

# INDIVIDUALS

## IND505 – Tim Ligon

20161219-5101 FERC PDF (Unofficial) 12/19/2016 9:58:55 AM

IND505-1  
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maintain the routing through the sinkhole plain and the conservation sites despite the known risks. Mountain Valley's credibility and decision making process around the pipeline routing must be questioned. Stating the obvious, the FERC will have to make a decision in the foreseeable future on whether to allow Mountain Valley to pursue the current alignment or the proposed variation in the Mount Tabor area. It is my hope that the FERC will heed the warnings from the state/federal agencies, subject matter experts, and concerned citizens and NOT allow the MVP pipeline alignment through any part of the Mount Tabor Sinkhole Plain or the conservation sites.

In closing, I would like to share some thoughts with the FERC that surfaced in my mind as I read through Dr. Kastning's report. As a safety professional, I recently attended a seminar on accident investigation utilizing the HFACS (Human Factors Analysis and Classification System) system which was developed by Dr.'s Scott Shappell and Doug Wiegmann. It is a broad human error framework that was originally used by the United States Air Force to investigate and analyze the human factors aspects of aviation. The HFACS system provides a tool to assist in the accident investigation process. Through the HFACS system, investigators are able to systematically identify active and latent failures within an organization that culminated in an accident. Some of the failure levels incorporated in the HFACS framework include preconditions for unsafe acts and organizational influences – both relevant to my comments below. By using the HFACS framework for accident investigation, organizations are able to identify the breakdowns within the entire system that allowed an accident to occur.

Comments submitted to the FERC by the USFS, DCR, Dr. Kastning and other subject matter experts have raised serious concerns about the current pipeline alignment through the intense karst topography in SW Virginia. Will the Mountain Valley Pipeline be the subject of a future case study after a catastrophic failure occurs in the SW Virginia karst? Will the investigative team determine that numerous warnings were raised to avoid the karst in SW Virginia only to be ignored by the pipeline company and governmental agencies? Will the investigators determine that groundwater contamination in the Mount Tabor Sinkhole Plain from a construction related spill could have been avoided had the pipeline been routed away from areas of high density interconnected karst? Will the investigation reveal that surface collapse in karst was the cause of the break and subsequent explosion of the pipeline near the Preston Forest subdivision? Will the investigation determine that a combination of weak soils, steep slopes combined with excessive rain from a tropical storm resulted in a catastrophic landslide and subsequent break in the pipeline as it crossed the steep slopes of Sinking Creek Mountain in Giles County? Will the investigative team conclude that the seismic risk in the Giles County area **should not** have been dismissed so quickly when considering 9 minor earthquakes occurred over a 22-year period (1959-1981) in or near Giles County and another 5 earthquakes of magnitude 4.0 or greater occurred within 100 miles of the MVP pipeline for the period 1976-2006?<sup>13</sup> Will the investigation conclude these seismic risks should have been taken more seriously when considering the compounded problems of karst, slope and soil hazards? Will a future investigation of a cataclysmic pipeline failure in the karst of SW Virginia conclude...?

I fully understand that the FERC has a regimented approval process that is based on the careful review of consolidated records, including public comments, all rooted in the law, facts, and science. I agree the FERC should base their decision on these factors and that is why the information submitted to the FERC by Dr. Kastning, USFS, DCR and others is so important and should weigh heavily on the final routing

<sup>13</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia) p. 46

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## IND505 – Tim Ligon

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decision. History is laden with countless past and recent examples of environmental disasters that could have been avoided had the warnings been observed. I trust the FERC knows by now that Mountain Valley has placed a stake in the ground relative to the pipeline routing through the karst topography in SW Virginia. They will not move off that position unless made to do so by the FERC. I implore the FERC to take the karst found in SW Virginia seriously and heed the numerous warnings from experts. Please don't let their warnings be the subject of a future investigative study where the questions are asked 'how could a disaster like this ever occur?' and 'why were all the warnings ignored during the approval process?' As Dr. Kastning states at the end of his report, "the stakes are very high and the risks are far too great."<sup>14</sup>

Respectfully Submitted,



Tim Ligon

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<sup>14</sup> Submittal 20160713-5029 Kastning Report (Geologic Hazards in the Karst Regions of Virginia and West Virginia)  
p. 55

# INDIVIDUALS

## IND506 – Donald Wayne Jones

20161219-5105 FERC PDF (Unofficial) 12/19/2016 10:06:43 AM

December 17, 2016

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

Dear Ms. Bose and Members of the Commission;

Reference: MV/KP CP16-10-000

Subject: Draft Environmental Impact Statement and its intentional inadequate representation of historical Adlai Jones home lands.

IND506-1

According to documents provided to Giles County residents from Mountain Valley Pipeline Project, the Adlai Jones farm lands included 4 historical structures:

One: Pole Barn (MVP Site No. 035-0412-0010).  
Two: Trace Road (MVP Site No. 035-0412-0466).  
Three: Cemetery (MVP Site No. 035-0412-0065).  
Four: Appalachian Trail (MVP Site No. 021-0512).

On page 4-379 of the DEIS only the Pole Barn is listed as a Culture Resource within the Direct Area of Potential Effect. Additionally, my grandfather's name is Adlai Jones: not Adie. Thanks for the carelessness you have shown with my family's heritage.

As cited previously by my father, George Lee Jones, in his statement of cultural attachment:

One: The Pole Barn was used as a stable for the work horses that were an absolute necessity for farmers who wisely farmed this land by hand for generations.

Two: The Trace Road was used by his family to access the upper ridges of the farm land for numerous agricultural ventures generation after generation.

\*Additionally and of significant historical importance MVP identifies this as a remnant of the Cumberland Gap Turnpike on page 12 of its Phase I Reconnaissance Architectural Survey (information specifically requested by FERC).

Three: The Cemetery holds head stones of family members dating back to generation 3 (out of 10 generations). James Alexander Jones rests here as a decorated Civil War veteran (1823-1891).

Four: The Appalachian Trail is located on the top ridge of the Jones family farms and was an important means of transportation and commerce for citizens such as Walt Caldwell who would travel over Gap Mountain via the Appalachian Trail to trade labor for necessary supplies.

I am extremely confused and upset with the historical structures that were never acknowledged by MVP surveys. I accompanied all surveys that were performed with my knowledge and spoke to the surveyors about all of these structures at least once and usually numerous times. The list of structures and sites and cultural importance of historical importance that MVP and FERC completely ignored are as follows:

One: A deeded hand-dug ditch dated to 1800's for overflow of a mountain spring used as water for livestock for a neighboring farm. This water source is still in use today.

IND506-1

Table 4.10.7-3 of the final EIS lists the Adlai Jones house and pole barn (35-412-10) as 1,781 feet away from the pipeline; Leffell house (35-412-11) 2,039 feet away; a cemetery (35-412-465) 135 feet away; road trace (35-412-466); and the camper cabin at the road trace (35-412-14) 2,712 feet away, all within the Greater Newport Rural Historic District in Giles County, Virginia. The ANST is discussed under the Jefferson National Forest. Our description of surveys in Craig County in section 4.10 stated that Tetra Tech recorded the Fisher Cemetery as site 22-5039, while the John Jones rock walls, Denny Jones Farm, and Bob Jones house were recorded as one combined site (22-5040). Copies of the historic architectural survey reports are part of the public record of this proceeding, and can be accessed by anyone using the internet to retrieve data on our eLibrary system.

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## IND506 – Donald Wayne Jones

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Two: Ancient mountain spring with water rights deeded to five properties still used today as their only water source.

Three: "Billy" spring referenced in Dad's culture attachment that would be directly impacted by MVP service road contamination.

Four: Jones Cave used by ancestors for food storage.

Five: Historical Adlai Jones home place purchased in 1923 adjoining Adlai Jones' great great great grandfather's farm lands.

Six: William Arkennedy Jones' historical barn (Adlai's father) still standing and in daily use by the Jones family. The barn doors are made of wormy chestnut cut from the farm and is artfully carved with farm life detail by William and Everett Jones dated in the year 1900. It stands within feet of the MVP center line.

Seven: Historical home place of Adlai and Everett Jones rebuilt in 1926 after a fire in the original structure. Present home of Gordon Jones' family (Generation 6). It also stands within feet of the MVP center line.

Eight: Uncle Bub Jones' home place remains with three chimneys still standing representing historical mortar joints on hand faced rocks and hand hewn logs with wooden wedge nails still intact.

Nine: Denny Jones' home place remains with visible foundation and spring fed water trough for food preservation.

Ten: Denny Jones' corn crib used as a home when their home place burned down. Jones family heritage story states that they would wake up with snow on their quilts from snow blowing in through the cracks of the walls.

Eleven: Heirloom shrubs still producing a brilliant orange bloom unlike any other in the spring.

Twelve: John Jones hand stacked rock fence.

Thirteen: Site of Camper dwelling within feet of the Trace Road. Said to be one of the oldest recorded properties in present Giles County.

Fourteen: Site of Camper dwelling near "Billy Spring".

Fifteen: Historical "Slave Quarters" located on Leffell farm (pre-Jones) still standing.

Sixteen: Dude Smith dwelling remains within feet of the AT probably one of the oldest structures in Newport Va.

Seventeen: Fisher Cemetery containing one foot stone, one head stone and numerous depressions.

Eighteen: Jones family historical culture attachment of entire 700+ acres of home lands completely disregarded by MVP and FERC.

My view on this situation is as follows:

One: Rich energy businesses who financially back the Mountain Valley Pipeline Project were handed the time and means to collect all pertinent information about the Adlai Jones farm lands but failed to accurate access and provide that information to the Federal Energy Regulatory Commission.

Two: FERC had access to information that they simply ignored for reasons unknown to me or they are incompetent in evaluating the information provided to them and incorporating it into the Draft Environmental Impact Statement.

Three: I asked MVP representatives numerous times for copies of the reports they compiled on the Adlai Jones farm via the survey process that we were forced to comply with in order to check for accuracy. The information is about our land and we should have access to that information at any time.

I was promised these documents time after time. I have yet to receive any information from MVP

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## IND506 – Donald Wayne Jones

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IND506-1 regarding the surveys. You may call this a misunderstanding or miscommunication or lack of knowledge  
cont'd of those representatives but according to the way I was raised I call these statements "lies".

Four: No permits should be issued to MVP via FERC as neither one has shown to be able to even collect and convey information correctly. In my viewpoint, if you can't provide information correctly, the citizens cannot expect MVP to build an enormous 42" 1400 psi pipeline accurately and safely.

Most sincerely,

Donald Wayne Jones  
vmftech@yahoo.com  
Generation 7

# INDIVIDUALS

## IND507 – Rose Hirschy

20161219-5109 FERC PDF (Unofficial) 12/19/2016 10:15:48 AM

Rose Hirschy, Hermitage, TN.  
Good morning,

IND507-1

I would like to state my opposition to the Mountain Valley Pipeline. These areas have been set aside for protection and deciding to place a pipeline through the area is in direct opposition to those stated goals. The job of the government is not to protect specific business interests, but rather the future sustainability and success of all people.

Rose Hirschy

IND507-1

This does not appear to be a comment on our draft EIS.

# INDIVIDUALS

IND508 – Clifford A. Shaffer

20161219-5111 FERC PDF (Unofficial) 12/19/2016 10:11:04 AM

December 18, 2016

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

Re: Mountain Valley Pipeline proposal, Docket No. CP 16-10  
Inadequate analysis of proposed Forest Service Plan Amendments

Dear Ms. Bose and Members of the Commission,

IND508-1

I am writing to communicate information that is relevant to the Mountain Valley pipeline (MVP) proposal. I oppose the proposed changes to the Forest Service Land and Resource Management Plan (LRMP) on the grounds that (1) the Draft Environmental Impact Statement provides inadequate analysis of the proposed changes to the LRMP as required under NEPA, and (2) the DEIS provides inadequate analysis of the relationship between the MVP project and other pipeline projects that can be reasonably foreseen. Hence, the DEIS should be revised.

NEPA stipulates that all "foreseeable consequences" of a proposed action be adequately addressed by the EIS process. In the case of the proposed Forest Service plan amendments, the DEIS is grossly inadequate, and does not conform to the requirements of the law.

My primary objection is that the analysis in the DEIS addresses only the effects of a 42 inch natural gas pipeline. Many commenters will address the question of whether the DEIS is adequate to that purpose. My objection has to do with the relationship of the DEIS to the Proposed Amendment 1. Proposed Amendment 1 states "The LRMP would be amended to reallocate 186 acres to the Management Prescription 5C-Designated Utility Corridors..."

With this proposed amendment, the project changes, and in a radical way. The DEIS addresses (whether adequately or not) a project that is limited to a 42-inch gas pipeline. A 500 foot wide Designated Utility Corridor that (initially) contains a 42-inch gas pipeline is a completely different project. The environmental, social, and economic consequences of a 500 foot wide Designated Utility Corridor that (initially) contains a 42-inch gas pipeline can reasonably be expected -- and under NEPA, can be "reasonably foreseen" -- to be different from those of a 42-inch gas pipeline alone. The DEIS makes no attempt to assess the impact of a 500 foot wide Designated Utility Corridor that (initially) contains a 42-inch gas pipeline.

When any utility such as a high voltage transmission line, large-diameter gas pipeline, or highway is built, it is reasonable to ask whether as a result, the existence of that corridor will itself draw other utilities to it (and thus increase the impact of the proposed action). If it is reasonable to foresee that happening, then NEPA requires that the additional effects be evaluated.

IND508-1

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

# INDIVIDUALS

## IND508 – Clifford A. Shaffer

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IND508-1  
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In the case of the Proposed Amendment 1, the express purpose of the proposal is to support additional infrastructure. There would be no purpose to granting such a Designated Utility Corridor unless it is to be used for exactly that purpose. It is not simply a speculation that additional utilities might be built, whose consequences arguably might or might not be foreseen. In this case, it is reasonable to interpret the action as the stated intention to approve additional utilities through the corridor in the future, since this is the very purpose of the corridor.

Since it is clearly an eventuality that can be "reasonably foreseeable", it becomes a requirement under NEPA that the EIS process consider the effects not just of the original proposal to build a 42-inch pipeline. Rather, the EIS process must consider the reasonably foreseen effects of a 500 foot Designated Utility Corridor that contains not only a 42 inch gas pipeline, but also a plausible range of options for additional utilities through the corridor.

Since the DEIS does not adequately address the effects of additional utilities through the corridor, it is inadequate. Since it is inadequate, it must be revised to account for all of the proposed amendment effects. This will require a major reevaluation and reassessment.

A reasonable analogy for this situation is to say that the EIS process set out to assess the effect of apples, and then concluded with a recommendation to use oranges instead. Yet, that same EIS process makes no attempt to assess the cost of oranges. In fact, this DEIS does not even assess whether the oranges are superior for the purpose to the originally proposed apples! A major infrastructure project should be built for a purpose. The original pipeline proposal presumably is meant to solve some problem. It is unknown whether changing the proposed project to one within a 500 foot Designated Utility Corridor is necessary or sufficient to solve the problem. This goes to the heart of comments that I submitted during the November 3 Public Session in Roanoke. The DEIS has a critical failing that it does not assess need for the pipeline in the way that one would expect to assess any infrastructure project. That is, there is no problem stated that the pipeline is meant to solve, and so no assessment for whether a less-impacting alternative could meet the stated need. Likewise, there is no stated need such that we can assess whether a 500 foot wide Designated Utility Corridor adequately addresses it, or whether a lesser impacting alternative can instead address it. MVP apparently saw no need for a 500 foot wide Designated Utility Corridor, since they did not ask for it. So it seems strange that another entity would propose such a major impact with no associated assessment. More to the point, this violates the law.

A related issue has to do with siting the 500 foot Designated Utility Corridor. It appears that the DEIS only evaluates the proposed corridor for the 42 inch pipeline proposal. In other words, the fundamental questions addressed by the DEIS relate only to the proposed action of constructing the pipeline. But this proposed action has now changed in a major way with the introduction of a 500 foot wide Designated Utility Corridor. That makes the fundamental questions addressed by the DEIS no longer the correct questions to ask. The 500 foot wide Designated Utility Corridor is a major environmental and economic decision, dwarfing the importance of a single 42 inch pipeline project. The DEIS should be addressing as its major question the needs, cost, and least



# INDIVIDUALS

## IND508 – Clifford A. Shaffer

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IND508-1  
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impacting route for a 500 foot wide Designated Utility Corridor. It could well be that the public good would be best addressed by a different action than siting the Designated Utility Corridor at the proposed location of the single 42 inch pipeline. It might well be that the Designated Utility Corridor would be better sited in another location, and that MVP would need to compromise the location of its pipeline for the greater public good.

IND508-2

My second objection to the DEIS is that it does not adequately address the MVP pipeline proposal within the broader context of a range of pipeline proposals that are currently under consideration. Among other proposals is the so-called Appalachian Connector, with a route that would run roughly parallel to the Mountain Valley Pipeline. Another is the Atlantic Coast Pipeline, which is mentioned in the DEIS without meaningful assessment of the cumulative impacts. (Despite being in a section with that title within the DEIS, no actual assessment of cumulative impacts or justification for why multiple projects should be built is included.) Thus, it is more than "reasonably foreseeable" that approval of the MVP pipeline might result in multiple pipelines being constructed through a relatively small geographic area. Furthermore, draft lease agreements provided by MVP to landowners along the MVP pipeline route includes permission to build a second pipeline within the leased right-of-way. Thus, for MVP, a second pipeline is more than a speculative possibility. It is a consequence that they seek to put into contract. Yet, the effects of this second pipeline are not addressed by the DEIS. They must be addressed, because such a second pipeline is not only "reasonably foreseeable", but it has been explicitly foreseen in writing by MVP in every proposed lease contract.

No entity is addressing the collective actions of multiple pipeline projects. Instead, each project is being evaluated in isolation. It is possible that, if it were the only project to be constructed, each one would be of sufficient value as opposed to the costs to be worth pursuing. That does not mean that collectively, the value of multiple such projects is worth their collective cost. We do not know how much value the multiple projects will have, but it is reasonable to expect that this will be less than the sum of their individual values. For example, only so much gas can be borne by the market, and that might be less than the sum of the pipeline capacities. At the same time, we do not know how the collective costs will impact the region. It is almost certain that the environmental and economic cost will be at least the sum of the environmental and economic costs for the individual projects. It is possible that various interactions will cause the cost to be even greater than the sums of the costs for the individual projects. We simply do not have sufficient analysis to know. Thus it is possible that various bifurcated EIS processes might approve multiple pipelines, where a more holistic approach would not have done so. This is a clear case of cumulative effects that can be reasonably foreseen.

The DEIS for this project is therefore inadequate under NEPA, as it does not assess all "reasonably foreseeable" consequences.

IND508-2

See the response to comment LA15-6 regarding the ACP Project and the Appalachian Connector project. Cumulative impacts are addressed in section 4.13. See the response to comment IND26-1 regarding installation of a second pipeline.

# INDIVIDUALS

IND508 – Clifford A. Shaffer

20161219-5111 FERC PDF (Unofficial) 12/19/2016 10:11:04 AM

IND508-2 | I am a registered intervenor in the Docket CP16-10 proceedings, and I am sending these  
cont'd | comments to the full service list via e-mail as per FERC policies.

Sincerely,



Clifford A. Shaffer  
249 Brookside Ln  
Newport, VA 24128  
540-544-7254  
shaffer@vt.edu

Cc:

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

Jennifer Adams, Special Project Coordinator, Jefferson National Forest,  
[jennifpadams@fs.fed.us](mailto:jennifpadams@fs.fed.us)

Barbara Rudnick, NEPA Team Leader, U.S. EPA, Region 3  
[Rudnick.barbara@epa.gov](mailto:Rudnick.barbara@epa.gov)

Ted Boling, Associate Director for NEPA, Council on Environmental Quality  
[Edward\\_A\\_Boling@ceq.eop.gov](mailto:Edward_A_Boling@ceq.eop.gov)

Jon Capacasa, Director, Water Protection Division, U.S. EPA Region 3  
[Capacasa.jon@epa.gov](mailto:Capacasa.jon@epa.gov)

# INDIVIDUALS

IND509 – Susan McPartland

20161219-5117 FERC PDF (Unofficial) 12/19/2016 10:22:44 AM

susan mcpartland, minden, NV.  
Dear Secretary Bose,

IND509-1

Please halt the proposed Mountain Valley Pipeline routed through a hazardous seismic zone in West Virginia and Virginia, posing great risks to local drinking water, fragile ecosystems and tourism.

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.

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.

IND509-1

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. A programmatic EIS is discussed in section 1.3.

# INDIVIDUALS

## IND510 – Jennifer Janney

20161219-5118 FERC PDF (Unofficial) 12/19/2016 10:38:51 AM

Jennifer Janney, Louisville, KY.

IND510-1

Please, please DO NOT approve this pipeline. The natural habitats it would disrupt are many not to mention the danger it would put residents in. The blast zone of 1,115 feet is not sufficient to protect historically significant buildings in Newport, Virginia.

There are very few permanent jobs with a pipeline - most of the jobs are temporary construction jobs. What exactly are the 1300 permanent jobs that are supposedly being created with this pipeline? The oil company already has all the administrative support it needs and I cannot fathom why they would need 1300 field workers, full time on a completed supposedly safe pipeline... So again, my question is what are these 1300 jobs?

The damage this would do the the area of the Appalachian Trail is irreversible. A 125' gash in a protected area is wrong. The area is protected for many reasons.

Please don't destroy this area for a pipeline.

Thank You

Jennifer Janney

IND510-1

See the response to comment IND2-1 regarding safety. Habitats are discussed in section 4.4 of the EIS. Historic Districts are discussed in section 4.10 of the final EIS. The project would generate temporary jobs, as explained in section 4.9. The ANST is discussed in section 4.8 of the EIS. The purpose of the pipeline is to transport natural gas; it has nothing to do with oil.

# INDIVIDUALS

## IND511 – Elizabeth Reeder

20161219-5126 FERC PDF (Unofficial) 12/19/2016 10:48:41 AM

Elizabeth Reeder, Jumping Branch, WV.  
December 19, 2016

Dear Ms. Bose and Members of the Commission:

IND511-1

As my final comment, I would like to say that as a federal agency, the FERC has a responsibility to the planet and to present and future generation to be knowledgeable about declines in species of Neotropical migrants. If the FERC allows the exceeding unpopular, ill-conceived, and environmentally damaging MVP project to proceed, please do not permit the destruction of millions of trees (i.e., the clearing of the pipeline right-of-way) to occur during the breeding season of birds. As you must know, these migratory birds do not breed on their wintering grounds but only here in North America. Destruction of their nests amounts to an unnecessary and indefensible blow to many species already in decline. Thank you.  
Betsy Reeder  
Ecologist

IND511-1

As stated in section 4.4 of the EIS, both Mountain Valley and Equitrans developed Migratory Bird Habitat Conservation Plans to minimize impacts on bird species.

# INDIVIDUALS

## IND512 – Bruce M. Coffey

20161219-5128 FERC PDF (Unofficial) 12/19/2016 10:41:27 AM

Ms. Bose:

IND512-1

I strongly OPPOSE AMENDMENTS of the Forest Management Plan which would REDUCE the STANDARDS ALLOWING for CONSTRUCTION of the proposed Mountain Valley Pipeline. I and those who oppose this pillage and rape of our natural resources say, emphatically:

NO to REZONING to create a "UTILITY CORRIDOR.

NO to CORRIDOR EXCEEDING RESTRICTIONS on soil and riparian conditions.

NO to REMOVAL of CURRENTLY PRESERVED OLD GROWTH FORESTS within construction corridors.

NO, NO, NO PERMIT to cross Appalachian NATIONAL Scenic Trail.

The consequences of the excessive erosion and resulting landslides in the MOUNTAINOUS, POPULATED terrain ARE NOT MITIGABLE.

Sincerely,

Bruce Coffey

10303 Russwood Rd.

Bent Mountain, VA 24059

IND512-1

The opposition to the LRMP amendments is noted.

# INDIVIDUALS

## IND513 – Thomas Bouldin

20161219-5143 FERC PDF (Unofficial) 12/19/2016 10:53:25 AM

December 18, 2016

To: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission  
Joby Timm, Forest Supervisor, George Washington and Jefferson National Forests, [jtimmm@fs.fed.us](mailto:jtimmm@fs.fed.us)  
Jennifer Adams, Special Project Coordinator, Jefferson National Forest, [jenniferpadams@fs.fed.us](mailto:jenniferpadams@fs.fed.us)  
Neil Kornze, Director, US Bureau of Land Management  
Vicky Craft, Bureau of Land Management [vcraft@blm.gov](mailto:vcraft@blm.gov)

Re: Mountain Valley Pipeline Application, Docket No. CP16-10-000  
Draft Environmental Impact Statement  
Opposition to Land and Resource Management Plan (LRMP) Amendments

IND513-1

We write to express our intense opposition to the Land and Resource Management Plan Amendments presented by the Federal Energy Regulatory Commission in the DEIS for the Application of the Mountain Valley Pipeline, LLC. In our view, the amendments proposed would violate the goals and purposes of the Forest Service by lowering scientifically-established standards of performance (Proposed Amendments 2-4) and stewardship, while Proposed Amendment 1 would establish (through the mechanism of the DEIS for a single Applicant) a 500' utility corridor through the Jefferson National Forest.

The first proposed amendment has significant implications for private and public lands beyond the Jefferson National Forest, one of which is that the route of the Mountain Valley Pipeline project could be expanded to subsume private and public lands within such a corridor anywhere between the source point for the MVP project in northern West Virginia and its Transco destination in Virginia.

The proposed first amendment also carries implications related to the co-location of other natural gas pipelines with the MVP, such as, for example, the Appalachian Connector. In other words, the implications of this amendment extend far beyond the Jefferson National Forest through every forested region and community between the Marcellus point of origin for the MVP in Wetzel County, West Virginia and its destination in Pittsylvania County, Virginia. **We find it appalling that this proposal would be supported by FERC through the mechanism of a single Applicant's request for a Right-of-Way Grant application, especially without a programmatic, multi-agency environmental assessment of the cumulative impacts arising from the establishment of such a corridor through the Allegheny and Appalachian highlands.** We note that FERC is on record in the CP16-10 Docket as repeatedly opposed to any programmatic study for the MVP and other projects being proposed for the region (documented in letters to members of Congress writing on behalf of their constituents). **The Council on Environmental Quality (CEQ) regulations that implement the National Environmental Policy Act define cumulative effects as "the impact on the environment which results from the incremental consequences of an action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions" (40 CFR § 1508.7).**

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IND513-1

See the response to comment FA8-1 regarding Amendment 1.  
The remaining comments are noted.

# INDIVIDUALS

## IND513 – Thomas Bouldin

20161219-5143 FERC PDF (Unofficial) 12/19/2016 10:53:25 AM

IND513-1  
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The approval of these amendments would provide a dangerous precedent by which any infrastructure project supported by a Federal agency could request exceptions to rules that have been established to protect and enhance environmental resources in the nation's forests. All four of the amendments seem designed to benefit private corporations seeking approval for what has proved, in the present case, to be a poorly designed and insufficiently researched project which, while promising high levels of profit for the company, presents significant environmental risks for degradation of public and private lands.

**Because the environmental implications of the proposed amendments as described in the DEIS extend beyond Forest Service lands, we want to emphasize the ways in which they appear to be designed specifically to subvert the goals of NEPA stated in §1500.1 (c).** "...The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment." To the contrary, the amendments seem intended to allow the greatest possible degradation of the environment while changing regulations to endorse that damage. We refer below to specific terms of the amendments and further summarize some of our concerns:

**Proposed Amendment 1. A 500'-wide Utility Corridor:** For many citizens contributing comments to the FERC docket, the first amendment is the most offensive of the four, calling for numerous changes in land-use regulations in order to allow the construction of a 500'-wide 'utility corridor' through the Jefferson National Forest. In justifying the request, the DEIS/FERC states that such a corridor requires special land use provisions "which serve a public benefit by providing a reliable supply of electricity, natural gas, or water essential to local, regional, and national economies" (pg. 4-261). The statement itself is not supported with any demonstrated need for such service at the present time—and, in fact, the DEIS does not present any proof of need for the MVP project (the DEIS claims that proof of need only will be made later in the application process). FERC's elaboration in the DEIS suggests just how extensive the environmental violations of such a corridor might become: the 500 foot right-of-way being populated with "long linear features like high voltage electric transmission lines and buried pipelines for public drinking water or natural gas." Such an intrusion into the Jefferson National Forest is unthinkable if one considers the NEPA intention to "protect, restore, and enhance the environment". And, significantly, comparable damages on a much greater scale would extend to all those private lands and core forests through which such utilities could be routed through any extension of the Jefferson National Forest corridor proposed by this amendment. Indeed, **the proposal seems designed to do just the opposite of what NEPA requires, and would convert restored and protected lands to purely industrial uses.**

IND513-2

**Proposed Amendment 2:** The goal of this amendment, as stated in the DEIS, is to "allow construction of the MVP pipeline to exceed restrictions on soil conditions and riparian corridor conditions as described in FW-5, FW-9, FW-13, FW-14 and 11-017 standards" (pg. 4-262). Clearly, the provisions currently in place reflect the Forest Service's best judgment as to the restrictions needed to preserve important environmental resources. Reducing those standards implies that the construction impacts required by MVP's proposed routing are excessive rather than minimal.

IND513-2

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



# INDIVIDUALS

## IND513 – Thomas Bouldin

20161219-5143 FERC PDF (Unofficial) 12/19/2016 10:53:25 AM

IND513-2  
cont'd | The DEIS states that MVP would negotiate with the Forest Service over mutually-satisfactory 'mitigation' procedures. It's important to note that the Forest Service has already had some highly unsatisfactory experience with MVP in relation to the Applicant's at times hazy notions of mitigation, as suggested in the FS comments on MVP's hydrologic Sedimentation studies. **That extensive mitigation efforts are requested beyond any regularly required under present regulations simply reinforces the fact that the exemptions are necessary to claim 'minimal' impacts can be achieved.**

IND513-3 | **Proposed Amendment 3:** The goal as stated in the DEIS is that "The Forest Plan would be amended to allow the removal of old growth trees within the construction corridor of the MVP pipeline" (pg. 4-263). We fail to see how such an exception can be justified in the context of a for-profit venture that has yet to be demonstrated to be in the public interest. **The preservation of old growth forest is an environmental ideal that has rapidly become a national and global necessity and that clearly benefits the public in numerous ways—and the 're-creation' of such a resource would take far longer than the MVP is predicted to remain operational. Such impact is serious in itself—but the possibility of establishing a precedent for cutting old growth tracts upon request is far more ominous.**

IND513-4 | **Proposed Amendment 4:** The DEIS states that "The Forest Plan would be amended to allow the MVP pipeline to cross the ANST on Peters Mountain. The SIO for the Rx 4A area and the ANST would be changed from High to Moderate. This amendment also requires the SIO of Moderate to be achieved within 5 to 10 years following completion of the project to allow for vegetation growth" (pg. 4-264)." As with the regulations being 'targeted' in Amendment 3, the existing regulations represent the Forest Service's best judgment for such designations. **The request demonstrates once again that MVP needs reductions in the standards for performance of construction activities in order to claim minimal impacts.** That the applicant needs such indulgences even prior to approval does not bode well for the performance of responsibilities by sub-contractors or others charged with implementing what to many commenters—both experts and affected citizens—appear to be inadequate planning and construction plans. **And, again, the danger of setting an unfortunate precedent is a major argument against approval.**

### Issues of concern related to the DEIS and MVP research

IND513-5 | The proposed amendments appear to us to be an inappropriate intercession on behalf of an applicant by FERC, the Federal agency charged with ensuring that the proposed action will pose minimal impacts on the environment. As suggested above, the rationale for the amendments seems to be the need to 'lower the bar' for MVP's performance of its environmental responsibilities. **In relation to the utility corridor proposal, please consider that NEPA §1508.27 (6) and (7) specifically state that significant impacts include situations wherein an action "...may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration." And (7) "...is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment."**

IND513-3 See the response to comment FA10-1 regarding Amendment 3.

IND513-4 See the response to comment FA10-1 regarding Amendment 4.

IND513-5 See the response to comment FA8-1. We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources. The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS). See the response to comment IND18-5 regarding independent research. Appendix F provides detailed information regarding each waterbody crossing for the projects. Earlier waterbody filings by Mountain Valley were further refined due to field surveys.

# INDIVIDUALS

## IND513 – Thomas Bouldin

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IND513-5  
conf'd

**There are sound reasons to see these proposals as entailing significant impacts to the Jefferson National Forest, as well as to surrounding private lands should a utility corridor be instituted that guides future development of infrastructure through the area. But there are also grounds for concern about the integrity of the research by the Applicant on which these proposals may be based.** In the course of the MVP application, FERC has systematically refused to undertake region-wide evaluations of environmental impacts despite hundreds of requests to do so. And, as the Forest Service has observed in the past, there have been substantial flaws in MVP's previous environmental studies. A close reading of the DEIS reveals some similar shortcomings with the materials assembled by FERC in the DEIS.

The excerpt below from a letter to FERC from the Bureau of Land Management [Section III, Page 4] emphasizes the BLM's responsibility to adjacent lands:

*"BLM, to the extent necessary, will develop avoidance, minimization, and mitigation strategies on the areas encompassed by the Mineral Leasing Act Right-of-Way application. Avoidance, minimization, and mitigation strategies may be imposed for reasons including but not limited to: protecting the natural resources associated with Federal lands **and adjacent lands** and preventing unnecessary or undue degradation to public lands. See 43 C.F.R.2881.2. BLM has authority to require the applicant to "[c]omply with all other stipulations that BLM may require." 43 C.F.R. 2885.11."*

One common flaw shared by both MVP and DEIS is a desire to redefine the context of action so that impacts appear more limited or less significant than they are. Thus MVP attempted repeatedly to limit the effects of sedimentation reported in their study of Jefferson Forest streams to only those portions of the waterways within the Forest. **Forest Service comments rejected this strategy<sup>1</sup>:**

*"The continual reference to sediment effects from actions only on the Jefferson National Forest is irrelevant to the effects from the project. To make an informed decision about allowing the construction of the pipeline on the proposed route that crosses the National Forest, the decision maker needs to know the direct, indirect, and cumulative effects from all activities in the analysis watershed because allowing the construction across the Forest or denying the permit is directly connected to the consequential route the pipeline takes."*

The DEIS is guilty of a very similar attempt to under-represent impacts. At no point in their discussion of stream impacts do the authors acknowledge that multiple tributaries in a watershed may be crossed by the ROW or by access road construction. In fact, the maps of the route accompanying the DEIS do not even delineate stream crossings except as can be inferred from the maps' depiction of major streams. Thus of the 99 stream crossings in Summers County, the reader can find only seven (7) mainstem streams depicted—and no tributaries at all—on maps in Appendix B. For instance, the multiple crossings in the Lick Creek drainage total 22 but the reader will find only Lick Creek itself illustrated (although un-labelled) on the topographic map of the crossing (page 23 of 50.)

<sup>1</sup> See Docket CP16-10, Document #20160816-5247. Quotation appears in Section 3.2 Proposed Action Erosion and Soil Loss (file page 4).

# INDIVIDUALS

## IND513 – Thomas Bouldin

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IND513-5  
cont'd

It has been of great importance to the general public that the Forest Service has been willing up to now to take a strong stance on the integrity of our environmental system, insisting that effects are not limited only to the Federal lands it oversees but may extend to surrounding privately owned lands. Neither MVP nor FERC, it seems to us, is exercising the same responsible judgment.

The DEIS takes a somewhat different approach to minimizing measured impacts. FERC's writers chose the largest possible areas of impact against which to measure the specific areas affected by the pipeline. On page 4-476 of the DEIS the authors attempt to justify a decision that effectively minimizes estimates of impacts to watersheds: "The relatively large geographic scopes of analysis utilized herein such as HUC10 watersheds and AQCRs were based on scaling to the relatively large size of the two projects, which extend for a combined 309 miles of new pipeline across three states (Pennsylvania, West Virginia, and Virginia)." They then state that "The 33 HUC10 watersheds (one is shared between the projects) represent a combined total 4,557,727 acres. The MVP and the EEP account for about 6,533 acres of impacts (0.1 percent) of these watersheds." The reported percentage is so low only because the total watershed area is so large: the project is nowhere near most of the 4.5 million acres listed and does not cross the vast majority of streams in those large watershed delineations. **Moreover, in the case of the MVP project, it is not the acres of the watershed crossed that is of significance: it is the number of stream crossings that will account for the damages to streams.** And here, again, the DEIS under-reports the relevant data: for example, for the Hominy Creek drainage in Nicholas County, West Virginia, the DEIS (pg. 4-173 and also Appendix F, "Fisheries of Special Concern" pg. F-5-1), acknowledges five crossings (one of Hominy Creek itself, and four of unnamed tributaries). However, an earlier MVP submission<sup>2</sup> shows there to be 37 crossings in the Hominy Creek watershed counting many tributaries that provide spawning areas for the watershed's self-sustaining population of trout.

These examples of less-than-principled research design could be multiplied many times over. The DEIS is filled with contradictory reports of data, omissions of previously reported impacts, and unsupported pronouncements of 'temporary' or 'minimal' impacts that simply disregard the nature of the environmental effects of construction. One should look most distrustfully on proposals for reduced standards that are buried in the middle of this many-hundred page compendium filled with information and argument of dubious accuracy.

As landowners who are deeply concerned about the environmental and social impacts of the Mountain Valley Pipeline as currently proposed, and as citizens concerned about current industry energy plans, we hope the Forest Service will continue its present stance in defense of responsible environmental policy. The Federal Energy Regulatory Commission's position on this issue seems in direct conflict with the requirements of NEPA, and out of step with current scientific research on the effects of fossil fuel consumption. We hope for the persistent assertion of wiser judgments from those elements of government better tutored in the broad concerns for a balanced policy regarding the world we live in. The DEIS for the Mountain Valley Pipeline should be withdrawn or another DEIS should be issued that addresses all the inadequacies identified in this one by cooperating agencies, experts and citizens; another comment period should be opened at that time.

<sup>2</sup> Docket CP16-10, Document #20160226-5404-Part 1. "Table of Trout Streams Crossed" (file page 72).

# INDIVIDUALS

## IND513 – Thomas Bouldin

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Respectfully submitted,

Thomas Bouldin and Susan Bouldin  
Pence Springs, West Virginia  
Registered Intervenor Docket No. CP16-10-000

Cc: Tony Tooke, Regional Forester for the Southern Region, USDA FS, Region 8  
Ted Boling, Associate Director for NEPA, CEQ  
Barbara Rudnick, NEPA Team Leader, US EPA Region 3  
Ben Lockett, Staff Attorney, Appalachian Mountain Advocates, Lewisburg, WV

# INDIVIDUALS

## IND514 – Isaac Witmer

20161219-5144 FERC PDF (Unofficial) 12/19/2016 11:08:01 AM

Isaac Witmer, Harrisonburg, VA.  
No to the Mountain Valley Pipeline.

IND514-1 | The Mountain Valley Pipeline is dangerous for the local environment. It's dangerous for the people that live nearby it, and the people that will be evicted.

IND514-2 | It is dangerous for the economy of the United States in a time when the Paris climate agreement expects the US to move away from Carbon Emitting energy sources.

And it is dangerous for our global environment as the temperatures rising has been directly connected to Carbon Dioxide levels, which is affected by fossil fuel burning.

No to the Mountain Valley Pipeline.

IND514-1 | See the response to comment IND2-1 regarding safety.

IND514-2 | Climate change and GHGs are discussed in sections 4.11 and 4.13 of the EIS.

# INDIVIDUALS

## IND515 – Andrew Williams

20161219-5154 FERC PDF (Unofficial) 12/19/2016 11:20:11 AM

Andrew Williams, Alexandria, VA.  
To Whom It May Concern:

IND515-1

As a resident of Virginia and someone who hikes parts of the Appalachian Trail regularly especially in and around Blacksburg, VA (Montgomery, Giles, Pulaski and Craig counties) I want express my strong opposition to the Mountain Valley Pipeline project. I do not want to see the scenic view from many of my favorite hikes ruined. I want anyone who hikes or visits this region to experience feelings and sights similar to those that have so greatly affected my life and often put things into a larger perspective for me in rough times. As a Virginian I cherish many of the scenic views where you look out and there is not a man-made object for as far the eye can see, which is something I believe our state and its citizenry should be proud and protective of. Also, I worry greatly about the environmental impacts to the local ecosystems and surrounding residents. Specifically the impact to the New River (one of the five oldest rivers in the world), all the rivers, creeks, and streams that feed into it, as well as the aquatic and non-aquatic wildlife that thrive and survive in this part of our great states wilderness. Lastly, and most importantly, this project will affect the citizens of Southwest Virginia through the unwanted and unseen effects on their water quality, visual impacts, and economic impacts on property values, income, and small business that rely on the hikers, tourists, and outdoor lovers.

IND515-2

IND515-3

Sincerely,  
Andrew Williams

IND515-1

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

IND515-2

Water resources are addressed in section 4.3 of the EIS. Aquatic resources are addressed in section 4.6 of the EIS. See the response to comment IND270-1 regarding wildlife.

IND515-3

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

# INDIVIDUALS

## IND516 – Lee Ann Williams

20161219-5162 FERC PDF (Unofficial) 12/19/2016 11:47:59 AM

Lee Williams, Richmond, VA.  
December 19, 2016  
Ms. Kimberly Bose  
Federal Energy Regulatory Commission  
888 First Street NE Washington, DC 20426  
Docket: #CP16-10-000

RE: Opposition to Mountain Valley Pipeline

IND516-1

I am writing to you today to voice my strong opposition of the MVP. From the beginning of the process at the fracking fields in West Virginia, through the middle with pipelines, to the end at export terminals, LNG is bad. Bad for clean water. Bad for air quality. Bad for public health in the communities all along the transport system. Bad economically in their shortsightedness; stranding assets in fossil fuels for the foreseeable future instead of investing in clean renewable infrastructure. Bad for everyone except the pipeline company. For Dominion to keep their stock prices stable, they must invest as heavily as possible in new infrastructure and supply to bolster investor confidence. At this point, I'm sure you're overwhelmed with statistical data, so I won't go into detail and will mainly list my objections.

#### Fracking:

-Releases Methane into the atmosphere which is documented and proven to be a worse greenhouse gas than carbon. Bad for the environment, and bad for air quality.  
-Injects water and toxic chemicals into the ground and thus contaminates groundwater. Drilling company steals water from communities for their process. Fracturing fluid chemicals are known to be toxic to humans and wildlife, and several are known to cause cancer. Potentially toxic substances include petroleum distillates such as kerosene and diesel fuel (which contain benzene, ethylbenzene, toluene, xylene, naphthalene and other chemicals); polycyclic aromatic hydrocarbons; methanol; formaldehyde; ethylene glycol; glycol ethers; hydrochloric acid; and sodium hydroxide. Very small quantities of some fracking chemicals are capable of contaminating millions of gallons of water. According to the Environmental Working Group, petroleum-based products known as petroleum distillates such as kerosene (also known as hydrotreated light distillates, mineral spirits, and a petroleum distillate blends) are likely to contain benzene, a known human carcinogen that is toxic in water at levels greater than five parts per billion (or 0.005 parts per million). Other chemicals, such as 1,2-Dichloroethane are volatile organic compounds (VOCs). Volatile organic constituents have been shown to be present in fracturing fluid flowback wastes at levels that exceed drinking water standards. For example, testing of flowback samples from Texas have revealed concentrations of 1,2-Dichloroethane at 1,580 ppb, which is more than 316 times EPA's Maximum Contaminant Level for 1,2-Dichloroethane in drinking water. VOCs not only pose a health concern while in the water, the volatile nature of the constituents means that they can also easily enter the air. According to researchers at the University of Pittsburgh's Center for Healthy Environments and Communities, organic compounds brought to the surface in the fracturing

IND516-1

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

# INDIVIDUALS

## IND516 – Lee Ann Williams

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IND516-1 cont'd flowback or produced water often go into open impoundments (frac ponds), where the volatile organic chemicals can offgas into the air. When companies have an excess of unused hydraulic fracturing fluids, they either use them at another job or dispose of them either at a hazardous waste facility, or SPRAYING ON ROADWAYS TO CUT DUST.

IND516-2 Pipeline Excavation:  
-Will cause erosion, loss of top soil and view shed, leaving a permanent scar across the mountains. The impact on native fauna and flora has not been adequately studied, but I don't need an expensive study to tell me its a bad idea for the habitat and species living there.

IND516-3 -Underground streams will be damed or diverted causing unknown impacts downstream. Above ground streams, wetlands and ground water will be adversely impacted by sediment and toxic runoff.

IND516-4 -Emissions from these giant machines will diminish air quality as well as quality of life for the communities subjected to their noise and air pollution.

IND516-5 -Public Safety in the blast zones can not be assured.

IND516-6 -Low income and minority communities are always the recipient of unwanted industrial projects and waste disposal, so this is a huge social justice issue.

IND516-7 -All of the above reasons will also adversely impact agricultural operations in close proximity to the pipeline, so local economies will suffer especially when you add in their loss of property value.

IND516-8 -This entire circus should be shut down based on the Clean Water Act and the COP2 Paris Agreement. Climate change is a serious threat to our coastlines and our national security. The Department of Defense lists Climate Change as a real and present danger.

For Dominion to keep their stock prices stable, they must invest as heavily as possible in new infrastructure and supply. For oil and gas companies, this means new exploration and new pipelines. Why would you do this, if you know you may have to abandon these assets before they've paid off? Two reasons: First, it sends a signal of confidence to markets that you expect to continue to grow in the future. Second, it's politically harder to force companies to abandon expensive investments than it is to prevent those systems from being built in the first place—the mere existence of a pipeline becomes an argument for continuing to use it. This, too, bolsters investor confidence. Note that whether these assets are eventually abandoned or not is of little concern to current investors looking to delay devaluations.

In closing, I implore you to heed the warning's of climate scientists and our military. If we are to continue to thrive on this planet, we need to leave untapped fossil fuels in the ground. This pipeline is stranding assets better used for clean energy technology development.

Sincerely,

Lee Anne Williams  
220 Randolph Square Lane  
Richmond, Virginia

IND516-2 The right-of-way would be restored and revegetated following construction (see section 2.4.2 of the EIS). See the response to comment IND70-1 regarding erosion.

IND516-3 Water resources are addressed in section 4.3 of the EIS. 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.

IND516-4 Air quality is addressed in section 4.11.1 of the EIS.

IND516-5 See the response to comment IND2-1 regarding safety.

IND516-6 Environmental justice is addressed in section 4.9 of the EIS.

IND516-7 See the response to comment IND12-1 regarding property values. See the response to comment IND36-2 regarding farming.

IND516-8 Climate change is addressed in sections 4.11 and 4.13 of the EIS.



# INDIVIDUALS

## IND517 – Daniel Miller

20161219-5164 FERC PDF (Unofficial) 12/19/2016 11:49:20 AM

IND517-1 Daniel Miller, Morgantown, WV.  
I am writing in support of the needed upgrade to natural gas pipelines.  
The Mountain Valley Pipeline will improve the safety of long term  
transport of natural gas in WV. Please approve this project after the  
environmental assessment has been completed.  
Dan

IND517-1

The commenter's statements are noted.

# INDIVIDUALS

## IND518 – Eve B. Jenkins

20161219-5183 FERC PDF (Unofficial) 12/19/2016 12:37:05 PM

IND518-1

Eve B Jenkins, Takoma Park, MD.

I am writing to voice my opposition to the Mountain Valley Pipeline project, at least in its current form. The pipeline will necessarily cause significant damage, deforestation, and aesthetic impact to both private and US Forest Service land; it will, in all likelihood (because this is what nearly always happens with pipelines) also result in water quality impacts from occasional spills. Lowering forest management plan standards to accommodate one particular project also opens the door to additional depredations. I urge you not to approve this project until there is further public review and more time for input from multiple stakeholders. In the interest of full disclosure, I am a stakeholder only in that I am a citizen of the greater region, a lover and protector of natural resources with a background in wildlife/fisheries management, and someone who would love to hike the AT someday.

IND518-1

Water resources are addressed in section 4.3 of the EIS. See the response to comment IND155-2 regarding forest impacts. Visual impacts are addressed in section 4.8 of the EIS. See the response to comment CO14-3 regarding spills.

# INDIVIDUALS

IND519 – Tina Smusz

20161219-5212 FERC PDF (Unofficial) 12/19/2016 12:08:58 PM

December 19, 2016

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

Joby Timm, Supervisor  
George Washington-Jefferson National Forest  
5162 Valleypointe Parkway  
Roanoke, Virginia 24019

Re: Environmental and Economic Consequences of Mountain Valley Pipeline, Docket No. CP 16-10

To Ms. Bose, Members of the Commission and Mr. Timm,

IND519-1

I am addressing significant problems with the final October 15, 2016 MVP route which traverses the following - the Jefferson National Forest in northern Montgomery County Virginia, the Slussers Chapel Conservation Area and aquifer, the North and South Forks of the Roanoke River, as well as many tributaries in the Roanoke River Watershed, before finally crossing the Roanoke River itself. This fairly recent route change raises new issues in relation to the proposed amendments #1 and #2 for the Forest Service Land and Resource Management Plan. More importantly, this final route with its multiple crossings of tributaries to the Roanoke River has critical implications for niche economic development in the Roanoke and Salem areas. The establishment of this route so late in the review process does not allow adequate time for commentary, advisement and input from affected parties, and should necessitate extension of the current deadline for comments, and revision of the DEIS based on a comprehensive analysis of the extensive impacts to the Roanoke River watershed. An additional 90 day comment period for the public should follow the release of a revised DEIS.

This new route iteration traverses the Slusser's Chapel Conservation Area jeopardizing the primary aquifer for hundreds of wells & springs which supply Montgomery and Roanoke county households, as well as water sources for livestock and crops. Most notably, the Slussers Chapel aquifer is also linked to the Roanoke City municipal water supply via karst underlayment, as well as small streams and springs feeding into the North Fork of the Roanoke River, one of the Roanoke River's main tributaries. The Spring Hollow reservoir (part of the Western Virginia Water Authority) is located just 0.8 miles east of the Mountain Valley Pipeline near mile marker 234.4. (Table 4.3.2-4 in the DEIS). Any leak from the nearby pipeline would contaminate the reservoir due to the communicating karst formation throughout this area (<http://www.dcr.virginia.gov/natural-heritage/image/va-karst-map2016.jpg>). Herbicide use along the pipeline path and sediment from pipeline construction and maintenance would additionally

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IND519-1

See the response to comment LA3-1 regarding extension of the comment period. See the response to comment LA1-7 regarding herbicides. See the response to comment FA11-15 regarding sedimentation and turbidity modeling. See the response to comment CO14-3 regarding spills and comment IND92-1 regarding leaks. Section 4.3 provides a discussion of the Spring Hollow Reservoir.

According to Mountain Valley, black powder sludge is not a concern for the MVP. Black powder forms in higher moisture gas systems. Mountain Valley would transport gas with a low moisture content.

# INDIVIDUALS

IND519 – Tina Smusz

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IND519-1  
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challenge the purity of this reservoir as well as Salem's public water supply, a portion of which is pumped directly from the Roanoke River.

Three additional river crossings by the MVP in Montgomery County compound the risk of reservoir contamination via pipeline leakage, herbicide use and sedimentation. The North Fork of the Roanoke River is crossed by both the Mountain Valley Pipeline and a permanent MVP access road near mile marker 227.3 (Mountain Valley Pipeline Map prepared by Montgomery County, VA Planning and GIS Services, 03/07/2016 (revised 10/16/2016)). This same map shows the pipeline crossing a significant tributary of the North Fork the Roanoke River, Bradshaw Creek, at mile marker 230.8. The Roanoke River itself is crossed between mile markers 235.6 and 235.7 just after the confluence of its North and South Forks. Roanoke River water is pumped into Spring Hollow Reservoir, one of two reservoirs supplying the Roanoke area (Western Virginia Water Authority website 12/14/2016). Spring Hollow Reservoir's water intake pump station is located less than 2 miles from Mountain Valley Pipeline's proposed 84' wide, destructive crossing of the Roanoke River. Salem also pumps Roanoke River water for part of its public water supply, which is also at risk of contamination. Extensive Karst underlayment throughout the Roanoke River valley directly links water from the Slusser's Chapel aquifer with the Spring Hollow Reservoir. Spring Hollow Reservoir supplies public water to areas along the west side of Roanoke (see map on page 29 of the following report from the Western Virginia Water Authority - <https://www.westernvawater.org/drinking-water/water-sources-and-treatment/water-quality-reports>). During a drought severe enough to significantly lower Carvin's Cove Reservoir, Spring Hollow Reservoir would supplement water supplies throughout Roanoke and its suburbs.

Based on the above, it is imperative that the pipeline route be moved away from both the Mt Tabor area aquifer (Slussers Chapel Conservation Area) and the multiple Roanoke River tributaries to prevent contamination of downstream public water supplies by sedimentation; pollution from diesel fuel spills and herbicides; and leaks of heavy metals and radioactive sludge resulting from the elevated radon in hydraulically fractured gas (ATSDR Radon case study. CASE STUDIES IN ENVIRONMENTAL MEDICINE (CSEM) Radon Toxicity Course: CB/WB1585). "Black Powder" a typical corrosion-related condensate in gas transmission lines would also contaminate water supplies if a breach or explosion occurred in the pipeline. Black Powder is comprised of iron oxides, iron sulfides, and/or iron carbonates with binder materials which can include paraffins, asphaltenes and glycols. Fine sand or silt can also be present in Black Powder (O Trifilleff, P France, and T Wines. Scientific & Technical Report: Black Powder Removal from Transmission Pipelines: Diagnostics and Solutions, presented January 2009 in Bahrain). Chances of cracks or holes in the pipeline are increased by the corrosive effects of Black Powder (Effect of Sales Gas Pipelines Black Powder Sludge on the Corrosion of Carbon Steel <https://www.onepetro.org/conference-paper/NACE-11087>). Gas leaks resulting from corrosion would contaminate water bodies and groundwater. Both radioactive sludge and Black Powder are deposited during the useful life of the pipeline and can leak from abandoned pipeline far into the future. (See [www.epa.gov/radiation/tenorm-oil-and-gas-production-wastes](http://www.epa.gov/radiation/tenorm-oil-and-gas-production-wastes)).

In reality, the only option for protecting the Slussers Chapel aquifer is to prohibit the pipeline from traversing the Jefferson National Forest (JNF) in Montgomery County. And the only option for truly

# INDIVIDUALS

IND519 – Tina Smusz

20161219-5212 FERC PDF (Unofficial) 12/19/2016 12:08:58 PM

IND519-1  
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protecting the Roanoke and Salem water supplies is to relocate the route away from all upstream water crossings in the Roanoke River watershed and to avoid crossing the karst terrain which links the watershed to Spring Hollow Reservoir.

**Contamination of aquifers which are linked to the Roanoke Virginia public water supply can seriously jeopardize economic growth, especially the burgeoning craft brewing industry** which now includes three breweries in Roanoke and Salem (Soaring Ridge, Big Lick and Parkway) and a large planned Deschutes brewery. Deschutes is expected to create over 100 new jobs in Roanoke and invest more than \$80 million dollars. The website [www.VisitRoanokeVa.com](http://www.VisitRoanokeVa.com) touts "The plentiful supply of top-quality water combined with the beautiful landscape and unique culture that exists in the region makes Virginia's Blue Ridge a natural choice for many beer companies." These are exactly the qualities that attracted Deschutes to the Roanoke area and which we citizens want to protect.

Deschutes has emphasized the outdoor recreation opportunities available to its employees and customers in our (currently) picturesque Blue Ridge mountain region – per a John Carlin interview with Deschutes staff in Bend Oregon "While here, they went mountain biking, hiked to Dragon's Tooth and partied in downtown" (<http://wsls.com/2016/11/09/why-did-deschutes-choose-roanoke/>). Building of the Deschutes facility is scheduled to begin in 2019. Could regional pipeline development threaten that project? A December 6 WSL510 news story highlights the importance of a high quality water supply and noted that Deschutes has begun testing water in Carvin's Cove (*Virginia Tech and Deschutes Brewery working together*, by Jenna Zibton - Virginia Today Anchor, Published: December 6, 2016, 4:00 am)

Carvin's Cove Reservoir supplies water for Soaring Ridge and Big Lick craft breweries in Roanoke, and will be the primary source for Deschutes brewery based on its plan to locate in the Roanoke Centre for Industry and Technology ([http://www.roanoke.com/business/news/roanoke/deschutes-to-build-brewery-in-roanoke/article\\_224a0174-a956-500d-9601-518d8f7664de.html](http://www.roanoke.com/business/news/roanoke/deschutes-to-build-brewery-in-roanoke/article_224a0174-a956-500d-9601-518d8f7664de.html)). Carvins Cove reached an all-time low of 34.1 feet below the spillway during the October 2002 drought ([www.westernwater.org/i-am-a-/recreationalist/carvins-cove-natural-reserve/history-of-carvins-cove](http://www.westernwater.org/i-am-a-/recreationalist/carvins-cove-natural-reserve/history-of-carvins-cove)). The reservoir water originates from its surrounding watershed plus additional water from two underground tunnels which carry overflow from Tinker and Catawba Creeks. Based on its water sources, the reservoir's levels are highly dependent on local regional rainfall.

Spring Hollow Reservoir water (along with water from municipal wells in the Roanoke/Salem area) would be redistributed to accommodate needs in the event of a drought severe enough to lower Carvin's Cove to critical levels. As explained above, Spring Hollow Reservoir contains contributions from the Slussers Chapel aquifer which currently is a healthy water source for private and public use. Protection of this aquifer ensures better public water supplies for people and businesses downstream that depend on water supplied by Spring Hollow Reservoir and the Roanoke River. **Protection of the public's health and the regional economic growth from craft brewing industries (and associated tourism) depends on elimination of the current Mountain Valley Pipeline route which crosses the Jefferson National Forest and numerous Roanoke River tributaries.**

# INDIVIDUALS

IND519 – Tina Smusz

20161219-5212 FERC PDF (Unofficial) 12/19/2016 12:08:58 PM

IND519-2

I oppose the proposed Forest Service Amendments to the Land and Resource Management Plan for this portion of the Jefferson National Forest – all of which facilitate placement of a dangerous, unnecessary, and permanent intrusion into the forest, aquifers and livelihood of citizens who reside downstream.

Amendment 1: reallocation of 186 acres to Prescription 5C – Designated Utility Corridors.

The description of Rx 5C corridors is as follows “...Designated Utility Corridors contain special uses which serve a public benefit by providing a reliable supply of electricity, natural gas, or water essential to local, regional, and national economies.” This “public benefit” to local and regional economies is not fulfilled by the Mountain Valley Pipeline which will supply minimal natural gas to the areas it traverses in Virginia, because the vast majority of areas are already well supplied. (Synapse Energy Economics, Inc. *“Are the Atlantic Coast and the Mountain Valley Pipeline Necessary? An examination of the need for additional pipeline capacity into Virginia and Carolinas”* September 12, 2016). Nearby areas also have reliable electrical service and, currently, clean water supplies. This 500’ wide utility corridor constitutes an open invitation for additional, polluting natural gas lines through the heart of our region and its economy.

IND519-3

Amendment 2: The LRMP would be amended to allow construction of the Mountain Valley Pipeline to exceed restrictions on soil conditions and riparian corridor conditions....., provided that mitigation measures or project requirements agreed upon by the Forest Service are implemented as needed.

This amendment constitutes a grave threat to area water supplies during and after construction. The qualifying phrase “as needed” provides no assurance that mitigation measures would be implemented. What entity ultimately decides “the need” for mitigation? And how would area residents experiencing impaired water flow or contaminated water supplies prove the harm caused by upstream damage to riparian corridors or sedimentation from “exceeding restrictions on soil conditions”?

In conclusion, the Mountain Valley Pipeline could do great harm to the health and livelihood of people living downstream from its permanent increase in sedimentation, use of herbicides, and toxic sludge which remains in abandoned pipelines for perpetuity. Mountain Valley Pipeline’s final *coup de grace* to this region’s health resides in the glaring absence of NEPA required decommissioning plans for the future abandoned pipeline and associated structures.

Tina Smusz, MD, MPH

Catawba, Virginia

IND519-2

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

IND519-3

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

**INDIVIDUALS**  
**IND520 – Robin Austin**

20161219-5217 FERC PDF (Unofficial) 12/19/2016 12:49:48 PM

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

Submission Date: 12/19/2016 12:49:48 PM

Filed Date: 12/19/2016 12:49:48 PM

Dockets

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

Filing Party/Contacts:

Filing Party Signer (Representative)

Other Contact (Principal)

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Individual rvbcrobin@yahoo.com

Basis for Intervening:

IND520-1 I am an affected landowner and concerned about the environmental and economic impacts of the Mountain Valley Pipeline.

IND520-1

Non-environmental Commission staff will make a determination on whether to grant a party's out-of-time intervention request.

**INDIVIDUALS**  
**IND521 – Georgia Lynn Banklow**

20161216-0064 FERC PDF (Unofficial) 12/16/2016

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

This is a form letter. 22  
 copies of this letter have  
 been submitted.

**ORIGINAL**

RE: Docket #CP16-10-000 (Mountain Valley Pipeline)  
 Dear Ms. Bose,

IND  
 521-1

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

IND521-1

See the response to comment FA11-12 regarding need.

IND  
 521-2

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

IND521-2

See the response to comment CO5-1 and LA5-1 regarding preparation of the draft EIS. Courts have found that plans do not have to complete at the NEPA level (Robertson v Methow Valley Citizens Council, 490 U.S. 332 [1989]), as long as they are completed prior to construction, as indicated in our recommended conditions. See also the response to comment LA1-4 regarding existing 42-inch pipelines in mountainous terrain. See the response to comment IND152-1 regarding third-party monitoring.

IND  
 521-3

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

IND521-3

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

IND  
 521-4

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

IND521-4

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

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.

Sincerely,

*Georgia Lynn Banklow*

*Georgia Lynn Banklow*

*17 Trellis Ct.*

*Asherike, NC 28806*

*12-10-16*

cc:  
 Mr. Joby Timm, Forest Supervisor & Coordinator  
 Ms. Jennifer Adams, Special Projects Coordinator  
 George Washington and Jefferson National Forests  
 5162 Valleypointe Parkway  
 Roanoke, Virginia 24019

RECEIVED  
 SECRETARY OF THE  
 FEDERAL ENERGY REGULATORY COMMISSION  
 DEC 16 2016



# INDIVIDUALS

## IND522 – Owen Ingram

20161219-5223 FERC PDF (Unofficial) 12/19/2016 1:36:47 PM

Christine Ingram, Kissimmee, FL.  
From my 14 year old son, Owen Ingram

December 17, 2016

Dear US Government member, FERC,

IND522-1

My family has been very close friends and still are very close friends with the owners of Four Corners Farms. We have had many fun times and memories on the farm, from taking care of the animals to sledding down their hills. Also, this farm is a large part of their lives. First, it is their business and this has created many relationships for them that they didn't have before. Second, this has changed their personalities and made them better people. They are more peaceful and more relaxed human beings. Finally, many people rely on Four Corners Farm to get fresh food and good food as well. Without Four Corners Farm, many people would be without a good, natural food source. Putting fracking large pipes under their farm and forcing them to move would destroy their lives and many other people's lives that are influenced or that rely on the farm. Please think through this and think about what you are actually doing when you are putting these fracking things down and under the farm. Thank you,

Owen Ingram

IND522-1

The proposed pipeline route would cross the edge of the parcel along the southern border of the agricultural field. Impacts on agricultural land is discussed in sections 4.2 and 4.8 of the EIS. See the response to comment IND332-1 regarding farming. See the response to comment IND2-3 regarding hydraulic fracturing.

# INDIVIDUALS

## IND523 – Audrey Ingram

20161219-5224 FERC PDF (Unofficial) 12/19/2016 1:37:50 PM

Christine Ingram, Kissimmee, FL.  
From my 10 year old daughter:

Dec 16, 2016

Dear FERC, Federal Government,

IND523-1

Four Corners Farm is a great company and business run by an incredible family. It would crush their hearts if they had to lose their farm because of pipelines running through their land. I have been there before and it is such a beautiful place and they care for it. Four Corners Farm deserves to be able to stay like it is and where it is. They are an amazing family business that provides eggs, chicken, pork, beef, mustards, honeys, and turkey for local families. They love what they do and I love their farm, so please don't run pipelines in their land.

Sincerely,  
Audrey Ingram

IND523-1

See the response to comment IND522-1 regarding Four Corners Farm.

# INDIVIDUALS

## IND524 – Kristin Peckman

20161219-5229 FERC PDF (Unofficial) 12/19/2016 1:59:00 PM

IND524-1 Kristin Peckman, Roanoke, VA.  
The maps on display at the FERC public hearing in Roanoke on December 3, 2016 show the Mountain Valley Pipeline route going through the middle of the Poor Mountain Natural Area Preserve, which was set aside by the Virginia Department of Natural Resources to protect the globally rare piratebush (*Buckleya distichophylla*). The maps accompanying the DEIS are not detailed enough to show this area, and the DEIS text makes no reference to the Poor Mountain Natural Area Preserve. You must ensure that the pipeline route does NOT go through this Preserve.

IND524-1

The Poor Mountain Natural Area Preserve was listed in table 4.8.1-10 of the draft EIS. As indicated in table 4.8.1-10, the proposed route would be about 3.4 miles from the Poor Mountain Natural Area Preserve.

# INDIVIDUALS

## IND525 – Christine Ingram

20161219-5227 FERC PDF (Unofficial) 12/19/2016 1:50:56 PM

Christine Ingram, Kissimmee, FL.  
Dear FERC,

IND525-1

I am writing on behalf of the Four Corners Farm, multigenerational, better than organic, family farming team run by the Reilly Family. I have been a part of the genesis of a farming dream and I have seen it come to fruition for this family. They were moved and changed by a deepening understanding of what it means to care for and steward well both land and animals. They taught our family so many things that I am deeply grateful for to this day regarding food and earth care. From a business standpoint, the changes that are being proposed to their land would drastically limit their chemical-free, pasture based farming productivity. To the surrounding community that has become invested in and recipients of excellent food, it would be a great loss and personally to the Reilly family, a limited productivity would mean losing the dream that have worked so hard to see come to fruition. On a personal level, the acreage that was purchased by this multigenerational family was centered on the unadulterated status of the creek that runs along their property, the broad expanse of the high and low pastures, land that could sustain pastured farming (rotational based requiring land), and the place to establish roots and keep in their family for generations to come. You need only see the live testimony of Evelyn, a young woman in her teens, expressing her desire to live on this land "forever" to see the fullness of the meaning of this land to this family. Risking the negative side effects of the pipeline installation process, the risk to clean water and clean land, the risk of explosion or pipeline failure is too great for this family. I am asking you to reconsider the proposed eminent domain of Four Corners Farm as well other properties owned by other families as it does not appear from my standpoint to benefit the local community as much as it does an industry that consistently overlooks the value of precious resources that cannot be protected or recreated: water, land, livestock, people, community...Please reconsider this pipeline proposal.

Sincerely, Christine Ingram

IND525-1

See the response to comment IND522-1 regarding Four Corners Farm. See the response to comment IND2-1 regarding safety. Organic farms are discussed in sections 2, 4.2, and 4.8 of the EIS. See the response to comment IND1-3 regarding eminent domain.

# INDIVIDUALS

## IND526 – Chris Selmer

20161219-5230 FERC PDF (Unofficial) 12/19/2016 1:59:01 PM

IND526-1 | Chris Selmer, Pacific Grove, CA.  
As someone who has hiked the entire Appalachian Trail, I find it  
appalling that a pipeline cutting across the trail would be under  
consideration. I strongly encourage the rejection of this application.

IND526-1

Impacts to the ANST are discussed in section 4.8 of the EIS.

# INDIVIDUALS

## IND527 – Amanda Page

20161219-5231 FERC PDF (Unofficial) 12/19/2016 1:59:13 PM

IND527-1 Amanda Page, Seattle, WA.  
My entire family is from this region. We consider this land to be our heritage.

This pipeline would be a disaster waiting to happen, and the benefit could never outweigh the detriment because there will certainly be leaks which will impact the entire Appalachian ecosystem, and cheapen and destroy this beautiful countryside.

Corporate greed will leave us with ravaged land that can never be replaced.

IND527-1 Underground, FERC-regulated, welded steel natural gas transportation pipelines rarely leak. The MVP would not destroy the country-side.

# INDIVIDUALS

## IND528 – Debra Staples

20161219-5268 FERC PDF (Unofficial) 12/19/2016 2:43:13 PM

- Debra Staples, Canton, GA.
- IND528-1 I oppose the Mountain Valley Pipeline for the following reasons: 1) Pipeline construction will disrupt and possibly destroy wildlife habitat.
  - IND528-2 2) Pipelines bring the potential for leaks that can contaminate soil, air and water, putting both wildlife habitats and human communities at risk.
  - IND528-3 3) Allowing this project to go forward will set a dangerous precedent, opening the door for other damaging uses of our wilderness lands.

- IND528-1 See the response to comment IND270-1 regarding wildlife.
- IND528-2 See the response to comment IND92-1 and IND179-2 regarding leaks. Air quality is discussed in section 4.11.1 of the EIS. Water resources are addressed in section 4.3 and soil in section 4.2 of the EIS.
- IND528-3 See the response to comment IND241-1 regarding induced development.

# INDIVIDUALS

## IND529 – Ischa Vingle

20161219-5286 FERC PDF (Unofficial) 12/19/2016 2:52:00 PM

IND529-1 Ischa Vingle, Brevard, NC.  
I would like to voice my opposition to this project. I disagree with expanding the network of pipelines in America as I believe we should be investing into renewable resources rather than continuing to invest in fossil fuels despite the ongoing related issues. This project will be going through wildlands that should be protected, destroying habitat, and putting the area known for purity at risk to pollution. I strongly oppose this project and know many people feel the same way. Please consider investing into newer, cleaner, more efficient methods of energy.

IND529-1 Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy. After pipeline installation underground, the right-of-way would be restored and revegetated as discussed in section 4.4 of the EIS.



# INDIVIDUALS

IND530 – S. Fisher

20161219-5350 FERC PDF (Unofficial) 12/19/2016 4:16:29 PM

IND530-1

S. Fisher, Santa clara, CA.

The jobs would be temporary, the damage to the environment long lasting.

The difficulty arguing with the oil crowd over projects like this are the different value systems: The only vista that the oil barons value is seeing increasing funds in their bank accounts, viewpoints have no monetary value, therefore, worthless. Experiencing wilderness also is meaningless to the oil crowd, wilderness is to be tamed, controlled and exploited, thus destroyed, not enjoyed and appreciated for its own sake. Leaving a heritage isn't about leaving areas of the country that our descendants can appreciate and experience, its about money so that the next generation of oil barons can continue to rule over others.

As long as the God of Profit (GOP) is the deity truly worshiped by so many in this country, nothing will change.

IND530-1

The proposed pipelines would transport natural gas not oil. After pipeline installation underground, the right-of-way would be restored and revegetated as discussed in section 4.4 of the EIS.

# INDIVIDUALS

## IND531 – Mandy Campbell

20161219-5334 FERC PDF (Unofficial) 12/19/2016 3:54:49 PM

IND531-1

Mandy Campbell, Atlanta, GA.

I am one of the three million Americans who enjoy the Appalachian Trail every year, and I hope to be one of the two thousand who attempt to thru-hike in a seasons one year soon. The Appalachian Trail is one of this country's treasures-- I feel passionately about this. I understand this pipeline is expected to cut through forest lands that are currently protected by the Forest Service's Roadless Rule, and that it will actually cut across the Trail itself.

I am concerned about the impact this project will have on the Appalachian Trail, and on the wild spaces that surrounds so much of it. I worry about the damage to the water, animals, and our experience of the Trail, and I am particularly worried about the impact of circumventing the Roadless Rule. If this project opens the door, we will see the protections of the rule diminished considerably.

I'm just one individual, just one hiker. I could try to be poetic about the beauty of the AT, but I expect you have a lot of comments to review, and I'm not that great a poet. But I hope you will consider the value of the Appalachian Trail, and everything that the Roadless Rule protects, in reviewing the path of this pipeline.

IND531-1

Impacts to the ANST and the roadless area are discussed in section 4.8 of the EIS.

# INDIVIDUALS

## IND532 – Jamie J. Virostko

20161220-5005 FERC PDF (Unofficial) 12/19/2016 7:09:45 PM

IND532-1

Jamie J Virostko, Charlottesville, VA.

I am strongly against the application for a Special Use Permit allowing the MVP to cross the Jefferson National Forest. The public is entitled to a draft EIS that backs up its conclusions with evidence based in credible scientific and technical analysis. The DEIS has not adequately addressed the issue of an alternative route. FERC has simply given the opinion that the route that crosses through the Jefferson Forest is preferable. That does not satisfy the law as the applicant does not illustrate that there are no reasonable alternatives.

Not only will the MVP likely harm the wilderness experience for this area, residents have documented the existence of wells and springs along the proposed route. This information was not included in the draft EIS, which is a breach of FERC's duty to properly assess the environmental impact of the pipeline, particularly on water sources.

In constructing the pipeline, roads must be built and the surrounding forest cleared. This will scar the landscape for decades, destroy habitats, and potentially degrade the water quality. In addition, there will be a likely increase in the risk of landslides and soil erosion.

The public must have the opportunity to review and comment on a draft EIS which provides the full information on the potential environmental impact. FERC must insist that the current EIS be revised and that the public is properly informed.

IND532-1

Section 3.0 Alternatives discusses alternatives that would avoid crossing the Jefferson National Forest.

# INDIVIDUALS

## IND533 – Emily Pfeiffer

20161220-5006 FERC PDF (Unofficial) 12/19/2016 7:26:43 PM

IND533-1

Emily Pfeiffer, SOMERVILLE, MA.  
I grew up in Montgomery County, just miles from the Appalachian Trail. I lovingly remember the green, fertile valleys and beautiful hiking trails of Virginia. But I was sadly shocked to smell the rancid smell of forest fire when visiting this November. This is a smell I learned from dry, desolate southern and central California and was devastated to find back home.

You've seen the damage to local drinking water and ecosystems in Virginia, West Virginia, North Carolina and nearly everywhere else pipelines run in recent years. These are hastily constructed projects, designed for out of state investors to make a quick buck without concern for or benefit to the locals. In the meantime, the fossil fuel bubble is close to bursting, with prices of solar and wind plummeting. Far better to invest in wind and solar AT HOME, rather than pollute what remains hear, and loose our stake in the growing new energy economies.

Not to mention, this proposal stands in violation of one of the most venerated protected public spaces in our country.

Please reject the proposed Mountain Valley Gas Pipeline and all other dangerous pipeline and extraction projects that cross your desk.

IND533-1

See the response to comment IND3-1 regarding drinking water. After pipeline installation underground, the right-of-way would be restored and revegetated as discussed in section 2 of the EIS. Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

# INDIVIDUALS

## IND534 – Rebecca Tisherman

20161220-5007 FERC PDF (Unofficial) 12/19/2016 7:39:30 PM

IND534-1 Rebecca Tisherman, Butler, PA.  
The EIS provided for the proposed pipeline is full of flaws and needs to be examined further before this pipeline can be considered. The Appalachian Trail and it's surrounding areas host a variety of ecosystems that could be detrimentally impacted by this pipeline, and therefore a more in depth and CORRECT study needs to be conducted. The EIS does not even show the correct center line for the trail. If this basic detail has been overlooked, I'm sure plenty of other details have been overlooked too. Please do more research before approving this pipeline.

IND534-1 Impacts to the ANST are discussed in section 4.8 of the EIS. The draft EIS illustrated the correct proposed pipeline route crossing of the ANST. See the response to comment LA5-1 regarding preparation of the draft EIS.

# INDIVIDUALS

## IND535 – Deborah Kushner

20161220-5002 FERC PDF (Unofficial) 12/19/2016 6:24:47 PM

IND535-1 | Deborah Kushner, Schuyler, VA.  
I would like to go on record to oppose the construction of the Mountain Valley Pipeline.

I oppose the pipeline for many reasons. Environmentally it would be a disaster, leaking methane, creating erosion zones that would degrade streams and waterways, and negatively impacting wildlife corridors and sensitive areas.

IND535-2 | Legally, using eminent domain will impact landowners having to live with a 125' right of way forever. Property values will plummet. Who wants to live next to a pipeline that will corrode, leak, explode???

IND535-3 | Studies have concluded that existing pipelines are sufficient to carry gas from WV and the oil fields. For profit gas and electric companies are not doing business for the 'public good' they are in the business of making money, no matter what the environmental cost.

Please oppose this pipeline project!

Thank you.

IND535-1 | See the response to comment IND92-1 regarding leaks. See the response to comment IND70-1 regarding erosion. Water resources are discussed in section 4.3 of the EIS. See the response to comment IND270-1 regarding wildlife.

IND535-2 | See the response to comment IND1-3 regarding eminent domain. See the response to comment IND12-1 regarding property values. See the response to comment IND2-1 regarding safety.

IND535-3 | See the response to comment FA11-12 regarding need. System alternatives are discussed in section 3.3 of the EIS.

# INDIVIDUALS

## IND536 – Kristina Webster

20161220-5012 FERC PDF (Unofficial) 12/19/2016 9:51:13 PM

IND536-1 Kristina Webster, Virginia Beach, VA.  
The proposed Mountain Valley Pipeline totally disregards our duties to the environment and the people that live in the area. This is once again the big oil companies being taken into consideration before the PEOPLE that the government is supposed to work for. This project is disgusting.

IND536-1 Instead of continuing to rape the Earth, the government should be focusing on renewable energy resources.

IND536-1

The proposed pipelines would transport natural gas, not oil. We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). Renewable energy alternatives are discussed in section 3 of the EIS. See also the response to comment IND40-1 regarding renewable energy.

# INDIVIDUALS

## IND537 – Lynn Cameron

20161220-5018 FERC PDF (Unofficial) 12/19/2016 10:27:28 PM

IND537-1

Lynn Cameron, Mt. Crawford, VA.

I am writing in opposition to the proposed Mountain Valley Pipeline route through the Jefferson National Forest in Virginia. This route would violate the Roadless Area Conservation Rule and would degrade the Peters Mountain and Brush Mountain Wilderness areas. Our Wilderness areas and roadless areas are protected from this type of destructive intrusion. Routing the MVP through the Jefferson National Forest would require amending the Forest Land and Resource Management Plan as utilities are not permitted in these management prescriptions. The Forest Plan should not be amended for this purpose; the pipeline is for private profit. Economic studies show that it is not needed. Improvements are currently underway on the WB Xpress project, an expansion of the existing Columbia Gas Pipeline serving West Virginia and Virginia and connecting to Transco. Together, the planned expansions in the existing Transco and Columbia Gas systems will provide more capacity to Virginia and the Carolinas than the ACP, MVP, and Appalachian Connector combined.

The Jefferson National Forest has been identified as a Biodiversity Hotspot by The Nature Conservancy. Forest fragmentation caused by the MVP would harm sensitive species and would permanently degrade their habitat by creating edge effect and encouraging invasive species and parasitism. What a shame it would be to run a pipeline through this special area.

Please do not issue a certificate of public convenience and necessity for the proposed Mountain Valley Pipeline route.

IND537-1

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



# INDIVIDUALS

## IND538 – Shari Farrar

20161220-5017 FERC PDF (Unofficial) 12/19/2016 10:19:32 PM

Shari Farrar, Hackett, AR.

IND538-1

Please do not ruin a beautiful part of our country in order to enable the avariciousness of the oil/gas industry. They are destroying our planet for greed. We have got to stop this.

A path through and near the Blue Ridge Skyline is another oil industry blot upon our society.

IND538-1

The proposed pipelines would transport natural gas, not oil. We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). The route would not cross the “Blue Ridge Skyline” but would cross the Blue Ridge Parkway, as discussed in section 4.8.

# INDIVIDUALS

## IND539 – Amar Kakirde

20161220-5020 FERC PDF (Unofficial) 12/19/2016 10:53:16 PM

IND539-1 Amar Kakirde, Williamsburg, VA.  
This project seems extremely risky for a limited payoff. Not only do the risks outweigh the benefits, but the risks enumerated in the impact statement do not cover the full gamut of risks that actually exist. Given the dangers of this proposal, it should be rejected immediately and without reservation.

IND539-1

See the response to comment IND2-1 regarding safety. See the response to comment FA11-12 regarding need.

# INDIVIDUALS

## IND540 – Molly Naffke

20161220-5022 FERC PDF (Unofficial) 12/20/2016 12:33:29 AM

IND540-1 Molly Naffke, Asheville, NC.  
I am writing to express my ardent opposition to the construction of the Mountain Valley Pipeline, proposed to carry natural gas across sections of the Appalachian Trail, from West Virginia to South Virginia. This project would require the unlawful destruction of land that is protected under the Forest Service's "roadless rule", thereby setting a dangerous precedent for other protected natural habitats and waterways. We already know, from the last several decades of pipeline leaks, breaches and explosions, that the threats they pose to our environment are grave. I, therefore, stand firmly against the addition of yet another faulty pipeline that is sure to imperil the safety and health of the disproportionately low-income citizens in it's proximity.

IND540-1 Section 4.8 of the EIS provides a discussion of the ANST. A discussion of low-income communities is provided in section 4.9. See the response to comment IND2-1 regarding safety.

# INDIVIDUALS

## IND541 – Sharon Bouge

20161220-5016 FERC PDF (Unofficial) 12/19/2016 10:18:23 PM

Sharon Bogue, Decatur, GA.

IND541-1

I am very concerned about the progress of this pipeline through precious public lands. The protected status of this land must be a top priority for our nation, because these lands are a national treasure. The proposed pipeline would cut through iconic landscapes and damage the fragile ecosystems of the Appalachian Mountains. I was raised in these mountains and I know firsthand that the beautiful wildlife, landscapes, and natural vistas attract tourists and visitors from all over the world, contributing to local economies throughout VA, TN, and NC. Due to the frequent number of pipeline leaks that continue to occur, this pipeline poses a grave threat to the water sources, ecosystems, wildlife, and people who depend on it to survive. Please deny the access of this pipeline. These lands belong to the taxpayers and should not be infringed upon by corporate interests.

IND541-1

See the response to comment IND92-1 regarding leaks. The EIS addresses wildlife in section 4.5, visual resources in section 4.8, tourism in section 4.9, and pipeline safety in section 4.12. See the response to comment IND2-1 regarding safety.

# INDIVIDUALS

## IND542 – Mary Scott

20161220-5024 FERC PDF (Unofficial) 12/20/2016 7:10:33 AM

Mary Scott, Kitty Hawk, NC.  
(CP16-CP16-10-000 and CP16-13-000)

Docket numbers

IND542-1

Please accept my request to withdraw the desire of these companies to destroy the forest and streams where my family grows and harvests their food and medicine. We have for generations utilized the plant and tree medicine found along our pristine creeks to keep our families healthy as well as many others on our mountain. I beg you not to take our soul, it is our church you seek to destroy, thus must be clear. That this is to export gas for private gain is seriously criminal. Please help us.  
Sincerely,  
Mary K Scott -000 and CP16-13-000)

IND542-1

We conclude that with mitigation, the project is not likely to have significant impacts on most environmental resources (except forest). Water resources are addressed in section 4.3 and forest in section 4.4 of the EIS. See the response to comment IND2-3 regarding export.

# INDIVIDUALS

## IND543 – Mark Reilly

20161220-5026 FERC PDF (Unofficial) 12/20/2016 7:46:18 AM

IND543-1 Mark Reilly, Fort Lauderdale, FL.  
Taking away one of the most important wildlife corridors on the east coast for a pipeline is not worth the environmental cost. I have hiked this region of the appalachian trail and would hate to see it blemished in such a way.

IND543-1 Section 4.8 of the EIS provides a revised discussion of the ANST. See the response to comment IND270-1 regarding wildlife.

# INDIVIDUALS

IND544 – Maury W. Johnson

20161219-5387 FERC PDF (Unofficial) 12/19/2016 4:17:25 PM

December 19, 2016

Dear Secretary Bose and the FERC Commission; Joby Timm, Supervisor of the Jefferson National Forest; John Schmidt, Project Coordinator USFWS, Elkins WV; and Others Whom it May Concern

RE: Draft Environmental Impact Statement  
FERC Docket CP16-10-000 Mountain Valley Pipeline

IND544-1

COMMENT: Impacts to Endangered Bat Species along the Mountain Valley Pipeline

Bats are a major concern to people all along the entire route; in my area the Greenville Saltpeter Cave (along with the nearby Laurel Creek Cave) there is a major USFWS Bat Buffer Zone due to protected hibernacula in these caves. Bats are crucially important to the farmers in the area and there should not be any industrial disturbance like this pipeline in the area. Bats are critically important to the food chain. They are important pollinators of crops. They also help keep harmful insects such as mosquitoes, flying ants and Japanese beetles in check. Bats can eat more than their body weight of insects each night. They are also an important part of the diet for predators such as bobcats, hawks and eagles and even some fish. Without bats, our food chain and ecosystem could collapse or at the very least be very negatively impacted.

Bat species in the area are already severely impacted by *“white-nose syndrome, a devastating disease that, since 2008, has killed an estimated 5.7 million bats in North America. In some cases, entire local populations have succumbed to this deadly disease. Because bats already have a naturally low birthrate, bat populations that do survive this epidemic will be slow to rebound. Only recently, wildlife biologists have begun to see hope for a treatment in a beneficial bacterium that may save affected bats. However, production and deployment details of this treatment are still under development. Best summarized in a recent article in the Pittsburgh Post-Gazette: “(by Karen Siskind, Eastern Region Coordinator, Project/Cluster Liaison December 12, 2012)*

I have enclosed the entire study, *Impacts of Shale Gas Development on Bat Populations in the Northeastern United States* (and web links) done in 2012 for Delaware River Water Keepers, as further evidence that the so-called benefits claimed for the MVP are not worth the long-term negative effects to the environment. The Monroe, Summers, Greenbrier, Craig, Giles, and Montgomery County areas of West Virginia and Virginia appear to be some of the last remaining areas without large environmental impacts left in the Eastern US for the recovery of bats.

The (2012) report focuses on landscape scale impacts that range from water quality threats, to disruption of winter hibernacula, the locations where bats hibernate during the winter, en masse. In addition, because bats have strong site fidelity to roosting trees or groups of trees, forest clearing for pipelines, well pads or other facilities may disproportionately impact local populations

Because of the significant adverse effects the Mountain Valley Pipeline construction and operation would have on the bat populations in this area, I strongly oppose the MVP's Construction in this area.

IND544-1

See the response to comment IND222-1 regarding bat surveys.

# INDIVIDUALS

## IND544 – Maury W. Johnson

20161219-5387 FERC PDF (Unofficial) 12/19/2016 4:17:25 PM

IND544-1  
cont'd | I have also attached other information and web links relevant to this issue.

Sincerely,

Maury W Johnson  
3227 Ellison Ridge  
Greenville, WV 24983

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

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

Johns Schmidt, Barbara Douglas and Tiernan Lennon, USFWS Elkins WV

Clifford Brown, Craig Stilher, Janet Clayton, WV DNR Office Elkins WV



# INDIVIDUALS

## IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

December 18, 2016

To Secretary Bose, the FERC Commission and Whom it May Concern,

RE: FERC DOCKET CP16-10-0000 -- The Mountain Valley Pipeline.

IND545-1 This submission will be about water resources, unstable soils and other unique features on my family's farm, located on Ellison's Ridge. Also it will explore some nearby areas on Ellison's Ridge and in the Hans Creek/Indian Creek Valleys of Monroe County, WV.

The Mountain Valley Pipeline proposed preferred corridor runs across my family's farm at the base of Ellison's Ridge, near the Hans Creek Valley. This land has been in my family for more than 150 years. My great-grandfather Casper Shanklin was born in 1856; his third wife and my great-grandmother Josephine Allen Shanklin was born in 1871; they both died in the 1940's. They had 4 children: John, George, my grandmother Nellie and her sister Anna. They were all raised on this farm. My grandfather built a home in the late 1800's (it burned down in 1959). A barn and several farm buildings were built; only the barn still exists. My father acquired the farm from my uncle in the 1960's. My father added to the farm by buying adjacent property that was part of the original farm over the next few years. It has been a part of our family for over 150 years. This farm is identified in the Landowner Impact Forms submitted by Save Monroe to the FERC (Accession No. 20151125-5115) as parcels 715a 715b and 715c, I shall refer to it as the Old Shanklin Farm.

Of the 150+ acres on this part of the farm (there is another 100+ acres located adjacent to the corridor) about 50 acres are rolling, cleared land used for grazing cattle and horses and growing crops, mostly hay and small gardens on about 10 acres. It is also used for hunting and other recreation activities. It has a large Whippoorwill and American Woodcock nesting area that has been managed for thirty years plus. (Here is a video taken of this area in May of 2013 <https://www.youtube.com/watch?v=pPzbaGw6n7o>) The farm is used by many migratory birds, including eagles for nesting (no eagle nests are currently located on the farm), protection and feeding.

The MVP wants to bisect the most usable part of the farm, the part that can be used for crops as well as the nesting area. They also impact the best housing sites, thus making its value vastly diminished should the corridor pass through the farm.

IND545-2 The MVP Corridor will impact at least 10 springs. Seven are permanent springs along this corridor. Two springs are in the middle of the pipeline corridor, despite being left off the DEIS report on page 4-73 table 4.3 1-2. I was present when MVP contractors recorded these springs in 2015.

IND545-3 It will also impact wetland areas that are just a few feet away from the pipeline corridor and an auxiliary work site on my farm. The auxiliary site also abuts a feature that may be karst. It was just recently identified by a geologist as fractured sandstone on the surface that may be going into limestone or karst subsurface. It will also impact 3 separate streams on my property.

IND545-1 Water resources are discussed in section 4.3 of the EIS; soils in section 4.2. Wildlife is discussed in section 4.5. Property values are discussed in section 4.9 of the EIS.

IND545-2 See the response to comment IND401-5 regarding wells and springs.

IND545-3 The EIS provides a discussion of wetlands and waterbodies in section 4.3 and karst in section 4.1.

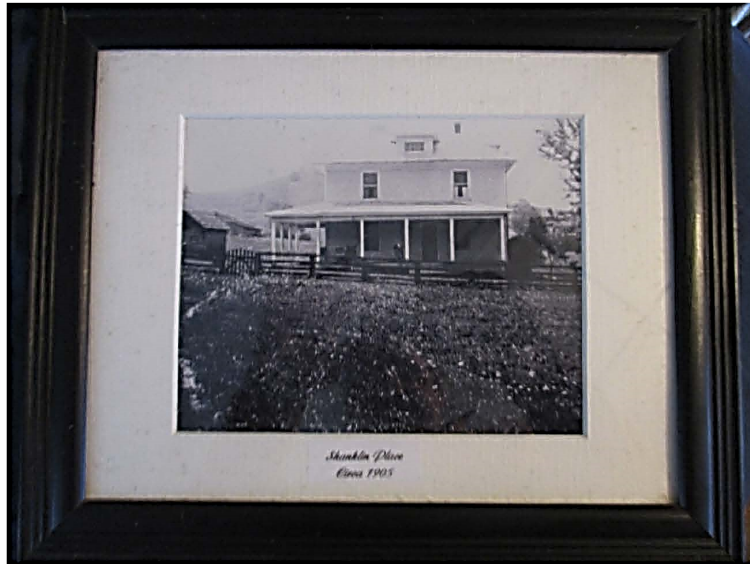
# INDIVIDUALS

IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

IND545-4 | There are also steep slopes and recent landslides on or near the pipeline corridor.

IND545-5 | Following are accompanying pictures and web links to the above described features:



Picture of the Old House that burned in 1959.

Click the links to see video documentation of the area on the farm that is at risk or impacted by the MVP Corridor. (These links should be part of the Official FERC record)

MVP Proposed Corridor on the Old Shanklin Farm - Part 1 - (54 seconds)

<https://www.youtube.com/watch?v=3kBQgbiv0tA>

MVP Proposed Corridor on the Old Shanklin Farm - Part 2—(32 seconds)

[https://www.youtube.com/watch?v=vWYSoXfe\\_gA](https://www.youtube.com/watch?v=vWYSoXfe_gA)

IND545-4 | Steep slopes and landslides are addressed in section 4.1 of the EIS.

IND545-5 | The commenter's photos and videos are noted.

# INDIVIDUALS

IND545 – Maury W. Johnson

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IND545-5  
cont'd



Picture of where water goes underground near the pipeline corridor/auxiliary work area on the Old Shanklin Farm, notice the little blue flag placed there by MVP Surveyors in 2015.

MVP Proposed Corridor on the Old Shanklin Farm - Part 3—(1 minute 18 seconds)

<https://www.youtube.com/watch?v=Xp8vbXUCdfo>

MVP Proposed Corridor on the Old Shanklin Farm - Part 4—(1 minute 24 seconds)

<https://www.youtube.com/watch?v=A1EMAvw4T58>

MVP Proposed Corridor on the Old Shanklin Farm - Part 5--

<https://www.youtube.com/watch?v=GEEZHIZ4D8w>

# INDIVIDUALS

IND545 – Maury W. Johnson

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IND545-5  
cont'd



Main spring less than 200 ft from the pipeline corridor and auxiliary work site.

MVP Proposed Corridor on the Old Shanklin Farm - Part 6—(1 minute 22 seconds)

<https://www.youtube.com/watch?v=4-5Ak-TVz2A>

MVP Proposed Corridor on the Old Shanklin Farm - Part 7—(53 seconds)

<https://www.youtube.com/watch?v=ksoY2j6qvUo>

MVP Proposed Corridor on the Old Shanklin Farm - Part 8—(33 seconds)

[https://www.youtube.com/watch?v=MXtUOv\\_Rvic](https://www.youtube.com/watch?v=MXtUOv_Rvic)

MVP Proposed Corridor on the Old Shanklin Farm - Part 9—Steep slopes & unstable soils Part 1  
(39 seconds) <https://www.youtube.com/watch?v=fN8sB3aosuE>

# INDIVIDUALS

IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

IND545-5  
cont'd



This slide occurred after a heavy rain in 2009.

MVP Proposed Corridor on the Old Shanklin Farm - Part 10 Unstable soils Part 2 - (30 seconds)

<https://www.youtube.com/watch?v=DzILMTBfYk>

MVP Proposed Corridor on the Old Shanklin Farm - Part 11—(17 seconds)

<https://www.youtube.com/watch?v=tlJETNzHXI>

MVP Proposed Corridor on the Old Shanklin Farm - Part 12—(17 seconds)

<https://www.youtube.com/watch?v=DzILMTBfYk>

MVP Proposed Corridor on the Old Shanklin Farm - Part 13-- Steep slope in the corridor -  
(27 seconds) <https://www.youtube.com/watch?v=McKx6HeNalo>

MVP Proposed Corridor on the Old Shanklin Farm - Part 14—(25 seconds)

<https://www.youtube.com/watch?v=EUNoXF7w7Mw>

# INDIVIDUALS

IND545 – Maury W. Johnson

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IND545-5  
cont'd



Spring near the construction corridor, Dec 16<sup>th</sup> 2016

MVP Proposed Corridor on the Old Shanklin Farm - Part 15—(44 seconds)

<https://www.youtube.com/watch?v=m1WhQoYzAKs>

MVP Proposed Corridor on the Old Shanklin Farm - Part 16—(42 seconds)

<https://www.youtube.com/watch?v=DHdudReMTIU>

MVP Proposed Corridor on the Old Shanklin Farm - Part 17—(39 seconds)

<https://www.youtube.com/watch?v=WxbKfajVmak>



This spring is the source for the left fork of Shanklin's Branch.

# INDIVIDUALS

## IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

IND545-6 Some of the unique features are Indian Artifacts (documented in an earlier submission), old buildings, foundations, possible karst and/or fractured rock features; numbers springs, wetlands and headwater streams. It is also home to a large oak tree of significant historical and cultural attachment. The geology features soils that are highly compactable, steep slopes and unstable soils. It also has some interesting fossils. It is the recharge area for my well that is located very near the corridor on a small piece (1.26 acres) of adjacent property, acquired from my Uncle and Aunt (indirectly).



*This old growth oak tree lies in the path of the MVP temporary construction right of way. If the MVP is built, they would cut or delimb this tree. Heavy truck and machinery traffic would compact the soils and kill the tree if they don't just cut it.*

IND545-7 My well, as well as my uncle's and aunt's well, is subject to surface runoff coming from the area of the pipeline corridor. This is just one of the reasons that I have been organic for many years. We are very careful about the disturbance of the land on the farm due to a very high concern for the purity and turbidity of the water.

Another secondary concern is that since these headwater streams and springs feed into the Hans Creek Valley and very directly into a large organic dairy farm owned by a neighbor, the entire

IND545-6 Cultural resources are discussed in section 4.10 of the EIS; geology in section 4.1; forest in 4.4; and water resources in section 4.3.

IND545-7 See the response to comment IND3-1 regarding drinking water. See the response to comment IND70-1 regarding erosion.

# INDIVIDUALS

## IND545 – Maury W. Johnson

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IND545-7 cont'd neighborhood is very aware of what could happen if we were to contaminate the waters in the valley. I also have a neighbor who has a large stocked fishing pond that is directly fed by the waters from the Old Shanklin Farm.

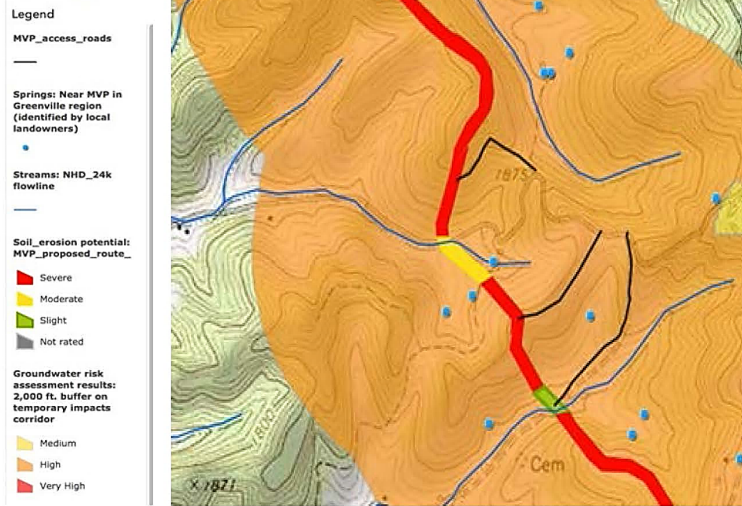
IND545-8 My daughter, who is currently serving in the US Navy, plans to return and build a house on the farm. That would not happen if the MVP crosses this area. My son also has expressed an interest to do the same one day, but his proposed house site would be compromised if the pipeline were to be built. Other things compromised are the plans for an organic orchard right where the pipeline is planning to run across the farm. The pipeline would impact at least 9 possible house seats along or near the corridor on my family farm.

I very much enjoy this property. It is part of who I am. My personal history and identity is very closely tied to this property. I have had several offers to buy this property and each time I told the prospective buyer that it was not for sale at any price. In the future there are plans to put this land into a conservation easement.

IND545-9

**DETAIL MAP for OLD SHANKLIN FARM aka the JOHNSON PROPERTY AREA  
Central Ellison Ridge Area: Severe Erosion Potential, High Groundwater Risk,  
and locally mapped springs.**

*Mapped springs do not represent all springs in the area, several springs in the area not shown on this map.*



IND545-8 Houses could be built outside the permanent easement.

IND545-9 Erosion is addressed in sections 2 and 4.2 of the EIS; springs in 4.3.



# INDIVIDUALS

IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

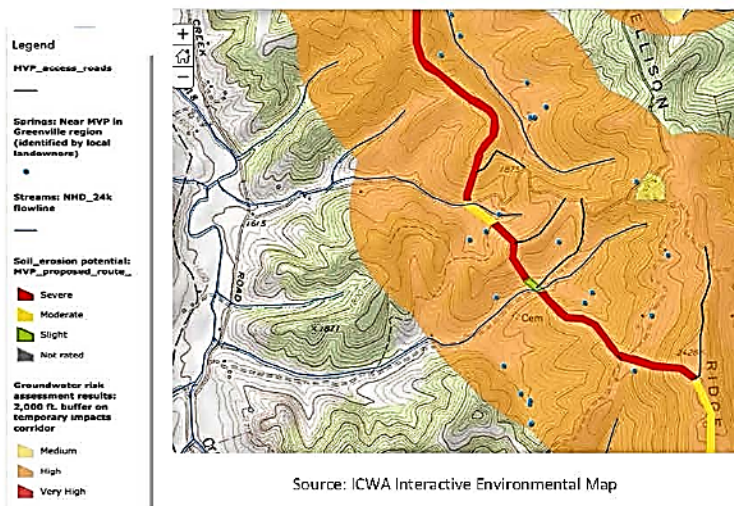
IND545-9  
cont'd

The previous map represents the Mountain Valley Pipeline across the Old Shanklin Farm, showing high impact potential to water resources on most of the farm in this area. It also shows high erosion potential and highly unstable soils on steep slopes on my family farm.

### Central Ellison Ridge Area: Severe Erosion Potential, High Groundwater Risk, and locally mapped springs

*Mapped springs do not represent all springs in the area, several springs in the area not shown on this map.*

This map represents the Mountain Valley Pipeline across the Ellison's Ridge Area, showing high impact potential to water resources on most of this area, including my family farm and house well. Also shown are high erosion potential and highly unstable soils on steep slopes on my family farm as well as other areas.



IND545-10

### OTHER AREAS OF CONCERN ON ELLISON'S RIDGE

Another area not mentioned in the DEIS is the Ellison's Ridge Road itself. Between the Corridor on Ellison's Ridge and the Hans Creek Road is a very unfirm portion of the Ellison's Ridge Road-State Route 23/9. It was built through a wetlands areas many years ago. Under heavy truck traffic it would become impassable very quickly, even in dry weather conditions.

IND545-10

The commenter's statements regarding Ellison's Ridge Road are noted. See the response to comment IND288-3 regarding road repairs.

# INDIVIDUALS

## IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

IND545-10  
cont'd

Below are a couple of pictures taken this past summer showing the numerous springs along side of the road. I know that there is at least one spring under the road in this area. According to Google Earth, this area is between these coordinates, 37.524876, -80.721777 and 37.525122, -80.720262.



Top picture is Ellison's Ridge road showing the Wetland area on the left side of the road, picture taken during a drought in September 2016. Bottom left picture shows a small snapping turtle who lives in the 'side ditch' beside the road. Bottom right picture shows more of the wetland and spring area along the side of the road. This area of the road is very "soft".

# INDIVIDUALS

## IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

IND545-11 | Another example of Karst topography on Ellison's Ridge is, according to Google Earth, located at 37.538973, -80.696868 and also at 37.542014, -80.699001. The photo below taken at 37.538973, -80.696868 is actually along the Ellison's Ridge Road, which would be used as an access to the pipeline corridor. This area was not mentioned in the DEIS as being KARST.



Pictures take from Ellison's Ridge Road; Water goes underground at the bottom of this sinkhole

### OTHER AREAS OF CONCERS IN THE HANS CREEK & INDIAN CREEK VALLEY

Here are 5 short videos, made in May 2015, after several days of rain and 2 made on December 17<sup>th</sup> 2016. They show the very interesting hydrogeological features of the Hans Creek Valley. Whereas the DEIS fails to identify the Karst topography of the Hans Creek, Indian Creek and Ellison's Ridge areas, this is video evidence of that topography. These videos are taken downstream from the Hans Creek Crossing in the Narrows of Hans Creek. It is also lateral to the corridor on Ellison's Ridge, directly above on the northeast side of the valley. According to Google Earth, the area is located between the coordinates of 37.506162, -80.715234 and 37.509268, -80.723104

IND545-11

The areas of karst that were identified in the EIS were limited to those areas that would be impacted by construction/operation of the projects. The commentor's videos and photos are noted.

# INDIVIDUALS

IND545 – Maury W. Johnson

20161219-5394 FERC PDF (Unofficial) 12/19/2016 4:24:04 PM

IND545-11  
cont'd



Ellison's Mill Pond on Hans Creek Hans Creek goes underground just below here

Hans Creek Underground Part 1--- (2 minutes 6 seconds)

<https://www.youtube.com/watch?v=GuqcMwg5RGU>

Hans Creek Underground Part 2--- (1 minutes 19 seconds)

<https://www.youtube.com/watch?v=HNLg5m48Zko&t=10s>

Hans Creek Underground Part 3--- (1 minutes 11 seconds)

[https://www.youtube.com/watch?v=PcWyEZO\\_PKc](https://www.youtube.com/watch?v=PcWyEZO_PKc)

Hans Creek Underground Part 4--- (1 minutes 13 seconds)

<https://www.youtube.com/watch?v=CanwOkXLHvc&t=1s>

Hans Creek Underground Part 5--- (20 seconds)

<https://www.youtube.com/watch?v=RQ9IyIuqzs>