: The DEIS claims there is no net loss of wetlands, but then states that MVP has not supplied information regarding their proposal to permanently fill 44 wetlands along access roads. The permanent filling of 44 wetlands is a significant impact. Information on wetland impacts must be provided to FERC.
  - IND440-3  Section 4.3.1 Groundwater: Private and domestic drinking water wells within the pipeline route have not yet been identified. FERC cannot determine the impact of blasting on water wells without this information. All water wells within the impact zone must be identified in the DEIS.
  - IND440-4  Section 4.6 Aquatic Resources: The DEIS does not adequately assess impacts of construction on aquatic life. MVP has not submitted the results of their analysis on sedimentation and turbidity from wet crossing methods. This information must be included in the DEIS.
  - IND440-5  Section 4.1.1.5 Geologic Hazards: The DEIS identifies 94 karst features, or caves, to be crossed by MVP. FERC has requested route variations to avoid some of these features. A study to determine interconnection between karst and water resources has not been completed. FERC must require a final route that avoids all karst features.
  - IND440-6  Section 4.1.2.4 Landslide Potential: The DEIS states that 78% of the pipeline route is highly susceptible to landslides; however, MVP has not supplied a detailed Landslide Mitigation Plan. FERC has requested route adjustments, additional information on landslide prone areas, and additional Best Management Practices (BMPs) to mitigate hazards from potential landslides. This information must be included.
- THANK YOU for your consideration of my comments!

- IND440-1 Following issuance of the draft EIS, Mountain Valley changed the three previously proposed wet open-cut waterbody crossings to dry open-cut crossings.
- IND440-2 See the response to comment IND209-1 regarding the permanent fill of wetlands.
- IND440-3 See the response to comment IND401-5 regarding pending water wells.
- IND440-4 A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. See also the response to comment FA11-15 regarding sediment and turbidity modeling.
- IND440-5 Karst features are discussed in section 4.1 of the EIS. Pipelines can and have been constructed within karst terrain.
- IND440-6 Table 2.4-2 indicates where in the docket Mountain Valley's *Landslide Mitigation Plan* can be found.

# INDIVIDUALS

IND441 – Michael J. McGee

This is a form letter  
that has been  
submitted 3 times.

20161215-5057(31825952)

Michael J McGee, Charlottesville, VA.

IND441-1 | -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.

IND441-2 | -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.

IND441-3 | -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.

IND441-4 | -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.

IND441-5 | -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.

IND441-6 | -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.

IND441-7 | -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.

IND441-8 | -The DEIS analysis of possible cumulative impacts on water bodies, particularly on headwater streams is superficial and incomplete.

IND441-9 | -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.

IND441-1 | Comment noted.

IND441-2 | We will not be producing a supplemental DEIS; but, instead will be addressing comments on the draft in a final EIS.

IND441-3 | Section 3.0 discusses alternatives that avoid crossing the Jefferson National Forest.

IND441-4 | 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.

IND441-5 | See the response to IND147-1 regarding drinking water springs and wells.

IND441-6 | The effects on the Brush Mountain IRA are discussed in Section 4.8. See the response to comment CO74-7 regarding Brush Mountain.

IND441-7 | See the response to comment IND401-7.

IND441-8 | Section 4.3 addresses the cumulative effects to waterbodies.

IND441-9 | See the response to comment FA10-1 regarding Amendment 4.

# INDIVIDUALS

IND441 – Michael J. McGee

IND441-9  
cont'd

In closing I'd like to express that we are living in a time that we will need to take care of our natural environment for future generations as past generations have done for us. We face a time where human destruction of the environment is catching up to us and we need to act now to protect natural environments and sometimes this may mean sacrifices must be made in the short term. Building pipelines and inroads through forests and streams to carry harmful chemicals from place to place at rapid speed threatens our environment it does not take care of it. I plead your understanding.

# INDIVIDUALS

## IND442 – Robert Browning

20161215-5058(31825970)

Robert Browning, charleston, WV.

Dear Administrators Overseeing the Energy Industry;

IND442-1 | I know its fun to rub ellbos w the fat cat representatives but please don't be part of the greed of the few over the people.

Regqqards,

IND442-1

This is not a comment about the draft EIS.

# INDIVIDUALS

IND443 – Luke A. Rostocki

20161215-5060(31825984)

luke a rostocki, md, summersville, WV.

Dear Sirs,

IND443-1

Having reviewed the Draft Environmental Impact Statement (DEIS) for the Mountain Valley Pipeline (MVP), I remain very concerned that the most important to me issues have not been adequately addressed in it.

Therefore I believe strongly that The Federal Energy Regulatory Commission (FERC) cannot make any reasonable determination as to the environmental (that includes streams, water sources, landslide risks etc.) impact of the project.

Luke A. Rostocki, MD

IND443-1

Water resources are addressed in section 4.3 of the EIS; landslide risks in section 4.1.

# INDIVIDUALS

## IND444 – Elizabeth Reeder

20161215-5061(31825992)

Elizabeth Reeder, Jumping Branch, WV.  
December 15, 2016

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

Re: Post-Operational Hazard

Dear Ms. Bose and Members of the Commission:

IND444-1

The DEIS states on page 2-58 that the “Applicants stated that the expected useful lifespan of the projects would be about 50 years” and that “facilities could either be abandoned in place or by removal.”

The DEIS does not address the many and valid concerns raised by Carl E. Zipper in his letter of July 20, 2016 (Post-Operational Hazard Mitigation Plan is Lacking Mountain Valley Pipeline (MVP) proposal, Docket No. PF15-3-000).

In his letter, Zipper points out that Federal regulations established under NEPA (18 CFR 380.4 (28)) enable, without consideration by environmental assessment or EIS, “... abandonment in place of a minor natural gas pipeline (short segments of buried pipe of 6-inch inside diameter or less), or abandonment by removal of minor surface facilities such as metering stations, valves, and taps under section 7 of the Natural Gas Act so long as appropriate erosion control and site restoration takes place”.

Obviously, MVP’s proposed 42-inch pipeline crossing hundreds of miles is a very different can of worms.

It is unconscionable to leave residents clueless as to what hazards may arise as the pipeline deteriorates. Humans, livestock, wildlife, and water resources face unknown risks as pipeline materials corrode and collapse in the future.

It is FERC’s responsibility to require MVP to lay out a specific plan, prior to construction, for the safe disassembly and removal of the pipeline, as well as replanting of the right-of-way with native vegetation.

Thank you.

Betsy Reeder  
Ecologist

IND444-1

Section 2.7 of the EIS addresses abandonment.



# INDIVIDUALS

IND445 – Bruce W. Zoecklein

December 15, 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,

IND445-1 | I am writing in regard to the Mountain Valley Pipeline (MVP) proposal, Docket No. CP 16-10. Specifically, I am writing to request public meetings with BLM in our area, the New River Valley of Virginia.  
We would like meetings in Montgomery and Giles Counties. The purpose of such meetings is to allow citizens to provide input regarding the Mountain Valley Pipeline proposal. To date, we have been force to deal with totally inadequate, closed and censored sessions. These have not allowed sharing of detailed information and issues of importance to our region. FERC and it's representatives have made it clear that our input is subject to their desires. Indeed, the actions of the Federal Energy Regulatory Commission would suggest we do not live in a participatory democracy!

IND445-2 | For example, Paul Friedman, the FERC Mountain Valley Pipeline project director attempted to deceived our citizens at the first (and only) Scoping meeting in our region. He showed a slide of a 22 inch or so pipeline on flat land and suggested this is what the MVP would look like in our area. This was obvious incorrect given our terrain and MVPs proposed 42 inch, 1400 psi-high pressure line. Secondly, he chastised the audience for believing gas transported via MVP would be for export. Subsequently, the Roanoke Times reported that a week before the Scoping meeting Friedman had been informed of an MVP client export contract. To add to our frustration, repeated attempts to have additional Scoping meetings in our part of the state were denied.

The so-called DEIS comment session in Roanoke Virginia on November 3, 2016 was equally biased. It was not an open session. It required individuals be in closed rooms to provide testimony to a stenographer. In my case no one was writing anything. The so-called stenographer used a tape recorder. Regardless, this format had the effect of limiting comments and intimidation. Apparently, this meeting format was designed to prevent sharing information with others. This was certainly the effect, whatever the intent. This motif does not constitute a public meeting! FERC stated this method was for efficiency. However, after more that several hours of wait time, some simply gave up and left.

IND445-3 | We have been told that comments provided to the stenographer at the DEIS meeting will be posted and available, to date that has not occurred. Even if it does, not all have either easy access to the internet or the skills to navigate through FERC web site. There is justified concern as to whether any of the information provided will appear in the public record.

IND445-1 | 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.

IND445-2 | During the public scoping meetings, Mr. Friedman showed slides of typical pipeline construction taken for projects across the country. He also stated truthfully that Mountain Valley did not design the project for export, and did not request export authority. See the response to comment LA2-1 regarding the comment sessions. Stenographers often use recording equipment during testimony to ensure accuracy.

IND445-3 | Transcripts for the public sessions to take comments on the draft EIS were posted to the FERC docket on November 16, 2016 (Accession Number 20161116-4001).

# INDIVIDUALS

## IND445 – Bruce W. Zoecklein

IND445-4 | The environmental report published by FERC is highly flawed and incomplete by anyone other than FERCs standards. So poor is this report that some groups have stated they will not even comment, except to request that it be completely redone and done correctly!

IND445-5 | The BLM should offer open meetings in our area so the agency can receive information from the citizens of this region. It is our experience that environmental information from FERC and MVP is highly biased or just plain inaccurate.

Not only does this project directly influence the lives of those who's land will be taken, but also relates to public health, safety, and economics concerns-all of which have been either dismissed or distorted by MVP.

IND445-6 | Regarding economics, please consider the following: According to a report by Key-Log Economics (2016), for every \$ 1 spent by the pipeline company our region will have a loss of \$3 as a result of lost property values, tax revenues, road/ infrastructure damage, slowed tourism, aesthetic view shed loss, water shed loss, etc. (See their report at [www.Keylogeconomics.com](http://www.Keylogeconomics.com)).

Lack of citizen input and the number of extremely important questions regarding the long lasting effects of this pipeline to everyone suggests the BLM hold meetings to gather information prior to decision making.

Thank you for considering this request.

Dr. Bruce Zoecklein

IND445-4 | See the response to comment LA5-1 regarding preparation of the draft EIS.

IND445-5 | Comment noted.

IND445-6 | See the response to comment IND137-1 regarding the KeyLog report.

# INDIVIDUALS

## IND446 – Bill Seale

20161215-5183(31833370)

Bill Seale, Blacksburg, VA.

- IND446-1 My wife and I strongly oppose the pipeline for the following reasons:  
1. My family is subject to undue risk without any compensation. We are within the blast of several alternatives and the evacuation zones of all alternatives.
- IND446-2 2. It would substantially reduce the value of my property.
- IND446-3 3. We will be subjected to considerable construction traffic, noise and air pollution, plus potential damage to well water.
- IND446-4 4. It is dangerous to bury a large 42-inch-diameter pipeline in an area with karst and steep unstable slopes.
- IND446-5 5. Montgomery County will incur uncompensated costs if the pipeline is constructed, nor will it collect any taxes.

Thank you.  
Bill and Carol Seale

IND446-1

See the response to comment IND2-1 regarding safety. Alternatives are discussed in section 3. In response to our draft EIS, Mountain Valley adopted the Mount Tabor Variation, Canoe Cave Variation, Mayapple School Variation, and Sunshine Valley School Variation into its proposed route. If you do not reside along those variations, you would not be affected by alternatives not selected.

IND446-2

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

IND446-3

Traffic is discussed in section 4.9 of the EIS; noise and air quality issues in section 4.11 of the EIS; and wells in section 4.3.1 of the EIS.

IND446-4

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.

IND446-5

See the response to comment IND345-4 regarding taxes to be paid to Montgomery County.

# INDIVIDUALS

## IND447 – Mary Wildfire

20161215-5100(31826581)

Mary Wildfire, Spencer, WV.

Dear FERC EIS comment readers:

IND447-1 | I wish to comment in response to the draft EIS for the Mountain Valley Pipeline. I have received information from West Virginia Rivers Coalition that details omissions and inadequacies in the report, but I am not going to include those because I'm sure others will. In any case, skimming over the draft EIS, I see that myriad issues and problems are all dealt with in the same way: the potential problems are detailed, and then waved away with the statement that the company's proposed mitigation or their following best available practices will make it all acceptable. I noted that in the section on environmental justice it was first shown that the project would not adversely affect people of color, whose concentration in the area to be traversed by the pipeline is lower than or average for the states. On the other hand, low income is prevalent in the affected area; but this is not a problem because the project would create jobs, and collateral spending. But if this is how it works, then why not assume that ALL proposed projects are fine and dandy in EJ terms, regardless of either the income or minority status of nearby residents, since there always jobs involved? Why even consider EJ since by this logic, it doesn't exist? (Not that those jobs will be reserved for local residents or minorities, of course, by FERC or any other agency.)

IND447-2 | And so I assume that issues of stream crossings not done in the most careful manner, or mitigation of wetlands, or listing and protecting of water wells, will be dealt with in the same way: you may require that the research be done but none of these considerations will affect the outcome—the company will assure you they're doing all that can be done and that will be good enough.

IND447-3 | I also note that the only projects rejected by FERC in over 30 years were turned down because of "inadequate market demand", and I was told by a FERC employee in Ripley, WV that "need" for a project equated to the company showing contracts for the product. Which suggests that FERC's actual purpose is to avoid too many overlapping and competing projects. So why even do an EIS, why collect comments? Presumably because: it's required by law (which may be struck down under the Trump Administration but that remains to be seen); because it gives jobs to ecologists, sociologists, geologists, etc; because that way it can be said that the thing has been carefully reviewed. And, perhaps, because it ties up opponents in writing comments or attending hearings rather than exploring more effective means of opposition.

IND447-4 | Yes, I do have an actual, specific issue about the MVP to raise here, one which neither WV Rivers nor the EIS addressed, that I could find (unless you count a sentence in which "GHG" was listed along with various other air pollutants, which we're assured, will be no issue since the company will use efficient equipment and best practices). But I believe a court has ruled in relation to another project that FERC must consider climate change. The sentence I just mentioned hardly qualifies. But here's the thing—neither is it adequate or acceptable to deal with this issue in the way this document deals with scores of others—by naming and sometimes quantifying them, then declaring that a little mitigation or area reduction or following best practices will take care of it. In fact, scientists are in overwhelming agreement that climate change is a serious crisis, and that we must begin sharply reducing emissions if we are have any hope of averting catastrophic climate change...severe effects are already pretty much inevitable even if we suddenly began behaving responsibly. The IPCC's scenarios for avoiding more than

IND447-1 | The environmental justice analysis provided in section 4.9 of the EIS is consistent with EO 12898.

IND447-2 | Construction methods at stream crossing are discussed in a careful manner in sections 2 and 4.3 of the EIS, together with mitigation for wetland impacts, and impacts on wells.

IND447-3 | See the response to comment IND196-5 regarding review of the projects. See section 1.2.3 of the EIS which explains how the Commission makes decisions.

IND447-4 | Climate change is discussed in sections 4.11 and 4.13 of the EIS.

# INDIVIDUALS

## IND447 – Mary Wildfire

IND447-4  
cont'd

2 degrees Celsius of warming all assume that we will increase emissions for a few years, then slowly reduce them while employing magical "negative emissions" technologies or practices. These negative emissions, whether they involve machinery or agricultural changes or incantations, are all unproven—and if they are so easy why aren't we already employing them?

There is exactly one way to avert catastrophic climate change, with the billions of premature human deaths—not to mention all the others, and the extinctions—it will bring about: we have to reduce greenhouse gas emissions, beginning right now. This means we have to reduce the burning of fossil fuels, and deforestation. Building new pipelines for natural gas means locking in fossil fuels for several decades. We could, instead, create jobs and preserve some modernity by engaging in a massive buildout of renewable energy infrastructure. But that doesn't have the lobbying pressure the fossil fuels have, so it isn't done.

Given this reality, I say this—having any part in creating new fossil fuel infrastructure is a criminal act. Is that statement hyperbole? You may say so today, but what will you say, 25 years from now if you're still alive, when you look into the accusing eyes of your children or grandchildren, who have found evidence that as late as 2017, you facilitated the continued growth of this destructive industry?

Mary Wildfire

# INDIVIDUALS

## IND448 – Philip Queen

20161215-5258(31837880)

Philip Queen, Richmond, VA.

IND448-1 | 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.

IND448-2 | Furthermore, 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.

IND448-3 | The infringement on the state and national treasures of the Jefferson National Forest and the Appalachian Trail should be avoided if at all possible.

IND448-1 Section 3.0 discusses alternatives that avoid crossing the Jefferson National Forest.

IND448-2 Section 4.13 of the EIS has a discussion of cumulative impacts on the ANST.

IND448-3 See the response to comment FA10-1 regarding Amendment 4.

# INDIVIDUALS

## IND449 – Elizabeth Welch

20161215-5161(31831395)

Elizabeth Welch, Roanoke, VA.

IND449-1

I am commenting on pages 4-144 to 4-151 of the Draft Environmental Impact Statement for the Proposed Mountain Valley Project and Equitrans Expansion Project (September 16, 2016), Docket No. CP16-10-000 and Docket No. CP16-13-000.

Dear Federal Energy Regulatory Commission Members,

I am commenting on my concern over forest fragmentation that would occur due to the construction of the MVP. The DEIS states that it will remove interior forests creating forest edges. I urge you to consider the ethical and environmental consequences of destroying forests that would otherwise long outlive humans to make way for irresponsible industrial projects. As stated in the DEIS, the forest fragmentation will lead to a loss in biodiversity, introduction of invasive non-native species, and the removal of habitat for those interior forest species (FERC, 2016, p. 4-145).

Although there are plans to reseed the forests with native plants, the time it takes to regrow a forest is significant during which many changes will occur. The edge effect will yield increased exposure to light and wind, higher temperatures, and a loss of moisture. As reported in the DEIS, these changes may create an unsuitable environment for those native species of salamanders and plants, resulting in an overall structural change to the forest community (FERC, 2016, p. 4-145). With higher temperatures and drier soil, an increase in wildfires is sure to occur. In fragmented forests, wildfires are less likely to spread. While that may seem to suggest a positive impact on the environment, I fear the reality is that it becomes more acceptable to let the fire kill its patch of forest and burn out. Because such a patch of forest is a seemingly small loss, it is likely that it will not be reseeded. Over time, the process will repeat itself and claim a significant portion of forest if unchecked. Additionally, The Mountain Valley Fire Prevention and Suppression Plan includes creating designated smoking areas dependent upon the public's willingness to abide by largely unenforceable safety rules to prevent fires (FERC, 2016, p. 4-150). Preventative measures that rely on the honor system seem highly likely to fail in the face of human apathy.

I am asking that you choose avoidance or better yet the No Action alternative as mitigation. It is our responsibility to preserve forested habitats and their animals. The environmental impact of the MVP renders its construction unethical. It would be better to start saying no to fossil fuels and move towards clean energy.

Sincerely,

Elizabeth Welch

IND449-1

Section 4.4.2 of the EIS does not state that forest fragmentation will lead to loss in biodiversity, introduction of invasive non-native species, and the removal of habitat for those interior forest species. The EIS states that these things could happen. The designated smoking areas discussed in Mountain Valley's *Fire Prevention and Suppression Plan* are for Mountain Valley employees and contractors rather than the general public. See the response to IND155-2 regarding forest impacts.

# INDIVIDUALS

IND450 – R. M. Greene

20161215-5269(31837954)

R. M. Greene, Silver Spring, MD.

IND450-1

I have been an AT hiker since 1997. My five-year-old son has even managed to get in a little hiking on it, and we have plans to do more. Please, do not allow some of the most beautiful views, the most precious ecosystems in our country be damaged by a pipeline.

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. It is FERC's responsibility to do the right thing — the alternative will be a turning point for the worse in an area that offers recreation and inspiration for millions of people.

With great concern and utmost hope that you will reevaluate the decision:

Very respectfully,

R. M. Greene

IND450-1

The ANST is discussed in section 4.8 of the EIS. The reasons the FERC did not prepare a programmatic NEPA document are explained in section 1.3.



# INDIVIDUALS

## IND451 – Doris L. Link

20161215-5000(31837986)

Doris L. Link, Newport, VA.

IND451-1

Shame on you for announcing a public meeting and hiding behind a stenographer and a time keeper, giving us three minutes to express how much Newport means to us. It's obvious you don't want to feel our pain.

Our peace of mind is already gone and if this MOST VILE project is allowed to destroy Newport our sense of place will go as well.

It's a place where wild, white strawberries grow as well as yellow lady slippers. A place where the night sky is not obliterated by city lights.

We plant our gardens in spring, feed the birds in winter. We LOVE where we live. Our spring water supply is threatened also.

My family has lived on this mountain for eleven generations. Please don't allow MVP to destroy it.

I dare any of you to come and see!

IND451-1

See the response to comment LA2-1 regarding the comment sessions. The MVP would not destroy the village of Newport. As stated in section 1.4 of the EIS, FERC staff visited the project area.

# INDIVIDUALS

## IND452 – Jaime Todaro

20161216-5058(31843205)

Jaime Todaro, Rockville, MD.

IND452-1 | Given the overwhelming evidence of the harm the Mountain Valley Pipeline would inflict on our region, the proposed project is not in the public interest. The only way that FERC could justify it is by sweeping the dangers under the rug, and that's what the draft Environmental Impact Statement (DEIS) does.

FERC's review falls short in several ways:

1) It fails to account for the cumulative, life-cycle greenhouse gas emissions the pipeline would trigger.

IND452-2 | 2) It completely dismisses the "upstream" damage that the pipeline could trigger via expanded fracking and gas infrastructure, given the 2 billion cubic feet per day of added capacity the project would create.

IND452-3 | 3) It does not fully assess the damage to water quality the pipeline would create. The pipeline would cross more than 1,000 waterways and wetlands.

IND452-4 | 4) It fails to look at the cumulative effects that the pipeline would have on vegetation and wildlife, permanently fragmenting habitat and harming wildlife such as the endangered northern long-eared bat.

IND452-5 | 5) It does not fully consider the harm to the region's history. The pipeline would cross six historic districts and several archaeological sites.

6) Finally, it fails to assess the true need for this new pipeline given the availability of renewable energy and existing pipeline capacity. That FERC allows companies to seize private land through eminent domain without a comprehensive evaluation of the need for the pipeline is shameful.

IND452-6 | A thorough examination of this project would show that the public and environment lose, while the gas industry profits. I urge you to deny Mountain Valley Pipeline's application or, at minimum, conduct a Programmatic Environmental Impact Statement that assesses all the regional pipeline projects in one document.

IND452-1 | GHGs are discussed in sections 4.11 and 4.13 of EIS.

IND452-2 | See the response to comment IND2-3 regarding hydraulic fracturing.

IND452-3 | Impacts and proposed mitigation for waterbodies and wetlands are discussed in section 4.3 of the EIS.

IND452-4 | Cumulative impacts are discussed in section 4.13 of the EIS.

IND452-5 | Historic Districts and archaeological sites are discussed in section 4.10 of the EIS.

IND452-6 | See the response to comment FA11-12 regarding need. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy. See the response to comment IND1-3 regarding eminent domain. The reasons the FERC did not prepare a programmatic NEPA document are explained in section 1.3 of the EIS.

# INDIVIDUALS

## IND453 – Tom Hoffman

20161216-5004 FERC PDF (Unofficial) 12/15/2016 8:44:48 PM

	<p>Tom Hoffman, Pearisburg, VA. I wish to strenuously oppose the construction of this pipeline for the following reasons:</p>		
IND453-1	<p>The amendments to the Forest Management Plan for the Jefferson National Forest must not be adopted. They would cause irreparable harm to the forest in order to allow the pipeline to be built. Numerous features and landmarks within the Forest would be negatively impacted: the views from Angel's Rest, McAfee's Knob and Dragon's Tooth, and the Brush Mountain and Peter's Mountain wilderness areas.</p>	IND453-1	The draft EIS addressed climate change in section 4.13. Erosion control is discussed in section 2, and karst terrain in section 4.1. See the response to comment IND234-1 regarding the Greater Newport Historic District. Historic covered bridges are addressed in section 4.10.
IND453-2	<p>The existing pipeline infrastructure is adequate for the natural gas needs of Virginia, and it is running at only 45% of its capacity. Therefore, the Mountain Valley Pipeline is not needed. FERC must assess this lack of need in its Environmental Impact Statements, as required by NEPA.</p>	IND453-2	The Commission would address need in its Project Order.
IND453-3	<p>The DEIS does not mention climate change as required by NEPA. Natural gas is not "cleaner" than coal. Gas emits methane, which is a very destructive element to the environment.</p>	IND453-3	Climate change is addressed in sections 4.11 and 4.13 of the EIS.
IND453-4	<p>The Jefferson National Forest Management Plan specifically mentions erosion control on steep slopes. This has already become a problem on the two-year-old Columbia Gas pipeline across Peter's Mountain that serves the Celanese plant at Narrows. That is only an eight or twelve inch pipe. A 42-inch pipe would cause much more damage.</p>	IND453-4	See the response to comment FA8-1 and FA10-1. See also the response to comment See the response to IND70-1 regarding erosion and sedimentation.
IND453-5	<p>The DEIS completely ignores a report on karst geography prepared by Dr. Ernst Kastning, PHD. Dr. Kastning is a very capable geologist associated with Radford University. It is obvious that the pipeline cannot be built on such terrain. Karst underlies many places on the route of the MVP, particularly in Giles County. There are many sinkholes, caves and underground streams that could undermine the pipeline. Contamination of the water is not mitigatable. Other than in the larger towns, everyone in Giles County obtains their drinking water from springs or well.</p>	IND453-5	Dr. Kastning's report is mentioned in section 4.1 of the EIS.
IND453-6	<p>This pipeline would destroy the town of Newport, an area protected by the National Historical Preservation Act. Two covered bridges are in the path of the pipeline and would be destroyed, as well as the Mount Olivet Methodist Church and some homes that predate the Civil War. There is no way to mitigate this situation.</p> <p>Thank you for your consideration of this matter.</p> <p>Sincerely,</p> <p>Tom Hoffman</p>	IND453-6	The Newport Historic District and Greater Newport Rural Historic District, which contains historic covered bridges, are discussed in section 4.10 of the EIS.

# INDIVIDUALS

IND454 – Richard Ettleson

12-12-16

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

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

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SECRETARY OF THE  
COMMISSION  
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REGULATORY COMMISSION

ORIGINAL

**Comments on the MVP DEIS, 4 Proposed Jefferson National Forest  
Land And Resource Management Plan Amendments.**

Docket No. CP16-10  
Mountain Valley Pipeline DEIS

**BACKGROUND:**

The Notice of Availability (NOA) of the Draft Environmental Impact Statement for the Proposed Mountain Valley Project was published in the Federal Register / Vol. 81, No. 187 / Tuesday, September 27, 2016 / Notices (pages 66268-66271). On page 66270 that document stated; **"To ensure consideration of your comments on the proposal in the final EIS. It is important that the Commission receive your comments on or before December 22, 2016."** which allowed 87 days (the number of days between 12-22-16 and the NOA date of 9-27-16) for public comment. The NOA stated that the proposed 4 Forest Service Amendments were developed in accordance with 36 CFR 219 (2012 version) regulations, but that is false information since CFR219.16(a)(2) indicates that LRMP Plan Amendments for which a DEIS is prepared must allow a public comment period of at least 90 days. FERC had no right in their NOA to curtail the time-period allowed for public comment on their DEIS.

The Environmental Protection Agency (EPA) filed their NOA concerning the proposed 4 Forest Service Amendments in the Federal Register / Vol. 81, No. 199 / Friday, October 14, 2016 / Notices (pages 71041 - 71042). **"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."** This NOA is the most recent Federal Register filing concerning the dates for public comments permitted on the proposed 4 LRMP Amendments. Since CFR219.16(a)(2) indicates that LRMP Plan Amendments for which a DEIS is prepared must allow a public comment period of at least 90 days from their NOA filing date, 10-14-16, that would allow public comments on the proposed 4 Amendments to be submitted until 1-12-17, which extends 20 days longer than the FERC public comment deadline of 12-22-16. Apparently, public comments sent in to the FS within the time-period they allowed will not be considered in the FERC analysis since the FS time-period allowed for comments in the EPA NOA extends beyond the time-limits set in FERC's NOA.

IND454-1

IND454-1

See the response to comment IND382-1 regarding the 90-day comment period.

# INDIVIDUALS

IND454 – Richard Ettleson

IND454-1  
cont'd

EPA's NOA is the latest Federal Register filing concerning the public comment period permitted on the consideration of the proposed 4 Forest Service Amendments. This most recent NOA hasn't been withdrawn, or corrected, so it can be assumed that it is still in effect. If the FS feels that the EPA NOA filing which was entered into the Federal Record after FERC's NOA filing was unnecessary, this doesn't alter the representations that EPA made of FS and BLM responsibilities. Unless the public is informed by an additional Federal Register filing, the public has a right to assume that the deadline on commenting on the proposed FS 4 LRMP Amendments is 1-12-17, and not the 12-22-16 deadline that FERC would prefer.

IND454-2

I have submitted previous comments (Docket No. CP16-10, Submittal 201612-0034, Doc Date 12-7-16, Filed Date 12-9-16) titled; "**The U.S. Forest Service Failure To Comply With Regulations Concerning Public Involvement.**") that details additional aspects of this specific issue concerning the lack of public participation opportunities in the LRMP Amendment process that I hope you'll also consider.

The FS, BLM, and FERC have been negligent in their obligations to comply with the regulatory requirements concerning public opportunities to participate in the process regarding the Proposed 4 LRMP Amendments. Unfairly limiting the permissible time periods allowed for public comments is not in the public interest. Issuing a Revised DEIS can allow an equal opportunity for the public to fairly participate with FERC, and the Cooperating Agencies, in the analysis for this multi-billion dollar Project.

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Following are my comments, and attachments, that apply to MVP's 125-foot wide right-of-way and the FS proposed 500-foot wide Utility Corridor relating to the Proposed 4 LRMP Amendments;

**PROPOSED AMENDMENT 1:**

Cultural Attachment is a Social/Cultural Resource that has been identified in the Applied Cultural Ecology (ACE) Study that FERC commissioned entitled; "**The Proposed Mountain Valley Pipeline Jefferson National Forest Segment Cultural Attachment Report.**" (Docket CP16-10, submittal 20160127-5356, dated 1-27-16). The ACE Study confirmed the Cultural Attachment Resource on lands managed by the FS, and on private property, in the MVP Project Area. Amendment 1 proposes to designate a new 500 foot-wide Prescription 5C Designated Utility Corridor crossing through the middle of the Peters Mountain Cultural Attachment Area to accommodate the MVP Project, and potentially any other Utility Projects that may be approved for crossing FS land in this general area in the future.

Although the ACE Study identified this Cultural Attachment Resource in the Project Area, it did not undertake an Effects Analysis, FERC has not made sufficient information available in the DEIS Cultural Attachment Chapter 4.10.8 (pages 4-366 to 4-373) to evaluate the Cultural

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IND454-2

The cultural attachment study by ACE, discussed in section 4.10 of the EIS, was focused on the Peters Mountain area. Section 4.10 included an effects analysis written by professional Cultural Anthropologists.

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

# INDIVIDUALS

IND454 – Richard Ettleson

IND454-2  
cont'd

Attachment Resource, and to understand the impacts of the MVP Project on this resource, which they have identified as being present on Federal lands, and private property, in the project area.

The Cultural Attachment Study by ACE was unduly limited by FERC to just narrowly focus on FS land although it was well documented that the Cultural Attachment Area was also present on private property. Although the ACE Study slightly expanded their study area beyond FERC's constraints, they did not do a comprehensive analysis which is the only effective approach in understanding this resource issue on Federal lands, as well as on private property. A new, expanded Study that includes an analysis of the Cultural Landscape impacted by MVP's proposed project should also include a complete Ethnographic Assessment, and an Effects Analysis, written by Cultural Anthropologists should be included in a Revised DEIS.

Before the FS and the BLM can make a decision on the MVP proposal they need to understand the resources that they manage in the affected area before deciding on what the cumulative, direct, and indirect impacts will be. The required information of this Social/Cultural Resource concerning Cultural Attachment has not been made available in the DEIS which deprives the FS, and BLM of the opportunity to understand how MVP's Project may affect the Resources that they are responsible to protect.

The enclosed 13-page (see enclosed Attachment "D") entitled; ““FERC-MVP DEIS, Chapter 4.10.8, Cultural Attachment, Comments” (Docket No. CP16-10, Submittal 20161121-0301, Doc Date 11-18-16, Filed Date 11-21-16) details the errors, omissions, and misrepresentations in the DEIS Cultural Attachment Chapter that need to be resolved before the FS, and BLM can make any fair-minded assessment on how the FS LRMP Proposed Amendment 1 will impact the identified Cultural Attachment Resource that has been identified in the Project Area. A Revised DEIS is necessary to take these specific concerns that I raised in the enclosed Attachment "D" so the FS and BLM will have the Resource information necessary before they can evaluate the potential impacts of siting MVP's project, or a 500-foot wide Utility Corridor, across this identified Social/Cultural Resource.

It is not reasonable to expect the public to submit comments on this 500-foot wide right-of-way when you with-hold, or don't know, the information regarding the resources that will be impacted by your decisions.

MVP and FERC confined their analysis in the DEIS for a 125-foot wide construction right-of-way. The FS has cooperated with that study, and in addition on their own initiative, without any request from MVP or FERC, the FS proposed to expand that 125-foot wide right-of-way into a 500-foot wide Utility Corridor. No environmental Analysis was included to support that 500-foot wide request aside from what has already been done for the MVP 125-foot wide proposal. The FS proposed expanding the existing 125-foot wide proposal by 400% to a 500-foot wide Utility Corridor, wider than a 1 ½ football field is long, with no Environmental Analysis is

# INDIVIDUALS

IND454 – Richard Ettleson

IND454-2  
cont'd

unacceptable. A Resource Analysis needs to be done before you can determine impacts and mitigations.

FS Amendment 1 includes the statement that; **"2) The new 5C area would not cross into Peters Mountain Wilderness so the Rx 5C area would be less than 500 feet wide along the boundary of the Wilderness."** The Proposal neglects to mention how much less the 500-foot wide would be at its narrowest point. This is vital information. Practically speaking, the entire 5C corridor should be the same width as its narrowest constriction.

At the FS meeting with area Organizations, attended by Forest Supervisor Timm and other FS Staff Officers, on 10-12-16 at the JNF Supervisor's Office in Roanoke VA, the question was raised to FS Officer Overcash inquiring what basis did the FS use for determining the width of the 500-foot wide Corridor, her answer was; **"We just picked it out of the air."** That is not sufficient basis for making the Amendment 1 proposal part of the DEIS, and this Amendment should be withdrawn.

IND454-3

**PROPOSED AMENDMENT 2:**

Soil and water conditions can be impacted by locating a 500-foot wide 5C Designated Utility Corridor on FS along the steep slopes of Peters Mountain which is a known Karst Area. **"Karst is a complicated geologic hydrologic and biologic environment. The DEIS does not fully address the extent, complexity, and integrated nature of the Karst systems within or near the corridor for the pipeline, particularly Karst in the subsurface"** (See enclosed Attachment "B", Ernst Kastning, Ph.D., Docket CP16-10, Submittal 201612-5032, dated 12-10-16, Page 5/16,). Peters Mountain supplies clean drinking water to at least 25% of Monroe County residents through the Red Sulfur Public Service District (RPSD). The recharge area for the springs that supplies their water originates from the Peters Mountain Karst Area. A Hydrological Study funded by West Virginia and Monroe County government is currently in progress to better understand the Hydrology of this area. The FS manages significant portions of the Karst Area which supplies the watershed. The Proposed MVP Natural Gas Pipeline Project, the proposed 500-foot wide 5C Designated Utility Corridor, and the Columbia Natural Gas Pipeline goes through this area.

Mistakes on managing this water resource on FS land in the Peters Mountain vicinity can impact the water supply for thousands of residents. For example; In July 2015, a contractor working for Columbia Gas of Virginia was responsible for a diesel fuel spill along the Natural Gas Pipeline on Peters Mountain that supplies the Celanese Plant in Giles County, Virginia. **"Ultimately, Commonwealth Environmental reported removing a total of 26, 55-gallon drums of diesel-contaminated soil from the site"** (See enclosed Attachment "C", Roanoke Times article by Duncan Adams). The Diesel fuel drained into a sinkhole in the Karst Area which contaminated the water supply for the RPSD that supplies drinking water for 4,000 residents, schools, and medical facilities in Monroe County, West Virginia. The Water Plant had to be closed from July 7

IND454-3

See the response to comment IND62-1 regarding Dr. Kastning's report. See the response to comment FA10-1 regarding Amendment 2.



# INDIVIDUALS

IND454 – Richard Ettleson

IND454-3  
cont'd

to July 27 at a cost of \$12,825, causing significant hardship, threatening the health and safety of the community.

That Natural Gas Pipeline right-of-way was partially built on nearby FS land that granted an easement for the Natural Gas Pipeline Construction project that was proposed by Columbia Gas of Virginia. The GW&JNF Forest Supervisor signed the Decision Notice (DN), and Finding Of No Significant Impact (FONSI) on 11-22-2013. In that DN the Forest Supervisor stated that the project **“..will not significantly effect the quality of the human environment”** (DN, Page 5, dated 11-22-2013). In retrospect, the Forest Supervisor was wrong about that statement. Also; **“There will be no major effect on public health or safety”** (DN, Page 6). The Forest Supervisor was wrong about that claim as well. On Page 6 of that DN he failed to appreciate the potential danger and susceptibility of the Karst ground that on the property he managed by stating; **“The project does not involve highly uncertain, unique, or unknown environmental risks”**. The poor judgment used by the Forest Supervisor in making his assessments that allowed this Natural Gas Pipeline to be built, indirectly contributed to the contamination of the Monroe County water supply.

It happened before, and it can happen again. If everything went as perfectly as the FS claimed in their planning documents there wouldn't have been any problem, but things rarely go exactly as planned, and the only way to guarantee that sensitive resources won't be compromised is to stay out of the area that has to be protected. The proposed MVP Natural Gas Pipeline Project, and the proposed FS 500-foot wide 5C Utility Corridor which will introduce additional Utility Projects crossing Peters Mountain above the RSPSD water plant poses a real threat to the health and safety of Monroe County residents.

This concern for FERC and the and the FS to stay out of the Karst Area is best summarized by Ernst Kastning, Ph.D. on page 2 of FERC Docket CP16-10, Submittal 20161212-5032, (See enclosed Attachment “B”) where he stated; **“Karst and associated hazards constitute a serious incompatibility with the proposed pipeline. The effect of these threats on the emplacement and maintenance of the pipeline, as well as the potential hazards of the line on the natural environment, renders this region as a ‘no-build’ zone for the project.”** The DEIS failed to capture this issue.

IND454-4

### **PROPOSED AMENDMENT 3:**

The Analysis didn't disclose the site index, or age of the old growth timber that MVP intends to remove. Old Growth Timber is a component of the visual quality that makes this area so attractive from the Appalachian National Scenic Trail. The Old Growth Timber wasn't evaluated as a component in the Cultural Attachment issue where residents hold this resource in such

IND454-4

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



# INDIVIDUALS

IND454 – Richard Ettleson

IND454-4  
cont'd | high regard. Old Growth Timber is a vital part of the Cultural Landscape that should be part of the analysis to understand its value before it's discarded.

IND454-5 | **PROPOSED AMENDMENT 4:**

The FS proposal to reduce the Scenic Integrity Objective (SIO) from High to Moderate on the Appalachian National Scenic Trail to allow the MVP crossing is not consistent with managing this significant Recreational Resource. If Amendment 1 was also approved creating a 500-foot wide Utility Corridor instead of the 125-foot right-of-way that MVP requested, the SIO would eventually be further reduced as new Utility Projects are introduced in the future. This Cumulative Effect should be considered in the FS evaluation.

NHPA eligibility for the Peters Mountain Area in the vicinity of the proposed MVP crossing is currently being evaluated by the National Park Service according to the recent FS DEIS comment; **"If the intent is to acknowledge that the NPS is currently leading an effort to determine whether the entire ANST is eligible for inclusion in on the National Register of Historic Places as a "cultural landscape," then that should be explicitly stated"** (Docket CP16-10, Submittal 20161115-5013, dated 11-14-16, page 13).

Additional studies would have to be done to understand how the Peters Mountain Rural Historic Landscape would be altered by MVP's project. This resource has been acknowledged as being present in the project area. On page 4-370 of the DEIS where it stated; **"In the opinion of ACE, Peters Mountain could be considered a rural historic landscape (Bengston and Austin, 2016)."** FERC's Effects Analysis failed to properly consider MVP's impacts on this Rural Historic Landscape. **"The findings of ACE that the area could be considered a cultural landscape and/or rural historic district would potentially more specifically change a number of the statements made throughout the DEIS regarding the need and legalities for mitigation"** (Rebecca L. Austin, Ph.D., e-mail dated 10-10-16).

FS Amendment 1 and Amendment 4, will preclude any designation for this area to qualify for any future designation recognizing it as a Rural Historic District eligible for NHPA protections. FERC, the FS, and the BLM have an obligation to comply with The National Historic Preservation Act (NHPA). The following three paragraphs are quoted from Docket CP16-10, Submittal 20151023-5124, dated 10-23-15, James Kent Associates, EXPERT REPORT;

**"NHPA was established (in 1966) to protect historical and archeological resources. Over time, through interpretation and case law, it has been extended as a tool to assist living culture as well. By documenting their Traditional Cultural Practices (TCP), people have been able to offer a defense of cultural practices that has led to curtailing destructive development or the mitigation of its impacts. The term "traditional," for the National Park Service (NPS), refers to "those beliefs, customs and practices of a living community that have been passed down through the generations, usually orally or through practice."**

IND454-5 | Section 4.10 of the EIS addresses compliance with the NHPA. That section states that the ANST is eligible for the NRHP. It also states that Peters Mountain is considered to be a rural historic landscape.

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

# INDIVIDUALS

IND454 – Richard Ettleson

IND454-5  
cont'd

**"The NHPA and the traditions within the National Trust used the term "historic vernacular landscapes" to reflect the unique ways that people over time shape the landscape on which they live. Congress's intent was to encourage individual Americans to defend and champion historic resources as part of the social fabric of the nation. It states: "Historic vernacular landscapes have evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes."**

**"The importance of the National Historic Preservation Act, and its interpretation and evolution over time, is that "historic vernacular landscapes" have been given legal weight and agency responsibility for sustaining "living cultural landscapes", (aka, "cultural attachment"). There is weight as well with the term "traditional cultural landscape," for which a case can be made in areas with high cultural attachment. If local residents use these terms to document their concerns about proposed federal actions, federal agencies, by virtue of the NHPA, must pay attention."**

Page 32 of the ACE study confirms that; **"Peters Mountain and the immediate surrounding area could be considered a historic vernacular or rural historic landscape"** (Docket CP16-10 Submittal 20160127-5356, P. 112/272, dated 1-15-16). NHPA has given legal weight and there is an agency responsibility for *sustaining living cultural landscapes* such as the historic vernacular landscape that ACE has identified on Peters Mountain.

The DEIS failed to consider NHPA eligibility on Federal land, and on private property, on the proposed MVP Peters Mountain crossing. FERC's Notice of Availability for the DEIS, dated 9-16-16, pages 3-4, indicate the *Reasonably Foreseeable actions* where the FS JNF LRMP Amendments will be needed to make provision for MVP's proposed crossing. Proposed Amendment 1 consists of a 500-foot wide Designated Utility Corridor designed to not only accommodate MVP, but to also encourage a future concentration of additional pipeline and other utility infrastructure projects through this sensitive Cultural Attachment Area which will have the potential to destroy this resource. This can prevent future NHPA eligibility on both Federal and private property in the Peters Mountain Area.

IND454-6

## **CUMULATIVE IMPACTS:**

Cumulative impacts on all 4 of the Proposed Amendment should include should include the existing 5C Utility Corridor located just a few miles away to accommodate the APCO High Voltage Transmission Line, and the Columbia Natural Gas Pipeline which is also located on FS land nearby.

IND454-6

A Rx5C-Designated Utility Corridors reallocation is no longer being proposed by the FS. Visual effects on NFS lands would be minimized by reducing the permanent operational right-of-way that is converted to herbaceous cover from 50 feet wide to 10 feet wide.

# INDIVIDUALS

IND454 – Richard Ettleson

IND454-6  
cont'd

Williams' Appalachian Connector Natural Gas Pipeline (see enclosed Attachment "A"), also referred to as; Transco's Western Marcellus Pipeline Project, is in early stage planning to cross this area and it is a "Reasonably Foreseeable" project that will be facilitated by the FS approval of the 5C Designated Utility Corridor proposed in Alternative 1.

Future Utility Projects will be forced to site their projects through the 500-foot wide corridor in addition to the MVP Project which will increase the Cumulative Impacts on FS land, and on private properties that will be on the routes to funnel in connections to the FS Utility Corridor increasing the environmental burden. These are Cumulative Impacts that should be part of the FS analysis before a new 5C Corridor is established.

Visual disruptions of MVP's linear right-of-way on FS land one side of Peters Mountain will impact the siting on the other side of Peters Mountain. This visual trespass on sacred land has an impact on the Cultural Attachment Resource. Amendment 1 will attract additional Utility projects into the area to link up with the 5C Corridor on FS land which will have a Cumulative Impact on the Visual Quality Resource. Reducing the Scenic Integrity Objective protections on the Appalachian Trail on Peters Mountain from High to Moderate will also reduce the Visual quality in the Cultural Attachment Area diminishing the features that this Resource requires for its continuing existence at this location.

**CONCLUSION:**

The DEIS did not include sufficient analysis to document the purpose and need for the Proposed FS Amendments. A Revised DEIS should be prepared to supplement the analysis that has already been done so the FS and BLM will have adequate data to base their decisions. For the reasons contained throughout my DEIS comments I formally object to all four of these proposed Amendments.

Sincerely,  
  
Richard Ettleson

# INDIVIDUALS

## IND455 – Diane Wray

20161216-5043(31838580)

Diane Wray, Callaway, VA.

IND455-1 I am against the construction of the Mountain Valley Pipeline.

Mountain Valley Pipeline proposes to build a 46" pipeline crossing 4,000 feet through the middle of our family farm in Franklin County, Virginia, which has been a beef operation for the past 70 years. The proposed route will cross timber land, pasture land and hay land and come within 100 yards of our home place, outbuildings and barns. This proposed pipeline, if approved, will completely change our farm operation because of the restrictions placed on the easement for use of the property, including, but not limited to, the sale or rent of the residence, the loss of hay land and pasture land, in addition to the potential danger of explosions due to using heavy machinery over the easement to make hay or cut timber, which is paramount to farming and harvesting timber. The proposed route also crosses waterways on our property used in the cattle operation, including a wetland area. I feel this pipeline will also adversely affect the watershed which we use for drinking water and to water our cattle. WATER IS LIFE!

Although this is very personal to our family and family farm, I am very concerned about the ecological, geological and environmental impacts of the proposed Mountain Valley Pipeline from West Virginia to Pittsylvania County, Virginia. Some of my concerns are:

(1) The disruption, contamination, sedimentation and pollution of the waterways, as well as the overall detriment to the watershed along the proposed pipeline route. I am also concerned about the lack of supervision during the construction and operation of the pipeline on our waterways by the Virginia Department of Environmental Quality. There are 144 proposed waterway crossings in Franklin County, Virginia alone, all of which empty into Smith Mountain Lake, a lake which provides electricity to a large portion of southwest Virginia and is of substantial economic value to Franklin County and four surrounding counties. WATER IS LIFE!

IND455-2 (2) The minimum requirement of the wall thickness of the pipe for rural areas, being 1/4 of the minimum requirement in more densely populated areas or business areas. The rural areas are surrounded by timber land, and in the event of an explosion, could devastate the surrounding cities and towns, as recently experienced in the Smokey Mountains. This has also happened in many locations throughout the U.S. due to exploding gas pipelines. According to local fire and safety organizations, there are insufficient methods of extinguishing a fire of this magnitude caused by an exploding pipeline in the rural areas. There is only one road leading away from our farm and many families in this rural area, and should they survive an explosion, would be trapped by the fire and unable to escape. At the very least, the pipeline should be built with the maximum required thickness in all areas.

IND455-3 (3) This project is NOT for public benefit but for private gain and eminent domain should not prevail. I believe this project is being built for the main purpose of EXPORTING GAS and not used for domestic purposes. Virginia residents will NOT benefit from this pipeline. It is strictly a transportation pipeline across West Virginia and Southwest Virginia to the coast of Virginia for exportation. Therefore, eminent domain should not be relevant in this matter although we have been threatened with it many times in order to steal and rape our land.

IND455-4 (4) The negative impact on the Karst geology of Virginia during and after construction of the pipeline. I do not feel sufficient information and tests have been provided by MVP or the DEQ to assure the safety and preservation of the karst region.

IND455-1 The MVP pipeline would be a 42-inch-diameter pipeline not a 46-inch-diameter pipeline. The operational pipeline easement would only prohibit construction of structures and roads on the right-of-way. Agricultural activities, such as growing hay or pasture on the right-of-way would not be restricted. Likewise, you can sell or rent off-right-of-way residences. Mountain Valley would compensate you for construction loss of timber or agricultural products. See the response to comment IND2-1 regarding safety. Section 4.3 of the EIS discusses mitigation of impacts on water resources and wetlands.

IND455-2 DOT regulates pipeline design, including wall thickness, as explained in section 4.12 of the EIS. See the response to comment IND18-2 regarding emergency response.

IND455-3 See the response to comment CO2-1 and IND281-2 regarding benefits. 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.

IND455-4 Karst terrain is 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

IND455 – Diane Wray

IND455-5 (5) The water pollution caused by fracking. The EPA recently reported that fracking DOES cause water pollution. No question about it. Fracking should be stopped immediately and denied in the future. WATER IS LIFE!

IND455-6 (6) The proposed final route has not be determined Each time the route is changed, all of the required tests need to be performed on the new route. The timeline as proposed by Mountain Valley Pipeline and FERC does not allow for adequate information and tests to be performed on the land because the proposed route has not been finalized.

In light of the recent report by the EPA which unequivocally determined fracking causes water pollution, as well as the (1) risk to the watershed during construction and operation of the pipeline, (2) risk of explosions with devastating results, (3) danger to the karst areas of Virginia and West Virginia, (4) ultimate use of the gas being for exportation rather than domestic use and (5) inadequate information and tests performed by MVP since the proposed route has not even been finalized, I respectfully request that FERC deny or, at the very least, delay, their decision to grant a permit to Mountain Valley Pipeline for the construction of a 46" pipeline and to review all of the data submitted by Mountain Valley Pipeline and its associates in detail to determine IF this pipeline will be of public benefit and to ascertain if all of the ecological, geological and environmental impacts caused by this pipeline will be completely mitigated by Mountain Valley Pipeline. Thank you.

IND455-5 See the response to comment IND2-3 regarding hydraulic fracturing.

IND455-6 See the response to comment LA3-1 regarding Mountain Valley's October 2016 filings.

# INDIVIDUALS

## IND456 – Becky Crabtree

20161216-5006 FERC PDF (Unofficial) 12/15/2016 9:33:36 PM

Becky Crabtree, Lindside, WV.  
October 31, 2016

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

RE: Draft Environmental Impact Statement, Docket #CP16-10-000

IND456-1

We are commenting on page 4-372 of the Draft Environmental Impact Statement for the proposed Mountain Valley Project and Equitrans Expansion Project (September 16, 2016), Docket #CP16-10-000 and Docket #CP16-13-000.

We are landowners on the MVP proposed route. In preparing the DEIS, the FERC failed to meaningfully address the significant concerns raised in our previously submitted comments:

Accession Number:20151125-5115. Supplemental Information of Save Monroe, Inc. under CP16-10. Information and updated reports from landowners on and near the proposed route in Monroe County, WV regarding important features of their property. Date 11/15/2015

Accession Number:20150616-5320-5321. Comment of Save Monroe under PF15-3-000. Monroe County, WV Landowner Impact Report and EIS Scoping Recommendations, Part IIA: Save Monroe. Date: 06/16/2015

The massive EIS document is overwhelming, both in scope and in the misleading information it contains. Specific information about water sources on Peters Mountain, for instance, lacks accuracy.

Pages and pages of text are devoted to explaining how this project will not affect the environment of current and future residents. I take issue with statements on page 4-372, 4th and 5th paragraphs, which sums up the misrepresentation of the truth:

"In other words, the MVP would not affect landownership, tenure, farm land use, or sense of home place, which are important values associated with cultural attachment to land noted in the ACE interviews with resident of the Peters Mountain community. The MVP would not change or affect the belief systems or tradition practices of the people who reside around Peters Mountain."

Sadly, in truth, there have already been negative effects. MVP intrusion on private property, the presence of hovering land agents, the tossing around of legal contracts and offers of money to low income residents has begun the erosion of sense of home place and traditional values.

Specifically, the property, which we bought in hopes of our daughters returning to their childhood home to build, will now have a pipeline

IND456-1

We stand by our analysis, especially with regards to Cultural Attachment in section 4.10 of the EIS. Water resources are discussed in section 4.3 of the EIS.

# INDIVIDUALS

## IND457 – Elizabeth Struthers Malbon

20161216-5021 FERC PDF (Unofficial) 12/16/2016 7:24:55 AM

To: Federal Energy Regulatory Commission

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

Re: Mountain Valley Pipeline, CP16-10-000  
DEIS: Sustainability and Climate Change

Date: December 16, 2016

IND457-1

As a resident of the Preston Forest Subdivision in Blacksburg, Montgomery County, Virginia, I am writing to express my serious concern about the lack of sustainability—both environmental sustainability and economic sustainability—made obvious in the Draft Environmental Impact Statement (FERC/DEIS-D0272) for the Mountain Valley Pipeline (Docket Number CP16-10-000).

### **FERC Mission Statement**

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>). I have given consideration to this mission statement in other comments to FERC; here I wish to focus on the requirement that FERC “assist consumers in obtaining ... sustainable energy services.” I would argue, as have many trained in science and engineering, that fracked gas is by definition unsustainable as an energy source—and this for several reasons, including dangers to water systems and contributions to global climate change. Thus, for FERC to approve of yet another pipeline for fracked gas at this point in the twenty-first century would be to fail in its mission to “assist consumers in obtaining ... sustainable energy services.”

### **Fracking and Threats to Water Systems**

Even the Environmental Protection Agency (EPA) in its final—and quite cautious—report on fracking, admits that fracking can threaten water systems. One key observation about the report is a sentence that appeared in the draft report but was deleted from the final report. Here is how Ben Wolfgang reported this situation in *The Washington Times* on December 13, 2016 (<http://www.washingtontimes.com/news/2016/dec/13/epa-final-report-fracking-more-questions-answers/>):

The draft report said that the EPA did not have evidence of “systemic impacts” on water, leading oil-and-gas proponents to claim victory. But agency officials said they can no longer make that claim.

“EPA scientists chose not to include this sentence in the final assessment released today,” Thomas A. Burke, EPA’s deputy assistant administrator and science adviser,

IND457-1

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



# INDIVIDUALS

## IND457 – Elizabeth Struthers Malbon

20161216-5021 FERC PDF (Unofficial) 12/16/2016 7:24:55 AM

E. S. Malbon to FERC

12/15/16

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IND457-1  
cont'd

told reporters on a conference call Tuesday morning. "EPA scientists concluded the sentence could not be quantitatively supported."

The EPA did identify conditions under which fracking — the process of injecting huge volumes of water and chemicals into the ground to break apart rock and release trapped oil or natural gas — can impact water supplies. The agency said areas with low water availability can be at risk; that spills at fracking sites can affect drinking water; that the discharge of inadequately treated fracking wastewater can affect drinking water supplies; and other conclusions.

Fracking, of course, is a threat to water systems at the source of the fracking, not along the route of the pipeline that would carry the fracked gas. There would be plenty of other threats to water systems from the construction of the MVP: sedimentation in streams that degrade local water supplies resulting from clear cutting of slopes, dry wells due to blasting in karst, polluted wells from pipeline leaks, etc.

IND457-2

### Fracked Gas and Economic Sustainability

I suspect that building another pipeline for fracked gas would increase the amount of fracking that is done because, when its source of fracked gas is depleted, a company that has invested heavily in a pipeline will pressure for more fracking to occur—to fill up their pipeline! This is especially relevant because the production expectancy of the Marcellus shale field currently being fracked and expected to fill the proposed Mountain Valley Pipeline is estimated to be from 10 to 30 years. In fact, at least two studies ("Drilling Deeper" by J. David Hughes, [http://www.postcarbon.org/wp-content/uploads/2014/10/Drilling-Deeper\\_FULL.pdf](http://www.postcarbon.org/wp-content/uploads/2014/10/Drilling-Deeper_FULL.pdf), and "Natural-Gas Boom and Coming Bust in United States" by L. David Roper, [http://www.roperld.com/science/minerals/USGasBoom\\_Bust.htm](http://www.roperld.com/science/minerals/USGasBoom_Bust.htm)) clearly show that Marcellus shale extraction will peak before 2016, before the MVP even begins construction! In addition to the threats to water systems and global climate change (on which I will say more below), one can ask whether such a risky venture is economically sustainable.

Does the economic outlay for such an extensive—and expensive—pipeline and compressor station system over such challenging terrain (the mountains and valleys are real, not just a name) make good economic sense for such a short production period? By whose figures? If domestic markets are currently oversupplied with both gas and oil, such that prices have fallen significantly, does that situation suggest (as other research has) that MVP has foreign markets in mind for the gas it hopes to transport? (Mr. Friedman, the FERC representative running the scoping meeting at Eastern Montgomery High School in Elliston, Virginia on May 5, 2015, insisted that Mountain Valley Pipeline would NOT be exporting the gas to come through the pipeline because the company had not applied for an export license. Many in the audience wondered what motivated his immoderate comment as moderator.) Since that time, indications have suggested that some of the fracked gas that is proposed to be transported via the MVP, 95% of which would be owned by affiliates of MVP (<http://www.lexology.com/library/detail.aspx?g=4fcd032f-7434-49da-848a-56aed11ebee>), would be sold in India. Presumably foreign exports could raise the price of gas domestically. How is that in keeping with FERC's mission to "assist consumers in

IND457-2

See the response to comment IND2-3 regarding export. See the response to comment IND277-13 regarding gas usage and customers.



# INDIVIDUALS

## IND457 – Elizabeth Struthers Malbon

20161216-5021 FERC PDF (Unofficial) 12/16/2016 7:24:55 AM

E. S. Malbon to FERC

12/15/16

3

IND457-2  
cont'd | obtaining reliable, efficient and sustainable energy services *at a reasonable cost* through appropriate regulatory and market means?"

### IND457-3 | **Fracking and Climate Change**

But the bigger issue is global climate change. A new report by the Sierra Club finds that "greenhouse gas pollution from the Atlantic Coast and Mountain Valley pipelines would be almost twice [192%] the total climate-changing emissions from existing power plants and other stationary sources in Virginia." (A description of the report and its findings appears here: <https://content.sierraclub.org/grassrootsnetwork/team-news/2016/01/climate-disrupting-pollution-atlantic-coast-and-mountain-valley-pipelines-nearly>; all quotations in this paragraph are from this description.)

The report, prepared by Richard Ball, PhD., a retired US EPA and DOE scientist who served as a lead author on the First and Second Intergovernmental Panel on Climate Change assessments and is the Energy Chair for the Sierra Club Virginia Chapter, estimates total carbon dioxide gas equivalent from each of the two pipelines over the natural gas fuel cycle, including fugitive emissions of methane from fracking in the gas fields, leakage during transmission and storage, and combustion of the delivered gas. It also shows the estimated planetary heating from all four proposed pipelines for Virginia.

Last week, the US EPA urged the Federal Energy Regulatory Commission (FERC) to require applicants for new pipelines to assess a project's indirect impacts, including potential increases in gas production and greenhouse gas (GHG) emissions. "Our report provides an assessment of the greenhouse gas emissions of the Atlantic Coast and Mountain Valley Pipelines as the EPA suggests," said Dr. Ball. "We urge FERC to consider this report and to require the pipeline developers to address climate concerns in a programmatic environmental impact statement that takes a comprehensive look at impacts from all proposed new or expanded pipelines." . . .

In addition to emitting large amounts of CO2 when burned, natural gas is a major contributor to climate change in the extraction and transmission stages, where significant amounts of methane escape from wells and pipeline leaks. Methane is a much more powerful greenhouse gas than CO2, and these "fugitive emissions" of methane have emerged as an area of serious concern that undercuts the case for natural gas as a cleaner substitute for coal. . . .

"There are more immediate and familiar concerns with these pipelines including property rights and water pollution," said [Glen] Besa, [Director of the Sierra Club Virginia Chapter,] "but climate change impacts should be considered by FERC particularly in light of the recent Paris agreement committing the United States to reducing our total emissions of greenhouse gas pollution."

Should climate change be the concern of FERC? Absolutely! The mission statement of FERC is to "assist consumers in obtaining reliable, efficient and sustainable energy services at a reasonable cost through appropriate regulatory and market means." Is shipping fracked

IND457-3 | Climate change is discussed in sections 4.11 and 4.13 of the EIS.

# INDIVIDUALS

## IND457 – Elizabeth Struthers Malbon

20161216-5021 FERC PDF (Unofficial) 12/16/2016 7:24:55 AM

E. S. Malbon to FERC

12/15/16

4

IND457-3  
cont'd

gas across two states to a port where it will be shipped to yet other places for burning “reliable, efficient and sustainable”? According to whose standards? And for which “consumers”? Not the citizens of West Virginia and Virginia who will not even be able to use this fracked gas that threatens their immediate environments—and not the citizens of the United States and the entire world either because the effects of greenhouse gasses are not local; they are global. The only potential gains might be to the salaries and bonuses of Mountain Valley officers and the stock values of their limited liability company; however, profits and increased stock values are not a given in this situation. The DEIS lists various inadequate “mitigations” for the many types of damage it proposes (to water, soil, forests, view sheds, etc.), but the only possible “mitigation” for the dramatic production of greenhouse gasses by such a project is NOT to construct the Mountain Valley Pipeline in the first place. In fact, such a decision would make sense for the stockholders of MVP as well.

### **Economic Costs of Climate Change**

A new report from the United Nations Development Program is “sounding the alarm on the economic cost of climate inaction”—and, I would add, action that contributes to increasing the rate of climate change. The report is described in a November 17, 2016 posting to Think Progress by Natasha Geiling (<https://thinkprogress.org/new-report-details-the-staggering-cost-of-climate-inaction-4f4bc7bff4d#.n46kd6uvp>; all quotations in this and the following paragraph are from this posting).

Limiting global warming to 1.5° Celsius (2.7° Fahrenheit) could save the global economy as much as \$12 trillion by 2050, compared with a business-as-usual scenario where the Earth warms 2.5° Celsius (4.5° Fahrenheit), according to the study, which was released Wednesday during the U.N. climate conference in Marrakesh. . . .

In his final big climate speech as Secretary of State, John Kerry underscored the idea that addressing global warming would help boost the global economy by unlocking investments in green technology and renewable energy. He warned that any country that chooses not to participate in climate action runs the risk of missing out on the wave of jobs, and economic benefits, that are likely to follow the clean energy revolution.

EQT and NextEra are energy companies. They could be in a position to move into this growing market segment by joining the clean energy revolution early, rather than trying to join the boom in fracked gas too late. It would be unfortunate to come to the clean energy revolution as late as they have come to the fracked gas boom. Being behind the trend is no way to get ahead in business. And, in addition, they would be able to be better citizens of the planet by not causing irreversible harm to its fragile and interconnected environments. Other businesses are there already. FERC should tell MVP to hurry!

With President-Elect Donald Trump making promises to pull the United States out of the Paris climate agreement, businesses are appealing to economic arguments to convince Trump that it is in the United States’ best interest to remain in the agreement. On Wednesday, 365 businesses signed a letter addressed to President

# INDIVIDUALS

## IND457 – Elizabeth Struthers Malbon

20161216-5021 FERC PDF (Unofficial) 12/16/2016 7:24:55 AM

E. S. Malbon to FERC

12/15/16

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IND457-3  
cont'd

Obama, President-Elect Trump, and world leaders, imploring them to support the Paris agreement.

“We want the U.S. economy to be energy efficient and powered by low-carbon energy,” the letter read. “Cost-effective and innovative solutions can help us achieve these objectives. Failure to build a low-carbon economy puts American prosperity at risk. But the right action now will create jobs and boost U.S. competitiveness.”

### **Conclusion**

The right action now is for FERC to deny a Certificate for Public Convenience and Necessity for the Mountain Valley Pipeline, and for its parent companies to move quickly into a future in the clean energy business, in which they could not only make profits but make a positive difference. In this way FERC could also achieve its mission to “assist consumers in obtaining reliable, efficient and sustainable energy services at a reasonable cost through appropriate regulatory and market means.”

# INDIVIDUALS

## IND458 – Tina Smusz (on behalf of Meriel Russell)

20161216-5022 FERC PDF (Unofficial) 12/15/2016 10:35:01 PM

December 15, 2016

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

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

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

Dear Ms. Bose and Forest Service Staff,

IND 458-1 | As a resident of Montgomery County, Virginia, I wish to register my opposition to the approval of the Mountain Valley Pipeline (MVP).  
The Forest Service has stated that the MVP cannot be built in accordance with the current Jefferson National Forest Management Plan. I am opposed to all of the proposed amendments to the USFS Land and Resource Management Plan which would allow for construction of the MVP. These alterations in management would lead to erosion on steep slopes, unmanageable spread of invasive plants, and irreplaceable old growth trees.

IND 458-2 | The National Environmental Policy Act requires that the need for the MVP be demonstrated in your environmental impact statement. Studies have shown that current energy demand can be met without the MVP. Additional studies have shown that natural gas pipelines are being overbuilt. The MVP is not needed.

IND 458-3 | The topography of western Virginia is completely inappropriate for pipeline construction. It is a designated seismic zone. Erosion control on steep slopes will be impossible. Karst hydrology is too sensitive and unstable, so the possibility of ruptures, leaks, and explosions is extremely high. Accidents, which do happen with pipelines, would destroy the water supplies for thousands of Virginia residents, not to mention the actual loss of life that would probably occur. These damages are not reversible.

IND 458-4 | The MVP is currently planned to be built right through Newport, Virginia, a historic district. The National Historical Preservation Act protects such historic districts, so this should not be allowed.

IND 458-5 | The construction of the MVP with a lowered scenic integrity objective for the portion of forest crossed by the Appalachian National Scenic Trail would permanently damage the treasured views in spite of a timeline for growth of vegetation over a 5-10 year period.  
In short, the construction of the MVP is not needed, and would cause irreparable harm to the citizens of Virginia.

Sincerely,

Meriel Russell  
Blacksburg, VA 24060

IND458-1 | Comment noted.

IND458-2 | See the response to comment FA11-12 regarding need.

IND458-3 | See the response to comment IND70-1 regarding erosion. Seismicity and karst are addressed in section 4.1 of the EIS. See the response to comment IND2-1 regarding safety. Water resources are discussed in section 4.3 of the EIS.

IND458-4 | Actually, the pipeline route would not cross the boundary for the Newport Historic District; read section 4.10 of the EIS.

IND458-5 | Visual impacts to the ANST are discussed in section 4.8 of the EIS.

# INDIVIDUALS

## IND459 – June Ponder

20161216-5026 FERC PDF (Unofficial) 12/16/2016 8:00:16 AM

June Ponder, Seneca, SC.

IND459-1

I am sure you have received many letters already of the issues that opponents detail about this pipeline, so I will not detail them all here.

However, in short, it would deface our mountain views, open the area to erosion. Plus on your side of things, it should be cheaper and have easier access to use already established corridors for this pipeline.

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

PLEASE GO BACK AND REVIEW THIS VARIED INPUT, AS THIS PROJECT HAS NOT FINISHED THEIR DUE DILIGENCE IN THIS MATTER. The current route proposed is not a good idea.

IND459-1

Visual impacts are addressed in section 4.8 of the EIS. See the response to comment IND70-1 regarding erosion.

# INDIVIDUALS

## IND460 – Nan Gray

20161216-5065 FERC PDF (Unofficial) 12/16/2016 11:58:58 AM

IND460-1 Nan Gray, Newport, VA.  
FERC should recognized huge impacts to water, soils and geology of  
proposed MVP construction and take the "No Action" Alternative for MVP.

IND460-1 Geology is discussed in section 4.1 of the EIS, soils in section 4.2, water in section 4.3, and alternatives in section 3.

# INDIVIDUALS

## IND461 – Nan Gray

20161216-5067 FERC PDF (Unofficial) 12/16/2016 12:14:01 PM

IND461-1 Nan Gray, Newport, VA.  
I have mapped sinkholes in Craig and Giles Counties VA and I showed Paul  
Freidman the maps at the public hearing in Roanoke VA, to prove there is  
a lack of incorporation of citizens input to the MVP information that MVP  
submitted to FERC. FERC has made its decesions prematurely, without  
knowledge of all the facts available and needs to declare a No Action"  
Alternative is most appropriate action for MVP routes.

All I want for Christmas is for FERC to say No Action on MVP so MVP goes  
away and never comes back.

IND461-1

The EIS addresses sinkholes in section 4.1. Alternatives are  
analyzed in section 3.

# INDIVIDUALS

## IND462 – Ken Goldsmith

20161216-5092 FERC PDF (Unofficial) 12/16/2016 12:59:06 PM

IND462-1 Ken Goldsmith, Raleigh, NC.  
I strongly OPPOSE ANY planned amendments to the Forest Plan that allow a pipeline or utility corridor for the Mountain Valley Pipeline (MVP). The MVP would negatively impact planned designated old growth site, an important roadless area, and a riparian zone along Craig Creek. This project is unwise, unnecessary, and not in the public interest.

IND462-1 Comment noted.



# INDIVIDUALS

IND463 – Bob Peckman

20161216-0010 FERC PDF (Unofficial) 12/15/2016

FEDERAL ENERGY REGULATORY COMMISSION  
NATIONAL ENVIRONMENTAL POLICY ACT REVIEW FOR THE  
MOUNTAIN VALLEY PROJECT & EQUITRANS EXPANSION PROJECT  
DOCKET Nos. CP16-10-000 & CP16-13-000

FILED  
SECRETARY OF THE  
COMMISSION

2016 DEC 15 P 4:19

FEDERAL ENERGY  
REGULATORY COMMISSION

ORIGINAL

### PUBLIC SESSION COMMENT FORM

Comments can be: (1) left at the sign-in table, (2) mailed to the addresses below, or (3) filed electronically by following the instructions provided below.

Please send one copy referenced to Docket No. CP16-10-000 & CP16-13-000 to the address below.  
**For Official Filing:**  
Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A  
Washington, DC 20426  
To expedite receipt and consideration of your comments, the Commission strongly encourages electronic filing of any comments to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's Internet web site at [www.ferc.gov](http://www.ferc.gov) under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account, which can be created on-line.

COMMENTS: (Please print; use and attach an additional sheet if necessary)

IND463-1

The pipeline would have limited negative impacts, huge but limited. The positive impacts would be much more limited. The pipeline is projected to operate for only a couple of decades. The scars to the earth affecting our quality of life and our tourist economy, the silt in our reservoirs, the pipe itself gradually being exposed by erosion will be here very much longer. The investors will take their money and leave. We will be left holding the bag. Even the profits that the investors take will pale next to our losses. And I have not even addressed

the property owners.

Commentor's Name and Mailing Address (Please Print)  
Bob Peckman  
8131 Webster Dr  
Roanoke, VA 24019

IND463-1

The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS). Impacts on tourism are addressed in section 4.8 of the EIS. See the response to comment IND70-1 regarding erosion.

# INDIVIDUALS

IND464 – Kristin Peckman

20161216-0011 FERC PDF (Unofficial) 12/15/2016

CP16-10

8131 Webster Dr.  
Roanoke, VA 24019  
December 8, 2016

FILED  
SECRETARY OF THE  
COMMISSION

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

2016 DEC 15 P 4:19

FEDERAL ENERGY  
REGULATORY COMMISSION

Neil Kornze, Director  
Bureau of Land Management  
1849 C Street, NW, Room 5565  
Washington, DC 20240

ORIGINAL

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

IND464-1

I am a citizen who over three decades has participated in the Jefferson National Forest planning process, along with many different stakeholders. Updating the Forest Plan requires time to develop consensus among those stakeholders. It appears from the DEIS for the Mountain Valley Pipeline that a single company is trying to bypass that process and ram changes to the Forest plan through for its own benefit. Such an action should never be allowed.

The proposed changes to the Forest plan are radical and destructive. The National Forests were created to initially restore and then preserve a forest environment, and the clean water it helps to protect, for future generations. The National Forests are increasingly important as urbanization threatens to overtake us.

Without a programmatic EIS that covers all current and future pipeline proposals, there can be no designation of a new utility corridor. The proposed 500-foot wide corridor lies so close to the Peters Mountain Wilderness that it would destroy the wilderness attributes (wildlife habitat comes to mind). So it certainly would not qualify for such a designation. In addition, it is questionable whether the pipeline serves a public benefit, and old growth trees are rare enough that their destruction would be unconscionable.

Project-specific Plan amendments also need to go through the entire process of public comment and thoughtful consideration. The brief comment period on this very sketchy DEIS is not sufficient for such consideration. The easing of restrictions on soil removal and compression by heavy equipment, and on care of riparian environments would create serious erosion similar to that seen in the Columbia gas pipeline near the Celanese plant and would impair headwater streams important to both wildlife (including endangered species) and humans. The removal of old-growth trees also removes an entire ecosystem. The lowering of the scenic integrity objectives for the Appalachian Trail impairs an experience of wilderness for thousands of people every year. Basically, all these amendments were clearly designed to

IND464-1

The reasons the FERC did not prepare a programmatic NEPA document is explained in section 1.3. See the response to comment FA8-1 regarding the 500-foot-wide utility corridor in the JNF. See the response to comment IND155-2 regarding forest impacts. See the response to comment IND378-3 regarding the comment period.

# INDIVIDUALS

IND464 – Kristin Peckman

20161216-0011 FERC PDF (Unofficial) 12/15/2016

IND  
464-1

benefit Mountain Valley to the detriment of the people whose taxes support the National Forest and the flora and fauna who inhabit it. One company has no right to override the hard work of those who developed a plan for the multiple users/inhabitants of the forest. All these amendments must be rejected.

The fact that you are asking that the standards be lowered is a statement that the pipeline will have serious negative impacts on the forest environment.

Sincerely,



Kristin Peckman

# INDIVIDUALS

## IND465 – Vic Hasler

20161216-5118 FERC PDF (Unofficial) 12/16/2016 2:02:29 PM

Vic Hasler, Kingsport, TN.  
Federal Energy Regulatory Commission  
Kimberly D. Bose, Secretary  
Provided via FERC Online on December 16, 2016

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

Ms. Bose,

IND465-1

This letter is being written on behalf of the Tennessee Eastman Hiking & Canoeing Club, which is one of the 31 trail-maintaining clubs for the Appalachian National Scenic Trail (ANST). The world-famous A.T. is recognized as a desired experience to traverse unmarred forests and vistas along the Appalachian Mountain range.

While the comments are for a specific pipeline proposal in Virginia, the approach being taken by FERC regarding changes to the Forest Plan managed by the USDA Forest Service is raising concerns for its long-term impact on the ability to maintain the integrity of national scenic trails. The protections provided by the current Forest Plans have adequately allowed the review and obtaining feedback for energy transmission projects which have crossed National Scenic and Historic Trails. No forced amendments to the Jefferson National Forest Plan are needed.

From my reading of the available project documents, Amendment 4 is the primary concern in degrading the Scenic Integrity Objective from "High" to "Moderate" for the Rx 4A forest management area which is for the Appalachian Trail. The impact is that the trail viewshed can be damaged for up to a decade versus just a couple of years under the current standard. Forests heal slowly, thus the ongoing experience could be spoiled for a lifetime. My specific request is that this amendment not be included in the final proposal, but employ the current best standards for protecting the wilderness and maintaining the trail experience.

Again this concern is not just about a single pipeline but the damage to how a nation manages its wilderness and forest assets for the current and subsequent generations.

Sincerely,

Vic Hasler  
Tennessee Eastman Hiking & Canoeing Club  
Kingsport, TN

IND465-1

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

# INDIVIDUALS

## IND466 – Thomas Bouldin

20161216-5122 FERC PDF (Unofficial) 12/16/2016 1:51:52 PM

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

From: Thomas Bouldin, Pence Springs, West Virginia

Date: December 16, 2016

RE: Docket No. CP16-10-000 Mountain Valley Pipeline  
Significant Misrepresentations and Omissions in the DEIS  
re: West Virginia Trout Streams

IND466-1

I submit the following protest against misrepresentations, errors, and seemingly intentional omissions from the FERC's published Draft of the Environmental Impact Statement for the Mountain Valley Pipeline. I reference the text of an earlier comment I submitted to Docket CP16-10 as Document #20160915-5109. It concerns potential impacts of the proposed construction on West Virginia water resources, specifically on designated trout waters. This comment was submitted on September 15, 2016, just before the DEIS was rushed into publication. Had FERC been more committed to producing a professionally-researched statement of environmental impacts, staff assigned to writing the DEIS might have had time to review the text and respond in good faith to the problems it details. Instead of such a responsible effort, the staff has chosen to misrepresent impacts to streams, evade any serious discussion of the issues raised—and in so doing have committed themselves to a badly-reasoned and poorly-edited defense of this aspect of the MVP proposal.

The FERC staff will need to undertake significant revisions to correct these errors in the draft. The unprofessional performance of the staff on this aspect of the DEIS calls into question FERC's capacity to fulfill its own publically stated commitment to fact and science. It also contributes significantly to the increasing body of evidence which, in my view, renders the DEIS invalid.

1

IND466-1

The draft EIS was not rushed into production; staff spent about two years working on the project. The draft EIS contained no intentional omissions. See the response to comments FA11-2 and LA5-1 regarding preparation of the EIS. The “Table of Trout Streams Crossed” was included in Mountain Valley’s Erosion and Sediment Control Plan. As indicated in appendix F-1, unnamed tributaries to Deer Creek (listed as B2) would be impacted by access roads rather than the pipeline. Table 4.6.1-2 has been revised in the final EIS to clarify the project component. Multiple crossings of the same waterbody are not hidden in the EIS. As stated in multiple places within the EIS, all waterbody crossings are listed in appendix F. The EIS provides a discussion of loss of stream bank cover in section 4.6.2.2. A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. Section 2.7 of the EIS provides an overview of future plans and abandonment. A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. Section 4.3 of the final EIS has been revised to include updated scour analysis information filed by Mountain Valley in October 2016.

# INDIVIDUALS

IND466 – Thomas Bouldin

20161216-5122 FERC PDF (Unofficial) 12/16/2016 1:51:52 PM

## TROUT STREAMS IN THE DEIS

IND466-1  
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The discussion of trout streams in the DEIS is brief, inaccurate and contradictory. In fact, it appears to be a systematic attempt to distract readers from previously reported data that show impacts far more serious than those acknowledged in the DEIS.

The discussion of trout streams gets off to an unpromising start because of faulty editing. On page 4-173, the DEIS states that the MVP would cross seven (7) non-stocked sustainable trout waters. On the following page, however, Table 4.6.1-2 states there are only six (6). Nothing in the text attempts to explain the contradiction. An examination of the Appendix F "Fisheries of Special Concern" (pg. F-5-1), however, appears at first glance to resolve the question; the table lists seven streams: the Left Fork of Holly River (MP 81.7), Hominy Creek and four of its various unnamed tributaries (all between MP 126.5 and 132.0), and Meadow Creek (MP. 140.1). All seven streams carry the designations "CW" (coldwater stream) and B2 (indicating trout stream status).

Unfortunately, however, this editing problem hardly exhausts the difficulties that study of the DEIS reveals. These seven streams are also reported as trout waters by MVP in an earlier listing submitted to Docket CP16-10 in late February 2016 as one small part of Document #20160226-5404-Part 1. This submission was assembled in response to specific requests from FERC for additional environmental data. The "Table of Trout Streams Crossed" (file page 72) presents a totally different picture of the MVP's potential impact on West Virginia's trout streams. For one thing, it includes a designated trout stream unmentioned in the DEIS: Deer Creek. This would seem to increase the total number of trout streams to 8—suggesting a 14% increase over the DEIS report. Such a shortfall is a bit discouraging if one expects scientific accuracy from the Draft Environmental Impact Statement. Staff may wish to argue that Deer Creek was left out of the count because the mainstem is not listed as being crossed: such sophistry would assume that no will notice that multiple damages to numerous tributaries may pose as great (or greater) a problem as one direct crossing of the mainstem stream.

# INDIVIDUALS

## IND466 – Thomas Bouldin

20161216-5122 FERC PDF (Unofficial) 12/16/2016 1:51:52 PM

IND466-1  
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The earlier reporting, however, reveals an even more distressing fact: the authors of the DEIS do not report the damaging number of crossings involved for each of the stream-complexes they identify. According to MVP's earlier report, the Left Fork of the Holly and several of its tributaries will be crossed a total of 10 times—not just once. The DEIS report of Hominy Creek and its four unnamed tributaries is just the beginning of the devastation: the watershed will see a total of 37 crossings. Meadow Creek and Deer Creek get off comparatively easier—with only 5 and 6 crossings respectively. **So what the authors of the DEIS hide in their report is that trout-supporting waters in West Virginia will see a total of at least 58 crossings!** And in fact the number is likely to be even higher: **for the four (4) mainstem trout streams and all their tributaries combined, the DEIS (Appendix F-1) lists an astounding 81 crossings, some of which are for the ROW, some of which are for access roads, and others for temporary workspace.**

That there should be so many hidden instances of impacts on these streams is a concern, as is the fact that identifying the actual crossings is so time-consuming. But even more troubling is the fact that the DEIS does not detail *any* of the impacts involved. For example, the DEIS appendix identifies 27 ROW crossings in the affected watersheds—each of which will be approximately 75' wide: that is at least *4047 linear feet of stream bank disrupted.* Of this amount, the 50-foot-wide permanent easement will require *2700 feet of stream bank permanently cleared of protective forest cover* and the remaining footage will take years to regrow mature forest trees. In the meantime, because of increased sunlight reaching the stream, *in-stream water temperatures will likely increase* (a major problem on a trout stream) and stream banks will be more vulnerable to *increased sedimentation* (which can result in *reduced spawning success*). Because we have no estimates of the length of disruption posed by access roads and ATWS, it is very difficult to estimate the square footage of streambed that will be permanently reconfigured to accommodate MVP's pipeline. And then there is the question of those damages which will develop as the pipeline ages and deteriorates after being 'decommissioned': what will be effects of water flooding down steep slopes through the failing pipeline and flushing into the stream at the bottom of a gorge where the crossing collapses under the power of high water? What kinds of toxins will have

# INDIVIDUALS

## IND466 – Thomas Bouldin

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built up over the fifty or sixty years of use—and will now enter the water supply of unsuspecting citizens? And why should FERC care? Because it is in the public interest.

Another instance of the significance of irresponsible obfuscation in the DEIS concerns damages incurred by a stream—not one crossed by the MVP but in proximity—which provides habitat for breeding populations of trout. This stream is Buffalo Creek, a tributary of the New River in Fayette County, not far from an area that *is* crossed by the pipeline. Buffalo Creek was the beneficiary of West Virginia's remarkable attempts to improve trout habitat and restore the state's environment, receiving stocking in 1993 and 1994 that resulted in a reproducing population of native Brook trout. But Buffalo Creek provides a stark warning to the authors of the DEIS, as portrayed in the following quotation from Trout Unlimited's *Guide to the Catch-and-Release Trout Streams of West Virginia (2002)*:

"The major flood that hit regions of southern West Virginia on July 8, 2001 did serious damage to Buffalo Creek. The heavy rains on that Sunday morning varied from 7 to 10 inches in a short period of time, and there was extensive destruction along many streams in the region. The flood waters on Buffalo Creek went 12 to 20 feet above normal stream levels and brought about drastic changes in the stream. The stream bed is now much wider, with boulders as large as small trucks having moved downstream" (pg. 14).

One can only imagine what this report would read like had the MVP been in place in the stream in 2001!

Nothing in the DEIS suggests that FERC staff are even aware of such damages as a possibility for the MVP project. Given their first failed and unprofessional attempt to calculate depth of scour for West Virginia streams, there is very little to suggest that EQT's designers of the MVP are prepared to protect a 42" pipeline from the possible impacts posed by "boulders as large as small trucks." The authors and researchers behind the DEIS have reported no empirical data on any of the impacts posed by the project, or posed for the project by the environment. Such data is no doubt available from the existing literature, and, moreover, should be developed site-by-site through



IND466-1  
cont'd

appropriate research. **However, FERC staff have chosen instead to forego an assessment of *actual* impacts—in favor of asserting that all problems will be minimal—thanks to essentially fictive, generalized mitigation plans and best practices whose effectiveness they do not demonstrate. And which they cannot demonstrate without the data with which to assess those impacts.**

### CONCLUSION

The details in this brief discussion are sufficient, I believe, to demonstrate that the DEIS has treated very badly indeed of impacts to West Virginia's trout waters. Not only is information inconsistent and difficult to access, but where the DEIS makes information available, it is terribly misleading and incomplete. Even in the most basic ways, the DEIS fails to respond to the issues I have previously raised concerning stream damages—and it entirely fails to live up to NEPA requirements for discussions of environmental impacts.

For these reasons, I request that my earlier comment be included with this protest against FERC's ineffectual and unprofessional reporting of potential environmental damage. FERC must issue a revised or supplemental DEIS—to include an adequate public comment period—which responds fully and accurately to the issues I have raised here, as well as those issues raised by numerous citizens, experts and agencies. **NEPA guidance requires nothing less than scientific accuracy—and the American public deserves far more than the self-serving excuses for the applicant offered by FERC staff in the present draft.**

# INDIVIDUALS

## IND467 – Reinhard Bouman

20161216-5136(31843692)

Reinhard Bouman, Meadow Bridge, WV.

Ms. Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426  
Dec. 16, 2016

IND467-1

Hello to all you planners, engineers, scientists, and regulators who got orders from above to move fracked gas from the Marcellus & Utica shale formations to the East Coast, My name is Reinhard Bouman & I live since almost 40 years with my family on a 230 acre organic farm in the Lick Creek watershed, approximately 1.25 miles downstream from the proposed Lick Creek crossing by the MVP.  
How can it be? Have you lost all respect & love for your Mother, who gives you air, water & provides for all your needs? Have you severed your connection to Nature, to His Creation?  
How else could anyone propose to plow through thousands of acres of forested, uninhabited land to bury a 42" steel snake to enrich the one percent? When I look at the proposed route, my heart constricts. These apparently uninhabited acres are not empty: they are the ever dwindling refugee camps for the 4-legged, the winged & multitudes of live forms, a fairly together ecosystem.  
But here we go again: man & his machines on the path of "progress", still under the delusion that started approximately 10,000 years ago which proclaims: "The world is made for man to rule & conquer it."  
May I utter my less invasive, less greedy, no "God damn hurry" (quoting our late Senator Byrd) approach to this new gold rush mentality?  
Ok, you have the technology to squeeze the gas out of the earth, but can you do it safe & beneficial to everyone, including the environment? Assuming one day you can, then why sell it, or even part of it immediately as LNG abroad? This is a national resource, also belonging to future generations. Imagine a Power Ball win of several million dollars; would you blow it in a week? Think of all the products we use daily derived from fossil fuels which is finite. But if you can't convince the greedy to think long term, then go along existing arteries of energy & transportation, & stay out of the little remaining "wilderness".  
I will do my best to keep you out of Summers County, and wish you a change of heart.  
Take care,  
Reinhard Bouman

IND467-1

See the response to comment IND155-2 regarding forest impacts. See the response to comment IND2-3 regarding export and hydraulic fracturing.

# INDIVIDUALS

IND468 – Matthew Bergman



RE: Mountain Valley Pipeline—Docket No. CP16-10-000

I support Dr. Kastning's conclusion that "...this region is a no-build zone for a gas pipeline of this size."

Comment:

IND468-1

I DON'T THINK ANY DECISIONS CAN BE  
MADE WITH TOO MUCH FORETHOUGHT  
AND RESULT ANALYSIS— SO IT CONCERNS  
ME THAT THE DEIS (4.6) IS NOT  
ABLE TO DRAW CONCLUSIONS REGARDING  
THE EFFECTS OF TURBIDITY AND SEDIMENTATION;  
ON FISHERIES AND AQUATIC LIFE.

Name: MATTHEW BERGMAN

email: bergzly@gmail.com

Address: 107 S. COURT SE, LEWISBURG, WV 24901

IND468-1

A revised discussion of sedimentation and turbidity can be found in section 4.3 of the final EIS. See the response to comment FA11-15 regarding sediment and turbidity modeling.

# INDIVIDUALS

## IND469 – Patricia Gundrum

20161216-5148 (31843743)

Patricia Gundrum, SOUTH CHARLESTON, WV.

IND469-1

My concerns include water crossings. The pipeline will cross the Elk, Gauley and Greenbrier Rivers using a proposed method which is very invasive in order to create a place for the pipes to cross. The Federal Energy Regulatory Commission should require Mountain Valley Pipeline to approach these river crossings with a less invasive method which would minimize erosion and potential for landslides, stream sedimentation and subsequent harm to aquatic life. Impacts on aquatic life should be more adequately assessed and those assessments submitted before any further decisions are made. Areas in the eastern part of WV which contains fragile karst geology is subject and very vulnerable to collapse and destruction, perhaps further affecting ground water.

IND469-1

In October 2016, Mountain Valley indicated it would cross the Elk, Gauley, and Greenbrier Rivers using dry techniques; and this is reflected in section 4.3 of the final EIS. Since Mountain Valley would cross all waterbodies using dry techniques, there would be a low potential for downstream sedimentation and turbidity. See the response to comment IND70-1 regarding erosion. We address landslides and karst in section 4.1; and aquatic resources in 4.6 of the EIS.

# INDIVIDUALS

## IND470 – Zane R. Lawhorn

20161220-5062 FERC PDF (Unofficial) 12/20/2016 9:00:13 AM

IND470-1

In the beautiful rural countryside of Monroe County, West Virginia there lies a historical landmark that is close to my heart. Along with being in the hearts of many other residents of this pristine area we call a national treasure.

Monroe County is distinctly unique in that it has changed very little over the 240 years since my ancestors settled here. Six years before the Declaration of Independence was signed my ancestors called this area home. The history of the Jacob Mann family is well documented and is a local cultural treasure.

As the years passed the early people needed a good way to travel from one community to another. Traveling was dangerous and very difficult in the rough terrain scattered with caves and sinkholes. For this need a road was blazed through the rugged countryside for wagons, for people to walk and for stagecoaches to travel. Settlements clustered around this road. Schools were built. People lived and died. Not far from the road there are the remains of a slave house where Kate and June lived their lives. The Oak Hill School sat just off this highway connecting Peterstown to Alderson and the outside world. News of war, new presidents and other important events would have traveled this path. A cabin still in existence as a home was built during the War Between the States in 1864. Wagon tracks created depressions in the fields they crossed and remain today.

The Mountain Valley Pipeline will cross this landmark destroying the integrity of its history on the Oak Hill Farm where these and many other historical treasures remain. James Gore's ancestors have owned this farm since the 1800's. I have personally spent many days on this farm walking the same road my ancestors walked. This road is personal to me, just as whatever decision representatives of FERC make will be personal to them. Your decision will affect people's lives. It will affect our heritage negatively forever. Will this be done for someone's profit?

While the official status of this historical landmark has not been established the potential remains as long it remains undisturbed by corporate greed. We don't want the pipeline or anything else to destroy this landmark. On the farm remains a wagon once used to haul goods on this highway. The cultural significance of this landmark reaches beyond our family and our heritage.....it is an American heritage. It is a flashback to another time when our founding fathers forged a nation out of a rugged and untamed wilderness.

The Mountain Valley Pipeline could potentially destroy what remains of this historical landmark forever robbing future generations of a national treasure. The descendents of these early settlers would lose a valuable historical site. This old turnpike connector road lies directly in the proposed route of the Mountain Valley Pipeline. An interstate pipeline that would be built strictly for the private gain of the partners of EQT Midstream Partners, LP. Their intent is clearly stated in their corporate stock prospectus that this is for private profit. This pipeline is not intended for the public welfare, it is a commercial venture strictly for profit. As the West Virginia Supreme Court of Appeals recently ruled this pipeline is for the illegal "private taking for private use".

This historical landmark once connected many communities to the Kanawha Turnpike and the rest of the world. On the Oak Hill Farm this landmark is readily visible and can be walked. You can still pass by

IND470-1

Mountain Valley has not yet received permission to survey this tract. Therefore, historic resources related to the Oak Hill Farm within the APE have not yet been identified.

# INDIVIDUALS

## IND470 – Zane R. Lawhorn

20161220-5062 FERC PDF (Unofficial) 12/20/2016 9:00:13 AM

IND470-1  
cont'd

old home sites, springs flowing with water that our ancestors would have stopped for a refreshing drink and cemeteries where some graves are marked with old stones and some remain unmarked. The historical significance surrounding the travels along this highway has yet to be explored. Were there Indian attacks? Has anyone been buried along this road in an unmarked grave? Did a famous general pass his troops along this roadway during the War Between the States or during our War for Independence? We cannot afford to lose the knowledge we have yet gained so someone can profit.

The Mountain Valley Pipeline is a direct threat to the status of this irreplaceable historical landmark that runs through the Narrows of Hans Creek, Oak Hill Farm, Johnson's Crossroads and through the Knobs on to Alderson. Very little of this road remains except on the Oak Hill Farm. To still be able to walk this old road is a cultural connection to our ancestors that can never be replaced. I can still walk the same road that my ancestors would have traveled two centuries ago. The Mountain Valley Pipeline must never be allowed to destroy this historical landmark and deny my descendents the right to take this walk.

I submit this plea to you the members of FERC on behalf of all ancestors of the early settlers that traveled this road. Do not allow our personal heritage to be lost for the private gain of EQT Midstream Partners, LP.

Submitted by,

Dr. Zane R Lawhorn

P.S. I have attached a photo of some of the many students who traveled this road to attend the Oak Hill School.



# INDIVIDUALS

## IND471 – Nan Gray

20161216-5060 FERC PDF (Unofficial) 12/16/2016 11:47:55 AM

Nan Gray, Newport, VA.

Nan Gray on FERC DEIS re MVP and EQT: Docket # CP16-10-000

Executive Summary for DEIS:

- IND471-1 1. Repeated requests from ES (from Dec to June) for soils data/analysis that is never supplied
- IND471-2 2. Repeated request from experts to provide soil taxonomic names and more thorough interpretation of the soil characteristics not provided by MVP nor EQT
- IND471-3 3. The DEIS does not contain recent baseline environmental data of the impacted sites. All sites known to be impacted by this project need to have baseline environmental data and monitoring for soil quality, in order to make an effort to avoid all Prime Forest and Prime Agricultural land, by declaration of a "No build zone - No Action". Good land, once it is destroyed, never recovers to its former self.
- IND471-4 4. Source waters will be impacted by the construction of the proposed MVP.
- IND471-5 5. Karst, unique and sensitive areas have water connectivity that must have monitoring for site specific Stormwater Plans prior to any land disturbance. The proposed pipe specifications of design and construction requirements need to be changed from Class 1 to Class 4, the most stringent design and construction, due to the extraordinarily high risk of soil and geology failure of the proposed MVP routes.
- IND471-6 6. Specifications of pipe should include shutoff valves every 500 feet with leak monitoring every 500 feet
- IND471-7 7. MVP and EQT must list proposed pipe contents, including liquified condensates and other byproducts
- IND471-8 8. Citizen input ignored regarding dangers of soils and geology
- IND471-9 9. The bearing strength of soils classified without known torque probe values must be rated as an ASTM D 2487-00 or D 2488-00 Soil Classification of 4B which suggests no more than 1000 pounds per square foot of weight. Torque probe values are an onsite measurement
- IND471-10 10. Due to the severe impact that the proposed MVP and EQT would pose to the environment, it is suggested that a "No Action" Alternative be directed in the DEIS.
- Flaws with EQT provide information in the DEIS
- IND471-10 1. USFS asked EQT to follow BLM pipeline Plan of Development (POD) for a right-of-way application through BLM land (Forest).
- a. POD would include detailed Future needs/expansion of the proposed ROW?
- b. Acre calculations by right of way
- c. Land status (prime agricultural land, etc ).
- d. Depth of pipeline
- e. Permanent width and size of ROW
- f. Temporary width and size of land used
- g. Connection to existing utility ROWs and their future components
- h. Access roads
- i. Will pipeline be removed at end of its life time?
- j. Fire control - Fire dramatically impairs soils! Preparation for this contingency (see below). Fire happens!
- k. Contingency planning for worst case scenarios (seismic activity, drought, flash flooding, fire, landslides).
- l. Stabilization and revitalization of disturbed areas

IND471-1 The EIS provides details regarding soils identifications. Orders and suborders and are general categories and would provide only generalized information regarding the soils that would be impacted. The soil taxonomy for the soil series presented in the EIS are available on the NCRS website. The NRCS developed SSURGO database provide the most reliable and standardized soil assessments and allows for compilation and direct comparison of soils data.

IND471-2 Surveys were completed for environmental resources where permission was granted. FERC does not require applicants to conduct soil sampling along the proposed right-of-way. Soil data from the SSURGO database is the standard. The No Action Alternative is discussed in section 3 of the EIS.

IND471-3 The EIS assesses potential impacts to applicable source water protection areas and public water intakes in section 4.3.2.

IND471-4 Karst and its relationship to groundwater resources are discussed in sections 4.1 and 4.3 of the EIS.

IND471-5 The DOT regulations determine class pipeline thickness and locations of shutoff valves.

IND471-6 As stated in the EIS the pipeline is for the transportation of natural gas (which is comprised of mostly methane) in a vapor state. The pipeline would not transport "mixed gases", oil, gasoline, or LNG.

IND471-7 Geology is discussed in section 4.1 of the EIS; soils in section 4.2.

IND471-8 As requested by the FERC, Mountain Valley filed a response to the commentor's letter (5f Accession number 20170330-5339). According to Mountain Valley torque probe values are not related to soil bearing capacity.

IND471-9 The No Action Alternative is discussed in section 3.1 of the EIS.

IND471-10 Mountain Valley filed with the FERC a revised POD on March 3, 2017. Acres are provided in table 2.3-1 of the EIS. Land use is discussed in section 4.8 of the EIS. The depth of cover is provided in table 2.4-3. The nominal construction right-of-way is 125-foot-wide; permanent easement 50 feet. Utilities discussed in section 2.4.2.14. Access roads are discussed in section 2, 4.8, and listed in appendix E. Abandonment is discussed in section 2.7 of the EIS. See the response to comment IND18-2 regarding emergency response. The EIS provides a discussion of earthquakes and landslides in section 4.1. A revised discussion of flash flooding is provided in section 4.3.2 of the final EIS. Restoration is discussed in section 2 of the EIS. See the response to comment FA11-12 regarding need. Cumulative in section 4.13. See the response to comment FA11-3 regarding a programmatic EIS.

# INDIVIDUALS

## IND471 – Nan Gray

20161216-5060 FERC PDF (Unofficial) 12/16/2016 11:47:55 AM

IND471-10 cont'd	m. Need analysis of "connected actions" and "cumulative impacts" (contingency) - requires a programmatic EIS. EIR 1	IND471-11	As stated in section 4.2.1 of the EIS, Mountain Valley has prepared an <i>Unanticipated Discovery of Contamination Plan</i> , which would be used in the event that unknown areas of contaminated soils are encountered during construction of the MVP.
IND471-11	1. Question 7.1 Potential for contaminated soils. MVP says they have compiled that data in Appendix 2D. a. Nan: EQT continues to not identify soils series names in tables. b. Still does not provide unanticipated discovery of contamination plan. EQT promises it by February 2016, June 2016, still incomplete	IND471-12	Soil impacts discussed in section 4.1 of the EIS.
IND471-12	2. Question 7.2 Temporary and permanent impacts on soils. a. Table 7.2-4 ostensibly provides the information, but....any impact will be permanent b. Table is inherently flawed: i. Table does not acknowledge possibility of permanent (not temporary) damage to soils. ii. "Temporary Impact" assumption: Table identifies temporary impacts, but implicitly assumes that the damage to soils in those locations is "temporary." There is NO such thing as temporary damage to soils . iii. Sloppy data entry: Significant figures are inconsistent (e.g. number digits to right of decimal).	IND471-13	The appendices N-1 to N10 provide by milepost soils data for the pipeline route, and detail map unit soils information for other facilities. Mountain Valley would follow the revegetation procedures discussed in sections 2 and 4.2 of the EIS.
IND471-13	3. Question 7.3 Re-vegetation and Soil Amendments (to soil necessary for vegetation growth) a. Total lack of site specific information - in what is a highly diverse soils environment by specific sites. b. Applicant does consider other variables that condition soils impact. E.g. Soil moisture is influenced by "aspect" (direction that slope faces) - fact not acknowledge by applicant. There are some locations where disturbed soils will never re-vegetate.	IND471-14	A reference to NOAA 1978 is included in the ground heaving discussion. Ground heaving or frost heaving is based on soil saturation, soil characteristics, and freezing temperatures. As discussed in section 4.2 the flow of gas through the pipe would warm the surrounding soils preventing ground heaving in proximity to the pipe. Field delineated hydric soils can be found in section 4.3. Note there would not be any aboveground facilities located within a wetland. See the response to comment IND401-5 regarding pending wells and springs.
IND471-14	4. Question 7.4 Depth of Frost Line. a. Table??? Data/proof ? references? National Ecological Observatory Network NEON at Mountain Lake Biological Station? NOAA? b. Provides discussion of frost heaving, but it is incomplete (i.e, they only address hydric soils). c. They state that the maximum depth of frost penetration along route is 20-30 inches deep. This conclusion assumes solely hydric soils. d. Compound effects: even if frost penetration is limited to 30 inches, there is no consideration of compound effects, such as resulting slope instability on north aspects. e. Hydric soils can be addressed on surfaces of less than 5% slope. However no consideration of hydric soils > 5% soils slopes. Unique ecosystems of mountain wetlands and their Vernal connectivity would be directly impacted by any land disturbing activities f. NRCS maps are not site specific and are based on a scale with a minimum unit of analysis of 5 acres or more. Pre-construction information will need to address site specific soil. g. There is a need to monitor the depth of the frost line with elevation changes. Severe temperature gradients could add to landscape instability and risk pipeline failure. h. Incomplete recognition of karst areas impacted in proposed ROW.	IND471-15	See section 4.2.
IND471-15	EIR 2 1. Question 7.1 Imported Top Soil a. Data provided. MVP does not intend to use imported top soils 2. Question 7.2 Permanent and Temporary Impact.		



# INDIVIDUALS

IND471 – Nan Gray

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IND471-15  
cont'd

- a. Data with no "analysis"
- 3. Question 7.3 Soil Limitations.
  - a. Table DR2 does not use taxonomic names, which indicate soil characteristics necessary for addressing this question.
  - b. Assume temporary impacts.
  - c. Table ignores karst stream flows. Table addresses intermittent stream flows, but

EIR #3

- 1. Question 1 Temporary and Repeated impacted acreage.
  - a. Data in Table A

# INDIVIDUALS

IND472 – Nan Gray

20161216-5063 FERC PDF (Unofficial) 12/16/2016 11:55:01 AM

Nan Gray, Newport, VA.  
Nan Gray on FERC DEIS re MVP and EQT: Docket # CP16-10-000  
Executive Summary for DEIS:

IND472-1

//// DEIS 4.12 RELIABILITY AND SAFETY fails to mention pipeline contents, except methane, as if that is the only commodity passing through this pipeline. Fails to mention other gases and liquids, byproducts (page 696/2669) and DEIS 4.12.1 Safety Standards (page 697/2669) ... The DOT also defines area classifications, based on population density in the vicinity of pipeline facilities, and specifies more rigorous safety requirements for populated areas. The class location unit is an area that extends 220 yards on either side of the centerline of any continuous 1-mile length of pipeline. The four area classifications are defined below:

- Class 1 - Location with 10 or fewer buildings intended for human occupancy;
- Class 2 - Location with more than 10 but less than 46 buildings intended for human occupancy;
- Class 3 - Location with 46 or more buildings intended for human occupancy or where the pipeline lies within 100 yards of any building, or small well-defined outside area occupied by 20 or more people on at least 5 days a week for 10 weeks in any 12-month period; and
- Class 4 - Location where buildings with four or more stories aboveground are prevalent.

+++we want more rigorous safety requirements because of the delicate, un-repairable, irreplaceable native diverse ecosystems and environment. Any pipelines through karst and all pipelines through Giles, Craig, Montgomery, Roanoke Counties should be built according to Class 4 standards (most rigorous) according to the DOT safety standards for pipeline design (wall thickness, etc.), construction, testing, operation, maintenance, and emergency response of pipeline facilities. 000000 Landslide Mitigation Plan that includes the results of field inspections conducted in steep slopes areas (page 702/2669) and outlines the characteristics of the inspected slip prone areas and potential mitigation measures... Further, MVP plans to use Class 2 pipe in all areas containing karst features and seismic features-NO, we want Class 4 pipe with no bridging (we want no pipe)

PPP///PPP  
Page 735/2669 of DEIS 4.13.2 Cumulative Impacts on specific Environmental Resources  
They say geologic and soils resource impact not required for 3 reasons, none of which address the continuous permanent impact on the soil that a pipeline construction of this magnitude would have.

IND472-2

IND472-1

The pipeline is for the transportation of natural gas (which is comprised of mostly methane) in a vapor state. The pipeline would not transport “mixed gases”, oil, gasoline, or LNG. Pipelines can be safely installed through karst terrain. As discussed in section 4.12 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. As stated in section 4.12.1 of the EIS, the safety standards are mandated by the DOT not the FERC. Slopes with landslide potential are discussed in section 4.1.2.14.

IND472-2

Soils excavated from the trench would be stockpiled alongside the trench and used for backfill. In accordance with the FERC Plan, as discussed in section 4.2 of the EIS, Mountain Valley would conduct topsoil and subsoil compaction tests in agricultural and residential areas using a penetrometer or other appropriate device at regular intervals. The results of the compaction tests would be compared and matched to undisturbed soil under similar moisture conditions to ensure any affected soils are properly decompacted. If compaction is found to have occurred, the area would be tilled and retested. As stated in section 4.2.2 of the EIS, the applicants would minimize impacts to prime farmlands by segregating topsoil, removing rock, and decompacting soils.

# INDIVIDUALS

IND472 – Nan Gray

20161216-5063 FERC PDF (Unofficial) 12/16/2016 11:55:01 AM

IND472-2

cont'd

- the site-specific nature of geological resources and soils;
- the generally localized potential effects to these resources in relation to the MVP and the EEP as well as from other projects (such as the limited areas where the projects would intersect or overlap); and
- the utilization of the Plan (for the MVP), Equitrans' Plan (for the EEP), and Mountain Valley and Equitrans' Procedures including environmental inspections and monitoring during construction.

This is a proposed continuous ditch and pipeline with highly disturbed, highly compacted fill material replacing healthy functioning soil and MVP and FERC say no impact to rock or soil...what is better than a healthy functioning soil and all of the ecosystem benefits that a healthy soil offers? Nothing better than healthy soils making healthy water. The soils and geology would be forever impacted, that is not the same as no impact. The whole function of ecosystem services is to have healthy soils that produce clean potable water. We have that here. Do not allow land disturbances anywhere there is clean water. \* Deny MVP any more time, money or permits. \* Deny MVP application. \*Decide healthy soil makes clean water, and these areas are not suitable for the proposed land use of a 42 inch pipeline and its construction. \*Decide the MVP approximate ROW an unsuitable land use for the entire route. \* Decide the best action is "No Action" with MVP.

IND472-3

DCR to FERC 20160520-5051 FERC PDF (Unofficial) 5/20/2016 9:54:59 AM that says the route is likely to impact karst is directly opposite of the DEIS which says there will be no impact to geology.  
FERC should direct a "No Action" Alternative in the proposed MVP DEIS.  
FOREST SERVICE  
Forest Service should direct a "No Action" Alternative in the proposed MVP  
Forest Service should not reduce its Erosion and Sediment Control Standards for the construction of any pipeline  
Forest Service should evaluate the FS Lands for water connectivity and require MVP to include in its application continuous monitoring 24 hrs/day 7 days/week for leak detection along proposed pipeline with automatic shut-off valves every 500 feet. Maintenance schedule of shut-off valves must be included in application  
ES should require Class 4 pipe design and construction for all proposed pipelines through National Forest Lands.  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ)  
Virginia Department of Environmental Quality (DEQ) should direct a "No Action" Alternative in the proposed MVP DEIS.  
VA (DEQ) should not reduce its Erosion and Sediment Control Standards for the construction of any pipeline.  
VA (DEQ) should require MVP to evaluate the water connectivity along its routes and require MVP to include in its application continuous monitoring 24 hrs/day 7 days/week for leak detection along proposed pipeline.  
VA (DEQ) should require Class 4 pipe design and construction for all proposed pipelines through Virginia Lands  
VA (DEQ) should require MVP evaluate the FS Lands for water connectivity and require MVP to include in its application continuous monitoring 24

IND472-3

Comments noted. Safety is discussed in section in 4.12. The No-Action Alternative is discussed in section 3 of the EIS.

# INDIVIDUALS

IND472 – Nan Gray

20161216-5063 FERC PDF (Unofficial) 12/16/2016 11:55:01 AM

IND472-3 | hrs/day 7 days/week for leak detection along proposed pipeline with  
cont'd | automatic shut-off valves every 500 feet. Maintenance schedule of shut-  
off valves must be included in application  
30 EIR questions (but I counted 19 Qs)  
EQT responded to most questions. If there are 30 Qs, then at least 58%  
are not adequately addressed and 30 Qs without analysis,

# INDIVIDUALS

## IND473 – Craig B. Humphrey

20161219-5028 FERC PDF (Unofficial) 12/18/2016 4:08:52 PM

Craig Humphrey, Sharpsburg, GA.  
Craig B Humphrey  
599 Neely Rd  
Sharpsburg, GA 30277

To whom it may concern,

IND473-1 I am writing to express my strong opposition to the proposed construction of the Mountain Vally Pipeline in any area protected by the USFS 'roadless rule'. Clearly, the construction of the pipeline would violate exactly the same protections for wilderness that road construction would and should not be approved for this reason.

IND473-2 In addition, the construction of new infrastructure which transports fossil fuels delays the transition of the U.S. to cleaner and safer energy sources. Every pipeline constructed creates one more reason to continue relying on fossil fuels and threatens the ability of our planet to support human life.

Thank you for your attention in this very important matter.

Craig B. Humphrey

IND473-1 The Roadless Area Conservation Rule and impacts to roadless areas under this regulation are discussed in section 4.8 of the EIS.

IND473-2 Energy policy is made by Congress and the President.

# INDIVIDUALS

## IND474 – Jordan Shenefield

20161219-5004 FERC PDF (Unofficial) 12/17/2016 5:10:30 PM

IND474-1

Jordan Shenefield, Lilburn, GA.

Good morning. I am writing because I am concerned that the correct and appropriate processes are not being followed for the Mountain Valley pipeline crossing the Appalachian Trail in Virginia. As you know, procedures are set in place to insure that perhaps better ideas are brought into the open. That is the case with this natural gas pipeline crossing the AT.

- No hearings held to look at the existing Forest Plans
- Protections in the Forest Plans ignored
- 5-10 years to clean up rather than the standard 2 years

Following the correct processes will insure that the pipeline is built in a way that becomes a win-win for everyone. Again, let me stress: I am not opposed to the pipeline crossing the AT; I'm concerned that proper hearings and procedures were not followed (which could lead to finding a better place).

Thanks for your help in getting the train back on the right track.

/s/ Jordan Shenefield

IND474-1

Section 4.8.2.4 discusses the process of coordination with the ATC and FS regarding the Appalachian National Scenic Trail.

# INDIVIDUALS

## IND475 – Deborah Way

20161219-5006 FERC PDF (Unofficial) 12/17/2016 6:14:53 PM

IND475-1 Deborah Way, Knoxville, TN.  
I oppose the Mountain Valley Pipeline Project from traversing area protected by the Forest Service's Roadless Rule. Allowing the pipeline to cross 3.4 miles of protected forest and clearing a 125-foot-wide section of that protected forest would set a dangerous precedent and encourage the possible abuse of the Roadless Rule in other areas. Additionally, the Appalachian Trail is truly a national treasure and to deface it for the ease of placing a pipeline that may very well leak in the future is simply not worth the long-term cost to our nation. Thank you for listening.

IND475-1

The Roadless Area Conservation Rule and impacts to roadless areas under this regulation are discussed in section 4.8 of the EIS. See the response to comment FA10-1 regarding Amendment 4.

# INDIVIDUALS

## IND476 – Raymond M. Gonda

20161219-5007 FERC PDF (Unofficial) 12/17/2016 6:45:51 PM

IND476-1 Raymond M Gonda, South Burlington, VT.  
The Apalachian Trail is a national treasure. A large reason for that is the sensational views accessible from its heights Having a swath of trees exceeding 100 ft cut out of its viewsheds is inimical to the wilderness experience and feeling that people who hike the trail seek. I am opposed to the pipeline crossing the trail and cutting through roadless areas. After all that is why they were classified as roadless with public input years ago. Don't change that now.

IND476-1

Visual impacts to the ANST are discussed in section 4.8 of the EIS.



# INDIVIDUALS

## IND477 – Bruce M. Coffey

20161219-5008 FERC PDF (Unofficial) 12/17/2016 11:02:29 PM

Bruce M Coffey, Bent Mountain, VA.  
Cultural attachment

IND477-1

As progeny of parents from eastern Kentucky and southern West Virginia, my attachment to mountain geography and culture is strong. I first knew Bent Mountain, VA in the mid nineteen sixties when, as a young school girl living in the Roanoke Valley, I traveled up THE mountain from Roanoke to Floyd, VA with my father. I was accustomed to my family's trips to WV, pre-Interstate highway, where we would wind up a mountain to a crest, and wind right back down. On this particular road trip, with my father that took us up Bent Mountain, I remember the amazing straight-stretch, cradled by wetlands, following our crest of the mountain. My father gave me my geography lesson of that day including describing the Bent Mountain Plateau and the vast wetlands that I now know are the pure sources of water providing life for the surrounding areas including the vast Roanoke Valley. Twenty years post my amazing discovery of the treasured Bent Mountain, my husband and I sought refuge on this fine mountain plateau following a devastating flood that took our home in the Roanoke Valley. We moved into a house on a small lot among the ridges and hollows of Bent Mountain surrounded, literally, by wetlands and supplied with fresh, clean water from a well close to our house. This mountain land has allowed us to raise three sons, grow food and nurture livestock. We have provided educational field trips on "our land" for PUBLIC school children in our efforts to promote knowledge of the need to conserve our lands and resources, particularly water. We added a great room to our house so our elderly father could have a safe place to live out his final years. Our sons still come up from the valley once a week to celebrate, "Mountain Monday" with family and friends at our Homeplace. We have lived on the land we call our property for thirty one years, and, most recently free of mortgage. Our plan is to live the rest of our years as stewards of this small, yet vital piece of the Bent Mountain Plateau. Construction of the proposed Mountain Valley Pipeline would literally destroy the cultural ties of the Bent Mountain Community along with the land and water necessary for life itself. Construction of the proposed pipeline would literally bisect our Cultural Homeland making it uninhabitable, AT ALL COSTS, for our family. MVP's instillation of a tool to provide economic benefits for private parties and to threaten the environment with malice is a travesty and the epitome of GREED.

IND477-1

Cultural attachment is discussed in section 4.10 of the EIS.

# INDIVIDUALS

## IND478 – Alison Roxby

20161219-5010 FERC PDF (Unofficial) 12/18/2016 3:16:54 AM

Alison Roxby, Seattle, WA.

IND478-1

I am against a pipeline that will impact the Appalachian Trail. The AT is a sight of scenic beauty and peaceful rest that is the heritage of all Americans. The AT and abutting lands have been protected from commercial exploitation for many years by forward-thinking individuals who realize that once our natural lands are gone they cannot be replaced. This

IND478-2

pipeline is an economic project-du-jour that will not stand the test of time, but could do irreparable harm to the natural areas close to the AT. Further, this pipeline would further the fossil fuel economy which is devastating our earth through climate change. For all these reasons, FERC should require an accurate and more thorough EIS before considering this pipeline project, and should coordinate with local stakeholders. I think you will find that a very few wealthy pipeline owners would benefit from this project, and many millions of us would lose our precious and dwindling natural space. I AM AGAINST THIS PIPELINE AND YOU SHOULD BE TOO!!!

IND478-1

Section 4.8 of the EIS provides a discussion of the ANST.

IND478-2

Climate change is discussed in sections 4.11. and 4.13 of the EIS. See section 1.4 regarding stakeholder comments.

# INDIVIDUALS

## IND479 – Corey Grant

20161219-5013 FERC PDF (Unofficial) 12/18/2016 9:23:11 AM

IND479-1 Corey grant, Jamaica plain, MA.  
As a citizen of this country and outdoor enthusiast I find it appalling, absurd, and completely unacceptable to even consider destruction to the AP with a pipeline. There are not many places left untouched by humans in this country and we need to think about the severe consequences this will cause for people, animals, the environment at large, and someone enjoying the simple beauty of a hike on the AP.

Please do not allow this to go forward.  
Thank you for reading,  
Corey Grant

IND479-1 Section 4.8 of the EIS provides a discussion of the ANST.

# INDIVIDUALS

## IND480 – Christine Mullon

20161219-5017 FERC PDF (Unofficial) 12/18/2016 11:33:02 AM

Christine Mullon, Orlando, FL.  
Ms. Bose,

IND480-1	<p>As I prepare for my 2017 hike on the Appalachian National Scenic Trail in Virginia, I am very concerned about the proposed Mountain Valley Pipeline. This proposal would do serious and unavoidable damage to the Appalachian Trail – a source of recreation for millions and a treasured historic wilderness conservation area.</p> <p>To permit the Mountain Valley Pipeline to sully this national landmark would be another environmental embarrassment to our country. The main reasons why the Federal Energy Regulatory Commission should not allow the Mountain Valley pipeline to be permitted are:</p> <ul style="list-style-type: none"><li>• The pipeline will travel through a designated seismic zone and over terrain that is considered extremely unstable. As the pipeline will run over multiple fragile natural resources – including multiple fresh water sources and protected forest areas – and near several communities, this presents a completely unnecessary and avoidable safety risk to people and the environment.</li></ul>	IND480-1	See the response to comment FA10-1 regarding Amendment 4.
IND480-2	<ul style="list-style-type: none"><li>• To accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely reckless, as it would open the gates for future infrastructure projects to cause similar destruction.</li></ul>	IND480-2	See the responses to comment FA10-1 regarding Amendments 2 and 3.
IND480-3	<ul style="list-style-type: none"><li>• The location of the proposed crossing is a scenic and unbroken forested landscape with an immediately adjacent federally designated Wilderness area. The proposed project would significantly degrade the views visible from up to 100 miles of the Appalachian Trail, including some of Virginia's most iconic vistas – Angels Rest, Rice Fields and potentially McAfee Knob.</li></ul> <p>I urge you to protect the Appalachian Trail and its surrounding landscape and communities.</p>	IND480-3	See the response to comment FA10-1 regarding Amendment 4.
IND480-4	<p>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.</p> <p>It is FERC's responsibility to do the right thing – the alternative will be a turning point for the worse in an area that offers recreation and inspiration for millions of people.</p> <p>Sincerely,</p>	IND480-4	The reasons the FERC did not prepare a programmatic NEPA document is explained in section 1.3 of the EIS.

# INDIVIDUALS

IND480 – Christine Mullan

20161219-5017 FERC PDF (Unofficial) 12/18/2016 11:33:02 AM

Christine D. Mullan  
Orlando, Florida

# INDIVIDUALS

## IND481 – Michael Levitt

20161219-5018 FERC PDF (Unofficial) 12/18/2016 12:03:56 PM

IND481-1 Michael Levitt, Royal Oak, MI.  
I am writing to express my opposition to the Mountain Valley Pipeline. The Appalachian Trail is a resource that should belong to all of the citizens of this country, and to build a pipeline through it for economic reasons will deprive future generations of the beauty of this part of the trail, create safety hazards to the area near the pipeline, and pollute the region. There is no reason for this pipeline other than corporate greed, and if you haven't been bought and paid for you will join me in opposing this project. We need to conserve our world, not destroy it.

IND481-1 Section 4.8 of the EIS provides a discussion of the ANST. See the response to comment IND2-1 regarding safety

# INDIVIDUALS

## IND482 – Sienna Cittadino

20161219-5019 FERC PDF (Unofficial) 12/18/2016 12:10:13 PM

IND482-1

Sienna Cittadino, Pittsburgh, PA.  
The construction of a pipeline that would cut across the Appalachian Trail is a poor decision by any metric, be it historical, environmental, economic, or political.

Allowing the Mountain Valley Pipeline to travel this route sets a dangerous precedent regarding "no-road" laws. If those laws are in place, they are obviously intended to preserve the ecological significance of a geographical site. A pipeline would not only be more intrusive than a road, it would also enter in the risk of spill, contamination, and leakage. As pipelines around the country continue to burst and leak on a near-daily basis, this is less a risk and more a certainty.

The proposed pipeline will destroy key aspects of the environment of the Appalachian region, and along with it jobs, livelihoods, and the health of its residents.

IND482-2

Allowing the proposed pipeline also further intensifies our nation's wrongheaded dependence on fossil fuels of all kinds. Renewable energy sources are the future, if there is going to be a future. The science is clear and conclusive, with little or no room for debate or doubt.

Creating this pipeline, wherever it may run, will negatively affect the USA's ability to compete in a post-fossil fuel world. The workers who obtain employment through the pipeline will turn around to those very same jobs disappearing by way of ecological and economic necessity. The bust following the boom will be destructive and severe, as we've seen time and time again.

At the very least, this pipeline, if built, will contribute to the weakening of our nation's National Defense in the face of the mounting tensions and disturbances that climate change will bring.

Building this pipeline is an act of lunacy in the name of greed. Those may not be the correct "political" terms to use, but they are nothing short of the truth. Infrastructure should aid the residents of our nation and of the counties through which the infrastructure passes, not harm them. This pipeline will harm them.

IND482-1

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

IND482-2

Comment noted.

# INDIVIDUALS

## IND483 – Richard Chamberlain

20161219-5020 FERC PDF (Unofficial) 12/18/2016 12:37:09 PM

- IND483-1 Richard Chamberlain, DENVER, CO.  
As a past Appalachian Trail thru hiker and current Appalachian Trail Conservancy member, there is no excuse for routing a pipeline with such visual impacts as MVP so close to the Appalachian Trail. Any rigorous visual impact analysis would have clearly shown how and where the MVP would have impacted the Appalachian Trail and its corridor. Please look to reroute this project in already established energy corridors that are beyond the visual impact of iconic viewpoints such as McAfee Knob and Angels's Rest. Please increase the number of key observation points (KOPs), including those on top of nearby summits and view points along the Appalachian Trail, such as those listed above, so that an adequate visual impact analysis is completed.
- IND483-2 Furthermore, why is the pipeline being routed through an established roadless area in Jefferson National Forest? This area was designated to be roadless to protect it, not for a pipeline to be constructed through.

IND483-1 See the response to comment FA10-1 regarding Amendment 4.

IND483-2 The Roadless Area Conservation Rule and impacts to roadless areas under this regulation are discussed in section 4.8 of the EIS. See also response to comment CO114-34.



# INDIVIDUALS

## IND484 – Rebecca True

20161219-5022 FERC PDF (Unofficial) 12/18/2016 1:17:52 PM

IND484-1 Rebecca True, Davenport, FL.  
Please do not allow oil companies and short-range "employment" opportunities ruin the Appalachian mountains. Our environment and beautiful country are worth more than these pipelines. Imagine trying to clean up an oil spill in the mountains, the detriment not only to the environment but to the people who live in these areas.

Only after the last tree has died and the last fish has been caught, will we realize we cannot eat money.

IND484-1 The project is for the interstate transportation of natural gas; and has nothing to do with oil.

# INDIVIDUALS

## IND485 – Guy W. Buford

20161219-5025 FERC PDF (Unofficial) 12/18/2016 2:51:03 PM

IND485-1

Guy W Buford, Rocky Mount, VA.

The Mountain Valley Pipeline has failed miserably to define a legitimate need for the project. Note the following gleaned from the DEIS regarding project need:

"Mountain Valley executed long-term precedent agreements with five shippers for 2 Bcf/d of natural gas firm transportation capacity. The project is fully subscribed."

How can this define a need for this exorbitant project? It offers no information about the demand to which these shippers are responding. The major shipper (64.5% of the 2Bcf/d capacity) in this group of five is none other than the EQT Energy Corporation, LLC, the major player in the joint venture that is MVP. Apparently MVP was only able to solicit 1/3 of the pipeline capacity outside of its own group. All that we know about the destination of this natural gas is the TRANSCO pooling point at station 165 in Pittsylvania County, VA. Who controls where it goes from there? It is in the pool and could go anywhere in the TRANSCO network including LNG terminals for exporting.

No where in the DEIS is there any analysis of the demand capacity of the existing pipeline infrastructure. Independent analysis by both the DOE and SYNAPSE Energy Economics, Inc demonstrate that there is no need for this project. The existing system is more than adequate for both existing and near future demands. The FERC had access to both of these reports and chose not to accept or even acknowledge them because they do not agree with the FERC's plans for the MVP. The FERC needs to provide evidence of reasons why these analyses are not acceptable; or to reject the project for the lack of a legitimate public need.

SUPPLEMENTAL INFORMATION PERTAINING TO THE PURPOSE AND NEED OF THE MVP  
(comments added in bold italics)

Copied from the NEPA Regulations

Sec. 1502.13 Purpose and need.

The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.

Sec. 1502.14 Alternatives including the proposed action.

This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. (only vague comparisons; alternative development continuing)

COPIED FROM THE DEIS

1.2 PURPOSE AND NEED OF THE PROJECTS

The Council on Environmental Quality's (CEQ) regulations for implementing NEPA at

40 CFR 1502.1 recommends that an EIS should briefly address the underlying purpose and need

for a project. In general, as described by the Applicants, the purpose of both the MVP and the

IND485-1

See the response to comment FA11-12 regarding need.

# INDIVIDUALS

## IND485 – Guy W. Buford

20161219-5025 FERC PDF (Unofficial) 12/18/2016 2:51:03 PM

IND485-1  
cont'd

EEP is to transport natural gas produced in the Appalachian Basin to markets in the Northeast, Mid-Atlantic, and Southeastern United States. Specifically, the MVP would deliver the identified gas volumes (2 Bcf/d) to five contracted shippers via a pooling point at Transco Station 165 in Pittsylvania County, Virginia; while the EEP would deliver contracted volumes of 0.4 Bcf/d (with potential for an additional 0.2 Bcf/d) to various end users via a connection with the MVP in Wetzel County, West Virginia. Further details are presented below.

During scoping, we received comments asserting that the real "secret" purpose of the MVP is to export natural gas overseas as liquefied natural gas (LNG).<sup>10</sup> As explained by the FERC staff at the public scoping meetings, there is no truth to that rumor. Mountain Valley clearly stated in its application that it did not design its facilities to transport natural gas to an LNG export terminal. The nearest LNG export terminal to the terminus of the MVP pipeline at the inland Transco Station 165 would be the existing Cove Point LNG terminal on the Chesapeake Bay in Calvert County, Maryland about 190 miles away. There is no direct connection from the Transco Station 165 to the Cove Point terminal. Mountain Valley stated that it does not intend to seek permission to export natural gas overseas as LNG from either the U.S. Department of Energy or the FERC. (why should they when shipping to the TRANSCO pool)

### 1.2.1 Mountain Valley Project

In its formal application with the FERC, Mountain Valley explained that the Mid-Atlantic and Southeastern United States has been mostly supplied with natural gas from the Gulf Coast. Recently, Gulf Coast supplies have been declining, while Mid-Atlantic and Southeastern market demands have been growing. In the Southeast, many electric generating utilities are switching from a fuel source of coal to natural gas (EIA, 2015). In addition, the population of the East Coast is expected to rise in the future. At the same time, natural gas production from shale formations in the Appalachian Basin has been increasing; from 2 Bcf/d in 2010 to 15 Bcf/d in 2014. According to Mountain Valley, the MVP would alleviate some of the constraints on this natural gas production by adding infrastructure to transport lower-priced natural gas from the Appalachian Basin to industrial users and power generators in the Mid-Atlantic and Southeastern

# INDIVIDUALS

IND485 – Guy W. Buford

20161219-5025 FERC PDF (Unofficial) 12/18/2016 2:51:03 PM

IND485-1  
cont'd

United States, as well as to local distribution companies (LDC). The terminus for the MVP pipeline at Transco Station 165 is the existing pooling point for Zone 5 on Transco's system and a gas trading hub for the Mid-Atlantic market. Along its route, the MVP pipeline would also be tapped to supply natural gas to Roanoke Gas, an LDC serving southwestern Virginia and a partner in the MVP.

#### 1.2.3 Project Need

During scoping, we received comments questioning the need for the MVP on the grounds that it would not directly benefit the citizens of West Virginia and Virginia, and stating that pipeline construction and operation would be a burden on affected landowners.<sup>11</sup> Some individuals suggested that there is no need fo

# INDIVIDUALS

## IND486 – Nicholas F. Polys

20161219-5355 FERC PDF (Unofficial) 12/19/2016 4:36:43 PM

Nicholas F Polys, Blacksburg, VA.

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)

Ms. Bose,

IND486-1

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), I feel the proposed Mountain Valley Pipeline (MVP) threatens my community and wellbeing on an unprecedented scale. There are many reasons why FERC perform its public duty and deny the MVP, which will cause un-mitigatable and irreparable harm to my region and locality. Specifically:

- Harmful changes to the Jefferson National Forest Management Plan In order to accommodate the visual and environmental damage that would be caused by the Mountain Valley Pipeline, the U.S. Forest Service agreed to lower the Jefferson National Forest Management Plan standards for water quality, visual impacts, the removal of old-growth forest, and the number of simultaneous projects passing through the borders of federally protected land. This unprecedented change is extremely ill-considered, not only because it would permit the Mountain Valley Pipeline to destroy thousands of acres of pristine forest, but it would open the gates for future infrastructure projects to cause similar destruction. All of these changes were made without sufficient public review or input from other partners – a rash and dangerous change from the standards previously established through decades of cooperation. I STRONGLY OPPOSE ANY amendments to the Jefferson National Forest Management Plan for the accommodation of this pipeline.

IND486-2

- Studies show that current energy demand can be met by existing infrastructure. We don't even need these pipelines! FERC has said that they will not assess the need for either pipeline (MVP and ACP) in the environmental impact statement. This is a violation of the NEPA process. This process requires that FERC's environmental impact statement first assess the need for the project and include reasonable alternatives to the project in addition to investigating environmental impacts. There are serious and documented risks to overbuilding pipeline infrastructure. FERC must perform its duty to the public.

IND486-3

- Climate change. The draft EIS doesn't mention cumulative impacts such as climate change. The EPA sent a recommendation to FERC that they need to address climate change and the need for this infrastructure.

IND486-1

See the response to comment FA8-1 regarding Amendment 1. See the responses to comment FA10-1 regarding Amendments 2, 3, and 4.

IND486-2

See the response to comment FA11-12 regarding need.

IND486-3

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

# INDIVIDUALS

## IND486 – Nicholas F. Polys

20161219-5355 FERC PDF (Unofficial) 12/19/2016 4:36:43 PM

IND486-3  
cont'd | Addressing cumulative impacts (i.e. climate change) is a required part of the NEPA process.

IND486-4 | • Karst Hydrology and Erosion Control on steep slopes. Even if MVP follows FERC's best management practices to the letter, it is still not enough to prevent erosion and landslides in this mountainous and wet landscape. There are Health and safety concerns for nearby communities and the surrounding environment. Numerous safety concerns loom over the Mountain Valley Pipeline as well. Situated on land that is geologically unstable – literally crossing over a designated seismic zone and numerous steep slopes– the risk of severe erosion, landslides and pipeline failure are extremely high. Such instability also poses a high likelihood of natural gas leaks, which could poison the surrounding environment and contaminate the groundwater used by nearby communities – causing irreparable harm.

IND486-5 | • Historic Preservation. The pipeline route is currently headed straight through Newport, between Mt. Olivet Church and the Newport Rec Center. The National Historical Preservation Act protects historic districts like Newport. Threats to historic places are not mitigatable.

IND486-6 | • Permanent damage to iconic views along the Appalachian Trail. The FERC DEIS failed to study the visual impact the Mountain Valley Pipeline would have on the A.T. and the surrounding area. Multiple iconic viewpoints in Virginia are predicted to be severely impacted, including Angels Rest, Kelly Knob, Rice Fields, Dragons Tooth and McAfee Knob – some of the most visited and photographed locations on the entire A.T. The proposed route for the project would require the creation of a 500-foot "utility corridor" around the pipeline – 125 feet wide initially, with the option of expanding to 500 feet for future projects – which would effectively eliminate thousands of acres of pristine forest. We predict that the pipeline corridor could be viewed from over 20 miles away at many viewpoints.

Sincerely,

Nicholas F. Polys, PhD

IND486-4 Karst, landslides, and seismicity are addressed in sections 4.1 and 4.2 of the EIS. See the response to comment IND70-1 regarding erosion.

IND486-5 The proposed pipeline would be 470 feet away from the Mt. Olivet Church and 945 feet away from Newport Recreation Center. 36 CFR 800, the regulations for implementing Section 106 of the NRHP, outlines procedures for mitigation of effects at historic properties. See section 4.10 of the EIS.

IND486-6 Visual impacts on the ANST are discussed in section 4.8 of the EIS. See also the response to comment FA8-1 regarding the 500-foot-wide utility corridor in the Jefferson National Forest.

# INDIVIDUALS

## IND487 – Anthony Gonzalez

20161219-5029 FERC PDF (Unofficial) 12/18/2016 4:12:27 PM

IND487-1 Anthony Gonzalez, Alexandria, VA.  
I strongly oppose construction of the Mountain Valley Pipeline. The impacts of this pipeline on the environment of this area are too deleterious. Profit and moneyed interests should not come before the same stewardship of our environment. Especially an environment as fragile and vital as the Appalachian Mountains.

I also oppose this project because the tactics of the Mountain Valley Pipeline LLC are troublesome, particularly as they relate to eminent domain and property rights. SW Virginia is not a barren land waiting for some large conglomerate to pillage. It's a land of hundreds of thousands of people who have been vocal in opposing this pipeline. That the Federal Government and Mountain Valley Pipeline LLC don't seem to care is incredibly worrying.

I urge the FERC to decline granting Mountain Valley Pipeline LLC the necessary authorizations to begin their destruction of Virginia forests, rivers and mountains.

Best,  
Anthony Gonzalez

IND487-1 See the response to comment IND1-3 regarding eminent domain.

# INDIVIDUALS

IND488 – Marianne J. Skeen

20161219-5030 FERC PDF (Unofficial) 12/18/2016 4:14:15 PM

Marianne J Skeen, Decatur, GA.  
Re: Proposed Mountain Valley Pipeline Comments: Docket No. CP16-10-000 -  
81 FR 71041

Ms. Bose,

IND488-1

For nearly 40 years, most of my volunteer efforts have been devoted to preserving and caring for the Appalachian National Scenic Trail (ANST). I have worked in the field moving rocks and dirt to improve trail conditions. I have enjoyed hiking on many miles of the A.T. and other trails on public land. I have served on myriad committees, both in my local A.T. club and as a 12 year member of the national board of the Appalachian Trail Conservancy. Most of my work has been with portions of the ANST that lie on US Forest Service lands. Part of that work has involved participating in public involvement sessions for National Forest planning. Specific language has been consistently inserted into Forest Plans to provide significant protection for the internationally recognized Appalachian Trail.

Now I have learned that FERC has proposed Forest Plan amendments to the Jefferson National Forest Plan that would allow activities that would substantially decrease the protections that we have worked over the years to defend. These 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. This would be a very disturbing precedent and would threaten protections nationwide.

Numerous energy transmission projects have crossed National Scenic and Historic Trails without requiring amendments to the respective Forest Plans. These plans have been developed 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 the visual quality of the ANST. The public has spent millions of dollars to protect the ANST. Any erosion of that protection would decrease the value of the investment in this national resource.

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 and impair the resources and values of the ANST. 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 both sides of the ANST.

IND488-1

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



# INDIVIDUALS

## IND488 – Marianne J. Skeen

20161219-5030 FERC PDF (Unofficial) 12/18/2016 4:14:15 PM

- IND488-2 REQUESTED ACTIONS:  
1) 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).
- IND488-3 2) No Amendment to the Forest Plan should be developed that lowers the Scenic Integrity Objectives of the Appalachian National Scenic Trail.
- IND488-4 3) Perform visual quality analyses following the Scenery Management System process, which would provide for scientific integrity of the analysis (40 CFR 1502.24).
- IND488-5 4) 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.
- IND488-6 5) 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)). Thank you for your consideration of these comments. Hopefully some reasonable routing can be determined that allows for protection of the ANST.

Sincerely,

Marianne J. Skeen  
553 N. Superior Ave  
Decatur, GA 30033

Cc: Job Timm, George Washington and Jefferson National Forests  
Forest Supervisor  
jtimmm@fs.fed.us

Wendy Janssen, National Park Service  
Appalachian National Scenic Trail Park Superintendent  
wendy\_janssen@nps.gov

Karen Overcash  
George Washington and Jefferson National Forest  
Forest Environmental Coordinator  
kovercash@fs.fed.us

IND488-2 The LMRP amendments were identified in the draft EIS, which was available for a 90-day public comment period. Although the LRMP amendments in the final EIS are different, they address essentially the same resource concerns as in the draft EIS.

IND488-3 Comment noted.

IND488-4 The visual analysis on NFS lands was conducted using the Scenery Management System.

IND488-5 Comment noted.

IND488-6 Comment noted.

**INDIVIDUALS**  
**IND489 – Pamela Burkhardt**

Date: 12-11-16

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

ORIGINAL

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

FILED  
SECRETARY OF THE  
COMMISSION  
2017 JAN 10 P 4: 18  
FEDERAL ENERGY  
REGULATORY COMMISSION

Dear Secretary Bose,

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

IND  
489-1

Although DEIS indicates there will be no net loss of wetlands, MVP provides NO information re: proposed permanently filling 44 wetlands along access roads. Such permanent filling is a significant impact that would disrupt aquatic life & change wildlife habitat. I also have concerns re: contamination from equipment and potential pipe line leaks. Information re: filling in wetlands must be included in the final EIS. If this information is not provided FERC must choose the No Action alternative.

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

Sincerely,

Name: Peggy Burkhardt  
Address: 1007 Overlook Dr  
City & State: Beckley, WV 25801  
Zip Code: 25801

*Our imported land  
is in Summers  
County*

IND489-1

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

# INDIVIDUALS

## IND490 – Mary LaLone

20161219-5036 FERC PDF (Unofficial) 12/18/2016 5:34:34 PM

IND490-1 Mary LaLone, Blacksburg, VA.  
I am writing to express my intense concern as a citizen who lives right in the blast zone of the Mountain Valley Pipeline as it crosses Mount Tabor Road, in Montgomery County, VA. My husband and I have built a beautiful home and substantial botanical garden at 2125 Mount Tabor Road, have lived here for 25 years, and have SUNK OUR LIFE SAVINGS into paying off our mortgage, expecting to be able to recoup our financial investment to be able to pay for retirement housing and care. This is every citizen's right to be able to fulfill. But all of a sudden our lives are being turned upside down by the intrusion of the proposed pipeline - we will not be able to sell our property in a pipeline blast zone to recoup its full worth and thus we won't be able to reinvest our savings into our retirement care. As we are retirement age, our lives are going to be hugely degraded if we can't recoup our property financial investment; everything we have is invested in this property.

IND490-1 In October 2016, Mountain Valley adopted the Mount Tabor Variation. The proposed pipeline would be more than 4,000 feet from the commenters parcel. See also the response to comment IND12-1 regarding property values.

IND490-2 Of more concern is the fact that the Mount Tabor Valley, where our property is sited, is in a serious karst geological zone, and there are also has underground coal seams, possibly coal shafts from Brush Mountain, running under this section of the valley. If we were to stay living on our property, quite likely blasting from the pipeline would undermine our house foundation and cause damage to our newly renovated structure. Our house is located just 2 properties over from the proposed pipeline route that comes across Mount Tabor Road. The renovation we did 2 years ago too the last of our savings, and we don't have the finances to handle structural problems to the walls or windows that blasting will cause.

IND490-2 See the response to comment CO14-1 regarding blasting.

IND490-3 And of equally serious concern is that the only potable water for the entire Mount Tabor Valley comes from the continental divide, just on the other side of the proposed pipeline from our property. IF ANY DISTURBANCE TO THE WATER FLOW, OR WATER CONTAMINATION, WERE TO OCCUR FROM PIPELINE BLASTING/CONSTRUCTION our entire source of property water would be in jeopardy. We could not stay on our property, and try to endure living next to a pipeline, if our water flow is diverted or contaminated. Our home and garden would be ruined, and our life's investment in our property would be gone - leaving us no remaining finances to move to seek retirement living and care.

IND490-3 See the response to comment IND3-1 regarding drinking water. Karst terrain is discussed in section 4.1 of the EIS.

THIS IS A GOOD TAX-PAYING CITIZEN'S WORST NIGHTMARE. The human sacrifices have not be taken into account; it is not just us but everyone living in the Mount Tabor Valley, with karst terrain and dependent on the underground water source coming from continental divide, that will be hurt by the currently proposed route for the Mountain Valley Pipeline.

Please help me, and the citizens living in the Mount Tabor Valley and watershed by requiring the Mountain Valley Pipeline to take a different route that won't disturb our fragile terrain and citizen's livelihoods.

# INDIVIDUALS

## IND491 – Dianne Broussard

20161219-5037 FERC PDF (Unofficial) 12/18/2016 5:36:28 PM

DIANNE BROUSSARD, LINDSIDE, WV.  
Dianne L. Broussard  
6613 Back Valley Road  
Lindside, WV 24951  
304-832-6386  
mr.travers@frontier.com

December 16, 2016

President Obama  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Re: Urgent Appeal for your Intervention  
Monroe County, WV – High Risk to Water Supply for County  
Residents and Farms  
Mountain Valley Pipeline Docket No. CP16-10-000

Dear President Obama, Father of our country:

IND491-1

The rural community of Monroe County, WV is facing a dire environmental threat by Mountain Valley Pipeline, LLC, who plans to traverse the county with a 42" pipeline system that will carry natural gas 300 miles from northwestern West Virginia to southern Virginia. For the past two years the residents of Monroe County, as well as dozens of environmental interests groups and environmental experts have voiced their concerns and heightened warnings to FERC that Monroe County is not geologically suitable or stable for this type of project. Despite the proposed benefits for a limited public sector outside of the state of West Virginia, the prominent risks to the environment and the public health and safety to Monroe County residents far outweigh these proposed benefits.

West Virginia will not receive any benefits from this pipeline, and Monroe County residents will shoulder the full and imminent risks to their drinking water supply, farm water supply, safety and personal health, farm and residential use and value of their properties. The county's environmental health and integrity of streams, thousands of acres of forests and the inherent nature and wildlife are at grave risks. Monroe County is a farming community; one can not farm without a good and sufficient source of water. Losing water quality and quantity in this community equates to losing their way of life and welfare; it is of permanent consequence.

IND491-2

There has been very limited land development in the history of Monroe County because the community values their water quality and supply as essential for its well being, and furthermore understands the potential risks to their water with any construction project due to the nature of karst as conduit of their water and the unpredictability of its flow, range, and potential to collapse under weight, vibration or forced redirection of water flow.

IND491-1

As listed in table 4.9.2-3, Mountain Valley would pay a total of about \$16.9 million annually in property and ad valorem taxes in West Virginia, including about \$1.8 million to Monroe County (FTI Consulting, 2015b). Water resources are discussed in section 4.3 of the EIS; while karst is discussed in section 4.1 of the EIS. See the response to comment IND12-1 regarding property values.

IND491-2

The EIS concludes that impacts on water sources would be temporary or short-term, and would be mitigated to not be significant. See the response to comment IND62-1 regarding Dr. Kastning's report. The FERC is funded by Congress.

# INDIVIDUALS

IND491 – Dianne Broussard

20161219-5037 FERC PDF (Unofficial) 12/18/2016 5:36:28 PM

IND491-2  
cont'd

I have enclosed a summary from 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, Karst and Hazards in Monroe County by Ernst H. Kastning, Ph.D., P.G. June 2016. This report should provide you with some background information about the geology of the county landscape and the vulnerability of the karst which provides conduit for the water supply for residents of our county. The full report can be found at [wp.vasierraclub.org](http://wp.vasierraclub.org).

To provide you with information on the location we have been fighting to protect: Monroe County with a population of 13,500 presents as a model community for those who respect the environment and choose to live a healthy lifestyle. It is a rare find, the kind you want to share with your children because these chosen places that have retained their environmental integrity are becoming extinct like the many species we indirectly extinguish with our disregard for environment, our obsession with fossil fuels. Families have moved here from all over our country to experience living off the land in the most beautiful and vast country landscapes where one can still breathe clean air and drink clean water. Farming practices here have been shifting to organic as our society learns of the benefits not only for ourselves but also our pollinators and wildlife.

Our county farmers produce honey, maple syrup, mushroom, asparagus, garlic, tomatoes, many varieties of fruits, melons and berries, pumpkins, peppers, gourmet lettuces, spinach and chard, corn....the list is endless. We have dairy goat and cow farmers, meat cattle farmers, chicken farms, alpaca farms, sheep farms...that list goes on too. Freshwater fishing and hunting of many species are also coveted pastimes here in the county. There are farm to table and farm to school programs, farmers who utilize high towers that permit them to extend the growing season into the winter months. Monroe county does not have pollution, traffic lights or fast food establishments. This county must be protected and preserved for future generations to experience the nature and heritage of farming and its health-style benefits. Likewise we need to preserve those very few areas left within our country that one can still breathe unpolluted air—my reason for moving here.

Thus far it has become blatantly obvious that our county's future health, welfare, economy and way of life have been placed in the hands of the Federal Energy Regulatory Commission, an organization who is funded by the same companies that they regulate. When I solicited help to save our county's water source I was informed by EPA, WV DEP, and other state government officials that FERC, and only FERC, will decide whether or not a pipeline is permitted to traverse the rolling hills, streams, forests, and steep rocky mountainous terrain of Monroe County—including the fragile and vulnerable karst. The MVP pipeline will cross about 245 miles of forest, about 3.4 miles of the Jefferson National Forest, and will cross the Appalachian Trail. All this clearing, trenching, heavy equipment traffic and blasting in an area considered a "no-build" zone because of the geologic hazards it presents.

I was alarmed to discover there is no "protective" agency who governs over FERC to keep their interests and decisions in line and to

# INDIVIDUALS

## IND491 – Dianne Broussard

20161219-5037 FERC PDF (Unofficial) 12/18/2016 5:36:28 PM

IND491-2  
cont'd

prioritize public health and safety. There is no "protective" agency to maintain that FERC complies with the White House's Council on Environmental Quality to House's Council on Environmental Quality to consider the pipeline's greenhouse gas emissions, and also to consider it's overall and site-wide environmental impact on our valued natural resources and wildlife.

When I asked a FERC representative during a face to face meeting in November if FERC had ever denied a gas pipeline a Certificate of Convenience and Necessity he commented, after a long pause, "there was one". When I asked another FERC representative at that same meeting how did MVP plan to compensate for, or remedy the contamination or restriction of residents' water supply should their project do harm to this resource, he gave no answer. Same FERC agent did not answer when I asked how MVP would mitigate or compensate families who were forced to leave their homes and farms because of loss of water supply due to their project.

How can our community stop this environmental offense and imminent risk? Please advise. FERC has given us a deadline of December 22, 2016 to comment on the project. Despite expert testimonies and thousands of objections both orally and written, FERC has not denied the MVP pipeline project. All objections thus far have only resulted in a 700 page Environmental Impact Study which does no more then mention 54 intentions to mitigate and 204 to minimize the multitude of ill effects resulting from their high impact project. The study also omits many key factors brought to FERC's attention both by experts and by residents who risk great losses. The mere fact that there are so many issues to be mitigated, minimized, should be enough for any agency to determine that the potential for adverse impact on landowners and communities far outweighs the proposed benefits to the public.

An energy gain for any part of the country should not result in the loss of water quality or quantity for another part of the country. All of us can live without natural gas. None of us can live without water.

President Obama, I thank you for your years of dedicated service. I thank you for guiding your people through the toughest of economies and for serving us with wisdom, your inherent diplomacy, full integrity, and a strong sense of equality. You have served beyond the scope of presidential obligations to which I will forever honor you as Father of our Country.

Most Respectfully,

Dianne Broussard

cc: Kimberly Bose, FERC  
Thomas Tidwell, U.S. Forest Service  
Joby Timm, Jefferson National Forest  
Jennifer Adams, Jefferson National Forest  
Gina McCarthy, EPA

# INDIVIDUALS

IND491 – Dianne Broussard

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Randy Huffman, WVDEP

# INDIVIDUALS

## IND492 – Brian Wooton

20161219-5039 FERC PDF (Unofficial) 12/18/2016 6:58:46 PM

IND492-1 Brian Wooton, Newport, OR.  
As a graduate of Virginia Tech, I have a strong interest in preserving the remaining natural beauty of southwestern Virginia. Please stop the Mountain Valley Pipeline from ruining Angels Rest.

IND492-1 Section 4.8 of the EIS provides a revised discussion of visual impacts on the ANST.



# INDIVIDUALS

## IND493 – Nancy LaPlaca

20161219-5040 FERC PDF (Unofficial) 12/18/2016 7:11:42 PM

Nancy LaPlaca, Durham, NC.  
Dear Sir/Ms.:

IND493-1 | The Mountain Valley Pipeline is a poorly thought out, destructive pipeline that is unlikely to deliver natural gas for more than five to ten years. Look at the Haynesville shale play, it's down by HALF after peaking in 2011. This isn't rocket science, it's a huge giveaway to utilities and pipeline companies.

We should obviously be investing in clean energy such as solar and wind, which have ZERO fuel costs.

And just in case you've been living under a rock, the damages from natural gas powered electricity are estimated by one of the top scientists in the U.S., Dr. Drew Shindell, at 8.4 cents/kWh. That means that every kWh of natural gas is costing us as much OR MORE in damages as the cost to generate the kWh.

We are digging a big, black hole, and our children will fall in it.

Wake up.

Nancy LaPlaca

IND493-1

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

# INDIVIDUALS

## IND494 – Alan Vance

20161219-5044 FERC PDF (Unofficial) 12/18/2016 8:13:30 PM

Alan Vance, Orlando, FL.

IND494-1 | No new pipeline corridor through the Appalachian Trail. There are plenty of existing road and power line crossings which can be multi-purposed.

IND494-1

Section 4.8 of the EIS provides a revised discussion of impacts on the ANST.

# INDIVIDUALS

## IND495 – Jerolyn K. Deplazes

20161219-5047 FERC PDF (Unofficial) 12/18/2016 8:55:45 PM

Jerolyn K Deplazes, Newport, VA.

IND495-1

I am writing to oppose the MVP route #200 through Newport, Virginia. This route would completely ruin our historic community, because the corridor runs through the Greater Rural Newport Historic District. It comes within 500 feet of a 1850s church and house; it comes within 500 feet of the Newport Rescue Squad and Newport Recreation Center, all hubs of activity throughout the year. Even though 8 filings have been made by David Brady enumerating the variety of errors reported by MVP concerning the historic district; even though many filings have been submitted by Louisa Gay advocating that MVP consider Hybrid Alternate 1A; even though karst expert Ernst Kastning has now entered his second objection to Route #200 as a NO-BUILD zone, there has been no indication that FERC has considered these significant reports.

Our farm is in the pipeline corridor; our road is an access road. Other property we own would be crossed by Route #200 and it would have a valve on it with permanent access and a staging area. In addition, our son has two properties it would cross. We feel targeted personally as well as members of this community for quite a long while. The devastation of each property, the disruption of the rural life of Newport is threatened by this pipeline. It will destroy our cultural and historic heritage. We appeal once again to FERC to require MVP to choose another route.

IND495-1

Impacts on the Greater Newport Rural Historic District are discussed in section 4.10. Section 3 of the final EIS has been revised to discuss the Hybrid 1A Alternative. See the response to comment IND62-1 regarding Dr. Kastning's report.

# INDIVIDUALS

## IND496 – Jim Workman

20161219-5049 FERC PDF (Unofficial) 12/18/2016 9:54:28 PM

IND496-1 Jim Workman, Newport, VA.  
The DEIS inadequately examines Hybrid Alternate 1A as an alternative to the proposed route. There have been several comments that put forth strong arguments as to why this alternate is preferable to the proposed route by having less potential negative environmental consequence to private property and national forest land. This route needs a thorough examination in the EIS before it is finalized and route selection is determined. While no Pipeline is better than a Pipeline via any route, the DEIS is currently seriously flawed without thorough examination of alternatives.

IND496-1

Section 3 of the final EIS has been revised to discuss the Hybrid 1A Alternative.

# INDIVIDUALS

## IND497 – Linda Black

20161219-5053 FERC PDF (Unofficial) 12/19/2016 3:06:22 AM

IND497-1

Linda Black, Woodbine, MD.

I am very much opposed to the proposed Mountain Valley Pipeline. It would be routed through a hazardous seismic zone in West Virginia and Virginia, posing great risks to local drinking water, fragile ecosystems and tourism. Considering that a September 2016 report explains existing energy infrastructure—including pipelines—is sufficient for meeting the regional needs of the area, there is no reason to put both the environment and the Trail at such risk. In this area it is not uncommon to see black bears, deer and songbirds among the 230,000 acres of precious old growth forests that preserve a piece of Appalachia unmarred by human impacts.

The Federal Energy Regulatory Commission's Environmental Impact Statement does not address critical concerns about the detrimental impacts to the environment, high cost to the local economy or consideration of the actual need for the pipeline. The pipeline also undermines the federal law that protects wild, roadless areas, setting a precedent that future energy infrastructure across the U.S. can permanently impair protected wildlands. There are already at least four other pipelines currently being considered in the mid-Atlantic region.

FERC needs to conduct an Environmental Impact Statement that comprehensively addresses energy infrastructure needs and fundamental concerns about whether destroying vulnerable ecosystems and desecrating a premiere hiking destination is necessary for the building of this pipeline. The Energy Zones Mapping Tool, a tool funded with taxpayer money, needs to be used by FERC to help avoid unnecessary conflicts in energy development and circumvent impacts to environmentally sensitive lands when planning energy corridors.

Thank you for considering my views.

IND497-1

Seismic issues are addressed in section 4.1 of the EIS, drinking water in section 4.3, tourism in section 4.9, and the ANST in section 4.8. See the response to comment FA11-12 regarding need. Programmatic EISs are discussed in section 1.3.

# INDIVIDUALS

## IND498 – Mode A. Johnson

20161219-5056 FERC PDF (Unofficial) 12/16/2016 7:06:56 PM

To: Secretary Kimberly D. Bose,  
Chairman Norman C. Bay and FERC Commissioners

From: Mode Johnson, M.S., Registered Intervenor and Affected Landowner

Date: December 16, 2016

Re: CP16-10-000 Mountain Valley Pipeline (MVP) Project - LiDAR Data Analysis of the Mount Tabor Variation route in Montgomery County, Virginia

### Introduction

IND498-1 This document was prompted by the inadequate response of Mountain Valley Pipeline (MVP) to requests from FERC and stakeholders to utilize LiDAR technology for sinkhole identification/density analyses. This technology would have proved invaluable when developing an alternative route **“specifically to avoid high-density karst”** as requested by FERC.<sup>1</sup> An analysis of the 2015 and the Mount Tabor Variation alternative route by an independent geologist using LiDAR technology will be presented in this document. **Results of this analysis will demonstrate that the Mount Tabor Variation route crosses through a region of more sinkholes and more high-density karst features than the 2015 Proposed Route and therefore does not comply with FERC’s request.**

NEPA regulations have not been fulfilled related to this project. L. Gay, in a prior submittal referencing CEQ NEPA regulation, stated that FERC must: “...objectively evaluate all reasonable alternatives... Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than desirable from the standpoint of the applicant. Agencies are obligated to evaluate all reasonable alternatives in enough detail so that a reader can compare and contrast the environmental effects of the various alternatives.”<sup>2</sup>

### Background

LIDAR (**L**ight **D**etecting and **R**anging) is an aerial topographical surveying technology that measures distance by illuminating a target with a laser light to record topographical data. LiDAR is used as a technology to make imagery and maps with applications in geology and forestry. LiDAR technology is commonly used in projects similar to the MVP pipeline project where much of the terrain is under the canopy of trees or direct visual access is difficult to obtain.

<sup>1</sup> FERC submittal 20160331-4008

<sup>2</sup> FERC submittal 20161114-5194

IND498-1 As requested by the FERC, Mountain Valley filed a response to the commenter's letter on February 17, 2017 (Attachment General 3h Accession number 20170217-5199). Section 4.1 of the EIS has been revised to provide a discussion of LiDar and electrical resistivity studies conducted by Mountain Valley.

# INDIVIDUALS

## IND498 – Mode A. Johnson

20161219-5056 FERC PDF (Unofficial) 12/16/2016 7:06:56 PM

IND498-1  
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FERC had requested MVP on three occasions<sup>3,4,5</sup> to conduct analyses utilizing remote sensing technologies, including LiDAR imagery, to correlate surficial karst features. A summary of FERC's requests and MVP's responses are in Attachment 1 at the end of this report. It should be noted that stakeholders also requested MVP to utilize LiDAR technology to assess karst terrain.<sup>6,7</sup>

MVP stated in supplemental data to the Draft Environmental Impact Statement (DEIS) released ten months after FERC's original request to utilize LiDAR technology:

"There is no publicly-available remote sensing data, including LIDAR, for the karst areas of the October 2016 Proposed Route. Mountain Valley collected LIDAR data along a narrow corridor corresponding to the October 2016 Proposed centerline."<sup>8</sup>

**The first sentence is incorrect** when it states: "There is no publicly-available remote sensing data, including LiDAR, for the karst areas of the October 2016 Proposed Route." Montgomery County (2005) and the Town of Blacksburg (2105) had LiDAR surveys performed for their respective jurisdictions and the author was able to easily obtain the processed bare earth point cloud tiles for this study. The cost was less than \$120 for data covering 2.48 x 4.66 miles (11.5 sq. mi.).<sup>9</sup> If a private citizen was able to obtain this data for LiDAR image creation, there is no reason MVP could not have obtained it also. The karst survey contractor for MVP is based in Blacksburg/Montgomery County. Therefore, this survey company, along with MVP, should have known this data was available.

The second sentence states: "Mountain Valley collected LiDAR data along a narrow corridor corresponding to the October 2016 Proposed Route centerline." MVP did use LiDAR but only selectively along the narrow pipeline route instead of over a wider expanse to examine karst terrain in the area referred to as the sinkhole plain. **LiDAR data images presented in this report will document a higher density of sinkholes along the Mount Tabor Variation Route compared to the 2015 Proposed Route.**

<sup>3</sup> FERC submittal 20151224-3000

<sup>4</sup> FERC submittal 20160331-4008

<sup>5</sup> FERC submittal 20160712-5188

<sup>6</sup> FERC submittal 20160714-5027

<sup>7</sup> FERC submittal 20160915-5084

<sup>8</sup> FERC submittal 20161014-5022 (pg. 15/93)

<sup>9</sup> Funding provided by donations to PreserveMontgomeryCountyVa.org

**Mount Tabor LiDAR Study**

IND498-1  
cont'd

James Spotila, Ph.D.<sup>10</sup> evaluated data obtained from LiDAR surveys conducted by Montgomery County and the Town of Blacksburg. Dr. Spotila completed the investigation presented in this document pro bono using his own resources and on his personal time. The study area encompassed the Mount Tabor Variation route and the corresponding 2015 Proposed Route, including the affected topography in the Mount Tabor region of northeast Montgomery County. The area involved in this study is shown in Figure 1 and extends from the base of Brush Mountain in the north to Catawba Road in the south, and Coal Bank Hollow Road in the west to Dry Run Road in the east.

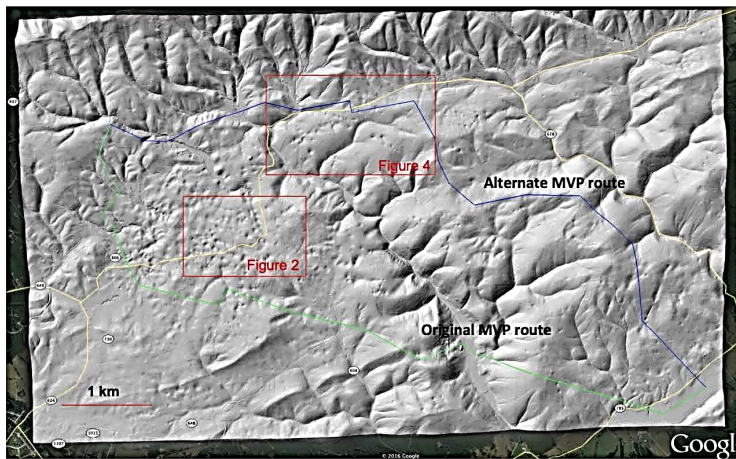


Figure 1. Overview of the complete LiDAR study area. The 2015 Proposed Route (green line) and the Mount Tabor Variation (blue line) are depicted. Insert Figure 2 illustrates a high sinkhole density area not involving any pipeline route. Insert Figure 4 illustrates an area around the Mount Tabor Variation pipeline route.

<sup>10</sup> James A. Spotila, Ph.D., professor of Geology in the Department of Geosciences at Virginia Tech (a brief biography is in Attachment 2 at end of this document).



# INDIVIDUALS

IND498 – Mode A. Johnson

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Insert Figure 2 is an example of high-density sinkhole area along Mount Tabor Road. The image illustrates how well sinkholes are defined in the LiDAR imagery. See Methodology in Attachment 2 for detail explanation on identifying sinkholes. A total of 612 sinkholes were identified in the study area. Any questionable crater was examined more closely to determine if the feature was a naturally formed sinkhole or a possible pond or other man-made feature. If a feature remained in question then it was deleted from the sinkhole-count. The alignment of sinkholes is evident and indicates an underlying void into which the ground collapsed.



Insert Figure 2- This is the insert in Figure 1 labeled Figure 2. This is an area of highest density sinkholes. The image illustrates how well sinkholes are defined utilizing LiDAR imagery.

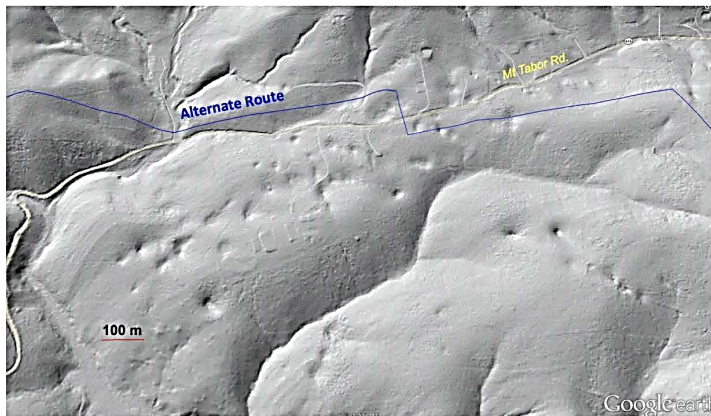
# INDIVIDUALS

IND498 – Mode A. Johnson

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(bold type is author's emphasis)The Mount Tabor Variation route was chosen to **specifically avoid high-density karst area** by MVP. Insert Figure 4 shows a segment along the Mount Tabor Variation route illustrating the high-density sinkholes occurring in this area. The Mount Tabor Variation route is NOT a low karst area and is NOT an area of lower sinkhole density. In fact, this segment of the Mount Tabor Variation in Insert Figure 4 is one of the highest sinkhole density areas of this alternative route. Once again, the alignment of sinkholes is evident. Dye trace studies conducted in October/November 2016 confirmed subterranean water flow from MP 223.4 along the Mount Tabor Variation route to Mill Creek, Slussers Chapel Cave and Thundercoft Cave.<sup>11</sup> **This mile post is on the eastern boundary of Slussers Chapel Conservation Site indicating the vast aquifer in this area.**



Insert Figure 4. This is the insert in Figure 1 labeled Figure 4. A segment of the Mount Tabor Variation route (blue line) traverses a high-density sinkhole area.

<sup>11</sup> 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.

# INDIVIDUALS

IND498 – Mode A. Johnson

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The spatial distribution of sinkholes in the Mount Tabor region is illustrated in Figure 5. Note that the 2015 Proposed pipeline route (blue line) will cross **two** regions of high sinkhole density (labeled A and B) while the alternative Mount Tabor Variation route (turquoise), selected to avoid the sinkhole plain, will bisect **three** regions of high sinkhole density (labeled C, D and E). The maximum sinkhole density encountered along either proposed route will be the same ( $112/\text{km}^2$  or  $\sim 7$  per acre). Therefore, despite avoiding the "Mt. Tabor sinkhole plain", the alternative Mount Tabor Variation route will actually pass through a region of greater sinkhole density

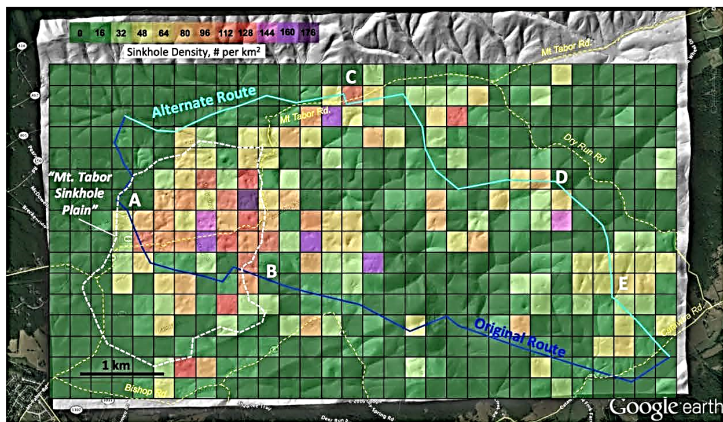


Figure 5. Sinkhole density along the two proposed pipeline routes in northeast Montgomery County. The alternative Mount Tabor Variation route (turquoise) and the original 2015 Proposed Route (blue) are depicted. The spatial distribution is illustrated as the sinkhole density (# per  $\text{km}^2$ ), based on the number of sinkholes occurring within each 250x250 m. cell ( $0.0625 \text{ km}^2$  or 15.4 acres). The density of each cell was converted to a square kilometer ( $\text{km}^2$ ) density value.

IND498-1  
cont'd The number of sinkholes located within 250-foot and 500-foot perpendicular to each proposed pipeline was calculated (Figure 6).

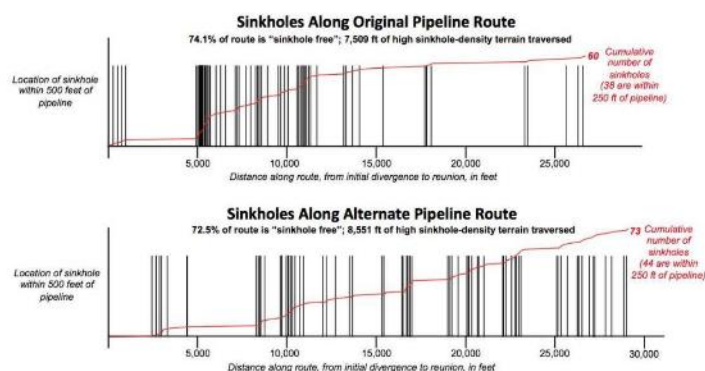


Figure 6. Number of sinkholes along the Original 2015 Pipeline Route and the alternative Mount Tabor Variation Route (2016 route).

The results indicate **there are more sinkholes along the Mount Tabor Variation route compared to the 2015 Proposed Route.**

- (1) There are 73 and 44 sinkholes within 500 and 250 feet, respectively, on the Mount Tabor Variation and the 2015 Proposed Route.
- (2) The percentage of the length of Mount Tabor Variation and the 2015 Proposed routes as being sinkhole-free was calculated to be 72.5% and 74.1%, respectively. This is the length of the pipeline that does not encounter a sinkhole within 500 feet perpendicular to pipeline for a distance of 500 feet or more along the length of the pipeline.
- (3) The Mount Tabor Variation route will traverse 8,551 feet of high sinkhole-density terrain compared to 7,509 feet along the 2015 Proposed Route. High-density sinkhole terrain traversed was calculated as the cumulative length of route segments with a sinkhole within at least 500 feet perpendicular to the pipeline.

# INDIVIDUALS

## IND498 – Mode A. Johnson

20161219-5056 FERC PDF (Unofficial) 12/16/2016 7:06:56 PM

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cont'd

By indexing sinkholes within 500 feet perpendicular to the pipeline, the data indicates that **Mount Tabor Variation route provides no additional protection of avoiding the hazards and the hydrologic impact associated with karst terrane.** These metrics demonstrate that the Mount Tabor Variation route is NOT as karst-free and NOT as sinkhole-free as the 2015 Proposed Route and is contrary to what MVP indicates. Consequently, **there is no advantage and more likely a disadvantage to the construction of a pipeline using the Mount Tabor Variation route.**

### Defining the Mount Tabor Sinkhole Plain

The Mount Tabor sinkhole plain, consisting of karst bedrock and the subterranean water conduits, cannot be defined by distinct boundaries but extends from Brush Mountain to Paris Mountain and east to Dry Run Road. The study presented in this paper demonstrates that **MVP clearly underestimated the size and extent of the karst geologic features along the Mount Tabor Variation route.** This alternative route was chosen by MVP to avoid “the high-density karst” area but in reality it will be well within this fragile karst ecosystem. Construction of either the Mount Tabor Variation route or the corresponding segment of the 2015 Proposed Route will be completely within carbonate rock, chiefly limestone, as mapped by Wearing and Doctor<sup>12</sup>, and therefore both routes are entirely within what the USGS classifies as “karst”.

### Conclusion

**MVP should have used LiDAR** as requested by FERC to correlate surficial karst features. LiDAR for this area was publicly available from Montgomery County, Virginia. Analysis of LiDAR concluded that **the alternative Mount Tabor Variation route will be within high-density karst and does no better at avoiding karsts compared to the original 2015 Proposed Route.** The percentage of pipeline traversing sinkhole-free area will be less on the Mount Tabor Variation route compared to the 2015 Proposed Route. The original 2015 Proposed Route will cross two regions of high sinkhole density while the Mount Tabor Variation alternative route will bisect three regions.

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<sup>12</sup> Weary, D.J., and Doctor, D.H., 2014, Karst in the United States: A digital map compilation and database: U.S. Geological Survey Open-File Report 2014-1156, p. 23.

# INDIVIDUALS

## IND498 – Mode A. Johnson

20161219-5056 FERC PDF (Unofficial) 12/16/2016 7:06:56 PM

IND498-1  
cont'd

The DEIS report states clearly:

“Construction across the Mount Tabor Sinkhole Plain could result in damage to natural resources, differential settlement and pipeline instability, and potential inadvertent releases to groundwater.”<sup>13</sup>

Based on the analysis in this independent geologist’s study, the Mount Tabor Variation route will **NOT** avoid the sinkhole plain, will **NOT** avoid the hazards and hydrologic impacts association with karst terrane and, consequently, will **NOT** be a better alternative route. The 2016 Proposed Route with the **Mount Tabor Variation will present the same risks and environmental implications as the 2015 Proposed Route.**

**MVP has not fulfilled FERC’s requests to identify an acceptable alternative route that would specifically avoid high-density karst area.**

#### Attachments:

1. FERC Requests for Use of Remote Sensing Technology and MVP’s Responses
2. Bio of James A. Spotila, Ph.D and Methodology of LiDAR Study

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

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<sup>13</sup> FERC submittal 20160916-4001(31692620) page 4-36

# INDIVIDUALS

## IND499 – Stephen Campbell

20161219-5054 FERC PDF (Unofficial) 12/19/2016 6:25:36 AM

Stephen Campbell, Philadelphia, PA.

IND499-1 I believe that this project will set the wrong precedent to using previously protected wilderness, and will open the doors to future degradation of our open wild lands for commercial use.

IND499-1

The pipeline route would not cross any designated “wilderness” lands; nor would it cross any known designated “wild open lands.”

# INDIVIDUALS

## IND500 – Andrew D. Hinz

20161219-5078 FERC PDF (Unofficial) 12/17/2016 11:27:37 AM

Docket CP16-10-000: Citizen Comment on the DEIS for the Mountain Valley Pipeline

IND500-1

The environmental impact of the proposed project includes unacceptable risk. A myriad of alternative investments and projects that provide comparable energy with overwhelmingly less risk for comparable or lower lifetime costs are practical. Until it can be demonstrated that the project will operate without directly or indirectly adding greenhouse gases into the atmosphere—or until it can be clearly demonstrated that additional emissions of greenhouse gases and resulting climate change poses no risk to existing planetary life, the environmental impact of this project precludes approval, considering the abundance of practically risk-free alternatives.

Andrew Hinz  
Baltimore, Maryland

IND500-1

See the response to comment IND2-1 regarding safety. Section 3 of the EIS provides a discussion of alternatives. Climate change and GHGs are discussed in sections 4.11 and 4.13.



# INDIVIDUALS

## IND501 – Corrine Baker

20161219-5080 FERC PDF (Unofficial) 12/17/2016 12:38:15 PM

1

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

December 16, 2016

IND  
501-1

This communication is in regard to the Mountain Valley Pipeline (MVP). I am writing to express my outrage at what you are calling an environmental report.

The DEIS should be withdrawn or re-written as a result of omissions, factual errors, and lack of justification used to reach conclusions. To suggest that this project may result in some adverse environmental impacts is an understatement of enormous magnitude.

Your report does not even place the Appalachian Trail at the correct place! It does not include streams on some properties and adds new meaning to the term superficial!

Most of the conclusions are subjective and this cursory overview is not supported by scientifically-derived information. I do not know how FERC could come to conclusions without even having basic facts correct

It is apparent that FERC is really a branch of the fossil fuel industry. That is the only conclusion that can be reached from reading the DEIS. FERC has accepted MVP's unsubstantiated dismissal of most of the citizen comments, without credible analysis or justification.

IND  
501-2

FERC's apparent goal is to remind citizens that we no longer live in a participatory democracy. The so-called environmental meeting held in Roanoke VA, November 3 is a good example.

The DEIS comment session in Roanoke Virginia on November 3, 2016 was biased. It was not an open session. It required individuals be in closed rooms to provide testimony to a stenographer. This format limited comments and was intimidating. This meeting format was designed to prevent sharing information and did not constitute a public meeting! FERC stated this method was for efficiency. However, about 3 hours waiting some simply gave up and left.

To add to the circus, the FERC representative, Paul Friedman, was both rude and dismissive. This gentleman scoffed at the idea that environmental report was lacking berated the audience for their skepticism. He should be removed!

The environmental review must be redone and done correctly.

Corinne Baker  
Blacksburg, VA

IND501-1

The draft EIS did not contain factual errors. It would not be withdrawn. However, we produced a final EIS that addressed comments on the draft. See the response to comment CO5-1 and LA5-1 regarding preparation of the draft EIS. The ANST was illustrated in its correct location in relation to the MVP pipeline route in figure 1-3. Waterbodies are discussed in section 4.3. All conclusions in the EIS are based on facts. The FERC is an independent federal regulatory agency created by Congress.

IND501-2

Our public participation program for this project was described in section 1.4 of the EIS. All sessions to take comments on the draft EIS were open to the public. See the response to comment LA2-1 regarding the draft EIS comment sessions. Mr. Friedman did not speak at the sessions, except to explain the format for taking comments.

# INDIVIDUALS

## IND502 – Corrine Baker

20161219-5081 FERC PDF (Unofficial) 12/17/2016 12:44:49 PM

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

December 16, 2016

- IND502-1 | This communication is in regard to the Mountain Valley Pipeline (MVP). I am writing to express my concern about FERC's environmental draft report. This report is difficult to take seriously. It is biased, incomplete and not science-based.
- A major concern I have is the effect on our water quality. MVP proposes to cross some numerous secondary streams (some of which were not in the DEIS) and rivers.
- The DEIS ignored threats the MVP presents to public water supplies and water quality due to erosion and sedimentation. The pipeline will cross steep mountain slopes where it is difficult, if not impossible, to effectively control erosion. Most of this pipeline spans slopes of 20% grade or more!
- MVP and FERC believe that mountainside erosion and sedimentation to local streams will be controlled, but offer no support for such claims. Why would their construction techniques will be any more effective than the numerous examples of failed pipeline construction? Like everything MVP states-trust us we will handle it.
- MVP's own report suggests that just part of this pipeline could deposit more than 9,000 tons of sediment annually into the New River, the James River, and the Roanoke River. Do you think that has no impact?
- IND502-2 | Dr. E. Kastning, a leading expert on the land in our region (unstable soil, numerous caves and sink holes) reported this pipeline cannot be safely built as a result of our soil and the mountainous terrane. Why is this scientist's recommendation and warnings not adequately addressed in the DEIS report?
- IND502-3 | Also not covered is that the pipeline rout in Giles Country goes directly over a seismic zone which is the location of the largest earthquake to ever occur in VA!
- IND502-4 | Water quality is only one issue that were not adequately addressed in DEIS. The DEIS draft published by FERC supporting the Mountain Valley Pipeline should be re-written for it lacks the scientific justification used to reach the conclusions stated.
- It is apparent that FERC is operating as a branch of the gas industry. However, the assumption that this industry will simply be able to do whatever it wants is not correct. Our concerns will be heard.

Corinne Baker

- IND502-1 | We disagree. The draft EIS was based on scientific facts. See the response to comment CO5-1 and LA5-1 regarding preparation of the draft EIS. Water quality is addressed in section 4.3 of the EIS. See the response to comment IND70-1 regarding erosion.
- IND502-2 | See the response to comment IND62-1 regarding Dr. Kastning's report.
- IND502-3 | Seismicity is addressed in section 4.1 of the EIS.
- IND502-4 | While the draft EIS does not have to be re-written, we produced a final EIS that addresses comments on the draft.

# INDIVIDUALS

## IND503 – Robin Scully Boucher

20161219-5082 FERC PDF (Unofficial) 12/17/2016 1:01:51 PM

2155 Mount Tabor Road  
Blacksburg, VA 24060  
December 17, 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

Dear Ms. Bose and Members of the Commission,

IND503-1

I am writing this letter to state that the draft herbicide plan sent to the U.S. Forest Service by the Mountain Valley Pipeline (MVP) for the use of herbicides to control invasive species along the (MVP) route has a huge problem associated with it:

**use of herbicides along the proposed MVP route will contaminate water.**

I am specifically going to refer to the area where the proposed MVP route cuts directly through the center of Slusser's Chapel Conservation Area and crosses the first order stream twice before it flows directly into the Slusser's Chapel Cave. In this area it will also cross the headwaters of Mill Creek and the drainage areas for karst sinkholes that also flow into Slusser's Chapel Cave.

The multiple and repeated crossings of our surface water by a 42" high-pressure natural gas pipeline alone will contaminate our groundwater. But adding herbicides to the surface water will be the deathblow to our water supply causing irreparable contamination to our aquifer. This is true because of the karst features inherent to our region and specifically because the abovementioned creeks feed into our aquifer by entering sinkholes which are a direct conduit to our groundwater.

In addition to the water supplying 1000's of residents in the area clean, fresh water for their families to drink, it also supports globally rare species, such as the threatened and endangered species, the Roanoke Logperch (*Percina rex*).

As a resident whose water supply will be impacted by such short-sited actions, I implore FERC to deny the permit for this pipeline, or minimally to disallow any and all use of herbicides, pesticides, and other biocides long this pipeline route.

Sincerely,

Robin Scully Boucher

IND503-1

See the response to comment LA1-7 and LA1-8 regarding herbicides.

# INDIVIDUALS

IND504 – Bruce W. Zoecklein

20161219-5095 FERC PDF (Unofficial) 12/19/2016 9:55:52 AM

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

December 19, 2016

IND504-1

This communication is in regard to the Mountain Valley Pipeline (MVP). I am writing to express my concern regarding the negative impact this proposal would have on our water quality.

Water quality is a very important issue, not adequately covered in the draft environmental review. Indeed, the DEIS should be withdrawn or re-written. There were numerous omissions, errors, and lack of justification used to reach some conclusions.

As an example, MVP plans on using herbicides in a wide swath in our region to help control invasive species. These herbicides will contaminate our watershed! Therefore, we will be drinking water which contains herbicides.

I moved to Southwest Virginia to be able to raise my family in an environment free of the multitude of toxic chemicals found in most municipal water systems. Our well water is currently totally free of man-made chemicals. Now we have the possibility of taking our pristine aquifer and completely destroying its integrity.

In the north end of Montgomery County Virginia, Craig Creek watershed and Slussers Chapel Conservation Area will be affected by the use of herbicides. This supplies our drinking water to many.

Forest Service land on both sides of Craig Creek Valley drain into Craig Creek. The Proposed MVP route cuts through the heart of Slussers Chapel Conservation Area, crossing the stream twice that flows directly into Slussers cave. It crosses the headwaters of Mill Creek and the drainage areas for the karst sinkholes that also flow into Slussers Chapel Cave.

This water supports the rare species, the Roanoke Logperch and the water supply for residences all the way to the North Fork of the Roanoke River!

Because of the karst nature of the land in our region, scientists that know this type of soil and environment have stated and written that this pipeline cannot be built safely. The mountain slopes and numerous sink holes make this soil too unstable for such a venture. Additionally, this soil acts like a sponge allowing contaminants to easily move into the aquifer.

This project proposes to spread herbicides into our drinking water. Do you want drink water containing herbicides?

Dr. Bruce Zoecklein

CC: Intervener Listserve

IND504-1

See the response to comment CO5-1 and LA5-1 regarding preparation of the EIS. See the response to comment LA1-7 regarding herbicides. See the response to comment IND62-1 regarding Dr. Kastning's report. Karst is discussed in section 4.1 of the EIS. Rare aquatic species, such as the Roanoke logperch, are discussed in sections 4.6 and 4.7.

# INDIVIDUALS

## IND505 – Tim Ligon

20161219-5101 FERC PDF (Unofficial) 12/19/2016 9:58:55 AM

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

From: Tim Ligon, Registered Intervenor

Date: December 20, 2016

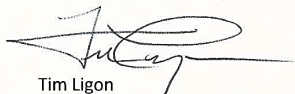
Re: Response to the FERC Karst Conclusions in the DEIS – Docket No. CP16-10-000

IND505-1 The DEIS response to the karst impact from the Mountain Valley Pipeline (MVP) is grossly inadequate, superficial in content and completely disregards independent professional analysis. The DEIS amazingly is devoid of any analysis/recommendations contained in the Kastning report as well as from other subject matter experts. The conclusions reached in the DEIS on karst are based almost exclusively on the data from consultants hired by the applicate and state that any hazards discovered will be solved through mitigation. The applicant and the FERC continue to ignore and/or dismiss a critical point by Dr. Kastning that “the karst in this mountainous region is much different than that in other areas. Sitting a pipeline through the Appalachian karst poses significantly greater hazards than in karst areas where the terrain has lower topographic relief.”<sup>1</sup> As stated in the ‘Kastning Response to the DEIS’, “The omission, intentional or not, has major consequences for the completeness, integrity, and accuracy of the DEIS”<sup>2</sup>.

One karst area of significant concern continues to be the Mount Tabor Karst Sinkhole Plain. As stated by Dr. Kastning, “The Mount Tabor Karst Sinkhole Plain has been identified as a significant and sensitive area of karst, by FERC, Draper Aden Associates, cave researchers, and this author. Several dye tracings there confirms extent of flow paths beneath the karst plain. In fact, the extent of this complex karst aquifer very likely exceeds the area that exhibits sinkholes.”<sup>3</sup> Although the FERC eventually required Mountain Valley to develop a route around this sensitive karst area, they regrettably did not avoid the Slussers Chapel Conservation Site, an important karst buffer for this area. In fact, the current alignment passes through substantial karst features that will have major negative impacts on the Slussers Chapel Cave and the water integrity of the residents in this county.

In conclusion, Mountain Valley cannot be allowed to pass through the sensitive karst found in the Mount Tabor Karst Sinkhole Plain and the associated buffer area of the Slussers Chapel Conservation Site. Lastly, I am resubmitting my previous report from August 1, 2016 due to its relevance in response to the DEIS.

Respectively Submitted,



Tim Ligon

<sup>1</sup> Submittal 20161214-5049 Kastning Response to DEIS p.3

<sup>2</sup> Submittal 20161214-5049 Kastning Response to DEIS p.2

<sup>3</sup> Submittal 20161214-5049 Kastning Response to DEIS p.7

IND505-1

See the response to comment IND62-1 regarding Dr. Kastning’s report. See the response to comment LA1-4 regarding existing 42-inch-diameter natural gas pipelines in karst terrain. See the response to comment CO6-1 regarding the Mount Tabor Variation.

# INDIVIDUALS

## IND505 – Tim Ligon

20161219-5101 FERC PDF (Unofficial) 12/19/2016 9:58:55 AM

IND505-1  
cont'd

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

From: Tim Ligon, Registered Intervenor

Date: August 1, 2016

Re: Supplemental Information on the Mount Tabor Sinkhole Plain in response to the Dr. Ernst  
Kastning report filed on July 13, 2016 – Docket No. CP16-10-000

### Opening Comments

Beginning with the initial application filed in late 2014, Mountain Valley has exhibited an insatiable desire to route the pipeline through the sensitive and hazardous karst topography found in SW Virginia. Despite feedback from their own consultants, various state/federal agencies, geology/soil experts and numerous residents living in the affected area, Mountain Valley has “stayed the course” on its current alignment through this high density karst topography. It was only after multiple requests by the FERC that MVP eventually agreed to develop an alternate route around what has been called the highest concentration of karst along the entire proposed route – the Mount Tabor Sinkhole Plain. Unfortunately, this proposed alternate will not eliminate all the risks to the sinkhole plain as it traverses through two important karst conservation buffer sites (Slussers Chapel and Old Mill).

After all the assessments, reports, and feedback that have been filed with the FERC relative to karst, we now have the most comprehensive and professional report to date authored by Dr. Ernst Kastning. Dr. Kastning has studied karst for over 50 years and has published over 100 papers on the subject. He is considered an expert on the karst hydrology found in SW Virginia and is well respected within his peer community. The information contained in his report validates and further expands upon the many concerns filed to date by numerous parties. These additional serious concerns raised by Dr. Kastning should alarm the FERC. The conclusion of his report states “that the karst and associated hazards constitute a serious incompatibility with the proposed pipeline. 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.”<sup>1</sup> I strongly encourage the FERC to consider the information contained in this report as they make future decisions on the pipeline alignment.

### Assessment of the Mount Tabor Sinkhole Plain

The Mount Tabor Sinkhole Plain is one of the four specific areas discussed in the Kastning report to “illustrate cumulative environmental hazards that cannot be mitigated through engineering and construction practice.”<sup>2</sup> This area of extensive karst is referenced throughout the report as Dr. Kastning articulates the geologic and environment hazards of siting a 42-inch-high pressure natural gas pipeline

<sup>1</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia) p.1

<sup>2</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia) p. 3



# INDIVIDUALS

## IND505 – Tim Ligon

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through the steep mountainous terrain interlaced with karst in the valleys below. Dr. Kastning makes his initial remarks about this area early in the Executive Summary section of his report:

Milepost 220-226 segment in Montgomery County: The proposed corridor crosses an area known as the 'Mt. Tabor Karst Sinkhole Plain' – perhaps the most intensive karst terrain along the entire route, and associated conservation areas. Several dye tracings have documented the interconnected nature of karst areas and caves within this area. Along this segment, the corridor is proposed to pass through two cave conservation areas, a natural area preserve, and a major segment of the karst plain where scores of large, compound sinkholes are present at the surface. As a result, MVP has proposed an alternate corridor for study in this area. However, a greater length of alternate proposed corridor passes through cave conservation areas than would the original proposed corridor. Both proposed corridors pass through the watershed of areas containing sinkholes that have been shown by dye traces to provide discharge into the primary spring of the Mill Creek Springs Natural Area Preserve that discharges into Mill Creek, a tributary of the North Fork of the Roanoke River. This is a short distance upstream from where it serves as habitat for a federally protected fish, the logperch. Furthermore, both proposed corridors pass through steep slopes that would threaten the integrity of the pipeline within a significant cave conservation area. This area is also populated, with numerous homes that draw household waters from karst aquifers and have no access to alternative water supplies.<sup>3</sup>

There have been numerous reports filed with the FERC on the current siting of the Mountain Valley Pipeline (MVP) through the Mount Tabor Sinkhole Plain since the initial application was filed in late 2014. Preliminary Karst Hazard Assessments performed by MVP consultant, Draper & Aden, recommended **avoidance of this area of high density karst**. Draper & Aden's initial comments are telling in light of the Kastning report:

The pipeline appears to avoid major known features, most of which are just to the north of the current alignment. However, the current MVP alignment impacts a residential neighborhood to the northwest of this area (Preston Forest) and a re-route may be considered by EQT. **We note that rerouting MVP to the northeast in this area would encounter a high density of karst features that would make such a reroute a challenging segment of construction, with potential impact to subsurface water as a key natural resource concern.** Constructability and natural resource considerations both suggest a very detailed and careful review. Consult with appropriate agencies for T&E species information queries. The areas within a mile to the north of mile posts 210-212 would be much more problematic.<sup>4</sup>

Draper & Aden, in Table 2.1 of the Proposed MVP Alignment (Summers County, WV to Roanoke County VA), state:

Description: Begin dolomite area (approximately). Begin Mt. Tabor Sinkhole Plain (MP 216.3-217.5) Geology poorly mapped in this area. **This area historically known to have extensive and well documented cave and karst development.** Karst water flows eastward to TNC-DCR natural area preserve.

<sup>3</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia) p.

4

<sup>4</sup> Resource Report 6, Preliminary Screening Analysis Karst, Water Supply and Geologic Hazards, Acrobat p.69

# INDIVIDUALS

## IND505 – Tim Ligon

20161219-5101 FERC PDF (Unofficial) 12/19/2016 9:58:55 AM

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Concerns: The proposed MVP pipeline encounters the Mount Tabor Sinkhole Plain as it progresses from MP 216.3. Karst features including sinkholes, swallets and caves are intensely and densely developed in this area. There is the potential for negative impact to karst resources and water resources, as well as potential for ground instability risk to pipeline.<sup>5</sup>

Even though different mileposts are stated in the comments above, it is clear they are referencing the Mount Tabor Sinkhole Plain. These statements were made by Draper & Aden on January 23, 2015.

Draper & Aden, a local engineering firm in Blacksburg, VA knows the area well. It is my opinion that they have a good basic understanding of the karst hazards/challenges in the Mount Tabor Sinkhole Plain and that it must be avoided. The Kastning report clearly supports Draper & Aden's initial assessment and much more. **Unexplainably, the final karst assessment (MVP Version 4.0.0 FERC Frozen Alignment) performed by consultant Draper & Aden significantly "downplays" the concerns originally articulated in the initial assessments.** In the final assessment, the classification changes to "Minor concerns, possible minor alignment adjustment or mitigation." Additionally, the consultant removed the "Avoidance of the Mount Tabor Sinkhole Plain and associated features is generally recommended" and replaced it with "The Mount Tabor sinkhole plain trends with regional bedrock and complete avoidance of the sinkhole plain is impractical. The density of karst features in this area (i.e. from MP 220.63 to 222.10) will require several minor adjustments during construction to avoid sinkholes, and also likely require stabilization and mitigation efforts."<sup>6</sup>

The Mount Tabor Sinkhole Plain is one of the more formidable concentrations of karst in the Appalachian Mountains and it coincidentally is located in the backyard of the consultant, Draper & Aden. Considering their statements in the preliminary karst assessment, there is little doubt as to their understanding of how serious the karst situation is in this area. **Why did Draper & Aden's assessment change so radically from the initial to the final resource report submitted to FERC in October 2015?** Only Draper & Aden and Mountain Valley can answer that question and it **CANNOT** be dismissed as the result of an initial desktop review. I originally questioned this issue in my December 7, 2015 report but felt it was important to do it again in light of the Kastning report and the critical decisions FERC will be making in the near future relative to the pipeline alignment through several areas of sensitive and high density karst. It is paramount that the FERC, affected stakeholders, and the general public have confidence that an accurate and impartial assessment is performed on the entire Mount Tabor Sinkhole Plain to include the Mount Tabor Variation.

### Protection of Buffer Zones in Karst

The Virginia Department of Conservation and Recreation (DCR) established a buffer zone known as the Slussers Chapel Conservation Site to protect the critical karst resources found in the Mount Tabor Sinkhole Plain. Additionally, there is another designated conservation site, Old Mill, in very close proximity to Slussers Chapel that will be impinged by the Mount Tabor Variation along its N.E. quadrante. Both the current alignment and the proposed Mount Tabor Variation traverses through a considerable distance in both conservation sites. The DCR, state/federal agencies and other subject matter experts

<sup>5</sup> Resource Report 6, Attachment 2.0, Karst Hazard Assessment, Desktop Review and Field Reconnaissance, Table 2.1, Acrobat p. 108

<sup>6</sup> Submittal # 20151023-5035 (30974910), CP16-10: Draft Resource Report 6. Seismic Hazards and Young Faults Report for MVP, October 16, 2015; Preliminary Screening Analysis Karst, Water Supply and Geologic Hazards January 23, 2015 RR 6, Appendix A – Karst Features, p. A-4



# INDIVIDUALS

## IND505 – Tim Ligon

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have submitted numerous reports conveying their concerns about the current alignment and the effects it will have on the karst resources as it passes through these conservation sites.

The information contained in the **Cave and Karst Information** section of the DCR report to FERC on March 17, 2016 outlines their concerns about the current pipeline alignment through these critical conservation sites.<sup>7</sup> The response by Mountain Valley on March 31, 2016 to the FERC stated the following:

#### Karst and Alternatives

A Cave and Karst Information data request is presented from the work of Mr. Wil Orndorff, DCR Karst Protection Coordinator. The following discussion addresses DCR's comments regarding potential impact to karst resources from the proposed alignment, as well as alternatives, as described in Resource Report 10.

DCR points out that a comparison table presented in Resource Report 10 showing miles of karst features crossed by the proposed alignment relative to alternatives does not address information on significant caves and resources that was provided by DCR in previous documents. However, the discussion on karst in Resource Report 10 is a summary presentation. Mountain Valley prepared a detailed Karst Hazards Assessment (updated as Attachment DR2 RR2-12), as well as a Karst Mitigation Plan (Resource Report 6), both of which present more detailed assessment of karst features.

DCR completed a karst conservation site impact index analysis (see Table 1, page 7, March 17, 2016 DCR letter) for the October 2015 proposed alignment and alternatives, noting that the proposed alignment scored higher in potential impacts as compared to northern alternatives. However, the Karst Hazards Assessment (as updated) prepared by Mountain Valley identified the major karst areas of DCR concern (e.g., karst conservation sites). At this time, the Canoe Cave area and the Mount Tabor sinkhole plain are notable karst feature areas that are impinged by the proposed alignment. Mountain Valley acknowledges DCR's concerns and comments regarding the Canoe Cave conservation site and recognizes the cave as a known hibernaculum of the federally threatened northern long-eared bat. Furthermore, DCR recommends that Mountain Valley avoid the Canoe Cave site. Mountain Valley continues to evaluate the Canoe Cave area to minimize potential impacts to karst features and water resources.

DCR provides comments about the proposed alignment intersecting Slussers Chapel and Old Mill conservation sites (see image provided below, taken from Figure 5, page 9 of DCR's March 17, 2016 letter). These conservation sites are generally located within what Mountain Valley identifies as the Mount Tabor sinkhole plain. Mountain Valley acknowledges DCR's concerns regarding these sensitive karst areas from the perspective of karst features and water resource protection, as well as rare, threatened and endangered species. Mountain Valley is committed to minimizing potential impacts to any and all karst areas. Importantly, the Mountain Valley Project is a linear construction project comprising an approximate 10-foot deep trench, with no impervious pavement installation or water withdrawals or injections in the karst areas. The local topography within the land-disturbed area of the Project will be restored to pre-construction

<sup>7</sup> Submittal 20160317-5126 DCR Report to FERC regarding karst, alternatives, and threatened and endangered species

# INDIVIDUALS

## IND505 – Tim Ligon

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grades, and revegetated, such that no permanent changes to the local surface water hydrology will result from the project. Furthermore, Mountain Valley will ensure through Project-specific erosion and sediment control and SPCC planning and implementation, that uncontrolled releases will be prevented to the extent possible and counter measures implemented immediately to protect karst features and water resources. Mountain Valley will have a Karst Specialist team on-site during all phases of construction in karst areas, whose responsibility is to monitor known karst features, and evaluate any new features encountered, and provide recommendations to Mountain Valley on avoidance and mitigation measures. Through the first hand observation and immediate onsite evaluations, Mountain Valley will effectively control and minimize the potential for the Project to impact karst resources and water resources within the conservation sites identified by DCR.<sup>8</sup>

Regrettably, Mountain Valley completely misses the overall point DCR is attempting to make about the importance of protecting the conservation sites. In fact, the following comments were made by DCR (Mr. Orndorff) in the **same report** that MVP responded to above:

Cave related conservation sites along the MVP Corridors' of the DCR report: This conservation site protects cave and karst associated element occurrences, including 2 state designated significant caves, both under conservation ownership. The conservation site boundary includes the land overlying the caves and watershed of the cave streams as determined by dye trace studies and topographic analysis. Six additional caves are documented within the conservation site. The two significant caves are Slussers Chapel by the Cave Conservancy of the Virginias and Mill Creek Cave by the Nature Conservancy.<sup>9</sup>

It appears that Mountain Valley only thinks of the conservation sites in terms of physical karst features e.g. sinkholes, caves, etc. and **not the watershed areas above those karst features**.

The importance of establishing protective buffer zones in karst is discussed by Kastning:

A major consideration in protecting natural water supplies is the protection of contributing sources – the 'upstream' areas of the flow system (Kastning and Kastning, 1997; Kastning, 2000). For surficial streams such protection entails environmental management of all tributaries within the catchment area (drainage basin). In groundwater-protection strategies, attention is usually focused on all zones that contribute recharge. If it is known that a karst system is very extensive (often based on dye-trace studies) and that it is sensitive (e.g., having rare or endangered species), it should be required that the entire area be protected with a buffer zone.

Karst terrains require special consideration for environmental protection. Environmentally sound engineering often requires that areas of karst be sufficiently delineated. This is especially true where recharge zones must be protected from contaminants introduced at the surface that may me readily conveyed into underlying aquifers discretely through infiltration at sinkholes or diffusely along dissolutionally widened fractures.

**In the case of the Mountain Valley Pipeline, it is imperative to delineate buffer zones in areas of karst where it is known that there are high densities of sinkholes, extensive mapped caves,**

<sup>8</sup> Submittal 20160421-5195 MVP Response to FERC dated 3-31-16 but filed on 4-21-16

<sup>9</sup> Submittal 20160317-5126 DCR report to FERC dated 3-17-16

# INDIVIDUALS

## IND505 – Tim Ligon

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**long groundwater flow paths documented by dye-tracing, and significant allogenic recharge. Those areas include (but not limited to): The Indian Creek to Peters Mountain area of Monroe County, the Canoe Cave area in Giles County, and the Mt. Tabor Karst Sinkhole Plain of Montgomery County, and the Elliston Karst Plain in eastern Montgomery and western Roanoke counties (discussed further in Section 4). Unfortunately, the MVP application routes the proposed pipeline through areas where potential impact to sensitive karst is likely. Documents submitted by Mountain Valley Pipeline and its consultants have not adequately considered buffer zones.<sup>10</sup>**

Dr. Kastning's comments are a validation of the concerns documented by DCR regarding the conservation sites (Slussers Chapel and Old Mill) established to protect the karst resources in the Mount Tabor Sinkhole Plain. Despite Mountain Valley's acknowledgement of DCR's concerns, they have not moved the pipeline alignment from the immediate watershed (east side of Brush Mountain) which is a short distance above the Mount Tabor Sinkhole Plain. As stated in my report dated May 6, 2016:

If Mountain Valley truly acknowledged DCR's concerns regarding the karst features and water resources, they would immediately change the route alignment to avoid this entire area. It is clear that MVP is determined to traverse numerous sensitive karst areas unless told to do otherwise by the FERC. Either MVP does not understand the potential impact this pipeline will have to the karst hydrology or they simply do not care.<sup>11</sup>

### Concluding Comments

The current pipeline alignment as well as the Mount Tabor Variation will traverse through areas of high density karst and the associated buffer zones (conservation sites). The Kastning report should be considered an expert validation of the numerous concerns filed with the FERC relative to the Mount Tabor Sinkhole Plain and the accompanying conservation sites. The pipeline alignment should not be allowed to pass through the Mount Tabor Sinkhole Plain OR the conservation sites established to protect it. The Kastning report substantiates that position in the following comments that can be found in Section 4 of his report:

There is every reason to believe that the entire Mt. Tabor Karst Sinkhole Plain is a single, extensive, and well-integrated karst aquifer. The only solution that would ensure that a pipeline would not negatively impact this karst and the underlying aquifer would be to entirely avoid the Mt. Tabor Karst Sinkhole Plain and its contributing watershed.<sup>12</sup>

There has been substantial information submitted to the FERC on the pipeline alignment through the Mount Tabor Sinkhole Plain, the Mount Tabor Variation and the conservation sites established to protect them. Mountain Valley acknowledges that these are sensitive areas with risk to the karst and water resources BUT continue down the path of mitigation and figure it out as we go. Mountain Valley has been negligent throughout the karst assessment process and unwavering in their determination to

<sup>10</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia) p. 34-35

<sup>11</sup> Submittal 20160506-5059 Tim Ligon Report to FERC concerning the Slussers Chapel Conservation Site

<sup>12</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia) p. 52